

# Draft Regulation 19 Sustainability Appraisal

**Draft**

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**Prepared for:  
Mid Sussex District Council**



# 1 Spatial Options

## 1.1 Introduction

The updated District Plan will guide the delivery of new development. Policies DP4 and DP6 of the adopted District Plan 2014-2031 set out the current spatial strategy which was based around proportionate growth across the hierarchy of settlements, with development towards the three towns (Burgess Hill, East Grinstead and Haywards Heath). This spatial strategy informed the location of allocations within the adopted District Plan and subsequent site allocations.

The revised draft strategy provides an opportunity to review this approach and, within limits of national policy, consider possible alternatives for the distribution of development. The revised draft strategy also accounts for the increase housing requirement across Mid Sussex. Further growth identified within the revised District Plan will be in accordance with the revised District Plan Strategy. The revised District Plan Strategy is based on the following four principles. Further growth within the Regulation 19 District Plan has been based on these principles:

- Protection of designated landscape (e.g., AONB).
- Making effective use of land.
- Growth at existing sustainable settlements where it is considered to be sustainable to do so.
- Opportunities for extensions, to improve sustainability of existing settlements that are currently less sustainable.

## 1.2 Level of housing need in Mid Sussex

A series of evidence based studies, including a Strategic Housing Market Assessment (SHMA), have been undertaken to determine the district's housing need.

The Local Housing Need is 19,620 dwellings (an average of 1,090 dwellings per annum). As of 1st April 2023, there were 9,921 commitments made up from planning permissions and development plan allocations that have yet to be implemented. Therefore to ensure housing need is met, the District Plan needs to make provision for 7,459 dwellings.

### 1.2.1 Neighbouring authority housing need

The West Sussex & Greater Brighton (WS&GB) Strategic Planning Board, made up initially of the coastal West Sussex local planning authorities together with Brighton & Hove City Council and Lewes District Council, now expanded to include authorities within the Northern West Sussex HMA (Mid Sussex, Crawley and Horsham) works to support better integration and alignment of strategic spatial and investment priorities in WS&GB.

Mid Sussex plays an active role in LSS3: the development of a longer-term strategy to address spatial options for meeting strategic housing, employment and infrastructure needs

over the period to 2050. Duty to co-operate meetings have been held with Crawley and Horsham to discuss unmet needs within the Northern West Sussex Housing Market Area to seek solutions. Crawley has an existing unmet need of 7,050 dwellings, with Horsham also likely to have unmet need.

### **1.3 Reasonable alternative principles**

The SEA Regulations require the Council to identify 'reasonable alternatives for all policies and proposals, where feasible'. Alternatives that are not reasonable do not need to be subject to appraisal. Alternatives to each of these principles were identified through consideration of different spatial strategy options, however, an assessment of all these alternatives was not included within the Regulation 18 SA, only the preferred two Options.

During consultation on the draft Regulation 18 District Plan, the Council received several comments surrounding the assessment of spatial Options. Consequently, further assessment of the sustainability performance of all reasonable alternatives considered has been presented below.

Each spatial Option has then been assessed against the full suite of SA objectives to identify whether they would contribute to, or conflict with, the achievement of the sustainability objective, taking into consideration the relevant appraisal questions.

### **1.4 Limitations**

Sustainability Appraisal is a useful exercise in terms of balancing various potential environmental and socio-economic effects of options against each other, however, it does not represent the whole of the analysis needed and even where one option scores most positively in terms of sustainability, it may not be appropriate for other reasons.

One factor which is not reflected in the SA scoring is the likelihood of implementation. Some of these options have much less certainty of delivery than others. The feasibility and likelihood of delivery has been looked at through other assessments, including the site assessment.

It should also be noted that SA is not a quantitative exercise, meaning it is not simply a matter of how many positive or negative scores are identified through appraisal. For some options, one positive score for one objective may outweigh several negative effects.

### **1.5 Alternatives**

#### **1.5.1 Protection of designated landscapes**

The National Planning Policy Framework (NPPF) states that *"Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes"*. The High Weald Area of Outstanding Natural Beauty (AONB) covers the north of the district, and so when developing spatial Options for the Plan period, this principle was included to ensure that the spatial options do not result in development that would bring harm to the landscape character or setting of the AONB.

There were no reasonable alternatives identified for 'protection of designated landscapes' as this principle requires consideration under current national planning policy. Under the SEA Regulations, alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g., the NPPF).

National planning policy and guidance outlines the importance of conserving and enhancing the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONBs) and its wildlife and cultural heritage. It is therefore reasonable to conclude that a 'do nothing' scenario is not a reasonable alternative and the only principle to assess is this spatial Option: "protection of designated landscapes".

A summary of the assessment scores is provided in Table XX below.

Table X-X Summary of assessments of potential impacts of the principle: protection of designated landscapes.

Protection of Designated Landscapes	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+/-	+	0	0	+/-	+	++	++	+	+	0	+/-	0	0

It is uncertain the impact this principle would have on housing delivery. The impact could be negative under the assumption that housing developments would either not be allowed in the High Weald AONB or the size of the development would be limited to ensure that significant damage to the landscape character does not occur. However, the Strategic Housing and Employment Land Availability Assessment (SHELAA) found that there is limited further growth potential at settlements within the AONB, and that the potential for growth is mostly in settlements out with the AONB.

However, this principle performs well against the natural resources objective, as it will help drive redevelopment of previously developed land and minimise the loss of open countryside to development.

It is also considered that this principle would have a minor positive impact on health and wellbeing, and climate change and transport as it would encourage development in the main towns outside the AONB ensuring residents have access to services and reduce the need for private car use, and its associated CO2 emissions.

This principle would have a major positive impact on biodiversity and geodiversity, and landscape objectives. Namely as it would protect landscape character and conserve the High Weald AONB, which also includes nationally designated land, such as Worth Forest SSSI and Wakehurst and Chiddingly Woods SSSI. Historic assets can be considered part of the landscape character, and so protection of the High Weald AONB, which contains many Listed Buildings and Scheduled Monuments, would have a major positive impact on the cultural heritage objective.

It is unclear on the impact this principle would have on the flooding and surface water objective or the water resources' objective. It may have a positive impact as protection of the landscape could help achieve Water Framework Directive Objectives; however, driving development to existing areas may put pressure on water resources here and increase the number of properties at risk of flooding. Although if natural flood management and sustainable design and construction techniques are implemented, then the risk of flooding could be reduced.

It is considered that this principle would have a neutral impact on the other SA objectives. For example, this principle would not impact economic growth or regeneration, the approach to education and community and crime, or energy and waste consumption.

#### 1.5.2 Making effective use of land

This principle is given a comprehensive definition in the NPPF which states that *"Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land"*. This principle was therefore included to ensure development over the plan period is considering the redevelopment of previously developed land where possible while meeting housing needs and achieving healthy communities, without causing unnecessary harm to the environment.

As with the first principle above, there were no reasonable alternatives identified for 'making effective use of land' since this principle requires consideration under current national planning policy. Ensuring that land within the district is used effectively is an important consideration in the preparation of the District Plan. National planning policy and guidance promotes the use of previously developed land and encourages consideration of various approaches to accommodating growth. It is therefore reasonable to conclude that a 'do nothing' scenario is also not a reasonable alternative and the only option to assess is this principle: "making effective use of land".

A summary of the assessment scores is provided in Table XX below.

Table X-X Summary of assessments of potential impacts of the principle: "making effective use of land".

Making Effective Use of Land	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+/-	+	+	+	+	++	+	+	+/-	++	+/-	+	+	+

This principle would have a major positive impact on the natural resources objective by supporting the redevelopment of previously developed land and reducing the need for development to encroach on open countryside and agricultural land. By bringing sites back to their full potential, it increases the vibrancy of a street making an area more attractive to live and work, and restores the character of the town without compromising the wider landscape character of the district. Through promoting development in existing settlements, new residents are more likely to have access to healthcare, schools, and community facilities, as well as public transport which in turn will reduce private car use, and the associated carbon emissions. This promotes town centre regeneration and supports the economic viability of existing businesses here and will reduce the need to commute out of the area.

The NPPF considers that making effective use of land is also looking at the potential for undeveloped land to provide "*wildlife, recreation, flood risk mitigation, cooling / shading, carbon storage or food production*". Therefore, this principle gives weight to achieving positive impacts for climate change, biodiversity, and flooding and surface water objectives. Nonetheless, without knowing the full details of the developments, it is difficult to conclude that this principle would not cause harm to local cultural heritage assets.

Furthermore, there is uncertainty on whether this principle would meet the housing needs of the district as it promotes the redevelopment of previously developed land which limits the provision of housing and the ability to deliver the range of type, tenure and mix of homes that the district requires. Mid Sussex has limited brownfield sites available for development - noting that only 12% of the district is within a defined Built-up Area.

### 1.5.3 Growth strategies

Alternatives were identified for the second two pillars to reflect alternative strategies for delivery of growth and meeting housing need.

The Options considered are outlined in Table X-X- below

Table x-x- Alternative spatial options for growth considered.

Option	Description of Spatial Option
Option 1	Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.
Option 2	Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.
Option 3	Creating a new sustainable settlement with associated facilities.
Option 4	Focus development in the three towns utilising existing facilities and transport links.
Option 5	Prioritise development on brownfield land.

Options 1 and 2 were considered as part of the Regulation 18 SA. The SA conclusions made by Lepus are largely considered to still be relevant. Some amendments have been made to the original assessment in light of increased understanding of the options.

Additional options were considered as a result of responses received during the Regulation 18 consultation, as outlined above, which were not included within the Regulation 18 SA. Option 3 was considered which would entail creation of a new sustainable settlement within the district. Option 4 would focus on development primarily being within the exiting three main towns (Burgess Hill, Haywards Heath and East Grinstead) since these have existing suitable facilities and transport links. Lastly Option 5 was considered which focussed on prioritising development on brownfield land.

A summary of the SA assessment scores and findings are provided in Table XX below, with the full assessments presented in sections 1.6 to 1.10.



Table X: Summary of assessments of potential impacts of the spatial Options.

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

Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements (Burgess Hill, East Grinstead and Haywards Heath) accommodating greater levels of growth. This option would facilitate the proportionate delivery of housing across a range of existing settlements. This would enable residents to utilise existing services and infrastructure and would support economic growth within existing settlements. However, this option could lead to development within sensitive landscape areas, such as High Weald AONB (to the north of Haywards Heath and south/east of East Grinstead) and lead to adverse impacts on landscape, natural resources, biodiversity and geodiversity.

Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools and health care, while recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities. This option is more likely to provide protection for High Weald AONB by avoiding areas within the AONB. However, it may have a negative impact on climate change and transport objectives as new residents may not be located close to existing services and sustainable transport options, depending on the extent of services available. However, there is potential for new services to be provided where growth is outside of settlements with existing facilities.

Option 3: Creating a new and sustainable settlement with associated services and facilities. This option may have a significant negative impact on greenhouse gas emissions through increased energy use and emissions generated by the construction and occupation of the



new development, as well as increase private car use dependent on the provision of sustainable travel options.

Option 4: focus on development in the three towns. This would likely lead to a significant positive impact on economic growth and regeneration in the three towns, supporting existing businesses and supporting the vitality and viability of these town centres. By utilising existing facilities and transport routes, residents would be less dependent on private car use and would have already have access to secondary schools and healthcare services. This would have a likely major positive impact on objectives for health and wellbeing, education, community and crime, climate change, and transport.

Option 5: prioritise development on brownfield land. As a predominantly rural district, brownfield sites are focussed in the three main towns and larger villages. Therefore, this Option performance on the social objectives (1 to 4) would be similar to option 4. New residents would be likely to be in proximity to healthcare services and schools, and it will also promote community cohesion by meeting housing need in the local area which reduces pressure on existing housing in the area. Proximity to services also performs well against the climate change and transport objective, as well as reducing the dependency of private car use, and associated GHG emissions. This Option would have a major positive impact on the natural resources objective by supporting the development of previously developed land and reducing the need for development to encroach on open countryside and agricultural land. Prioritising developments on brownfield land presents an opportunity for delivery of biodiversity net gain through bringing previously developed land back to its full potential without compromising land which may have established habitats and species. Furthermore, this Option avoids growth in the High Weald AONB and South Downs National Park and so limits impacts on these designated landscapes.

## **1.6 Feasibility of options**

The SA considered the respective likely environmental and socio-economic impacts of each of the growth strategy options. However, as outlined in Section 1.4, the SA does not reflect the whole of the analysis needed and does not consider the likelihood and feasibility of implementation. It is also not a quantitative exercise; therefore some SA objectives carry greater weighting.

Housing need and the site selection process informed the feasibility of the Options. An overview of the feasibility of each option in meeting housing need is outlined below.

Option 1 (the adopted District Plan) proportioned housing need across the district based on settlement category (DP4) and settlement (DP6) based on proportion of households/population. For example, if one settlement contained 10% of current households within the district, it received 10% of the housing requirement. Following the site assessment process it became evident that there were insufficient sites deemed to be 'reasonable alternatives' to continue this, since a number of developments have already come forward since the adopted plan. Many settlements did not have sufficient sites to meet the need, whereas some settlements had a need of zero, but many sites to choose

from. Therefore continuing with this option would not be achievable since it would not enable sufficient sites to be allocated to meeting housing need within the district.

Option 2 would seek to support growth across settlements with existing facilities. It would allow allocation of sites to meet internal housing needs including the provision of affordable housing and a mix of type and tenures of housing. This would also allow allocation of a surplus of approximately 1000 dwellings. This would contribute to meeting unmet need in neighbouring authorities.

Option 3 would have a major positive impact on delivering housing in the district through a new settlement. One potential location was considered that met this spatial approach, known as 'Mayfield Market Town', on the western boundary of the district near Twineham, although the majority of the site boundary is within Horsham District. However, this site was previously ruled out during the site selection process due to a historic lack of support from Horsham District Council. The site has now been withdrawn from consideration by the site promoter. In addition, water neutrality considerations arising in this location have led to deliverability concerns over and above the previous reasons for rejection.. This option is therefore not considered feasible to address housing requirements since MSDC does not have available sites to deliver such a strategy in the pool of sites identified as reasonable alternatives.

Option 4 focussed development in the three towns. This Option is similar to Option 1 by focussing development in the three urban centres, however it does not incorporate proportionate growth across the other settlements in the district and would limit the ability to meet the whole district's housing need as it would exclude larger site allocations in rural areas. It is therefore unlikely that this Option would meet the required housing need for the district, particularly as the SHELAA and Site Selection process demonstrate there is very limited growth potential at East Grinstead and Haywards Heath.

Option 5 performs well against the SA objectives, however it would not be suitable to meet housing need alone since there are limited brownfield sites available within the reasonable alternatives identified following the site selection process. The two larger brownfield sites allocated in the Regulation 19 Plan are at Burgess Hill Station and Orchards Shopping Centre in Haywards Heath which would provide 400 homes. An Urban Capacity Study has been prepared by the District Council and this has informed a Brownfield element to the windfall allowance. Overall, this figure would not come close to meeting the district's housing need in full.

Overall, Option 2 is preferable since it will support the delivery of larger strategic sites in some locations, as well as supporting some growth to across the other categories of settlements. This will enable the internal housing need to be met, along with provision of a surplus of dwellings to support neighbouring authorities in meeting their need. In SA terms it will also have positive impacts on landscape through limiting growth in sensitive landscapes.

However, it will also incorporate elements of Option 1 to continue growth at existing sustainable settlements where available sites allow.

## 1.7 Option 1 Assessment

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

SA Objective		Impact	Assessment
1	<b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	+/-	<ul style="list-style-type: none"> <li>• This Option has the potential to meet the identified housing need for the district, including the provision of affordable housing and mixed types / tenure housing.</li> <li>• This Option spreads new development across the main urban centres and other principal settlements within the district. It will therefore increase accessibility to new housing development across the district.</li> <li>• Lack of availability of sites for meeting housing need in each area.</li> <li>• Risk that smaller settlements in rural areas will not benefit from increased access to services.</li> </ul>
2	<b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.	+	<ul style="list-style-type: none"> <li>• In relation to access to health services, existing GP surgeries are associated with the medium size and larger settlements across the district, with occasional practices within the High Weald AONB.</li> <li>• There are two NHS hospitals with an A&amp;E department within the Plan area: Queen Victoria Hospital in East Grinstead and Princess Royal Hospital in Haywards Heath.</li> <li>• However, growth located in medium and smaller settlements may locate new residents at greater distances from hospital services.</li> </ul>

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

3	<b>Education:</b> To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities	++	<ul style="list-style-type: none"> <li>As set out in the Mid Sussex SA Scoping Report, there are 42 primary schools and seven secondary schools serving the district. In terms of access to education, 89.8% of households within Mid Sussex are within a 15-minute walk (approximately 1.2km) from a primary school, and 64.9% of households are within 20-minute walk from a secondary school. As determined in the Reg 18 SA, this Option would locate housing growth in areas of existing settlements so new residents are likely to be in proximity to existing schools. It is noted that existing schools may be close to capacity, however it is assumed these schools can extend or adapt to predicted need.</li> </ul>
4	<b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.	++	<ul style="list-style-type: none"> <li>The spatial location and design of new development can support opportunities for social interaction and community cohesion by providing spaces and places for communities to meet or locating new development in proximity to existing community facilities, such as primary schools, community halls, libraries, public open spaces, parks, and active community groups. Such facilities are typically located in existing towns or other built-up areas. This Option would be likely to locate new residents in proximity to existing community facilities and groups located within the main towns and other settlements.</li> <li>Improved access to housing and employment may contribute to a reduction in social inequalities and increase community cohesion and community health and wellbeing.</li> </ul>

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

<b>5</b>	<b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources	<b>0</b>	<ul style="list-style-type: none"> <li>The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.</li> </ul>
<b>6</b>	<b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	<b>--</b>	<ul style="list-style-type: none"> <li>This Option is likely to lead to the allocation of development sites on greenfield land, with relatively few opportunities for the redevelopment of previously developed land. The development of greenfield sites is likely to lead to the loss of soils, which is a finite natural resource.</li> <li>Many of the proposed sites for development are within mineral safeguarding areas. The development of these sites would therefore lead to mineral sterilisation.</li> </ul>

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

7	<b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity	-	<ul style="list-style-type: none"> <li>• There are numerous Sites of Special Scientific Interest (SSSIs) within the district, predominately located within the High Weald AONB or in the South Downs National Park. Ditchling Common SSSI is located in close proximity to the eastern edge of Burgess Hill. Spatial Option 1, which supports development at the three main towns, including Burgess Hill, has the potential to have adverse impacts on this SSSI.</li> <li>• The provision of significant new development has the potential to cause negative impacts on biodiversity through loss of habitat and disturbance to species. Conversely, high quality design that protects and enhances environmental and ecological characteristics, has the potential to provide some benefits. Policies will be in place, including DPN2, to facilitate Biodiversity Net Gain which will achieve positive effects on biodiversity. However, on balance, increased development and increased population is more likely to have negative effects.</li> </ul>
8	<b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place	-	<ul style="list-style-type: none"> <li>• This spatial strategy will follow the existing District Plan approach, which focuses new development in the main urban centres and other principal settlements across the district.</li> <li>• By focusing new development in existing urban areas / rural settlements, this could reduce the risk that new development could adversely affect the character of sensitive landscapes in more rural parts of the district.</li> <li>• Conversely, by allocating most of the new development in the Haywards Heath / East Grinstead / Burgess Hill areas, there is a greater risk of urban sprawl.</li> <li>• New development could have both positive and negative effects on landscape. The nature and scale of these impacts are related to the location of the development</li> </ul>

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

			<p>and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design.</p> <ul style="list-style-type: none"> <li>Nonetheless, Option 1 is still likely to lead to the development of greenfield sites and adverse impacts on local landscape character, to some extent.</li> </ul>
9	<p><b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.</p>	-	<ul style="list-style-type: none"> <li>New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features.</li> <li>There is potential that this spatial Option could contribute to this SA objective in several ways: it should focus development in existing urban areas, reducing the risk that heritage features and historic landscape character outside these areas could be affected, and it could provide a mechanism for the conservation and enhancement of heritage features through urban regeneration.</li> <li>However, this Option has the potential to locate development in proximity to associated Conservation Areas as these are located in the main urban centres and smaller settlements.</li> </ul>
10	<p><b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the</p>	+	<ul style="list-style-type: none"> <li>Most of the community, education and retail facilities are in existing town centres. The three main towns are also serviced by existing train stations. This Option supports growth in the main centres and proportionally across the other settlements in the hierarchy, which may reduce the need to travel by private car and support opportunities for the use of public transport and active travel.</li> </ul>



**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

	district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.		<ul style="list-style-type: none"> <li>• However, by focusing new development in/near existing urban areas, which are more likely to experience air quality issues, there is a greater risk of contributing to the formation of a significant local air quality issue if private car use is not reduced.</li> <li>• Appropriate policy and schemes would need to be implemented to encourage active travel, for example, the provision of safe cycle lanes and pedestrian walkways where possible, as well as reliable bus and train services.</li> </ul>
11	<b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal.	+/-	<ul style="list-style-type: none"> <li>• Planning policy seeks to increase the energy efficiency of new development and the proportion of energy generated from renewable sources to help mitigate climate change as well as reduce waste generation and disposal.</li> <li>• By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.</li> </ul>
12	<b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.	+/-	<ul style="list-style-type: none"> <li>• It is likely that the provision of new dwellings and employment sites will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision.</li> <li>• Appropriate policy will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.</li> </ul>

**Option 1: Maintain the existing spatial strategy set out in policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.**

<b>13</b>	<b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.	++	<ul style="list-style-type: none"> <li>In seeking to deliver development proportionally across the settlement hierarchy, this Option would be likely to support business in the three main towns and the village centres, as well as supporting any local retail needs in the lower category settlements.</li> </ul>
<b>14</b>	<b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.	++	<ul style="list-style-type: none"> <li>This Option would be likely to support business in the three main town centres and the village centres, as well as supporting any local retail needs in the lower category settlements.</li> <li>This Option may also serve to support the allocations for employment uses at Burgess Hill as well as allocations for employment at Handcross and Pease Pottage.</li> </ul>

## 1.8 Option 2 Assessment

**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

SA Objective		Impact	Assessment
1	<b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	++	<ul style="list-style-type: none"> <li>This Option has the potential to meet the identified housing need for the district, including the provision of affordable housing and mixed types / tenure housing.</li> <li>Option 2 would support housing growth in settlement locations where there is greater potential to improve the sustainability of the settlement by delivering new local facilities and services to meet daily needs as part of the new development.</li> <li>This Option would support the delivery of large strategic sites in some locations as well as supporting some growth to meet local needs across the other settlements. As concluded in the Regulation 18 SA, this Option provides more certainty of the availability of sites and the deliverability of this Option in comparison to Option 1.</li> </ul>
2	<b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.	+/-	<ul style="list-style-type: none"> <li>Growth located in medium and smaller settlements may locate new residents at greater distances from hospital and GP services.</li> <li>This Option seeks support growth in settlements with existing facilities. The performance of this Option is dependent on the location of the main areas of housing growth in relation to hospital and GP services. This has been assessed as part of the site assessment process.</li> </ul>

**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

<b>3</b>	<b>Education:</b> To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities	<b>+/-</b>	<ul style="list-style-type: none"> <li>As determined in the Regulation 18 SA report, this Option would be likely to lead to the delivery of a large growth area which is anticipated to be of sufficient scale to support an additional new primary school within the site, as well as plan sustainable access routes to this school for many new residents. However, access to schools would need to be ensured through sustainable means such as school bus services and cycle routes where possible.</li> <li>The performance of this Option is dependent on the location of the main areas of housing growth in relation to schools and travel provisions.</li> </ul>
<b>4</b>	<b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.	<b>+/-</b>	<ul style="list-style-type: none"> <li>Similar to above, larger scale development may bring forward the opportunity to deliver new primary schools, open spaces and potentially other community facilities alongside the opportunity to plan new routes for active / sustainable travel.</li> <li>The performance of this Option is dependent on the location of the main areas of housing growth in relation to community facilities.</li> </ul>
<b>5</b>	<b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources	<b>0</b>	<ul style="list-style-type: none"> <li>The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.</li> </ul>

**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

<b>6</b>	<b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	--	<ul style="list-style-type: none"> <li>This Option is likely to lead to the allocation of development sites on greenfield land, with relatively few opportunities for the redevelopment of previously developed land. The development of greenfield sites is likely to lead to the loss of soils, which is a finite natural resource.</li> <li>Many of the proposed sites for development are within mineral safeguarding areas. The development of these sites would therefore lead to mineral sterilisation.</li> </ul>
<b>7</b>	<b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity	-	<ul style="list-style-type: none"> <li>There are numerous SSSIs and areas of ancient woodland, within the district, predominately located within the High Weald AONB or in the South Downs National Park. Spatial Option 2, which seeks to limit growth in the settlements within the High Weald AONB would be likely to have fewer adverse impacts on these features within the AONB. Overall, this Option supports development in a sustainable location and has the potential to have fewer impacts on locally designated biodiversity sites.</li> <li>Nonetheless, this Option is likely to require the development of greenfield sites (as opposed to the use of previously developed land) which may lead to the loss of, and adverse impacts on, priority habitats. Policies will be in place, including DPN2, to facilitate Biodiversity Net Gain which will achieve positive effects on biodiversity.</li> </ul>

**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

8	<b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place	-	<ul style="list-style-type: none"> <li>This Option seeks to avoid growth in protected landscapes. The High Weald AONB covers almost half of the district. This Option is more likely to lead to development in land that is less accommodating to change than Option 1; however, it will better protect the AONB.</li> <li>However, Option 2 is still likely to lead to the development of greenfield sites and adverse impacts on local landscape character, to some extent.</li> </ul>
9	<b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.	0	<ul style="list-style-type: none"> <li>This Option provides the opportunity to locate development in a location which reduces potential impacts on Conservation Areas and limits growth in the settlements in the AONB, which may also reduce the potential for impacts on associated Conservation Areas.</li> </ul>
10	<b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the	-	<ul style="list-style-type: none"> <li>This Option supports new growth in proximity to existing lower category settlements. It is likely that these growth areas would support some mixed uses, retail, education, and community facilities as part of the new development and would be likely to require a new public transport link.</li> <li>It is anticipated that private car usage overall, however, would be greater than if development was in an existing urban centre. The nature of the impact would depend on the location of the growth area in relation to existing public transport services and the types of facilities and services proposed as part of the development.</li> </ul>

**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

	district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.		
11	<b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal.	+/-	<ul style="list-style-type: none"> <li>• Planning policy seeks to increase the energy efficiency of new development and the proportion of energy generated from renewable sources to help mitigate climate change as well as reduce waste generation and disposal.</li> <li>• By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.</li> </ul>
12	<b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.	+/-	<ul style="list-style-type: none"> <li>• It is likely that any new development, particularly large-scale, will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision.</li> <li>• This would likely require the provision of significant new water supply and treatment infrastructure.</li> <li>• Appropriate policy provisions will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.</li> </ul>



**Option 2: Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial Option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools, and health care. While recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.**

<b>13</b>	<b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.	+	<ul style="list-style-type: none"> <li>This Option seeks to deliver a new growth area in the district, which is likely to lie in proximity to a lower order settlement, and limit development within the settlements located within the High Weald AONB. The level of growth proposed seeks to be able to support new retail opportunities as part of the development and, in turn, support the vitality of the associated settlement.</li> <li>By limiting growth in the lower category settlements within the High Weald AONB, this Option may limit the viability of delivering new business opportunities associated with these settlements and have a negligible impact on village centre regeneration.</li> </ul>
<b>14</b>	<b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.	+	<ul style="list-style-type: none"> <li>As above, this Option seeks to deliver new growth areas in the district at a level which can support new retail opportunities, employment (as well as through construction activities) and support economic growth and competitiveness which is spread across the district.</li> <li>"Significant sites" may provide some element of local employment space. The location of the growth area is unknown and, therefore, it is uncertain if this Option would serve to support existing employment areas and local businesses. By delivering a greater level of growth there is likely to be lower levels of development in some of the main settlements.</li> <li>It should be noted that this Option may limit the viability of delivering new business opportunities associated with these settlements.</li> </ul>

## 1.9 Option 3 Assessment

Option 3: Creating a new sustainable settlement with associated facilities.			
SA Objective		Impact	Assessment
	<b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	+	<ul style="list-style-type: none"> <li>This Option provides a means to deliver strategic-scale new housing development which would incorporate a range of housing to address various needs.</li> </ul>
2	<b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.	+/-	<ul style="list-style-type: none"> <li>A largescale new settlement may support the delivery of new healthcare facilities, such as a new GP practice. However, should this not come forward, existing facilities may not be in close proximity.</li> <li>This spatial strategy acknowledges that the creation of a new settlement provides opportunities to create new community facilities, such as open spaces and playing fields, which could benefit local community health and wellbeing.</li> <li>In addition, a holistically planned new development could promote walking and cycling, which could further contribute to healthy and active lifestyles.</li> </ul>
3	<b>Education:</b> To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities	+/-	<ul style="list-style-type: none"> <li>This spatial Option is likely to include the provision of / access to education.</li> <li>A large scale new settlement would require the provision of a primary school, as well as sustainable access routes to this school for the residents.</li> <li>Dependent on the scale of the settlement a new secondary school may be provided. However, should this be unfeasible, access to the existing secondary schools in the district would need to be ensured through sustainable means such as school bus services and cycle routes where possible.</li> </ul>
4	<b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce	+/-	<ul style="list-style-type: none"> <li>This spatial Option is likely to include the provision of significant new community services and facilities that will benefit the new community.</li> </ul>

### Option 3: Creating a new sustainable settlement with associated facilities.

	inequalities. Promote integration within existing town/village and retain their separate identities.		<ul style="list-style-type: none"> <li>This Option may compromise social cohesion in other areas of the district, particularly where residents are unable to remain in their current settlement due to lack of housing provision.</li> <li>However, there is a risk that other urban areas and particularly smaller settlements in rural areas will not benefit from increased access to community services and facilities.</li> </ul>
5	<b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources	0	<ul style="list-style-type: none"> <li>The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.</li> <li>Nonetheless, this spatial strategy is not likely to support the reduction of flood risk to existing communities.</li> </ul>
6	<b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	--	<ul style="list-style-type: none"> <li>Most of the district (63.7%) is classified as Grade 3 Agricultural Land. It is likely that some of this land would be classified as Grade 3a and therefore Best and Most Versatile (BMV) land. Grade 3 land surrounds many settlements, including main settlements as well as the lower order settlements. Due to the distribution of potential BMV land across the district, it is likely that the delivery of new settlement would lead to the loss of BMV land.</li> </ul>

### Option 3: Creating a new sustainable settlement with associated facilities.

7	<b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity	-	This spatial strategy would likely involve the loss of a large area of (greenfield) countryside to accommodate the new settlement and a range of ancillary development (highways, energy supply, sewerage, water supply, etc). This would result in significant habitat loss and create long-term damage and disturbance to habitats and species. Overall, it is anticipated that this would likely result in an overall loss of biodiversity in the district. Policies will be in place, including DPN2, to facilitate Biodiversity Net Gain which will achieve positive effects on biodiversity.
8	<b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place	-	<ul style="list-style-type: none"> <li>• This spatial Option will focus development in a new settlement. This is likely to have a significant local landscape impact, which would need to be comprehensively mitigated through sensitive site selection and ensuring high-quality design.</li> <li>• By focusing most new development in one main area, this could reduce the risk that new development could adversely affect the character of sensitive landscapes in other parts of the district.</li> <li>• New development could have both positive and negative effects on landscape. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design.</li> </ul>

### Option 3: Creating a new sustainable settlement with associated facilities.

9	<b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.	0	<ul style="list-style-type: none"> <li>• New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features.</li> <li>• However, this spatial strategy approach could contribute to this SA objective by focusing development in one area, reducing the risk that heritage features and historic landscape character outside this area could be affected.</li> </ul>
10	<b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.	-	<ul style="list-style-type: none"> <li>• It is likely that the creation of a new settlement will have a negative effect on local air quality within the district, through major new construction works and increased traffic emissions. Focusing major new development in one area creates a greater risk of contributing to the formation of a significant local air quality issue.</li> <li>• It is possible that this spatial strategy will have a significant negative effect on greenhouse gas emissions, through increased energy use and emissions generated by the construction and occupation of the new development.</li> <li>• Such an approach has the potential to cause a significant increase in greenhouse gas emissions associated with private car use.</li> <li>• Appropriate policy provisions will be required to ensure that greenhouse gas emissions associated with new development are minimised. This should include measures to minimise emissions at source, through the promotion of low-carbon design and energy efficient design, and measures to minimise the reliance on private car use.</li> </ul>

### Option 3: Creating a new sustainable settlement with associated facilities.

11	<b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal.	+/-	<ul style="list-style-type: none"> <li>A new settlement would likely require the provision of new waste management infrastructure. By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities/services.</li> <li>However, it also presents the opportunity to incorporate energy efficient design and implement renewable energy provisions.</li> </ul>
12	<b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.	-	<ul style="list-style-type: none"> <li>It is likely that large-scale new development will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision.</li> <li>This would likely require the provision of significant new water supply and treatment infrastructure as the new settlement would likely be in a location without existing infrastructure.</li> <li>Appropriate policy provisions will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.</li> </ul>
13	<b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.	-	<ul style="list-style-type: none"> <li>This spatial Option would not support the regeneration of existing Town Centres and villages in the district.</li> <li>Through appropriate design and ensuring the required services and facilities are provided with a new settlement, then residents would be unlikely to travel into existing town centres within the district.</li> </ul>
14	<b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the	+	<ul style="list-style-type: none"> <li>The scale of new development required by this spatial strategy has the potential to create a significant economic stimulus and promote employment opportunities</li> </ul>

**Option 3: Creating a new sustainable settlement with associated facilities.**

	District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.		<p>across the district and within communities, as opposed to focused mainly in the town centres.</p> <ul style="list-style-type: none"><li>• Furthermore, should provision of transport links be secured, this could encourage inward investment in the district.</li></ul>
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## 1.10 Option 4 Assessment

### Option 4: Focus development in the three towns utilising existing facilities and transport links.

SA Objective		Impact	Assessment
1	<b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	+/-	<ul style="list-style-type: none"> <li>This Option focuses new development to the main urban centres in district. It will therefore increase accessibility to new housing development in existing Town Centres. However, there would not be increased access to housing within rural areas of the district and this approach could lead to urban sprawl of the three towns.</li> </ul>
2	<b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.	+	<ul style="list-style-type: none"> <li>Increasing growth at the three main towns would be likely to locate residents in proximity to a range of existing healthcare services which would be expected to increase capacity to meet the increase in demand from new households.</li> <li>The main A&amp;E department for the district is located in Haywards Heath, with Queen Victoria Hospital in East Grinstead and Priory Hospital on the outskirts of Burgess Hill. Therefore, new residents will be located with sustainable access to medical services.</li> <li>Health and wellbeing also include active travel and so, development in town centres allows residents to walk or cycle daily to a range of services and recreational offerings as well as work. This in turn encourages a more social community environment where all residents have access to community facilities.</li> </ul>

**Option 4: Focus development in the three towns utilising existing facilities and transport links.**

3	<b>Education:</b> To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities	+	<ul style="list-style-type: none"> <li>There are existing secondary schools in the three towns - Burgess Hill (Oakmeads Community College and St Paul's Catholic College), East Grinstead (Sackville Community College and Imberhorne School), Haywards Heath (Oathall Community College). Therefore, residents would already have access to secondary schools and so would have a positive impact on this objective. It is noted that these schools may be nearing capacity, however MSDC would be able to plan for extending or adapting these school to meet predicted need.</li> </ul>
4	<b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.	++	<ul style="list-style-type: none"> <li>Facilities which promote social interaction and community cohesion are often located in existing towns (such as primary schools, community halls, libraries, public open spaces, parks, and active community groups). Therefore, like Option 1, this Option would be likely to locate new residents in proximity to existing community facilities and groups located within the main towns.</li> <li>Furthermore, by providing more housing in the main towns, this will prevent inflated housing and rental prices and reduce social inequalities due to a lack of available housing.</li> </ul>
5	<b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources	0	<ul style="list-style-type: none"> <li>The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.</li> </ul>
6	<b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and	+/-	<ul style="list-style-type: none"> <li>Focusing development in the main town centres will provide opportunities to redevelop previously developed land.</li> </ul>

**Option 4: Focus development in the three towns utilising existing facilities and transport links.**

	existing buildings, including reuse of materials from buildings, and encourage urban renaissance.		<ul style="list-style-type: none"> <li>• However, it will still be likely to lead to the allocation of development sites on greenfield land, with relatively few opportunities for the redevelopment of previously development land. The development of greenfield sites could lead to the loss of soils, which is a finite natural resource.</li> <li>•</li> </ul>
<b>7</b>	<b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity	-	<ul style="list-style-type: none"> <li>• There are numerous SSSIs within the district, predominately located within the High Weald AONB or in the South Downs National Park. Ditchling Common SSSI is located in close proximity to the eastern edge of Burgess Hill. Focussing development around the three towns including Burgess Hill, has the potential to have adverse impacts on this SSSI.</li> </ul>
<b>8</b>	<b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place	+	<ul style="list-style-type: none"> <li>• By focusing new development in existing urban areas, this could reduce the risk that new development could adversely affect the character of sensitive landscapes in more rural parts of the district.</li> <li>• New development could have both positive and negative effects on landscape. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design.</li> <li>• It should be noted that by allocating most new development in the Haywards Heath / East Grinstead / Burgess Hill areas, there is a greater risk of urban sprawl.</li> </ul>

#### Option 4: Focus development in the three towns utilising existing facilities and transport links.

9	<b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.	+/-	<ul style="list-style-type: none"> <li>• New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features.</li> <li>• However, this Option could contribute to this SA objective. By focusing development in existing urban areas, this reduces the risk that heritage features and historic landscape character outside these areas could be affected. In addition, it could provide a mechanism for the conservation and enhancement of heritage features through urban regeneration.</li> </ul>
10	<b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.	+	<ul style="list-style-type: none"> <li>• Most of the community, education and retail facilities are in existing town centres. The three main towns are also serviced by existing train stations. This Option supports growth in the main centres and proportionally across the other settlements in the hierarchy, which may reduce the need to travel by private car and support opportunities for the use of public transport and active travel.</li> <li>• However, by focusing new development in/near existing urban areas, which are more likely to experience air quality issues, there is a greater risk of contributing to the formation of a significant local air quality issue if private car use is not reduced.</li> <li>• Appropriate policy and schemes would need to be implemented to encourage active travel, for example, the provision of safe cycle lanes and pedestrian walkways where possible, as well as reliable bus and train services.</li> </ul>

**Option 4: Focus development in the three towns utilising existing facilities and transport links.**

11	<b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal.	+	<ul style="list-style-type: none"> <li>Planning policy seeks to increase the energy efficiency of new development and the proportion of energy generated from renewable sources to help mitigate climate change as well as reduce waste generation and disposal.</li> <li>By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.</li> </ul>
12	<b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.	+/-	<ul style="list-style-type: none"> <li>It is likely that the provision of new dwellings and employment sites will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision.</li> <li>Appropriate policy will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.</li> </ul>
13	<b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.	++	<ul style="list-style-type: none"> <li>This Option prioritises development in the three main towns - Burgess Hill, Haywards Heath, and East Grinstead - so would deliver housing growth in locations which would help to support existing businesses located in the main centres, supporting the vitality and viability of town centre regeneration.</li> </ul>
14	<b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of	+	<ul style="list-style-type: none"> <li>This Option would have a minor positive impact on economic growth by reducing out commuting.</li> </ul>

**Option 4: Focus development in the three towns utilising existing facilities and transport links.**

employment including the opportunity for people to live and work within their communities.

- However, this growth would be focused in the main towns, whereas developments in both main towns and new or smaller areas would provide more opportunities for employment across the District.

## 1.11 Option 5 Assessment

Option 5: Prioritise development on brownfield land.			
SA Objective		Impact	Assessment
1	<b>Housing:</b> To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	+/-	<ul style="list-style-type: none"> <li>Prioritising brownfield sites limits the location and size of developments and would be unlikely to have a significant contribution to meeting all housing need.</li> <li>Mid Sussex has limited brownfield sites available for development. The two larger brownfield sites allocated in the plan are at Burgess Hill Station and Orchards Shopping Centre.</li> </ul>
2	<b>Health and wellbeing:</b> To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.	+	<ul style="list-style-type: none"> <li>Brownfield sites are mostly located in existing / established communities so new residents are likely to be in proximity to healthcare services.</li> <li>For example, the brownfield site at Orchards Shopping Centre is located in Haywards Heath which has a Hospital with an A&amp;E Department.</li> </ul>
3	<b>Education:</b> To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities	++	<ul style="list-style-type: none"> <li>As a predominantly rural district, brownfield sites are focused in the three main towns and larger villages. New residents are likely to be in proximity to secondary schools.</li> </ul>
4	<b>Community and crime:</b> To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.	++	<ul style="list-style-type: none"> <li>Promotes community cohesion by meeting housing need in the local area which prevents increased housing and rental prices.</li> <li>Provision of new houses in existing areas serviced by community facilities may support their maintenance.</li> </ul>



### Option 5: Prioritise development on brownfield land.

5	<b>Flooding and surface water:</b> To reduce the risk to people, properties, the economy and the environment of flooding from all sources	+	<ul style="list-style-type: none"> <li>The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. Implementation of sustainable drainage at all brownfield developments is required in accordance with Policy DPS4 of the revised Plan Strategy. Therefore, this Option would have a minor positive impact on the flooding and surface water objective as it may reduce the flood risk at existing brownfield sites.</li> </ul>
6	<b>Natural resources:</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	++	<ul style="list-style-type: none"> <li>Option 5 would have a major positive impact on the natural resources objective by supporting the redevelopment of previously developed land and reducing the need for development on greenfield sites, Mineral Safeguarding Areas or the encroachment of open countryside and agricultural land.</li> </ul>
7	<b>Biodiversity and geodiversity:</b> To conserve and enhance the District's biodiversity and geodiversity	+/-	<ul style="list-style-type: none"> <li>Prioritising developments on brownfield land presents an opportunity for biodiversity net gain.</li> <li>Despite a focus on regeneration of brownfield sites in existing urban areas, this spatial strategy would likely still require some new development in rural areas and greenfield sites due to limited brownfield sites available for redevelopment.</li> </ul>
8	<b>Landscape:</b> To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place	+/-	<ul style="list-style-type: none"> <li>Prioritising developments on brownfield land presents an opportunity for introducing high quality design in the context of local landscape character. Furthermore, it avoids growth in the High Weald AONB and South Downs National Park and so limits impacts on these designated landscapes.</li> </ul>

### Option 5: Prioritise development on brownfield land.

			<ul style="list-style-type: none"> <li>Despite a focus on regeneration of brownfield sites in existing urban areas, this spatial strategy would likely still require some new development in rural areas and greenfield sites due to limited brownfield sites available for redevelopment.</li> </ul>
9	<b>Cultural heritage:</b> To protect, enhance and make accessible for enjoyment, the District's historic environment.	+/-	<ul style="list-style-type: none"> <li>New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features.</li> <li>There is potential that this spatial Option could contribute to this SA objective in several ways: it should focus development in existing urban areas, reducing the risk that heritage features and historic landscape character outside these areas could be affected, and it could provide a mechanism for the conservation and enhancement of heritage features through urban regeneration.</li> </ul>
10	<b>Climate change and transport:</b> To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.	+	<ul style="list-style-type: none"> <li>Residents will be less reliant on private car use and associated GHG emissions since most brownfield sites are located in existing towns with existing transport and infrastructure provision.</li> </ul>

### Option 5: Prioritise development on brownfield land.

11	<b>Energy and waste:</b> To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal.	+	<ul style="list-style-type: none"> <li>Planning policy seeks to increase the energy efficiency of new development and the proportion of energy generated from renewable sources to help mitigate climate change as well as reduce waste generation and disposal.</li> <li>By supporting provision of brownfield land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.</li> </ul>
12	<b>Water resources:</b> To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.	+/-	<ul style="list-style-type: none"> <li>It is possible that the redevelopment of brownfield land would negatively impact water quality and water resources in the district, through increased potential for pollution and increased need for water provision.</li> <li>Appropriate policy provisions will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.</li> <li>However, due to limited brownfield sites available, this may also limit the pressure on water resources.</li> </ul>
13	<b>Economic regeneration:</b> To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.	++	<ul style="list-style-type: none"> <li>This Option would revitalise areas of the Town Centres which are currently vacant or in disrepair.</li> <li>The delivery of new development on brownfield sites - particularly at Burgess Hill and Orchards Shopping Centre - should promote development in these urban centres where services and jobs are most accessible.</li> </ul>
14	<b>Economic growth:</b> To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of	++	<ul style="list-style-type: none"> <li>By delivering new development on brownfield sites in Town Centres (such as at Burgess Hill Station and Oaklands Shopping Centre in Haywards Heath),</li> </ul>

**Option 5: Prioritise development on brownfield land.**

	employment including the opportunity for people to live and work within their communities.		this will place new residents in areas where services and jobs are accessible and existing businesses can be supported.
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## 2 Reasonable Alternative Policies

### 2.1 Introduction

42 policies were identified during the development of the adopted District Plan in 2014 and assessed against the previous SA framework.

Policies are split across themes (sustainability, natural environment and green infrastructure, countryside, built environment, transport, economy, sustainable communities, housing, infrastructure).

During the development of the Regulation 18 District Plan, Mid Sussex District Council undertook a review of each of the policies to determine the extent of any changes required and identified a series of alternative options to address these required changes. Policies either remained as they were, were subject to minor updates or major updates. New policies were also introduced to supplement existing policies.

The review status was as the below:

- **No update required:** the policy as written in the District Plan does not require any amendment - remains 'in date'; with full weight.
- **Minor update:** the policy as written in the District Plan is still in date however factual corrections, updates (e.g., cross-references or references to changes in policy/SPDs/guidance) or points of clarification are required. Does not change the overall meaning of the existing policy.
- **Major update:** Existing policy requires a full review as a result of changing targets, strategy, updated evidence base or national policy.

85 draft policies were assessed against the SA framework and presented in the Regulation 18 SA, 26 of these are site allocation policies which set site specific requirements to guide development.

Following consultation on the Regulation 18 Plan and SA, several updates have been made to these policies.

### 2.2 Reasonable Alternatives

For all policies that were reviewed and amended, the Council could potentially have included a range of different alternative wordings or approaches.

The SEA Regulations require the Council to identify 'reasonable alternatives' for all policies and proposals, where feasible. More specifically, Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of '*an outline of the reasons for selecting the alternatives dealt with*'.

The SEA Regulations require that the alternative policies considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not

reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g., the National Planning Policy Framework (NPPF)).

For all new policies and existing policies where major updates were proposed to form part of the updated District Plan, the Council identified a range of reasonable alternatives. Alternatives were not identified where no updates to adopted policies were required, or a minor update was undertaken, since these were assessed against the SA framework for the adopted District Plan in 2014 and the policy purpose/meaning has not changed. These policies are also known to conform with the Plan's objectives.

However, an assessment of alternative policies was not included in the Regulation 18 SA. As a result, to provide this context, assessment of the sustainability performance of all reasonable alternatives to major policy updates and new policies considered since the adopted plan is included below to provide justification of the reasoning behind selection of the preferred option.

### **2.3 Overview of policy updates**

Table X below presents an overview of where alternatives were considered for policies and the updates included in the Regulation 19 Plan following the Regulation 18 Plan consultation period.

All of the policies, as well as their reasonable alternatives, have been assessed to the same level of detail to identify their likely sustainability impacts. This assessment is presented in section 2 below.



Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
<b>Sustainability</b>					
DPS1	DPS1	Climate change	New policy	n/a	No alternatives since the NPPF includes requirement to mitigate climate change
DPS2	DPS2	Sustainable Design and Construction	Major update	n/a	See Section 2 below for further details. <b>Energy:</b> five alternatives; <b>Water:</b> two alternatives; <b>Renewable and low carbon energy:</b> three alternatives; <b>Existing buildings:</b> three alternatives; <b>Carbon sequestration:</b> two alternatives
DPS3	DPS3	Renewable and Low Carbon Energy Schemes	Minor update	n/a	n/a as minor update
DPS4	DPS4	Flood Risk and Sustainable Drainage	No update	Major update	No alternatives as update required following major Planning Practice Guidance update.
DPS5	criteria covered under DPN6	Water Environment	Minor update	n/a	n/a as minor update
	DPI7	Water and Wastewater Infrastructure	n/a	New Policy	

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
n/a	DPS5	Water neutrality	n/a	New policy	1) Follow 'optional' Building Regulations Approved Document Part G (the standard required in currently adopted local plans within Sussex North Water Resource Zone) 2) Follow more ambitious standard recommended for local plan adoption in the Water Neutrality Study Part C.
DPS6	DPS6	Health and Wellbeing	New Policy	n/a	No alternative option, resulted from introduction of other policies (DPB1, DPT3, DPT2, DPN3 and other DPN policies, DPI1, DPI5, DPI6, DPE policies, DPS1)
<b>Natural Environment and GI</b>					
DPN1	DPN1	Biodiversity, Geodiversity and Nature Recovery	Major update	n/a	No alternatives. Updated to include reference to nature recovery and Local Nature Recovery Strategy and to reflect best practice, required under legislation.
DPN2	DPN2	Biodiversity Net Gain	New Policy	n/a	1) No Policy - rely on legislation and national policy and guidance 2) Local policy reflects to meet national requirement and add a local perspective 3) Have a policy that goes beyond national requirement
DPN3	DPN3	Green and Blue Infrastructure	New Policy	n/a	1) have a policy that contributes to the establishment of GI and supports development of connected network of multi-

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
					functional green space. 2) As option 1 but safeguards land around Burgess Hill for delivery of multi-functional 'Green Circle'. 3) To not have a policy and rely on national policy and guidance
DPN4	DPN4	Trees, Woodland and Hedgerows	Minor update	n/a	n/a as minor update
DPN5	DPN5	Historic Parks and Gardens	No update	Minor update	n/a as minor update
DPN6	DPN6	Pollution	New Policy	n/a	No alternatives as came from general update of DP29 which has been split into three policies. Required under changes in national guidance.
DPN7	DPN7	Noise Impacts	Minor update	n/a	n/a as minor update
DPN8	DPN8	Light Impacts and Dark Skies	Minor update	n/a	n/a as minor update
DPN9	DPN9	Air Quality	Minor update	n/a	n/a as minor update
DPN10	DPN10	Land Stability and Contaminated Land	New policy	n/a	No options as required under national legislation.
<b>Countryside</b>					

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPC1	DPC1	Protection and Enhancement of Countryside	Minor update	n/a	n/a as minor update
DPC2	DPC2	Preventing Coalescence	No update	Minor	n/a as minor update
DPC3	DPC3	New Homes in the Countryside	Minor update	n/a	n/a as minor update
DPC4	DPC4	High Weald Area of Outstanding Natural Beauty	Minor update	n/a	n/a as minor update
DPC5	DPC5	Setting of the South Downs National Park	No update	Minor update	n/a as minor update
DPC6	DPC6	Ashdown Forest SPA and SAC	Minor update	n/a	n/a as minor update
<b>Built Environment</b>					
DPB1	DPB1	Character and Design	Minor update	n/a	n/a as minor update
DPB2	DPB2	Listed Buildings and Other Heritage Assets	Minor update	n/a	n/a as minor update
DPB3	DPB3	Conservation Areas	No update	Minor update	n/a as minor update
<b>Transport</b>					
DPT1	DPT1	Placemaking and Connectivity	Major update	n/a	1) simple update to existing policy to address changes to NPPF

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
					2) Provide granular policies to maximise outcome
DPT2	DTP2	Rights of Way and Other Recreational Routes	No update	n/a	n/a as no update
DPT3	DPT3	Active Travel	New Policy	n/a	1) Rely on West Sussex transport plan 2) Create policy with specific emphasis on active travel for greater emphasis
DPT4	DPT4	Parking and Electric Vehicle Charging Infrastructure	New Policy	n/a	1) Rely on West Sussex Transport Plan 2) Seek higher standards locally
DPT5	DPT5	Off-Airport Car Parking	New Policy	n/a	Rely on non-specific West Sussex transport plan / sustainable travel policies.
<b>Economy</b>					
DPE1	DPE1	Sustainable Economic Development	Major Update	n/a	No options as updated to reflect changes in NPPF.
DPE2	DPE2	Existing Employment Sites	Minor update	n/a	n/a as minor update
DPE3	DPE3	Employment Allocations	New policy	n/a	1) Need approach: no allocations 2) Opportunity approach: provide mix used development on significant sites to create sustainable communities 3) over-supply approach: allocate site above and beyond Option 1 and 2 (spatial strategy principles)

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPE4	DPE4	Town and Village Centres	Major update	n/a	No options as updated to reflect changes in NPPF.
DPE5	DPE5	Within Town and Village Centre Boundaries	Major update	n/a	No options as updated to reflect changes in NPPF.
DPE6	DPE6	Within Primary Shopping Areas	Major update	n/a	No options as updated to reflect changes in NPPF.
DPE7	DPE7	Smaller Village and Neighbourhood Centres	Major update	n/a	No options as updated to reflect changes to Permitted Development Rights and NPPF.
DPE8	DPE8	Sustainable Rural Development and the Rural Economy	Minor update	n/a	n/a as minor update
DEP9	DPE9	Sustainable Tourism and the Visitor Economy	Minor update	n/a	n/a as minor update
<b>Sustainable Communities</b>					
DPSC1	DPSC1	Land to the West of Burgess Hill / North of Hurstpierpoint	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPSC2	DPSC3	Land to the South of Reeds Lane, Sayers Common	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPSC3	DPSC2	Land at Crabbet Park	New policy	n/a	Site allocation - alternatives assessed within site assessment
<b>Housing Policy and Allocations</b>					
DPH1	DPH1	Housing	Major update	n/a	1) Housing requirement approach: meet the housing requirement calculated for Mid

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
					Sussex by allocating the most suitable sites in line with the site selection methodology 2) higher growth approach: identify sites above and beyond housing requirement
DPH2	DPH2	Sustainable Development - Outside the Built Up Area	New Policy	n/a	No reasonable alternatives as policy is required to support plan delivery.
DPH3	DPH3	Sustainable Development - Inside the Built Up Area	New Policy	n/a	No reasonable alternatives as policy is required to support plan delivery.
DPH4	DPH4	General Principles for Housing Allocations	New Policy	Deleted	This policy was a list of criteria reflecting other policies in the plan and national guidance. Criteria within the policy have been moved to other relevant policies within the plan.
DPH5	DPA1	Batchelors Farm, Keymer Road, Burgess Hill	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH6	DPA2	Land at South of Appletree Close, Janes Lane, Burgess Hill	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH7	DPA3	Burgess Hill Station, Burgess Hill	New policy	n/a	Site allocation - alternatives assessed within site assessment



Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPH8	DPA4	Land off West Hoathly Road, East Grinstead	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH9	DPA5	Land at Hurstwood Lane, Haywards Heath	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH10	DPA6	Land at Junction of Hurstwood Lane and Colewell Lane, Haywards Heath	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH11	DPA7	Land east of Borde Hill Lane, Haywards Heath	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH12	DPA8	Orchards Shopping Centre, Haywards Heath	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH13	DPA9	Land to West of Turners Hill Road, Crawley Down	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH14	DPA10	Hurst Farm, Turners Hill Road, Crawley Down	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH15	DPA11	Land rear of 2 Hurst Road, Hassocks	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH16	DPA12	Land west of Kemps, Hustpierpoint	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH17	DPA13	The Paddocks, Lewes Road, Ashurst Wood	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH18	DPA14	Land at Foxhole Farm, Bolney	New policy	n/a	Site allocation - alternatives assessed within site assessment

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPH19	DPSC4	Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH20	DPSC5	Land at Coombe Farm, London Road, Sayers Common	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH21	DPSC6	Land to the West of Kings Business Centre, Reeds Lane, Sayers Common	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH22	DPA15	Land at LVS Hassocks, London Road, Sayers Common	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH23	DPA15	Ham Lane Farm House, Ham Lane, Scaynes Hill	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH24	DPA16	Challoners, Cuckfield Road, Ansty	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH25	DPA17	Land to the west of Marwick Close, Bolney Road, Ansty	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH26	DPA18	Older Persons Housing and Specialist Accommodation	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH27	DPA18	Land at Byanda, Hassocks	New policy	n/a	Site allocation - alternatives assessed within site assessment

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPH28	DPA19	Land at Hyde Lodge, Handcross	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH29	DPH5	Gypsies, Travellers and Travelling Showpeople	Major update	n/a	1) address need during the plan period 2) allocate site to address surplus need from neighbouring authorities
DPH30	DPH6	Self and Custom Build Housing	New policy	n/a	1) rely on other policies in the plan and existing guidance for self and custom build housing to come forward: national guidance provide advice on how to meet the identified need so this could be addressed without a district-wide policy in place 2) develop policy led by local evidence to secure dedicated plots for self and custom build housing within proposed allocations
DPH31	DPH7	Housing Mix	Major update	n/a	No reasonable alternatives - evidence led
DPH32	DPH8	Affordable Housing	Minor update	n/a	n/a as minor update
DPH33	DPH9	First Homes	New Policy	n/a	No reasonable alternatives - evidence led
DPH34	DPH10	Rural Exception Sites	Minor update	n/a	n/a as minor update
DPH35	DPH11	Dwelling Space Standards	No update	n/a	n/a as no update

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPH36	DPH12	Accessibility	Minor update	n/a	n/a as minor update
<b>Infrastructure</b>					
DPI1	DPI1	Securing Infrastructure	Major update	n/a	1) have a detailed policy with expectation for all proposals 2) to rely on national policy
DPI2	DPI2	Planning Obligations	New policy	n/a	No options as driven by requirements of Planning Practice Guidance (sets out developer obligation requirements within plan), regulations and evidence
DPI3	DPI3	Major Infrastructure Projects	New policy	n/a	No reasonable alternatives identified
DPI4	DP14	Communications Infrastructure	Minor update	n/a	n/a as minor update
DPI5	DP15	Open Space, Sport and Recreational Facilities	Minor update	n/a	n/a as minor update
DPI6	DPI6	Community and Cultural Facilities and Local Services	Minor update	n/a	n/a as minor update
DPI7	DP18	Viability	Minor update	n/a	n/a as minor update

## 3 Policy Assessment

The following section presents an assessment of each preferred policy and the alternative options considered, where relevant, to support the inclusion of the preferred policy option within the plan.

The 85 preferred draft policies (including 26 site allocation policies) were assessed at the Regulation 18 stage by Lepus Consulting. This assessment remains valid and therefore policies have not been re-assessed unless updates were made following the Regulation 18 consultation, as summarised in table x above.

The below section therefore presents the findings of the assessment undertaken by Lepus Consulting, along with a new assessment of the alternatives that were considered, and any updates following consultation.

### 3.1 Sustainability

#### 3.1.1 DPS1: Climate Change

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

There were no alternatives considered for this policy since the NPPF includes a requirement to mitigate climate change. There has been no update to this policy since the Regulation 18 Plan, except for minor wording changes, and so the Regulation 18 SA assessment undertaken by Lepus remains unchanged. Lepus' full assessment summary is included below.

Table 2-1: Assessment of policy DPS1

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	+	0	0	+	+	+	0	0	++	+	+	0	0

The policy covers a wide range of themes to provide support and guidance for development proposals. This includes stating that new developments “*will be expected to take measures to reduce carbon emissions, including improvements in energy efficiency, in the design and construction of buildings*” whilst supporting renewable and low carbon schemes.

Additionally, active travel is supported within the policy whereby new developments “*should prioritise active travel such as walking and cycling and sustainable transport such as public transport to reduce reliance on private modes of transport and to facilitate healthy lifestyles*”. This could help to encourage physical exercise and reduce emission of harmful air pollutants. Major positive impacts on climate change and transport within the Plan area would be expected through the criteria outlined within this policy (SA Objective 10), as well as minor positive impacts on energy and waste and human health (SA Objectives 2 and 11).

Policy DPS1 requires all development to be designed to “*minimise vulnerability from the effects of climate change particularly in terms of overheating, flood risk and water supply*”. Additionally, the incorporation of requirements for biodiversity net gain, nature-based solutions to flood risk, tree protection, and the protection and provision of green infrastructure (GI) throughout the Plan area as a result of this policy, and other related policies within the Plan, would be likely to have positive impacts on flood management and habitat creation and protection. Therefore, a minor positive impact on flooding and biodiversity could be expected (SA Objectives 5 and 7). By aiming to protect water supplies within the Plan area from the effects of climate change, which could include prolonged periods of drought or water scarcity, a minor positive impact on water resources could result (SA Objective 12) by improving infrastructure preparedness to these events.

The policy outlines that “development will be expected to take opportunities to improve soil health and minimise disturbance to soils in order to protect soil biodiversity and carbon storage”, which could help to promote efficient use of land and the conservation of finite soil resources and ecosystem services they provide. The policy could therefore lead to a minor

positive impact on natural resources through protection of ecologically and agriculturally important soils, potentially including BMV land, within the Plan area (SA Objective 6).

### 3.1.2 DPS2: Sustainable Design and Construction

Policy DPS2 seeks to ensure that all development proposals will be expected to “contribute to the reduction of greenhouse gas emissions, increase resilience to the impacts of climate change and improve sustainability” within every phase of a project. Additionally, the policy sets out various design standard targets for future development proposals to achieve, amongst relevant national standards and other MSDPR policies, in order to combat climate change and its potential impacts.

Since the Regulation 18 Plan, this policy has been reworded. Five alternative policies were also considered since Regulation 18, which are outlined in Table x-x below and assessed against the SA Objectives in Table x-x.

Alternatives for Policy DPS2	
Energy	1: Rely on building regulations 2: Set a requirement to reduce emissions by a certain percentage 3: Set a target via third-party assessment scheme 4: Set performance targets 5: Introduce post-occupancy monitoring of building requirement
Water	1: Continue using current guideline and policy 2: Set tighter water efficiency standards
Renewable and low carbon energy	1: Set out overarching criteria 2: Set out criteria for each type of energy technology 3: Actively support community renewable energy schemes
Existing buildings	1: Provide guidance on sustainable retrofitting 2: Support consequential improvement as part of works to smaller building
Carbon sequestration	1: Continue with reg 18 policy 2: Strengthen policy wording



Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
DPS2	0	+	0	0	+	+	+	0	0	+	++	++	0	0
<b>Alternatives: Energy</b>														
1	0	+	0	0	0	0	0	0	0	+	+	0	0	0
2	0	+	0	0	0	+	0	0	0	++	++	0	0	0
3	0	+	0	0	0	0	0	0	0	++	++	0	0	0
4	0	+	0	0	0	0	0	0	0	++	++	0	0	0
5	0	++	0	0	0	+	0	0	0	++	++	0	0	0
<b>Alternatives: Water</b>														
1	0	0	0	0	0	0	+	0	0	0	0	+	0	0
2	0	0	0	0	0	0	+	0	0	0	0	++	0	0
<b>Alternatives: Renewable and low carbon energy</b>														
1	0	0	0	0	0	0	0	0	0	+	+	0	0	0
2	0	0	0	0	0	0	0	0	0	+	+	0	0	0
3	0	+	+	+	0	0	0	0	0	++	++	0	0	+
<b>Alternatives: Existing buildings</b>														
1	0	0	0	0	0	+	0	0	0	+	+	0	0	0
2	0	0	0	0	0	+	0	0	0	+	+	0	0	0
3	0	0	0	0	0	+	0	0	0	++	++	0	0	0
<b>Alternatives: Carbon sequestration</b>														
1	0	0	0	0	0	0	0	0	0	+	+	0	0	0
2	0	0	0	0	0	0	0	0	0	+	+	0	0	0

## Energy

Policy DPS2 seeks to ensure that all development proposals will be expected to "contribute to the reduction of carbon emissions, increase resilience to the impacts of climate change and improve sustainability" within every phase of a project. Drawing upon building

regulations and introducing post-occupancy monitoring of building requirements will help to monitor this contribution to the reduction of carbon emissions.

It is considered that the introduction of post-occupancy monitoring of building requirements would have a significant positive impact on the health and wellbeing of building users. In contrast, simply setting targets for reduction in emissions would be a step in the right direction but there would need to be a requirement to meet these targets.

## Water

Policy DPS3 also regards water resource management within the district and establishes criteria for proposals to meet to be supported by the Council. Setting tighter water efficiency standards would have a positive impact on water resources. Additionally, this policy states that new developments are to incorporate designs which maximise efficient use of water resources through rainwater harvesting, greywater recycling and the integration of SUDs. This could have positive impacts on biodiversity through habitat creation.

## Renewable and low carbon energy

Supporting community renewable energy schemes may improve the wellbeing of the community. This may also facilitate learning and education of renewable energy across the community.

## Existing buildings

All of the options considered for existing buildings would likely have minor or major positive impacts on climate change and managing energy and waste. All developments would be expected to be energy efficient and follow the waste hierarchy to minimise the amount of waste produced.

## Carbon sequestration

Policy seeks to improve energy efficiency of developments which could lead to the reduction of overall carbon emissions and help mitigate climate change.

### 3.1.3 DPS3: Renewable and Low Carbon Energy Schemes

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

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	0	0	0	0	+	-	-	0	0	++	0	0	0

The promotion of renewable or low carbon technologies, including small community-led schemes incorporated within new development as advocated within Policy DPS3, would help to facilitate a decreased reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of greenhouse gases (GHGs) that are emitted into the atmosphere. This in turn would reduce Mid Sussex's contribution towards the causes of climate change. This policy would therefore be likely to have a major positive impact on Mid Sussex's renewable energy resources by seeking opportunities to utilise renewable and low carbon energy sources (SA Objective 11).

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

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

### 3.1.4 DPS4: Flood Risk and Sustainable Drainage

Policy DPS4 seeks to manage the risk of flooding throughout the Plan area and ensure that measures are put in place within new developments to promote resilience to flooding from a range of sources.

Since the Regulation 18 Plan, this policy has been expanded to reflect national planning policy guidance. No alternatives were considered as the update was required following major Planning Practice Guidance changes.

The policy states: *"Proposals for development will need to follow a sequential risk-based approach directing development away from areas at highest risk (whether existing or future risk), ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. All development should consider flood risk in line with national guidance at the time of assessment, including the need to consider and assess flood risk from all sources consistently"*.

The policy now seeks to ensure that new development makes suitable drainage provisions, and that no development is approved on any land within the functional floodplain. The policy wording has been strengthened to direct development away from areas of flood risk and make clear the requirement for sustainable drainage measures in new development.

Policy Option DPS4	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	++	0	+	+	0	0	0	+	0	0

Lepus' assessment outcome from the SA Regulation 18 SA remains unchanged.

The policy in the Regulation 18 Plan required SuDS in developments of over ten dwellings (or equivalent mixed use); however, the policy update now requires the implementation of SuDS in all new developments, including replacement structures and brownfield development. This, and other requirements as set out in the policy, would be expected to ensure that all future development proposals would not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. Therefore, a major positive impact on reducing flood risk would still be anticipated (SA Objective 5).

The policy now states "Green infrastructure will be incorporated, where possible, to improve biodiversity and water quality", which will further reinforce the minor positive impact the policy will have on biodiversity (SA Objectives 7).

The policy's wording remains the same in relation to landscape and water resources (SA Objective 8 and 12) and the policy will have a neutral impact on the other SA Objectives, as assessed in the Regulation 18 SA.

### 3.1.5 DPS5: Water and Wastewater Infrastructure and the Water Environment

Policy DPS5 outlines the standards which development proposals must meet to be supported, in relation to water infrastructure and the water environment, and covers topics such as water resources, pollution, quantity and foul water / sewage facilities.

There have been minor wording updates to this policy since the Regulation 18 Plan to include considerations of biodiversity, nature-based solutions, buffer zones and to encourage consultation with water and utility companies. The Lepus Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

For clarity, the policy requirements have been split between policy DPN6 which now covers matters in the water environment and new policy DPI7 which encompasses criteria on water and wastewater infrastructure. The sustainability credentials of the policy remain unchanged.

Policy Option DPS5	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	+	0	0	0	0	++	0	0

The policy seeks to only support development proposals “where it can be demonstrated that it would not result in an unacceptable risk to or adversely affect the quality, quantity, levels and ecology of surface water and groundwater resources including reservoirs” as well as those which would result in a net increase in water supply or sewage treatment facilities to serve development. This policy would be likely to help provide for future increased demand on water resources and wastewater infrastructure from an increasing population, as well as protecting the water environment from pollution. Overall, a major positive impact on water resources (SA Objective 12) can be expected as a result of this policy.

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

### 3.1.6 DPS5: Water Neutrality

All of Horsham District, most of Crawley Borough, and parts of Chichester District and the South Downs National Park fall within the Southern Water Sussex North Water Resource Zone (WRZ). A small part of Mid Sussex is within this WRZ. Therefore, to protect the nature conservation sites and to provide the necessary certainty that development will not have an adverse effect on the Arun Valley sites, development within the WRZ must demonstrate that it is water neutral.

Policy DPS7 requires all development to be designed to achieve water efficiency standards, as well as offsetting the demand for water against existing supplies.

Two options have been considered for this policy. These were:

1. Follow 'optional' Building Regulations Approved Document Part G (the standard required in currently adopted local plans within Sussex North Water Resource Zone).
2. Follow more ambitious standard recommended for local plan adoption in the Water Neutrality Study Part C1.

This policy has been added to the District Plan since the Regulation 18 Plan, and so was not assessed as part of the previous SA. An assessment of this policy and its alternatives is presented below.

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1 Crawley Borough Council, 2023. Joint Topic Paper: Water Neutrality. Available at: <https://crawley.gov.uk/sites/default/files/2023-05/9.%20Joint%20Topic%20Paper%20Water%20Neutrality%20May%202023.pdf> [Accessed 10th November 2023]

Policy Option DPST7	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	0	0	0	0	0	+	0	0	0	0	+	0	0
2	0	0	0	0	0	0	+	0	0	0	0	++	0	0

It is considered that both Options would have a negligible impact on most SA Objectives.

Sussex North WRZ is supplied from groundwater abstraction on the river Arun, close to Pulborough in Horsham district. The abstraction site is located close to a group of nature conservation sites, known as the Arun Valley Sites, that are nationally or internationally designated as SAC, SPA and Ramsar. The Options perform well against the biodiversity objective as it protects these sites from harm as a result of development (SA Objective 7).

Options 1 and 2 will both provide benefits for the local water resources through promoting the sustainable use of water and ensuring that all development incorporates a sustainable water efficient design. However, Option 1 requires 110 mains litres of mains supplied water per person per day whereas Option 2 goes further by setting a more ambitious water efficiency target of 85 mains litres of mains supplied water per person per day. Therefore, although both options perform well against the water resource objective, Option 2 would deliver a greater positive impact (SA Objective 11).

Option 2 was therefore chosen as it requires lower levels of water supply offsetting over the plan period, than Option 1, and would help deliver more housing in the district.

### 3.1.7 DPS6: Health and Wellbeing

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

There has been a minor wording update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.



Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	++	+	++	+	0	+	+	0	+	0	0	+	+

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

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

Through seeking to ensure that development proposals “*incorporate GI and biodiversity*” into the plans, the policy could result in positive impacts on flood risk and biodiversity. Enhanced GI and vegetation coverage would allow for slower water infiltration and runoff, as well as promoting or conserving habitats for wildlife. Policy DPS6 also seeks to ensure developments “*incorporate measures to provide resilience against the effects of climate change including ... flood risk*”. Therefore, a minor positive impact on flooding and biodiversity could result (SA Objectives 5 and 7).

Furthermore, through incorporating enhancements to GI and public open spaces, and delivering high quality well-designed neighbourhoods, the policy could potentially result in a



minor positive impact on the character and quality of, and accessibility to, the local landscape (SA Objective 8).

Policy DPS6 seeks to ensure that development proposals prioritise “*active travel such as walking and cycling and sustainable transport such as public transport*”, and therefore through striving to reduce reliance on private vehicles within the Plan area and subsequent GHG emissions, a minor positive impact on climate change and transport (SA Objective 10) could be expected. Additionally, through increasing active travel provisions, accessibility across the Plan area to essential services including employment opportunities and education could be improved. Therefore, a minor positive impact on education, economic regeneration and economic growth could be expected (SA Objectives 3, 13 and 14).

## 3.2 Natural Environment and Green Infrastructure

### 3.2.1 DPN1: Biodiversity, Geodiversity and Nature Recovery

No alternatives were considered for this policy. However, Policy DPN1 has been updated since the District Plan to include references to nature recovery strategies, as well as to reflect best practice, required under legislation.

Since the Regulation 18 Plan, the policy wording has been strengthened around protecting biodiversity in all developments and incorporating biodiversity into new developments. The impact on the SA biodiversity objective remains a major positive and Lepus' Regulation 18 SA assessment is unchanged. Lepus' full assessment summary is included below.

Policy Option DPN1	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	+	+	++	+	0	+	0	+	0	0

Nationally and locally designated biodiversity assets within Mid Sussex include numerous SSSIs and LWSs, and many non-designated biodiversity assets such as priority habitats, hedgerows, and veteran trees. Additionally, Ashdown Forest SPA and SAC is located to the north east of the district boundary. Together, these biodiversity and geodiversity assets

form a complex ecological network which supports a wide range of flora and fauna. Policy DPN1 would be expected to support development proposals which safeguard biodiversity and geodiversity assets within the Plan area and meet the outlined criteria within the policy, including ‘last resort’ mitigation and compensation measures in line with the mitigation hierarchy. Additionally, through implementation of this policy and Policy DPN2, development proposals will also need to be in accordance with relevant biodiversity net gain standards and guidelines. Achieving biodiversity net gain is a requirement that relies on long term, effective and well-funded strategies. It is anticipated that this policy would have a major positive impact on biodiversity and geodiversity (SA Objective 7) within the Plan area.

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

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

Furthermore, in regard to natural resources (SA Objective 6), the policy also seeks to minimise adverse impacts on soils including BMV agricultural land resulting from development.

Policy DPN1 supports development proposals which “*avoids damage to, protects and enhances the special characteristics*” of nationally protected areas, such as the High Weald AONB. Additionally, by protecting and enhancing biodiversity assets, it would be likely that some key landscape features would also be protected and enhanced. Therefore, this policy would be likely to have a minor positive impact on the local landscape and cultural heritage (SA Objective 8).

### 3.2.2 DPN2: Biodiversity Net Gain

Policy DPN2 supports developments which “*demonstrate through a Biodiversity Gain Plan that measurable and meaningful net gains for biodiversity will be achieved and will be secured and managed appropriately*” and proposals which demonstrate adherence to the mitigation hierarchy in relation to firstly protecting biodiversity of the site in question rather than off-site or compensatory gains.

Three reasonable alternatives were considered for this policy. These were:

1. No Policy - rely on legislation and national policy and guidance.

2. Local policy reflects to meet national requirement and add a local perspective.
3. Have a policy that goes beyond national requirement.

The assessment of these alternatives against the SA Objectives are in Table x-x below.

Policy Option DPN2	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	+	0	0	+	+	+	0	0	+	0	+	0	0
2	0	+	0	0	+	+	++	0	0	+	0	+	0	0
3	0	+	0	0	+	+	++	0	0	+	0	+	0	0

Biodiversity net gain is an approach to development where a site's biodiversity is left in a better state than it was originally and is currently required at a 10% threshold as specified within the recently enacted Environment Act 2021, which is expected to become law from January 2024. However, Mid Sussex requires a 20% net gain for Significant Sites allocation in the Plan policies DPSC1 - DPSC3.

It is considered that all options would perform similarly against the SA Objectives. Although Option 1 would provide less biodiversity benefit than Options 2 and 3 as it does not enforce additional BNG requirements for Significant Sites within the District.

Option 2 was brought forward to specify this additional BNG requirement, with all other sites complying with national policy. Option 3 was not brought forward as it is unlikely that the Council would be able to impose a 20% BNG across all sites.

There were minor wording changes to this policy since the Regulation 18 Plan. It is considered that Lepus' Regulation 18 SA assessment of Option 2 remains unchanged, and the full assessment summary is included below.

Policy DPN2 will likely enhance biodiversity through provision of *“features to encourage biodiversity and pollination within and around the development”*. The policy also seeks to maximise opportunities for biodiversity net gains associated with Biodiversity Opportunity Areas and in accordance with the Local Nature Recovery Strategy, helping to create more abundant and resilient GI and ecological networks. Policy DPN2 also seeks to ensure that 'significant sites' within the MSDPR, outlined in Policies DPSC1, DPSC2 and DPSC3, will

provide for a 20% biodiversity net gain. Therefore, through these provisions, Policy DPN2 could be expected to have a major positive impact on biodiversity (SA Objective 7).

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

Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants, the protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses and groundwater receptors. The protection and enhancement of biodiversity features provided by biodiversity net gain requirements as outlined within Policy DPN2 would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore, this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.

### 3.2.3 DPN3: Green and Blue Infrastructure

Policy DPN3 aims to ensure the provision and safeguarding of Green Infrastructure (GI) and aims to ensure that all development proposals contribute positively to the improvement and connectivity of GI across the Plan area. This policy was assessed as part of the Adopted Plan, however, was not included as part of the Adopted Plan. It is now considered that green and blue infrastructure is an important delivery mechanism for sustainable infrastructure.

Since the Regulation 18 Plan, there have been minor updates to this policy which includes reference to Blue Infrastructure. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below and in Table x-x.

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

This policy would be likely to have a positive impact on residents' wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health. Additionally, the policy seeks to ensure that developments provide GI which may include integrated green space, providing mixed use environments for site end users, which could potentially provide space for socialisation and community cohesion. A minor positive impact on human health (SA Objective 2) and community and crime (SA Objective 4) can therefore be expected.

Increased GI provision and connectivity would be expected to contribute towards improving air quality due to the increased uptake of CO<sub>2</sub> and filtration of pollutants, including those associated with road transport, which could potentially help to reduce residents' exposure to

air pollution. Due to this enhanced carbon storage capacity, this policy could potentially help to reduce exposure of human and ecological receptors to transport related GHG emissions within the Plan area and would therefore be expected to have a minor positive impact on climate change and transport (SA Objective 10).

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

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

Three reasonable alternatives were considered for this policy and were assessed as part of the Adopted Plan. These were:

1. Have a policy that contributes to the establishment of GI and supports development of connected network of multi-functional green space.
2. As option 1, but safeguards land around Burgess Hill for delivery of multi-functional 'Green Circle'.
3. To not have a policy and rely on national policy and guidance.

The assessment of these alternatives against the SA Objectives are in Table x-x below. The assessment undertaken to inform the adopted plan was against the previous SA framework. These findings have been adapted to fit the current SA framework for consistency.

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
DPN3	0	+	0	+	+	0	+	+	0	+	0	+	0	0

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
<b>Alternatives (adapted from Adopted Plan SA assessment)</b>														
1	+/-	+	0	0	+	0	++	++	+/-	+/-	0	+	0	0
2	+/-	++	0	0	+	0	++	++	+/-	+/-	0	+	0	0
3	0	+/-	0	0	+/-	0	+/-	+/-	0	0	0	+/-	0	0
<b>Further assessment of Option 2 in the short, medium, and long term</b>														
Short	+/-	+	0	0	+/-	0	+	+	+/-	+/-	0	+	0	0
Med	+/-	++	0	0	+	0	++	++	+/-	+/-	0	+	0	0
Long	+/-	++	0	0	+	0	++	++	+/-	+/-	0	+	0	0

It was determined as part of the Adopted Plan SA assessment that Option 1 would address the causes of climate change and would likely reduce road congestion, however there was uncertainty around this. Option 1 would have a major positive impact on conserving and enhancing biodiversity and protecting and enhancing the countryside (SA Objectives 7 and 8), as the policy promotes the establishment of GI and its associated functions. GI would have a minor positive impact on flood risk management (SA Objective 5). Option 2 would also promote positive benefits for biodiversity, landscape, and flooding, and would have a major positive impact on health and wellbeing (SA Objective 2) as it safeguards land for informal open space.

Overall, Option 2 would likely result in positive impacts for the SA Objectives, particularly the Environmental Objectives (SA Objectives 5-12). These positive benefits would increase over the longer term with the strongest impacts seen through the conserving and enhancing biodiversity and protecting and enhancing the countryside (SA Objectives 7 and 8).

It was concluded that Option 3 would not perform as well against these objectives as relying on national policy and guidance would not go far enough in terms of protecting, improving, enhancing, managing, and restoring a connected network of multi-functional greenspace and the associated GI.

### 3.2.4 DPN4: Trees, Woodland and Hedgerows



Mid Sussex has a large abundance of woodland, with two thirds of the district's woodland resources occupied by areas of ancient woodland, with particularly large stands of ancient woodland located in the north west of the district. Trees, woodland and hedgerows form a main component of the district's GI and have important biodiversity and human health benefits, as well as helping to increase resilience against climate change such as through removing carbon dioxide from the air, carbon storage and flood alleviation. By aiming to protect and enhance the abundance of trees, woodland and hedgerows within the Plan area from development related pressures, Policy DPN4 would be likely to protect and improve existing habitats for wildlife and ecological networks.

Minor wording updates have been made to this policy since the Regulation 18 Plan to offer additional protection to the district's ancient woodland; to avoid fragmentation of these habitats; and to establish tree related considerations in relation to new development.

Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Policy Option DPN4	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	-	+	0	0	+	+	++	+	+	+	0	+	0	0

This policy supports proposals where developers secure “*appropriate long-term management arrangements*” of these ecological assets and provides exemptions where, as a last resort, developers must compensate for any ecological assets lost. Therefore, a major positive impact on local biodiversity (SA Objective 7) can be expected.

The policy restricts development on areas which are currently occupied by woodland and seeks to locate development “*as far as possible from ancient woodland*”, which may reduce the number of potential sites, and their yield, within the district. Therefore, a minor negative impact on housing provision (SA Objective 1) could be expected from this policy.

Policy DPN4 supports “*the protection and enhancement of trees, woodland and hedgerows*” and encourages the planting of new trees. By protecting and enhancing these natural assets which currently make up a large proportion of the district's area and therefore contribute towards the experience of residential life within the district, the policy would likely enhance residents' access to, and views of, a diverse range of habitats and potentially lead

to improvements in mental and physical health. Policy DPN4 therefore is expected to have a minor positive impact on health and wellbeing within the Plan area (SA Objective 2).

Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction, filtration of air pollutants, the protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses. The potential protection and enhancement of biodiversity features as outlined within Policy DPN4 would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.

Policy DPN4 will not support development that *“will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance”*, such as the High Weald AONB. By protecting and enhancing biodiversity assets, it would be likely that the character and/or setting of some key landscape features, and cultural heritage features, would also be protected and enhanced. Therefore, this policy would be likely to have a minor positive impact on the local landscape and cultural heritage (SA Objectives 8 and 9).

### 3.2.5 DPN5: Historic Parks and Gardens

Policy DPN5 outlines that development which is located within or adjacent to a historic park or garden will be permitted only where it *“protects and enhances its special features, setting and views into and out of the park or garden”*.

There has been a minor update to this policy since the Regulation 18 Plan with the addition of the following text: *“Buildings or structures within a registered park or garden, or park or garden of special local historic interest will also be protected where they form part of or contribute to the character, appearance and setting of a registered park or garden, or park or garden of special local historic interest”*.

It is considered that Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.



Policy Option DPN5	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	0	0	+	+	+	0	0	0	0	0

This policy would be expected to help ensure that *"the character, appearance and setting of historic parks and gardens, or park or garden of special local historic interest"* within the Plan area are protected from development related threats and pressures. Therefore, this policy would be expected to have minor positive impacts on cultural heritage within Mid Sussex (SA Objective 9). Additionally, through protecting these parks and gardens, which would likely have some biodiversity and landscape value, a minor positive impact on local biodiversity and landscape settings would be expected (SA Objectives 7 and 8).

### 3.2.6 DPN6: Pollution

Policy DPN6 states that development proposals within the Plan area which are likely to lead to various pollution impacts and hazards will not be supported, and that mitigation measures must be undertaken for development proposals likely to lead to air, noise, vibration, light, water, soil, odour, dust, or any other pollutants.

There has been a minor wording update to this policy to include the provision of pollution prevention practices. No alternatives are considered as this was a general update of DP29 which has now been split into three policies, and the update was required under changes in national guidance.

Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Policy Option DPN6	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	+	+	0	0	0	0	+	0	0

The policy refers to adherence to other related policies within the Plan and requires that all development proposals should consider the Council's published guidance on the topic of avoiding and mitigating pollution.

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

### 3.2.7 DPN7: Noise Impacts

Policy DPN7 seeks to protect amenity by supporting developments which follow the various criteria within the policy for minimising any noise impacts, including being of “*good acoustic design*”.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPN7	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	+	+	+	0	0	0	0	0

Mid Sussex is a largely rural district where high standards of amenity and tranquillity are a key part of life for residents. The policy would be likely to ensure that local residents are not exposed to, and that developments do not result in, unacceptable levels of noise pollution. This would be expected to have benefits on mental health and wellbeing of residents, and therefore have a minor positive impact on SA Objective 2.

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

Policy DPN7 seeks to protect areas that are “*valued for tranquility for recreation and amenity reasons, including protected landscapes and their setting*”, such as the High Weald AONB. The policy therefore could have a minor positive impact on local landscape and cultural heritage settings (SA Objectives 8 and 9).

### 3.2.8 DPN8: Light Impacts and Dark Skies

Policy DPN8 seeks to protect amenity by supporting developments which follow the various criteria within the policy for minimising any light pollution impacts, where development proposals are required to ensure that “*the design and specification of the lighting would minimise sky glow, glare and light spillage in relation to the visibility of the night sky, local amenity and local character*”.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPN8	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	+	+	+	0	0	0	0	0

The policy would be likely to ensure that local residents are not exposed to, and that developments do not result in, unacceptable levels of illumination. This would help ensure day to day life is not impacted (for example local residents' sleep routine) and will be

expected to have benefits on mental health and wellbeing of residents, and therefore result in a minor positive impact on SA Objective 2.

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

Policy DPN8 seeks to protect intrinsically dark landscapes, including areas within the High Weald AONB. Additionally, the policy supports illuminations of landmarks or heritage features, where the level and type of illumination enhances these features. Policy DPN8 therefore could have a minor positive impact on local landscape and cultural heritage settings (SA Objectives 8 and 9).

### 3.2.9 DPN9: Air Quality

Air pollution is a significant international and local concern. Policy DPN9 seeks to ensure that development proposals specified within the policy, including those “*within relevant proximity to existing or candidate Air Quality Management Areas (AQMAs) or designated nature conservation areas sensitive to changes in air quality*”, would not result in a significant increase in air pollution.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPN9	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	+	0	0	+	0	0	0	0

The policy sets out criteria for development proposals to meet, including mitigation measures, to be supported by the Plan. Policy DPN9 would be likely to help prevent significant reductions in air quality across the Plan area, and as such, have a minor positive impact on the health and wellbeing (SA Objective 2) of future and current residents through ensuring residents are not exposed to unacceptable levels of air pollution, and supporting GI proposals.

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

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

### 3.2.10 DPN10: Land Stability and Contaminated Land

Policy DPN10 seeks to protect land stability and land quality by ensuring all development proposals taken ground conditions, and stability and contamination risks in to consideration.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPN10	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	+	+	0	0	0	0	+	0	0

Contaminated land could lead to adverse biodiversity and human health impacts through the spread of toxins once 'locked' within the ground. Additionally, development on unstable land could lead to erosion of material, polluting nearby watercourses and has the potential to damage infrastructure and adversely affect human health. This policy aims to ensure that remediation and mitigation measures are carried out before development on contaminated

or unstable land can be supported. This would be likely to have a minor positive impact on human health, biodiversity and water resources (SA Objectives 2, 7 and 12).

Additionally, the use of remediated contaminated land for development could potentially help prevent development on previously undeveloped land (for example, greenfield land), and therefore, this policy could potentially help prevent the loss of ecologically or agriculturally valuable soil resources and encourage efficient use of land. This would be expected to have a minor positive impact on natural resources (SA Objective 6).

### 3.3 Countryside

#### 3.3.1 DPC1: Protection and Enhancement of the Countryside

Policy DPC1 seeks to protect and enhance the countryside, defined as the area outside of Built-up Area Boundaries (BUABs), and supports development in the countryside providing it “*maintains or where possible enhances the quality of the rural and landscape character of the District*”.

There have been minor wording updates to this policy to, which includes the provision of additional assessments and mineral policy considerations. Lepus' Regulation 18 SA assessment remains unchanged though, and Lepus' full assessment summary is included below.

Policy Option DPC1	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	+	+	+	+	0	0	0	0	0

Large areas of Mid Sussex coincide with the South Downs National Park or the High Weald AONB. Outside of these designations, the district remains largely rural with areas of open countryside separating the settlements. This policy would be expected to limit urbanisation of the countryside and help to prevent coalescence of settlements, maintaining their distinct characters and landscape settings and which could also indirectly protect the settings of heritage assets located within these areas. Therefore, a minor positive impact on local landscape and cultural heritage settings could be expected (SA Objectives 8 and 9).

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

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

### 3.3.2 DPC2: Preventing Coalescence

Policy DPC2 aims to ensure that future development would not result in adverse impacts on the existing landscape settings within the Plan area, by not supporting development proposals which may lead to the coalescence of settlements which would harm their “unique characteristics”.

Since the Regulation 18 Plan, there has been a minor update to this policy. This is an additional sentence which states that “*Development proposals should demonstrate they are landscape-led and informed by evidence such as landscape and visual impact assessments*”. Notwithstanding this update, it is considered that Lepus’ Regulation 18 SA assessment remains unchanged, and Lepus’ full assessment summary is included below.

Policy Option DPC2	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	+	0	+	0	++	+	0	0	0	0	0

By protecting settlements, largely located within the countryside, within the Plan area from the effects of urbanisation and resulting coalescence, a major positive impact on the protection of the local landscape would be expected (SA Objective 8). Through protecting local landscape settings of rural settlements, a minor positive impact on protecting the



settings of cultural heritage assets within these locations could also be expected (SA Objective 9).

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

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

### 3.3.3 DPC3: New Homes in the Countryside

Policy DPC3 sets out criteria for residential development to meet if located within the countryside (outside of defined BUABs).

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPC3	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	0	0	0	0	0	+	+	0	0	0	0	+

The policy supports proposals where special justification exists and allows for the re-use and adaptation of rural buildings to meet the diverse housing need. This policy could therefore potentially contribute towards a minor positive impact on housing provision (SA Objective 1).

Through permitting *the “re-use and adaptation of rural buildings”* where proposals secure the future of a heritage asset and enhance the landscape setting of the area, the policy could potentially help to rejuvenate old or dilapidated buildings and restore their historic



significance. A minor positive impact on the local landscape and cultural heritage assets could be expected (SA Objectives 8 and 9).

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

### 3.3.4 DPC4: High Weald Area of Outstanding Natural Beauty

The High Weald AONB is an ancient landscape comprised of small and irregular shaped fields, scattered farmsteads and ancient routeways. Policy DPC4 aims to support development proposals that conserve and enhance the historic landscape and historic settlement pattern of this AONB.

There have been minor updates to this policy to include further considerations of the setting of the AONB and related policy documents. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Policy Option DPC4	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	-	0	0	+	0	0	+	++	+	0	0	0	0	+

This policy would be expected to support development within the High Weald AONB “*where it conserves and enhances natural beauty and has regard to the High Weald AONB Management Plan*”, including landscape features and their setting, applying a landscape-led design approach. Additionally, development proposals located within the AONB should be located and designed to ensure there is no significant adverse impact on landscape character and views into and out of the AONB. This policy would be likely to help protect the distinctiveness of the nationally important landscape of the AONB for future generations, and therefore, major positive impacts on the landscape character of the High Weald AONB would be expected (SA Objective 8).

The protection afforded to the AONB under this policy would be anticipated to have a minor positive impact on cultural heritage (SA Objective 9), by helping to provide protection to the character and setting of locally and nationally important heritage assets within the AONB.

This policy would support development within the High Weald AONB which “*support the land-based economy and social well-being of local communities within the AONB*”, whilst being compatible with conservation aims, which could lead to minor positive impacts on community cohesion (SA Objective 4) and the local economy (SA Objective 14), through localised developments for community use.

Policy DPC4 seeks to support development which conserves and enhances natural beauty, including the conservation of wildlife. By protecting areas of high biodiversity value, and incorporating measures such as the protection of dark skies within the AONB with likely benefits for nocturnal species, a minor positive impact on biodiversity would be expected (SA Objective 7).

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

### 3.3.5 DPC5: Setting of the South Downs National Park

Policy DPC5 regards the protection of the visual and special qualities, tranquillity, and essential characteristics of South Downs National Park from development that goes against the criteria identified within the Policy.

Since the Regulation 18 Plan, there has been a minor update to this policy. This change is to ensure no adverse effect on the “*transitional landscape character in the setting of the National Park*”. It is considered that Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Policy Option DPC5	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	-	0	0	+	0	0	+	++	+	0	0	0	0	+

The National Park comprises large swathes of primarily open countryside, and therefore this policy would be likely to have a major positive impact on protecting the setting and characteristics of this important landscape (SA Objective 8).

By supporting development which is consistent with the purposes of the South Downs National Park, which includes current aims of increasing land managed for nature from 25% to 33% by 2037, this policy would be likely to contribute towards the protection and enhancement of ecological networks. Special qualities of the park include areas which possess high value biodiversity, and by protecting these assets, a minor positive impact on biodiversity is expected (SA Objective 7).

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

### 3.3.6 DPC6: Ashdown Forest SPA and SAC

Ashdown Forest SPA and SAC is located on the outskirts of the Mid Sussex District boundary to the north east, within the High Weald AONB. Policy DPC6 aims to protect this designated Habitats site from development related impacts through providing distance thresholds and criteria for development proposals to adhere to, in accordance with the SANG and SAMM schemes<sup>2</sup>.

There has been no update to this policy, only minor wording additions, and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPC6	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	+	+	0	+	0	0	0	0

<sup>2</sup> Mid Sussex District Council (2022) Protecting Ashdown Forest. Available at: <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/> [Date Accessed: 09/11/2023]

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

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

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

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

### 3.4 Built Environment

#### 3.4.1 DPB1: Character and Design

Policy DPB1 seeks to ensure development designs incorporate various features including open areas to “*animate and provide natural surveillance*”, which would potentially help to discourage crime and reduce the fear of crime within the community. Additionally, the policy seeks to encourage community interaction through supporting proposals with layouts to exhibit a strong neighbourhood focus/centre, with larger (500+ dwellings) residential schemes being expected to incorporate a ‘mixed-use’ element, for example including leisure centres and schools.

This wording of the original policy remains unchanged since the Regulation 18 Plan, although the policy has been updated to consider the 20-minute neighbourhood.

Furthermore, Policy DPH4 was deleted since the Regulation 18 Plan and Aerodrome Safeguarding Requirements from the policy has been added to Policy DPB1 with updated text as recommended during the consultation phase.

Lepus' Regulation 18 SA assessment remains mostly unchanged, and Lepus' full assessment summary is included below. Notably, economic growth (Objective 14) performs better under the updated policy as it requires major residential and mixed-use proposals to *"exploit opportunities to improve access to local employment, community health and wellbeing facilities, either by connecting to existing facilities or providing new"*.

Policy Option DPB1	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	++	+	+	+	+	+	+	+	0	0	+

Effective design can help to ensure new developments are well integrated into the surrounding landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance quality of life for residents, strengthen sense of place, improve the attractiveness of a location, and create safer places to live and work. Building for Life 12<sup>3</sup> is a government endorsed design quality indicator for well-designed developments. This guidance should be used by local authorities to help guide design codes within the Plan area. Policy DPB1, alongside the guidance provided within this document, would help to ensure all new development within the Plan period is of high quality and design.

The policy is likely to encourage community cohesion and interaction and promote community-based provisions through well planned design, therefore, a major positive impact on aspects of community and crime within the Plan area is expected (SA Objective 4).

Under this policy, improvements to pedestrian and cycle network and opens spaces would be required, which, in addition to encouraging physical exercise, would be expected to provide alternative sustainable modes of transport and pleasant spaces which could

3 D. Birkbeck and S. Kruczkowski (2015) Building for Life 12. Available at: <https://www.designforhomes.org/wp-content/uploads/2020/11/BFL-2020-Brochure.pdf> [Date Accessed: 09/11/2023]

potentially benefit mental wellbeing. An appropriate mix and density of housing would also be expected to have benefits in relation to health and wellbeing, by providing spacious places for people to live. This policy would be likely to make a positive contribution to reducing crime and the fear of crime in the local area. This would be expected to create safe and cohesive communities and help to improve quality of life for residents, and as such, have benefits to the local community. Overall, this would be expected to result in a minor positive impact on health (SA Objective 2).

The policy supports development which “incorporates sustainable construction principles and is designed for adaptation and future weather events”, additionally, proposals which incorporate a GI plan that “*maximises opportunities to retain existing trees and incorporate new trees*” where vegetation would help absorb excess water during flood events. Through encouraging the incorporation of these aspects into future developments, the policy is likely to have a minor positive impact on reducing flood risk (SA Objective 5) within the Plan area. Additionally, the policy may create new habitats and improve connectivity for wildlife through the provisioning of trees and GI, which may have a minor positive impact on biodiversity (SA Objective 7).

Policy DPB1 seeks to “*optimise the potential*” of a site, especially where a site is previously developed, promoting an efficient use of land, which could reduce the amount of best most versatile land lost to development in other areas of the district. Therefore, a minor positive impact on natural resources (SA Objective 6) could be expected.

High quality design would help to ensure that new development does not have an adverse effect on the local landscape. Policy DPB1 seeks to ensure that new development reflects “*the distinctive character of the towns and villages and protects their separate identity and valued townscapes*”, as well as being sensitive to countryside surroundings. Therefore, a minor positive impact on landscape is expected (SA Objective 8). Additionally, through ensuring that future developments reflect the distinctive character of the local surroundings and consider views onto the development, the settings of local heritage assets (such as Listed Buildings) could be conserved or enhanced and therefore a minor positive impact on cultural heritage (SA Objective 9) could result.

The policy sets out that development proposals should be “*organised around green transport principles*” and should “*create a pedestrian and cyclist friendly layout that is safe, well connective, legible and accessible*”, whilst being in a location with good public transport links, as well as considering amenity issues such as air pollution. Therefore, the policy is likely to improve access to work and services by public transport, walking or cycling, as well as helping to protect air quality. A minor positive impact on climate change and transport (SA Objective 10) could be expected.

The criteria of high-quality design set out by Policy DPB1 includes the incorporation of “*sustainable construction principles*” into development proposals, which could include use of local materials, recycling or aims of net-zero emissions during the construction phase of development. A minor positive impact on energy and waste (SA Objective 11) could be expected from this aspect of the policy.



### 3.4.2 DPB2: Listed Buildings and Other Heritage Assets

The diverse range of heritage assets throughout the Plan area provides a strong sense of place and character to their surroundings. Policy DPB2 requires new development to “*protect listed buildings and their settings*” and “*conserve heritage assets in a manner appropriate to their significance*”, including archaeological, architectural, artistic or historic significance, for the enjoyment of future generations in the district and contribution to residents’ quality of life.

There have been minor wording updates to this policy, which includes additional assessment requirements. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Policy Option DPB2	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	0	0	0	+	++	0	0	0	0	0

This policy sets out criteria for which development proposals should adhere to in regard to protecting historic assets. Therefore, a major positive impact on the historic environment would be anticipated (SA Objective 9).

Through protecting heritage assets within the Plan area, this policy would be likely to have a minor positive impact on the local landscape character (SA Objective 8), for example through the requirement to use traditional construction materials and techniques, which may also help to conserve the setting of high-quality landscapes such as the High Weald AONB.

### 3.4.3 DPB3: Conservation Areas

Policy DPB3 seeks to ensure, through various criteria, that development within each of the district's Conservation Areas (CAs) “*preserve or enhance its special character, appearance and the range of activities which contribute to it*” and that development “*will also protect the setting of the conservation area and in particular views into and out of the area*”.

There has been a minor wording update to this policy to include the consideration of trees. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Policy Option DPB3	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	0	0	0	+	++	0	0	0	0	0

There are 36 CAs located within the Mid Sussex District, concentrated in various settlement areas such as East Grinstead, Haywards Heath, and Burgess Hill. Where heritage assets within CAs are conserved and / or enhanced through this policy, a minor positive impact on cultural heritage (SA Objective 9) can be expected.

Through aiming to protect and conserve CAs and their settings, a minor positive impact on the local landscape within the Plan area can be expected, where the special characteristics and qualities of affected landscapes and townscape will benefit from this policy (SA Objective 8).

### 3.5 Transport

#### 3.5.1 DPT1: Placemaking and connectivity

Mid Sussex is a largely rural district where a large proportion of residents currently rely on private vehicles to access community services and facilities. Policy DPT1 seeks to ensure that future development meets the objectives as set out within the emerging West Sussex Transport Plan 2022-2036<sup>4</sup>, by providing relevant criteria for proposals to achieve to attain sustainable transport focused infrastructure within the Plan area.

Two reasonable alternatives were considered for this policy. These were:

1. Simple update to existing policy to address changes to NPPF.
2. Provide granular policies to maximise outcome.

The assessment of these alternatives against the SA Objectives are in Table x-x below.

<sup>4</sup> West Sussex County Council (2021) West Sussex Transport Plan 2022 to 2036. Available at: <https://www.westsussex.gov.uk/about-the-council/policies-and-reports/roads-and-travel-policy-and-reports/west-sussex-transport-plan/> [Date Accessed: 13/11/2023]



Policy Option DPT1	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	+	0	+	0	0	0	0	0	+	0	0	0	+
2	0	++	0	+	0	0	0	0	0	++	0	0	0	+

The policy outlines support for implementing sustainable transport options, such as active transport, as a priority before any highway plans are undertaken. By striving to provide residents with well-linked sustainable transport methods as an alternative to private vehicles, a minor positive impact on climate change and transport (SA Objective 10) could result, as vehicle related emissions and pollution could reduce during the Plan period.

Policy DPT1 supports active transport measures where developments are expected to improve walking and cycle routes and links within the Plan area, which would likely have mental and physical health benefits for site end users. Additionally, enhanced active and transport links could improve residents' access to community facilities, for example shops, libraries and GP services. Therefore, a minor positive impact on health and wellbeing and community, community and crime could result (SA Objectives 2 and 4).

The policy states that new streets within developments "shall be designed to adoptable standard which can easily incorporate advanced digital infrastructure, including fibre". This aspect could enhance the home working experience and lead to positive impacts on economic growth, by increasing the range of employment opportunities within the Plan area, as well as benefitting local businesses with faster internet connectivity. A minor positive impact on economic growth could therefore be expected (SA Objective 14).

Option 1 entails a simple update to reflect changes to the NPPF, however, Option 2 provides further detail to support active travel measures and maximise their benefit, including the creation of 20-minute neighbourhoods. It is therefore considered to be the preferred Option to deliver these benefits.

### 3.5.2 DPT2: Rights of Way and Other Recreational Routes

Policy DPT2 seeks to protect existing Public Rights of Way and other recreational routes from development related threats and pressures by ensuring development *"does not result in the loss of or does not adversely affect a right of way or other recreational routes unless*

a new route is provided which is of at least an equivalent value and which does not sever important routes". The policy also provides criteria to ensure that development proposals encourage access to the countryside for site end users.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPT2	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	0	+	0	+	0	0	0	0

Access to a diverse range of natural habitats is known to have benefits for mental and physical wellbeing and could potentially encourage residents to engage in a more active lifestyle, as well as facilitating better access to the surrounding landscape. By helping to protect these important recreational and active transport assets for future generations, a minor positive impact on human health and wellbeing, landscape and climate change and transport could be expected (SA Objectives 2, 8 and 10).

### 3.5.3 DPT3: Active and Sustainable Travel

Policy DPT3 seeks to deliver development with promotes a health environment for residents by embedding the principles of the 20-minute neighbourhood and promoting active travel infrastructure, while also removing any barriers to active and sustainable travel.

Two reasonable alternatives were considered for this policy. These were:

1. Rely on West Sussex transport plan.
2. Create policy with specific emphasis on active travel for greater emphasis.

The assessment of these alternatives against the SA Objectives are in Table x-x below.

Policy Option DPT3	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	+	0	+	0	0	0	0	0	+	0	0	0	0
2	0	++	0	++	0	0	+	0	0	++	0	0	0	+

Option 1 relies on the active travel guidance in the West Sussex Transport Plan<sup>5</sup> (WSTP), which provides a broad strategy for extending walking and cycling routes across West Sussex. Through this strategy, a minor positive impact on health and wellbeing, community and climate change and transport could be reached (SA Objectives 2, 4 and 10).

Option 2 was brought forward in order to embed more ambitious active travel measures which go beyond those outlined in the WSTP. Since the Regulation 18 Plan, the policy wording has been updated to embed the principles of the 20-minute neighbourhood, as well as incorporating cycle hubs and supporting the delivery of bus service improvements.

This policy seeks to improve access to active travel facilities by requiring developments to provide “*high quality, attractive, fit for purpose and convenient active travel infrastructure, within the development which links to existing networks and key facilities / services*” and to build upon various cycling and walking infrastructure schemes.

By ensuring that new developments offer more than just cycle parking but also cycle hubs which include parking e-bike hire, showers and changing facilities, positive impacts on health and wellbeing could result where more people are likely to take up cycling as a form of recreation or active transport. Additionally, by providing cycleways and linking these to the existing cycle network, better access to community facilities could result as well as a reduction of the reliance on private vehicles for transport. Therefore, the policy now performs better against the health and wellbeing, community cohesion, transport, and economic growth objectives as it seeks to improve active travel connections between settlements as well as connect residents to facilities and services (SA Objective 2, 4, 10 and 14).

<sup>5</sup> West Sussex County Council (2022). West Sussex Transport Plan 2022 to 2036. Available at: <https://www.westsussex.gov.uk/media/17428/wstp.pdf> [Accessed 13/11/2023].

The policy also now seeks for new active travel infrastructure to connect with existing green networks where possible and incorporate green infrastructure would have a minor positive impact on biodiversity (SA Objective 7), which is an improvement from the neutral impact assessed as part of the Regulation 18 SA.

#### 3.5.4 DPT4: Parking and Electric Vehicle Charging Infrastructure

Policy DPT4 seeks to ensure that all new developments provide “adequate and well-integrated car parking”, “accessibility of the site to services and sustainable travel infrastructure” (depending on type, mix and use of the development) and that Electric Vehicle Charging (EVC) points are provided in non-residential developments.

Two reasonable alternatives were considered for this policy. These were:

1. Rely on West Sussex Transport Plan.
2. Seek higher standards locally.

The assessment of these alternatives against the SA Objectives are in Table x-x below.

Policy Option DPT4	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	0	0	0	0	0	0	0	0	+	0	0	0	0
2	0	0	0	+	0	0	0	0	0	++	+	0	0	0

Option 1 requires the policy to rely on guidance within the WSTP which focuses on providing on-street electric vehicle charging infrastructure. This would provide a minor positive impact on climate change and transport by increasing the support for residents with EVs (SA Objective 10).

Option 2 was chosen to be brought forward, which seeks to achieve higher standards locally through measures such as EV charging points within non-residential developments. Since the Regulation 18 Plan, significant wording updates have been made to this policy. The updated assessment is shown in Table x-x above, and the assessment summary is included below.

In the Regulation 18 Plan, EVC points were to be provided in 5% of parking spaces in a non-residential development with more than 10 parking spaces, and cable routes were to be provided in 50% of the remaining spaces. The policy has been updated to now state that *"a minimum of 25% of all parking spaces with 'Fast' (7kW) or faster, Electric Vehicle Charging points; cable routes shall be provided for 100% of the remaining total number of spaces"* for all non-residential developments. Furthermore, the policy has also been updated since the Regulation 18 Plan to include the Council's support of Car Clubs, of which the vehicles are to be powered by alternative non-fossil fuels which would help achieve energy benefits (Objective 11). This would reduce resident's private car use by providing shared cars for short term hire in public spaces. The policy therefore performs better against the climate change and transport objective and has increased from minor positive to major positive (SA Objective 10) and would change the energy and waste impact from neutral to minor positive. Additionally, Car Clubs can be community organised and therefore would promote community cohesion, providing a minor positive impact on SA Objective 4.

### 3.5.5 DPT5: Off Airport Car Parking

Policy DPT5 aims to resist additional car parking developments at Gatwick Airport, associated with the Northern Runway Project. This was a new policy in the Regulation 18 Plan and two alternatives were considered for this policy. These were:

1. Rely on non-specific West Sussex transport plan / sustainable travel policies.
2. New specific policy.

The assessment of these alternatives against the SA Objectives are in Table x-x below.

Policy Option DPT5	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	0	0	0	0	0	0	0	0	+	0	0	0	0
2	0	0	0	0	0	0	0	0	0	+	0	0	0	0

The policy could potentially help to encourage use of public transport to reach the airport rather than private cars, resulting in a minor positive impact on climate change and transport (SA Objective 10).

### 3.6 Economy

#### 3.6.1 DPE1: Sustainable Economic Development

Policy DPE1 sets out the Council's criteria to achieve sustainable economic development throughout the Plan area in relation to business growth and infrastructure. Through supporting existing businesses and allowing them to expand if required, as well as ensuring infrastructure within the district can provide for future business growth, further employment opportunities could be provided, and economic growth encouraged.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPE1	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	+	-	-	-	-	-	0	-	-	++	++

The policy also seeks to ensure that major development proposals (for example the Sustainable Settlements as identified within the plan, can demonstrate *“how they will contribute to addressing identified local skills shortages and support local employment, skills development and training”*. The policy supports employment for residents and their development of skills through means such as training, which could improve accessibility into the local jobs market. A major positive impact on the economic objectives would therefore be expected through this policy (SA Objectives 13 and 14).

Through supporting business expansion, the policy could allow for smaller community-based businesses to grow and potentially increase residents' access to community facilities such as pubs, shops, and hairdressers, which may also lead to better community cohesion through use of these businesses. Therefore, a minor positive impact on the community focused objective (SA Objective 4) could be expected.

Policy DPE1 supports the general expansion of businesses which could lead to impacts on various environmental constraints such as flood risk, soil and water resources, biodiversity and heritage assets, landscape settings and waste production, without further information. The assessment of sites has identified a range of sustainability impacts regarding SA Objectives 5, 6, 7, 8, 9, 11 and 12, and therefore, for the purposes of this policy assessment the overall impact is minor negative, using the precautionary principle.

### 3.6.2 DPE2: Existing Employment Sites

Policy DPE2 supports the protection and expansion of existing employment areas and provides criteria for these development proposals to meet in order to be supported by the Council. The policy would protect existing employment sites allocated for 'general industrial' or 'storage and distribution' uses, and proposals which would lead to a loss in these employment areas would be resisted, unless it can be *"clearly demonstrated by the applicant that the site/premises are no longer needed and/or viable for employment use"*. Additionally, the policy supports proposals for intensification within the boundary of Existing Employment Sites, provided it is in accordance with other development plan and national policies.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPE2	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	-	-	-	-	-	0	-	-	++	++

By protecting these key employment areas from non-employment related redevelopment (for example residential developments), local jobs are protected. Policy DPE2 supports in-principle the expansion of Existing Employment Sites within the identified built up areas, and also supports expansion of Existing Employment Sites outside of built-up areas where certain criteria are met. Overall, major positive impacts can be expected relating to economic regeneration and economic growth through the protection and enhancement of key employment areas (SA Objectives 13 and 14).



Policy DPE2 supports the expansion of Existing Employment Areas, and although proposals are required to meet criteria to help avoid negative impacts, impacts on various environmental constraints such as flood risk, soil and water resources, biodiversity and heritage assets, landscape settings and waste production, cannot be ruled out without further information.

The assessment of sites has identified a range of sustainability impacts regarding SA Objectives 5, 6, 7, 8, 9, 11 and 12, and therefore, for the purposes of this policy assessment the overall impact is minor negative, using the precautionary principle.

### 3.6.3 DPE3: Employment Allocations

Policy DPE3 sets out the 'Significant Sites' allocated within the draft Plan, and the requirement for these sites to include provision of employment land to help cater for the needs associated with the proposed housing growth, by providing employment and local business opportunities. Policy DPSC1 relates to Site 740, and DPSC2 relates to Site 18, both of which were assessed alongside reasonable alternatives.

Three reasonable alternatives were considered for this policy. These were:

1. Need approach with no allocations.
2. Opportunity approach which provides mix use development on significant sites to create sustainable communities.
3. Over-supply approach which allocates a site above and beyond Option 1 and 2 (spatial strategy principles).

The assessment of these alternatives against the SA Objectives are in Table x-x below.

Policy Option DPT5	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	0	+	0	+	0	!	-	-	-	0	-	0	+	+
3	+	+	0	+	0	!	-	-	-	0	-	0	+	+

These alternatives were considered to determine the feasibility of delivery of over-supply approaches.



Option 2 was chosen as the Economic Growth Assessment Update<sup>6</sup> identified no outstanding residual employment need due to sufficient supply through planning permissions and allocations already planned for. However, the sustainable settlements allocated in policies DPSC2 and DPSC3 present opportunities for a mix of uses to create sustainable communities.

There have been no updates to this policy and Lepus' Regulation 18 assessment remains unchanged. Lepus' assessment is included in Table xx above and the summary is included below.

The proposed employment areas within the Significant Sites referenced in this policy will include retail and commercial opportunities as well as services (as defined within Class E). Mid Sussex is a largely rural district and through providing the local area surrounding these three sites with greater accessibility to employment opportunities, facilities and services, a minor positive impact on residents' health and wellbeing, access to community and local economic regeneration and growth could be expected (SA Objectives 2, 4, 13 and 14).

The pre-mitigation assessments of the sites have identified potential negative impacts resulting from the development of the employment areas within these sites. These constraints relate to flood risk, natural resources (including mineral safeguarding areas), biodiversity, landscape settings, cultural heritage settings and assets, traffic related emissions, waste production and water resources (including nearby watercourses).

Site-specific requirements provided within the site policies DPSC2 and DPSC3, as referred to within Policy DPE3, would be likely to address some of these adverse impacts, by avoiding development in areas of flood risk and providing multifunctional SUDS, providing active travel and sustainable transport options and mitigating impacts on water resources. A negligible impact would be expected overall for SA Objectives 5, 10 and 12.

A minor negative impact would be likely to remain for biodiversity (SA Objective 7), due to potential for disturbance or degradation of ancient woodland and priority habitat within the sites. Furthermore, the large-scale nature of the sites situated on previously undeveloped land means that despite proposed master planning measures and incorporation of open space, the development is likely to change the landscape character and setting to nearby heritage assets, with a minor negative impact on landscape (SA Objective 8) and cultural heritage (SA Objective 9).

A major negative impact would be likely in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) because of the development, and potential sterilisation of mineral resources within the MSA.

#### 3.6.4 DPE4: Town and Village Centre Development

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<sup>6</sup> Lichfields (2022). Northern West Sussex Economic Growth Assessment - Focused Update for Mid Sussex. Available at: <https://www.midsussex.gov.uk/media/8673/mid-sussex-economic-growth-assessment-update-2022.pdf> [Accessed 13/11/2023].

Policy DPE4 sets out the hierarchy of centres within Mid Sussex including town centres and village centres, and proposed 'sequential test', to help ensure that development proposals are of appropriate use and scale depending on the needs and capacity of the area.

No alternatives were considered for this policy and the policy has only been updated since the Local Plan to reflect changes to national planning policy.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPE4	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	+	0	0	0	0	0	0	0	0	+	+

This policy aims to support and strengthen the identified hierarchy of centres. This would be expected to provide benefits at the local community scale, in terms of residents' access to local services and facilities, and well as strengthening the local economy. In addition, this policy would be expected to support and protect key retail areas through ensuring that development proposals of "500m<sup>2</sup> or more gross floorspace for the sale of convenience or comparison goods outside a town centre must be accompanied by a Retail Impact Assessment in order to demonstrate that they would not have a significant adverse impact on a town centre, either on their own or cumulatively in the area". Therefore, a minor positive impact on economic regeneration and growth within the Plan area could be expected (SA Objectives 13 and 14).

Through supporting development within a town or village centre, as defined within the table within the policy, residents are more likely to have greater access to facilities and services within their local area. Additionally, by supporting local businesses and the local economy, this policy would be expected to have positive impacts on the health and wellbeing of residents. Therefore, minor positive impacts on SA Objectives 2 and 4 could be expected.

### 3.6.5 DPE5: Within Town and Village Centre Boundaries

Policy DPE5 seeks to support development of main town centre uses, as defined by the NPPF, and covers other forms of development such as temporary ‘meanwhile’ uses and delivery lockers.

No alternatives were considered for this policy and the policy has only been updated since the Local Plan to reflect changes to national planning policy.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPE5	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	+	0	0	0	0	0	0	0	0	+	0

By outlining support for appropriate developments within defined Town and Village Centre Boundaries, the policy would likely improve residents’ accessibility to facilities and services which fall within the categories outlined within the policy, and also enhance the viability and vitality of the town centres within the Plan area. Therefore, a minor positive impact on community accessibility and economic regeneration and growth could be expected (SA Objectives 4, 13 and 14).

### 3.6.6 DPE6: Development Within Primary Shopping Areas

Policy DPE6 aims to support development within designated Primary Shopping Areas which would retain and enhance Class E uses (commercial, business and service), as defined within the policy, provided the vitality and viability of the centre is not harmed from such proposed development.

No alternatives were considered for this policy and the policy has only been updated since the Local Plan to reflect changes to national planning policy.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPE6	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	0	+	0	0	0	+	0	0	0	0	+	0

The policy sets out criteria which development proposals should adhere to for them to be supported, including resisting the loss of Class E uses to alternative non-town centre uses. This policy would likely help to maintain and increase the range of employment opportunities, shops and services available in the town centres across the district and therefore a minor positive impact on economic regeneration is expected (SA Objective 13).

This policy supports residential uses in upper storeys of town centre buildings, and in some specific circumstances the policy supports ground floor residential units. This would likely help to ensure delivery of a range of types, tenures and mix of homes required over the Plan period, and therefore a minor positive impact on housing provision could be expected (SA Objective 1).

Additionally, through responsibly supporting the need of growing communities within town centres, accessibility to services including healthcare and recreation facilities, such as pharmacies and gyms, could be improved. This could result in a positive impact on health and wellbeing and community access (SA Objectives 2 and 4).

The policy also sets out the Council's support for town centre developments where they maintain an attractive and active frontage to the public realm. Through resisting development which would harm the vitality and viability of the centre or the character of the street scene, this policy could potentially result in a minor positive impact on the local landscape character (SA Objective 8).

### 3.6.7 DPE7: Smaller Villages and Neighbourhood Centres

Policy DPE7 recognises the important role that Mid Sussex's smaller villages and neighbourhood centres can play in regard to supporting the needs of the local community.

No alternatives were considered for this policy and the policy has only been updated since the Local Plan to reflect changes to national planning policy and Permitted Development Rights.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPE7	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	+	0	0	0	0	0	+	0	0	+	+

Through seeking to protect “*Smaller villages, neighbourhood centres and parades of five or more main town centre uses*”, this policy could potentially help to retain residents' sustainable access to facilities and services, maintaining the viability and vitality of the smaller centres. Therefore, a minor positive impact on community accessibility, climate change and transport, and economic regeneration and growth could be expected (SA Objectives 4, 10, 13 and 14).

### 3.6.8 DPE8: Sustainable Rural Development and the Rural Economy

Policy DPE8 supports various types of rural development including leisure and tourism related development, farm diversification and the re-use and adaptation of farm buildings for business use or sustainable rural tourism, for example, where the policy provides criteria for development proposals to meet in order to be supported.

There has been no significant update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPE8	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	0	0	0	+	0	0	+	0

Mid Sussex District is largely rural, and some of the key rural businesses within Mid Sussex include agriculture, horticulture and forestry. In addition, an increasing number of residents in rural areas are home workers. Overall, this policy would be expected to have a minor positive impact on the local economy regeneration and the wellbeing of local residents, by encouraging the provision of rural employment opportunities (SA Objectives 2 and 13). Additionally, by ensuring employment opportunities within the rural areas of Mid Sussex are safeguarded and promoted, this policy could potentially help reduce the need to travel for residents living in these areas, which could result in a minor positive impact on reducing transport related emissions (SA Objective 10).

### 3.6.9 DPE9: Sustainable Tourism and the Visitor Economy

Policy DPE9 aims to promote sustainable tourism and the visitor economy within Mid Sussex through supporting the retainment of existing tourism accommodation as well as development proposals for new tourist accommodation and attractions, in principle, with criteria for such developments to meet to be supported.

There have only been minor wording changes to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPE9	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	0	0	+	+	0	0	+	+

This policy would be likely to enhance the tourism potential of Mid Sussex and result in an increase in the number of visitors to the Plan area. Increased tourism would be expected to have benefits in relation to the local economy by potentially providing new cultural activities and promote growth in rural areas, therefore a minor positive impact on economic regeneration and growth could be expected (SA Objectives 13 and 14). Additionally, an increase in employment opportunities and a strong local economy would also be likely to have a minor positive impact on the wellbeing of local residents (SA Objective 2).

Through safeguarding heritage features such as the Bluebell Railway Link and railway corridor between Horsted Keynes and Haywards Heath, as well as potentially conserving and promoting other cultural heritage features as tourist attractions through this policy, a minor positive impact on cultural heritage within the Plan area could be expected (SA Objective 9).

The policy sets out the requirement for tourist development to encourage sustainable travel opportunities and to ensure that anticipated traffic generation would not result in “harm on highway safety or severe residual cumulative impacts on the road network”. Therefore, through encouraging sustainable transport there is potential for tourists to use these transport methods rather than private vehicles, and a minor positive impact on climate change and transport could be expected (SA Objective 10).

### 3.7 Sustainable Communities

#### 3.7.1 DPSC1: Broad location to the west of Burgess Hill / North of Hurstpierpoint

Policy DPSC1 relates to Site 740, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.



There has been a major update to the wording of this policy since the Regulation 18 Plan however the site it relates to remains the same therefore Lepus Consulting's Regulation 18 SA assessment summary is included below.

Policy Option DPSC1	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	-	+	++	++	0	--	-	-	0	0	-	0	0	++

The policy sets out a range of on-site infrastructure and services that will be required alongside the proposed large-scale mixed-use development including retail, leisure and workspaces, to provide a co-ordinated and sustainable community. This includes provision of a new neighbourhood centre and sustainable transport measures with a “central bus route” and “Green travel corridors for cycle and pedestrian access”. These measures would be likely to improve sustainable travel choice and provide new facilities for the local community, reducing the need to travel. This would be expected to result in a benefit to transport and accessibility; although, owing to the large scale of proposed development and introduction of 1,400 new dwellings, it is likely that not all the needs of the community would be met on site, with some reliance on private car use and increased traffic on the surrounding road network to some extent. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. The policy sets out a range of requirements for community infrastructure, including on-site sports pitches, leisure facilities and allotments, as well as financial contributions towards further community facilities, healthcare, and emergency services. The proposed development would also include an element of extra-care housing. The policy would be likely to improve access to and provision of community and healthcare facilities, and seeks to create a new sustainable community, resulting in a major positive impact on SA Objective 4.

However, the A273 passes the site to the east, with potential adverse implications for the health of site end users in the eastern extent. The policy requires the development to



provide “green travel corridors” and incorporate links to the ‘Green Circle’ which is located parallel to the A273. With careful design and layout, and maintaining the tree buffer along the A273, it is anticipated that residential development would be directed away from this area and site end users would be protected from reduced air quality and noise pollution effects from the main road. Overall, a minor positive impact on health and wellbeing (SA Objective 2) would be expected, owing to the proposed emphasis on active travel and the provision of new leisure and healthcare facilities.

The policy also requires the development of a new primary school on site. The site is also located in an area within sustainable travel times to existing schools. Therefore, the policy would be likely to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a major positive impact on education (SA Objective 3).

The proposed sustainable travel improvements and new facilities, including active travel links, may help to reduce transport related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 1,400 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

The site coincides with 'Northend Copse' ancient woodland, as well as sections of 'Jackson's Pit' and 'Parson's Withes' ancient woodland, with further extents of deciduous woodland priority habitat also within the site boundary. The policy does not make any specific provisions to conserve and enhance these habitats. Although direct loss of the ancient woodland would be resisted in accordance with other District Plan policies, the introduction of 1,400 new dwellings in proximity to these woodlands would be likely to introduce risks of increased disturbance or habitat degradation, with a minor negative impact on biodiversity overall (SA Objective 7).

The east of the site is located within ‘West Burgess Hill Low Weald’ which has ‘high’ capacity, according to the Landscape Capacity Study<sup>12</sup>; however, the west of the site is located within ‘Cobb’s Mill Low Weald’ which has ‘low’ capacity. Policy DPSC1 seeks to incorporate “Open space, sports pitches and village green” within the new community, with green links and development informed by a comprehensive masterplan. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain owing to the large scale of development proposed.

Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘low’ impact on nearby listed buildings. The policy requires “Protection of setting of Grade II Listing Building at North End Farm to the west of the site” which would help to inform appropriate mitigation measures, with a negligible impact expected overall for cultural heritage (SA Objective 9).

A major negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of

potential BMV land) as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 5, 6, 7, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

### 3.7.2 DPSC2: Land to the south of Reeds Lane, Sayers Common

Policy DPSC2 relates to Site 799, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy since the Regulation 18 Plan. Primarily in the delivery of the 20-minute neighbourhood through coordinated public transport services and the retention and enhancement of PROWs which cross the site. It is considered that these additions have improved the policy's climate change and transport impact from negligible to minor positive as it should reduce residents reliance on private cars (SA Objective 10).

The development must also provide "protection of setting of Grade II Listed Wellington Cottage and Grade II Listed North Pottersfield and South Potterfield Cottages". This would improve the cultural heritage impact performance from minor negative to negligible (SA Objective 9).

The policy also now acknowledges that the site is within a Mineral Safeguarding Area and that any development should consider the potential for minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a major negative due to the large development of undeveloped land, loss of open countryside and agricultural land.

Regarding the other objectives, the Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' assessment summary for these objectives is included below.

Policy Option DPSC2	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	++	++	+	-	0	-	0	+	-	0	+	++

The policy sets out a range of on-site infrastructure and services that will be required alongside the proposed large-scale mixed-use development including a neighbourhood centre with community facilities and employment uses, to provide a co-ordinated and sustainable community. This includes provision of a new neighbourhood centre and sustainable transport measures with a new “transport hub” and “Sustainable travel connections to Burgess Hill”. These measures would be likely to improve sustainable travel choice and provide new facilities for the local community, reducing the need to travel. This would be expected to result in a benefit to transport and accessibility; although, owing to the large scale of proposed development and introduction of 2,000 new dwellings, it is likely that not all the needs of the community would be met on site, with some reliance on private car use and increased traffic on the surrounding road network to some extent. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. A positive effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

The policy seeks to “improve connectivity” which would be expected to include active travel provisions and sets out a range of requirements for community infrastructure including on play space, leisure facilities, healthcare, and community facilities, as well as financial contributions towards further community and sports facilities, healthcare and emergency services. The proposed development would also include an element of extra-care housing and seeks to create a new sustainable community. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and a major positive impact on community (SA Objective 4), through improving the provision of and access to healthcare, recreation, and leisure facilities for the local community.

The policy also states that the development should deliver an “All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form, with early years and potential SEND”. Therefore, the policy could potentially help to improve the provision of and access to primary and secondary schools in the local area to ensure that the educational needs of the development can be met, resulting in a major positive impact on education (SA Objective 3).

The proposed sustainable travel improvements and new facilities may help to reduce transport related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 2,000 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

Much of the site is located within ‘Albourne Low Weald’ which has ‘low’ capacity. The site comprises a large area of agricultural / pastoral land situated between Sayers Common and High Cross. Policy DPSC2 states that development should be informed by a comprehensive masterplan and seeks to “ensure there is significant open space and landscaping on the southern boundary to ensure a gap between Sayers Common and

Albourne, to maintain the separate identity of these settlements”. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain owing to the large scale of development proposed.

There are no designated biodiversity sites or priority habitats within the site, although there are some nearby stands of ancient woodland. The provision of “significant open space and landscaping”, alongside requirements set out in other District Plan policies in relation to provision of ecological networks and GI, would help to minimise potential for adverse impacts on biodiversity. Overall, and subject to no significant effects being identified in the HRA, the policy could potentially result in a negligible impact on biodiversity (SA Objective 7).

Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘high’ adverse impact on the Grade II Listed Building ‘Wellington Cottage’ and ‘mid-high’ impact on other nearby listed buildings including ‘West House Farmhouse’. The policy does not make any specific provisions in relation to these listed buildings, and, although the landscaping provisions may serve to reduce adverse effects on the historic character of the area to some extent, it is likely that the introduction of 2,000 dwellings would alter the rural setting to several listed buildings. A minor negative impact on cultural heritage would be expected (SA Objective 9).

A major negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) because of the development.

The findings for SA Objectives 1, 5, 6, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

### 3.7.3 DPSC3: Land at Crabbet Park, Copthorne

Policy DPSC3 relates to Site 18, which was assessed alongside reasonable alternatives in Appendix C (pre-mitigation) and Appendix D (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording additions to this policy since the Regulation 19 Plan. Relevant to this assess include addressing any issues to the adjacent ancient woodland, protecting the setting of Grade II\* Listed Crabbet Park, the Orangery and Tennis Court and Grade II Listed Pear Tree House, Ley House, Rowfant Mill, Rowfant Mill House and Rushmore Cottage, and retaining and enhancing PROWs which cross the site.

Notwithstanding these, Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Policy Option DPSC3	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	++	++	0	--	-	-	-	0	-	0	+	++

The policy sets out a range of on-site infrastructure and services that will be required alongside the proposed large-scale mixed-use development including community facilities and employment space, to provide a co-ordinated and sustainable community. This includes provision of a new neighbourhood centre and sustainable transport measures with a “transport hub” and *“Improved linkages to cycling and walking network to ... Three Bridges train station, Crawley Town Centre and areas of employment”*. These measures would be likely to improve sustainable travel choice and provide new facilities for the local community, reducing the need to travel. This would be expected to benefit transport and accessibility; although, owing to the large scale of proposed development and introduction of 2,300 new dwellings, it is likely that not all the needs of the community would be met on site, with some reliance on private car use and increased traffic on the surrounding road network to some extent. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. A positive effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. The policy sets out a range of requirements for community infrastructure, including on-site play space, leisure facilities and healthcare, as well as financial contributions towards further community facilities, sports, healthcare and emergency services. The proposed development would also include an element of extra care housing. The policy would be likely to improve access to and provision of community and healthcare facilities, and seeks to create a new sustainable community, resulting in a major positive impact on SA Objective 4.

However, the A2220 passes the site to the north, and the M23 to the west, with potential adverse implications for the health of site end users in proximity to these areas. In accordance with other District Plan policies, it is expected that the development would retain the existing tree belts alongside these roads. With careful design and layout,



informed by master planning, and maintaining the tree buffers, it is anticipated that residential development would be directed away from this area and site end users would be protected from reduced air quality and noise pollution effects from the main roads. Overall, a minor positive impact on health and wellbeing (SA Objective 2) would be expected, owing to the proposed emphasis on active travel and the provision of new leisure and healthcare facilities.

The policy states that the development should deliver an *“All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form”*. Therefore, the policy could potentially help to improve the provision of and access to primary and secondary schools in the local area to ensure that the educational needs of the development can be met, resulting in a major positive impact on education (SA Objective 3).

The proposed sustainable travel improvements and new facilities, including active travel links, may help to reduce transport related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 2,300 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

The site coincides with large areas of deciduous woodland priority habitat, as well as several stands of ancient woodland including: 'Drivers Wood', 'Burley's Wood', 'Old Hollow Wood', 'Brewhouse Wood', 'Hotel Wood', 'Layhouse Wood' and 'Compasses Wood'. The policy does not make any specific provisions to conserve and enhance these habitats. Although direct loss of the ancient woodland would be resisted in accordance with other District Plan policies, the introduction of 2,300 new dwellings in proximity to these woodlands would be likely to introduce risks of increased disturbance or habitat degradation, with a minor negative impact on biodiversity overall (SA Objective 7).

The north west of the site is located within 'East Crawley-Copthorne Settled Woodland Matrix' and the south east within 'Rowfant High Weald', both of which have 'low' capacity, according to the Landscape Capacity Study. Policy DPSC3 seeks to ensure *“Mitigation of impact of the development on the AONB which lies to the south of the site”* and ensure development is informed by a comprehensive masterplan. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain owing to the large scale of development proposed and potential impacts on the setting of the AONB.

Heritage officer comments provided by the Council indicate that the development of the site could lead to a 'high' adverse impact on nearby listed buildings. This includes the Grade II Listed Building 'Ley House' within the site, and the adjacent 'Rowfant Mill' and 'Pear Tree House, Crabbet Park' as well as the Grade II\* Listed Building 'Crabbet Park'. The policy does not make any specific provisions in relation to these listed buildings, and, although the masterplanning provisions may serve to reduce adverse effects on the historic character of the area to some extent, it is likely that the introduction of 2,300 dwellings would alter the

rural setting to several listed buildings. A minor negative impact on cultural heritage would be expected (SA Objective 9).

A major negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) as a result of the development. The findings for SA Objectives 1, 5, 6, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

### 3.8 Housing

#### 3.8.1 DPH1: Housing

#### 3.8.2 DPH2: Sustainable Development - Outside the Built-Up Area

Policy DPH2 sets out the criteria for supporting small-scale development outside of existing built-up areas where it meets identified local housing, employment and community needs. This policy will help to ensure that development within countryside areas is “demonstrated to be sustainable” and adheres to various other policies within the Plan, such as design specifications.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH2	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	0	+	0	-	0	+	0	0	0	0	+	+

This policy will be likely to help meet the housing requirement of the whole community, and could lead to a range of type, tenure and mix of homes within the district. Additionally, the policy will likely support requirements of smaller local developers or individuals seeking to build a house within the community, as sites must either be within the Local Plan, a

Neighbourhood Plan or proposals of fewer than 10 dwellings. Therefore, a minor positive impact on housing provision could be expected (SA Objective 1). Additionally, through ensuring that sites are “*contiguous with an existing built-up area of the settlement*”, it may

enhance community cohesion, and therefore a minor positive impact on community and crime (SA Objective 4) would be expected.

Through ensuring development proposed for locations outside of built-up areas are guided by Policy DPH2, a minor positive impact on landscape (SA Objective 8) could be expected as proposals for small developments and adherence to design guides which would conserve or enhance the landscape setting would be supported.

By supporting localised developments outside of built-up areas, a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14) could be expected where the developments themselves could provide local work for tradespeople and new residents may increase footfall for local businesses and provide more business, as well as potential for new residents to be employed locally.

Development outside of built-up areas would likely be located on previously undeveloped land. As such, development proposals under this policy (although of a smaller scale) could potentially result in the loss of soil, to some extent; therefore, a minor negative impact on natural resources could result (SA Objective 6).

### 3.8.3 DPH3: Sustainable Development - Inside the Built-Up Area

Policy DPH3 sets out the criteria for supporting development within built-up areas where it which will help to provide appropriate development within existing towns and villages and adheres to various other policies within the Plan, such as design specifications.

There have been wording updates to this policy. However, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH3	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	0	+	0	+	0	+	0	+	0	0	+	+

This policy will be likely to contribute towards meeting the housing requirement of local communities, and could lead to a range of type, tenure and mix of homes within the district due to the requirement to ensure development is of an appropriate scale and nature depending on the settlement in question. Additionally, the policy will likely support



requirements of smaller local developers or individuals seeking to build a house within the community. Therefore, a minor positive impact on housing provision could be expected (SA Objective 1). Additionally, through supporting residential developments within the built-up areas, a greater sense of community cohesion could result, and it is likely that new development would be well located with respect to existing local services, and therefore a minor positive impact on the community and equality (SA Objective 4) would be expected.

Through ensuring development proposed for locations within built-up areas are guided by Policy DPB1 (Character and Design), a minor positive impact on landscape (SA Objective 8) could be expected as developments would be expected to adhere to design guides and would therefore likely conserve or enhance the landscape setting of the surroundings.

Policy DPH3 seeks to support a greater concentration of residential units within areas with *“good accessibility to shops and services or good public transport links that minimise the need to travel and/or reliance on private cars”*. Therefore, a minor positive impact on climate change and transport (SA Objective 10) could be expected through potentially reducing the level of GHGs emitted from private cars and their subsequent impact on climate change.

By supporting localised developments within built-up areas, a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14) could be expected where construction of the developments themselves could provide local work for tradespeople and new residents may increase footfall for local businesses and provide more business, as well as potential for new residents to be employed locally.

Furthermore, through promoting development within existing settlements including infilling and redevelopment, Policy DPH3 could potentially help to encourage an efficient use of land and reduce the need to develop other greenfield locations. A minor positive impact on natural resources could therefore be expected (SA Objective 6).

#### 3.8.4 DPH4: General Development Principles for Housing Allocations

This policy has been deleted since the Regulation 18 Plan and the criteria within the policy has been moved into other relevant policies within the plan.

#### 3.8.5 DPH5: Batchelors Farm, Keymer Road, Burgess Hill

Policy DPH5 relates to Site 573, which was assessed alongside reasonable alternatives in Appendix C (pre-mitigation) and Appendix D (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor

negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH5	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	++	+	+	-	0	0	0	0	0	0	0	+

Provision of sustainable transport measures on site would be expected to improve travel choice, with the policy requiring development proposals to “prioritise cycle and pedestrian connections”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to recreation and leisure facilities for the local community.

Policy DPH5 also sets out to “*Retain, protect and enhance mature trees across the whole site and hedgerows along the boundaries and ensure development provides a positive edge to these features and the wider countryside*”, which may help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

### 3.8.6 DPH6: Land at South of Appletree Close, Janes Lane, Burgess Hill

Policy DPH6 relates to Site 1030, which was assessed alongside reasonable alternatives in Appendix C (pre-mitigation) and Appendix D (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH6	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	+	+	+	-	0	0	0	0	0	0	0	+

The policy requires financial contributions towards various community facilities and infrastructure, including education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The site is located on the edge of Burgess Hill, which has a good range of services and public transport options, including a train station. Provision of sustainable transport measures on site would be expected to improve travel choice, with the policy requiring development proposals to *“prioritise cycle and pedestrian connections throughout the site and onto Janes Lane”*. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services via walking or cycling, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects

associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

The policy seeks to encourage active travel, which may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and improve the provision of and access to recreation and leisure facilities for the local community (SA Objective 4), which is already assessed positively.

The site is located within 'Lunce Low Weald' which has 'low' capacity, according to the Landscape Capacity Study<sup>14</sup>. Policy DPH6 sets out to "Retain, protect and enhance mature trees across the whole site and hedgerows along the boundaries and ensure development provides a positive edge to these features and the wider countryside", which may help to reduce adverse effects on the surrounding landscape character. By retaining the hedgerows which surround the site, and assuming new development would be in keeping with the existing adjacent housing development, it is anticipated that there could be a negligible impact overall for landscape (SA Objective 8).

These measures could also help to retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### 3.8.7 DPH7: Burgess Hill Station, Burgess Hill

Policy DPH7 relates to Site 1123, which was assessed alongside reasonable alternatives in Appendix C (pre-mitigation) and Appendix D (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely that to ensure that the site is connected to the sewerage system. Nonetheless, it is still considered that the development would have a minor negative impact on energy and waste due to the increased energy consumption and waste generation. Therefore, Lepus Consulting's Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH7	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	++	++	++	+	+	0	+	0	++	-	0	++	+

The policy requires consideration of new children's equipped play space and allotment space, as well as financial contributions towards various community facilities and infrastructure, including play space, sports facilities, education and emergency facilities, which would be likely to benefit SA Objectives 2, 3 and 4. These objectives were already assessed positively owing to the site's location with respect to existing facilities and the effects of other policies.

Policy DPH7 promotes the delivery of an *"attractive and accessible mixed-use development and transport mobility hub, creating a new gateway development to Burgess Hill"* with use of a masterplan. These measures would be likely to improve the local townscape character and strengthen sense of place, leading to a minor positive impact on landscape (SA Objective 8).

The policy also sets out a range of travel improvements, including the requirement to *"Create a mobility hub which prioritises sustainable and active travel links throughout the development establishing a permeable layout"*. The emphasis on sustainable travel links, in combination with the site's location adjacent to Burgess Hill Station, provides a likelihood of reducing transport related GHG emissions and encouraging a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 300 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

### 3.8.8 DPH8: Land off West Hoathly Road, East Grinstead

Policy DPH8 relates to Site 198, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH8	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	0	-	0	0	0	0	0	+

The policy sets out the requirement for a new parkland and link to Sunnyside Recreation Ground, as well as a “*footpath link to East Grinstead along West Hoathly Road*”, which would be likely to improve accessibility and may encourage active travel for local journeys. Further financial contributions are required in relation to range of community and leisure facilities including sports facilities and play space. These measures would help to improve the provision of and access to community facilities, and encourage exercise and recreation, with a minor positive impact anticipated on health and wellbeing and the local community (SA Objectives 2 and 4).

The improvements to the local pedestrian network, alongside the proposed “sustainable transport measures” would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Furthermore, the policy requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local



area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

Landscape officer comments provided by the Council indicate that the development of the site could lead to a 'moderate' adverse impact on High Weald AONB, due to the loss of a medieval field system and may have adverse impacts on the surrounding settlement pattern. The site is also located within 'Sunnyside High Weald' which has 'negligible / low' capacity, according to the Landscape Capacity Study. Policy DPH8 requires an LVIA to be undertaken to "inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB", as well as ensuring that development proposals take into account the objectives of the High Weald AONB Management Plan, the High Weald Housing Design Guide and the Colour Study. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.

The site is located adjacent to 'Rockingshill Wood' ancient woodland and coincides with deciduous woodland along the south eastern site edge. The policy seeks to ensure that the development provides "an appropriate buffer for the ancient woodland to the east of the site in line with Policy DPN4" and states that the mature trees/ hedgerows on site boundaries should be retained and enhanced. These measures would be likely to reduce the potential for adverse effects on the ancient woodland and priority habitat. The site also lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected overall.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The findings for SA Objectives 1, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

#### 3.8.9 DPH9: Land at Hurstwood Lane, Haywards Heath

Policy DPH9 relates to a section of Site 858 (the portion of the site which lies within Mid Sussex District), which was assessed alongside reasonable alternatives in Appendix C (pre-mitigation) and Appendix D (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There has been a minor wording addition to this policy, however, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.



Policy Option DPH9	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	0	-	0	0	0	0	0	+

The policy states that “sustainable transport measures” and improved active travel links should be provided, including “providing pedestrian and cycling connections between the developments” as part of the wider Neighbourhood Plan allocation. These measures would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services as well as the site’s location on the periphery of Haywards Heath, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) through improving the provision of and access to recreation and leisure facilities.

Further benefits would be likely in relation to the local community through the outlined financial contributions; however, the site is located outside of sustainable travel times to existing community facilities and may restrict sustainable travel choices to facilities to some extent. The policy would be expected to reduce the potential for negative effects associated with the community, with a negligible impact recorded overall for SA Objective 4.

The policy requires financial contributions towards education. The proposed active travel links within Policy DPH9 may also help to provide sustainable access to the proposed new school in the adjacent Hurst Farm allocation within the Haywards Heath Neighbourhood

Plan7. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The site is near to several stands of ancient woodland, including 'Hursthouse Lane Wood' to the north, and 'Hurst Wood' and 'Cleave Water Wood' to the south, across Colwell Lane. The site also coincides with a small section of deciduous woodland priority habitat, in the south eastern corner. Policy DPH9 sets out the requirement for enhanced GI, to *"Retain the trees and ground levels along Hurstwood Lane"* and to *"Provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west of the site, including ecological corridors"*. These measures would be likely to reduce the potential for adverse effects on the ancient woodland and priority habitat. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected overall.

The site is located within 'Haywards Heath South-eastern Fringe' which has 'low' capacity, according to the Landscape Capacity Study<sup>17</sup>. Further to the provision of an "appropriate transition" into the countryside, the policy states that "Measures will be necessary to mitigate the impact of development on the landscape character of the surrounding area, including a landscape buffer on the eastern site boundary". Although there may be a change in the landscape character to some extent due to the proposed development, these measures would be anticipated to reduce adverse impacts on the landscape character, with a negligible impact overall for landscape (SA Objective 8).

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### 3.8.10 DPH10: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath

Policy DPH10 relates to Site 508, which was assessed alongside reasonable alternatives in Appendix C (pre-mitigation) and Appendix D (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There has been a minor wording addition to this policy, however, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

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<sup>7</sup> Haywards Heath Town Council (2016) Haywards Heath Town Council Neighbourhood Plan 2014-2031: Our Bright Future, December 2016.  
Available at: <https://www.midsussex.gov.uk/media/2801/haywards-heath-neighbourhood-plan.pdf> [Date Accessed: 10/11/2023]

Policy Option DPH10	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	0	0	0	0	0	0	+	+

The policy outlines required improvements to travel choice, including provision of pedestrian and cycling connections and “sustainable transport measures”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to recreation and leisure facilities for the local community.

The policy requires financial contributions towards education. The proposed active travel links within Policy DPH9 may also help to provide sustainable access to the proposed new school in the adjacent Hurst Farm allocation within the Haywards Heath Neighbourhood Plan. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

Policy DPH10 states that the development should “Retain the trees on the site boundaries to provide a landscape buffer to the wider countryside” and incorporate GI and ecological corridors. These measures may help to retain and enhance biodiversity assets. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

The site is located within ‘Haywards Heath South-eastern Fringe’ which has ‘low’ capacity, according to the Landscape Capacity Study<sup>19</sup>. Policy DPH10 seeks to ensure that the development integrates well with the adjacent allocation DPH9 and states that “Measures

will be necessary to mitigate the impact of development on the landscape character of the surrounding area". The site is relatively small-scale and enclosed by trees, and the policy advocates to "Retain the trees on the site boundaries to provide a landscape buffer to the wider countryside". Although there would be a change in the landscape character to some extent due to the proposed development, by retaining the trees which surround the site it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

#### 3.8.11 DPH11: Land east of Borde Hill Lane Haywards Heath

Policy DPH11 relates to Site 556, which was assessed alongside reasonable alternatives in Appendix C (pre-mitigation) and Appendix D (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

The policy also now states *"avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to deliver biodiversity / environmental improvements and flood resilience"*. In the Regulation 18 SA post-mitigation assessment the policy had a neutral impact on flooding, improved from a pre-mitigation major negative impact on flooding due to mitigation applied through District Plan policies. It is considered that the policy would still have a neutral impact on flooding. The impact on biodiversity also remains unchanged, as a minor negative impact, due to the loss of semi-improved grassland priority habitat and the site being within 7km of Ashdown Forest SAC/SPA.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH11	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	0	-	-	-	0	0	0	0	0	+

Provision of sustainable transport measures would be expected to improve travel choice, with the policy requiring development proposals to “*provide suitable vehicular, pedestrian and cycle access*”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Additionally, the policy requires delivery of new play space on site, as well as contributions towards sports facilities and other community infrastructure improvements. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) through improving the provision of and access to recreation and leisure facilities.

Furthermore, the policy requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. A large proportion of the site coincides with good quality semi-improved grassland priority habitat which would be lost and/or degraded as a result of the proposed development. A minor negative impact on biodiversity would be expected (SA Objective 7).

The site is located within 'Horsgate High Weald' which has 'low' capacity, according to the Landscape Capacity Study<sup>8</sup>. Policy DPH11 states that the proposal should "Contain development to central and eastern parts of site to reduce potential impacts on setting on High Weald AONB (to be informed by an LVIA)". Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.

Policy DPH11 requires the development to "Provide appropriate mitigation to address the potential impact on nearby Grade II listed building 'South Lodge'" informed by a Heritage Impact Assessment. This may also help to inform appropriate and comprehensive mitigation for effects on 'Borde Hill' RPG, within which 'South Lodge' lies. An overall negligible impact on cultural heritage (SA Objective 9) could be achieved.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 4, 5, 6, 7, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

#### 3.8.12 DPH12: Orchards Shopping Centre, Haywards Heath

Policy DPH12 relates to Site 1121, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely that to ensure that the site is connected to the sewerage system. Nonetheless, it is still considered that the development would have a minor negative impact on energy and waste due to the increased energy consumption and waste generation. Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

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<sup>8</sup> Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: [https://www.midsussex.gov.uk/media/3236/ep48i\\_landscapecapacitystudy\\_combined.pdf](https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf) [Date accessed: 10/11/2023]



Policy Option DPH12	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	++	++	++	+	+	0	+	0	++	-	0	++	+

The policy requires financial contributions towards various community facilities and infrastructure, including play space, sports facilities, education and emergency facilities, which would be likely to benefit SA Objectives 2, 3 and 4. These objectives were already assessed positively owing to the site's location with respect to existing facilities and the effects of other policies.

The policy seeks to *“Deliver a mixed-use development including retail, leisure, residential and other complimentary town centre uses to help provide a central and diverse hub for the town centre”* with good pedestrian connectivity. The emphasis on sustainable travel links and the likely improved offer of local services and shopping provides a likelihood of reducing transport related GHG emissions and encouraging a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 100 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

Furthermore, through the provision of a central and diverse hub for Haywards Heath incorporating active frontages and *“optimising the site's topography and taking into account the design principles set out in the 2020 Mid Sussex Design Guide SPD”*, there is potential for enhancement of the local townscape character and strengthening sense of place. Therefore, the policy could potentially result in a minor positive impact on landscape (SA Objective 8).

The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

Policy DPH12 requires the development to be *“Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II\*”*



*listed building 'St Wilfrids Church'". An overall negligible impact on cultural heritage (SA Objective 9) would be expected.*

### 3.8.13 DPH13: Land to west of Turners Hill Road, Crawley Down

Policy DPH13 relates to site 688, which was assessed alongside reasonable alternatives. The site policy sets out a range of site specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been major policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to integrate development with the site to the north (DPH14) such as through design of the site layout and by providing pedestrian and cycling connections, green infrastructure and ecological corridors which would now have a minor positive impact for biodiversity and landscape. The policy also now states that development should be "directed away from areas of flood risk and mitigate impacts through integration of SUDS to deliver biodiversity/environmental improvements and flood resilience". It is considered that the policy would still have a minor positive impact on flooding, and also on health and wellbeing.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains mostly unchanged, and Lepus' assessment summary is included below with the relevant edits.

Policy Option DP14	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	+	+	+	-	+	+	0	-	-	0	0	+

### 3.8.14 DPH14: Hurst Farm, Turners Hill Road, Crawley Down

Policy DPH14 relates to Site 743, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been minor wording updates to this policy since Regulation 18. The policy now states "avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to deliver biodiversity / environmental improvements and flood resilience". It is considered that the policy would still have a minor positive impact on flooding. The impact on biodiversity could now be considered a minor positive impact, instead of negligible, through the introduction of natural flood management measures that deliver environmental improvements.

Lepus Consultings's Regulation 18 SA assessment remains mostly unchanged, and Lepus' assessment summary is included below.

Policy Option DP14	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	0	+	-	+	0	0	0	0	0	0	+

The policy sets out provision of "sustainable transport measures" including the requirement to "Provide suitable vehicular, pedestrian and cycle access from Turners Hill Road". These measures would be expected to improve travel choice. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) through improving the provision of and access to recreation and leisure facilities.

Further benefits would be likely in relation to the local community through the outlined financial contributions; however, the site is located outside of sustainable travel times to existing community facilities and may restrict sustainable travel choices to facilities to some

extent. The policy would be expected to reduce the potential for negative effects associated with the community, with a negligible impact recorded overall for SA Objective 4. The site is in close proximity to Site 688 and could benefit from the provision of play space, sports pitches and potential doctor surgery proposed within Policy DPH13 if this comes forward; however, the relative delivery timescales are uncertain at the time of assessment and there is potential for one site to come forward without the other.

The policy also requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools, and particularly secondary schools, in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The site is adjacent to two stands of ancient woodland: ‘Pescotts Wood West’ and ‘Pescotts Wood East’. Policy DPH14 states that “appropriate buffers will be required” to protect the woodlands. Considering the existing development on site, and the adjacent residential areas, it is likely that the proposed introduction of 37 dwellings would not introduce a significant adverse effect on the ancient woodland. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

The site is located within ‘Crawley Down Northern Fringe’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study<sup>22</sup>. Policy DPH14 states that “Mitigation measures will be required to protect the setting and form of parts of the site that fall within and adjacent to sensitive landscape areas”. The site is relatively small-scale and enclosed by trees, with some existing development on site. Although there may be a change in the landscape character to some extent due to the proposed development, by providing a suitable buffer for the surrounding ancient woodland it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).

Policy DPH14 requires the development to be “*Provide appropriate mitigation to address the potential impact on Grade II listed building ‘Westlands’*” informed by a Heritage Impact Assessment. An overall negligible impact on cultural heritage (SA Objective 9) would be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

The findings for SA Objectives 1, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

#### 3.8.15 DPH15: Land rear of 2 Hurst Road, Hassocks

Policy DPH15 relates to Site 210, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH15	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	++	++	+	-	0	0	0	0	0	0	++	+

The site is located within the settlement of Hassocks and has good connectivity to existing facilities and is well served by public transport infrastructure. Policy DPH15 seeks to further improve sustainable transport for the site, including *“suitable vehicular, pedestrian and cycle access from London Road”* which may encourage the uptake of active travel. The policy also requires financial contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to benefit health and wellbeing through improving the provision of and access to recreation and leisure facilities for the local community.

However, the site is located within 200m of ‘Mid Sussex AQMA No. 1’ and adjacent to the A273, with potential adverse implications for the health of site end users. The policy requires the development to *“Retain and enhance mature trees/ hedgerows along site boundaries, including screening to A273”*, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Considering the trend of improvements in NO<sub>2</sub> levels within the AQMA<sup>9</sup>, alongside the proposed screening measures, a negligible impact could be achieved overall with regard to health and wellbeing (SA Objective 2) and transport (SA Objective 10).

<sup>9</sup> Mid Sussex District Council (2022) Air Quality Annual Status Report. June. Available at: <https://www.midsussex.gov.uk/media/8723/air-quality-annual-status-report-asr-2022.pdf> [Date Accessed: 10/11/2023]

Policy DPH15 seeks to *“Mitigate potential impacts from development on TPOs in south east corner and along northern boundary”* and *“Provide appropriate landscaping taking into account any sensitive, longer views to the north west of the site”*. These measures would be likely to reduce adverse effects on the surrounding landscape character. By retaining the hedgerows which surround the site, and assuming new development would be in keeping with the existing adjacent housing development, it is anticipated that there would be a negligible impact overall for landscape (SA Objective 8).

These measures could also help to retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

The findings for SA Objectives 1, 3, 4, 5, 6, 9, 11, 12, 13 and 14 are unchanged from the post-mitigation site assessment.

#### 3.8.16 DPH16: Land west of Kemps, Hurstpierpoint

Policy DPH16 relates to Site 13, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH16	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	++	+	-	0	-	-	++	0	0	++	+

The site is located within the settlement of Hurstpierpoint, and has relatively good connectivity to existing facilities and is well served by public transport infrastructure. The policy seeks to improve the provision of “sustainable transport measures”, including a requirement to “Create new pedestrian and cycle links to connect to the existing PROW network” which may encourage the uptake of active travel. The policy also requires financial contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2). The policy would also be likely to improve the provision of and access to recreation and leisure facilities for the local community (SA Objective 4), and which is already assessed positively.

The policy also requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The policy seeks to “Retain and enhance mature trees/ hedgerows on site boundaries and within the site” and ensure that ecological corridors are conserved through proposed landscaping measures including along the streams which pass through the site. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

The site is located within ‘Hurstpierpoint Low Weald’ which has ‘negligible/low’ capacity, according to the Landscape Capacity Study<sup>24</sup>. Policy DPH16 encourages a “*landscape-led approach to development*” which retains and enhances the mature trees and hedgerows along the site boundaries and provides “*appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west of the site, including ecological corridors*”. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.



Heritage officer comments provided by the Council indicate that the development of the site could lead to a 'high' harm to the adjacent Langton Lane Conservation Area and Grade II Listed Building 'Langton Grange'. Despite the policy requirements to "Provide appropriate mitigation" to address the impacts, informed by a Heritage Impact Assessment, it is likely that the loss of the current field systems would diminish the separation of the heritage assets from the settlement of Hurstpierpoint and could alter their settings. A minor negative impact on cultural heritage cannot be ruled out at this stage until the details of the proposals have been agreed (SA Objective 9).

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

### 3.8.17 DPH17: The Paddocks, Lewes Road, Ashurst Wood

Policy DPH17 relates to Site 984, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely sewerage connections and that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH17	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	+	+	+	-	0	0	0	0	0	0	-	+

The site is located outside of sustainable travel times to some local facilities and services, including train stations. Policy DPH17 does not include specific provisions relating to sustainable transport or active travel, although it does encourage development to "Avoid the



appearance of a car-dominated layout” which may serve to reduce reliance on private car use, to some extent. The policy also requires financial contributions towards play space, sports facilities and other community infrastructure; therefore, the development would be expected improve the provision of and access to recreation and leisure facilities with benefits to health and wellbeing, and for the local community (SA Objective 4) which is already assessed positively.

However, the site is located adjacent to the A22, with potential adverse implications for the health of site end users. The policy requires the development to “*Retain mature trees/ hedgerows on site boundaries*”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2) and transport (SA Objective 10).

The policy requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

Landscape officer comments provided by the Council indicate that the development of the site could lead to a ‘moderate’ adverse impact on High Weald AONB, due to the potential impact on woodland and trees. The site is located within ‘Luxford High Weald’ which has ‘negligible/low’ capacity, according to the Landscape Capacity Study<sup>25</sup>. Policy DPH17 states that the proposal should “take a landscape-led approach to development”, retain the mature trees and hedgerows surrounding the site, and “Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB”. The site is small-scale and enclosed by trees and existing development, with some existing buildings on site. Although there would be a change in the landscape character to some extent due to the proposed development, it is expected that adverse impacts on the landscape character could be reduced through the policy provisions and with reference to the design guide, with a negligible impact overall for landscape (SA Objective 8).

The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. The southern edge of the site coincides with deciduous woodland priority habitat. The policy states that development will “Retain mature trees/ hedgerows on site boundaries” which would be expected to ensure there is no degradation or loss of the priority habitat. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

### 3.8.18 DPH18: Land at Foxhole Farm, Bolney

Policy DPH18 relates to Site 1120, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to

result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely sewerage connections and that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH18	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	0	+	+	+	-	0	-	0	-	-	0	0	+

The policy sets out provision of “sustainable transport measures” including the requirement to “Provide suitable vehicular, pedestrian and cycle access from Cowfold Road (A272)” and “*additional pedestrian and cycle access to The Street from north of the site between Westmeadow and Downland*”. These measures would be expected to improve travel choice and encourage active travel, with a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport to some extent, although a minor negative impact would be expected overall for SA Objective 10. A negligible effect could be achieved overall regarding SA Objective 13, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires the development to “Provide [a] country park and community allotments” as well as financial contributions towards play space, sports facilities, healthcare and other community infrastructure. These measures would be likely to improve provision of and access to recreation and leisure facilities, resulting in a minor positive impact on community (SA Objective 4).

However, the site is located adjacent to the A272, with potential adverse implications for the health of site end users in relation to exposure to pollution. The policy requires the development to *“Retain mature trees/ hedgerows along site boundaries”*, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2).

The proposed sustainable travel improvements, including active travel links, may help to reduce transport related GHG emissions to some extent. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 200 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

The policy requires development to *“Explore opportunities to enhance education provision in the village that meets an identified local need”*. Therefore, the policy would be expected to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The site is located within ‘Bolney Sloping High Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study. It is likely that there would be a change in the landscape character to some extent due to the proposed development of 200 homes. Policy DPH18 states that the proposal should *“Retain mature trees/ hedgerows along site boundaries”* and provide a country park which may help to promote access to outdoor space and enjoyment of the countryside. Despite these provisions, at this stage of the planning process, a minor negative impact on the character of the landscape (SA Objective 8) cannot be ruled out.

Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘low’ to ‘moderate’ adverse impact on nearby listed buildings, Bolney Conservation Area, and archaeology. Policy DPH18 states that the development should be *“Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II listed building, ‘Walnut and Well Cottage’, and Bolney Conservation Areas (North and South)”*. This would be likely to help inform appropriate mitigation measures, with a negligible impact expected overall for cultural heritage (SA Objective 9).

The policy seeks to *“Retain mature trees/ hedgerows along site boundaries”* which may help to conserve ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

### 3.8.19 DPH19: Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common

Policy DPH19 relates to site 1026, which was assessed alongside reasonable alternatives. The site policy sets out a range of site specific requirements which would be expected to

result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that this would have a minor positive impact on climate change and transport, health and wellbeing, education and community and crime.

It also includes an intention to 'avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience. This is considered to have a minor positive impact on biodiversity and landscape.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains mostly unchanged, and Lepus' assessment summary is included below with the relevant edits.

Policy Option DP19	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	+	+	0	+	0	0	0	+

### 3.8.20 DPH20: Land at Coombe Farm, London Road, Sayers Common

Policy DPH20 relates to site 601, which was assessed alongside reasonable alternatives. The site policy sets out a range of site specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-

minute neighbourhood principles. It is therefore considered that this would have a minor positive impact on climate change and transport, health and wellbeing, education and community and crime.

It also includes an intention to 'avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience. This is considered to have a minor positive impact on biodiversity and landscape.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains mostly unchanged, and Lepus' assessment summary is included below with the relevant edits.

Policy Option DPH20	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	+	+	+	-	+	+	0	+	0	0	0	+

### 3.8.21 DPH21: Land to the West of Kings Business Centre, Reeds Lane, Sayers Common

Policy DPH21 relates to site 830, which was assessed alongside reasonable alternatives. The site policy sets out a range of site specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that this would have a minor positive impact on climate change and transport, health and wellbeing, education and community and crime.

It also includes an intention to 'avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience. This is considered to have a minor positive impact on biodiversity and landscape.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains mostly unchanged, and Lepus' assessment summary is included below with the relevant edits.

Policy Option DPH21	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	+	+	+	-	+	+	0	0	-	0	0	+

### 3.8.22 DPH22: Land at LVS Hassocks, London Road, Sayers Common

Policy DPH22 relates to site 1003, which was assessed alongside reasonable alternatives. The site policy sets out a range of site specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that this would have a minor positive impact on climate change and transport, health and wellbeing, education and community and crime.

It also includes an intention to 'avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience. This is considered to have a minor positive impact on biodiversity and landscape.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains mostly unchanged, and Lepus' assessment summary is included below with the relevant edits.



Policy Option DPH22	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	+	+	+	-	+	+	0	0	-	0	0	+

### 3.8.23 DPH23: Ham Lane Farm House, Ham Lane, Scaynes Hill

Policy DPH23 relates to Site 1020, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH23	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	0	0	0	0	0	0	0	+



The policy sets out provision of “*sustainable transport measures*” including the requirement to “*Provide suitable vehicular, pedestrian and cycle access from Ham Lane*” and to “*Create new pedestrian links to existing PROW network along site’s southern boundary*”. These measures would be expected to improve travel choice and encourage active travel, with a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to recreation and leisure facilities for the local community.

The policy also requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

The majority of site is located within ‘Scaynes Hill High Weald’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study. Policy DPH23 states that the proposal should “*Retain existing mature trees and hedgerows along site boundary*” and include a buffer for the ancient woodland to the south east. The site is relatively small-scale and enclosed on two sides by existing development. Although there would be a change in the landscape character to some extent due to the proposed development, by retaining the trees and hedgerows it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).

The retention and enhancement of mature trees and hedgerows, and incorporation of a suitable buffer to protect the nearby ancient woodland ‘Anchor Wood’ to the south east, would be likely to reduce potential for adverse effects on biodiversity, and could potentially help to conserve ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land because of the development, and potential sterilisation of mineral resources within the MSA.

### 3.8.24 DPH24: Land at Ansty Fields and rear of North Cottages, Cuckfield Road, Ansty

Policy DPH24 relates to Site 631, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH24	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	0	+	+	-	0	0	0	0	0	0	0	+

The policy includes provision of “sustainable transport measures” which would be expected to improve travel choice, with the policy requiring development proposals to “Integrate development with the site to the west (DPH25) by providing pedestrian and cycling connections and GI connectivity”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. These measures would be likely to improve provision of and access to recreation and leisure facilities, resulting in a minor positive impact on community (SA Objective 4).

However, the site is located in close proximity to the A272, with potential adverse implications for the health of site end users. The policy requires the development to “Retain and enhance mature trees/ hedgerows on site boundaries”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2).

The policy also requires financial contributions towards education, which could potentially help to improve the provision of and access to schools in the local area; although, owing to the location of the site outside of sustainable travel times to both primary and secondary schools, it is likely that some reliance on less sustainable travel methods would remain. The policy would be expected to reduce the potential for negative effects associated with access to education, with a negligible impact recorded overall (SA Objective 3).

The site is relatively small-scale and enclosed by hedgerows and adjacent existing residential development. Policy DPH24 also sets out to “Retain and enhance mature trees/ hedgerows on site boundaries especially on the southern boundary adjacent to the PROW” and ensure that the development design and layout reflects “a transition from the built environment to the rural countryside”. These measures would be likely to help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development.

### 3.8.25 DPH25: Land to the west of Marwick Close, Bolney Road, Ansty

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	0	0	+	+	-	0	0	0	0	0	0	0	+

### 3.8.26 DPH26: Older Persons' Housing and Specialist Accommodation

Policy DPH26 sets criteria for related development proposals and aims to provide adequate accommodation for older residents and those with specialist needs within Mid Sussex.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	+	0	+	0	0	0	+	0	+	0	0	0	0

Over the Plan period, it is likely that there will be an increase in the need for homes for the elderly and those in need of specialist care. It is expected that people over the age of 60 will require different types of housing of various sizes and tenures, and those over 80 will have particular needs for specialist forms of housing, including some homes with care provision and access for those with reduced mobility. This policy would be likely to have a minor positive impact on housing and specialist accommodation provision (SA Objective 1).

By providing specialist and supported homes for older residents across the Plan area, this policy would be expected to result in benefits to the health and wellbeing of these residents. In addition, this policy would be likely to help support a more inclusive and vibrant community, and therefore, result in a minor positive impact on health and wellbeing and communities (SA Objectives 2 and 4).

Additionally, Policy DPH26 seeks to ensure that new development proposals for older persons' housing is "accessible by foot or public transport to local shops, services community facilities and the wider public network". This would help ensure that vulnerable residents would not be cut off from these essential services and will also help to ensure that residents have opportunities choose to use sustainable transport instead of private vehicles, potentially resulting in the reduction of transport related GHG emissions. A minor positive impact on climate change and transport could therefore be expected (SA Objective 10).

This policy states that new proposals should be "located within or contiguous to the Built-Up Area Boundary". Additionally, development proposals for annexes to older persons' housing and special accommodation should respect "the character and appearance of the host building and local area and is sub-servient to the existing building". Through supporting

proposals which respect the setting of the local landscape, a minor positive impact could be expected (SA Objective 8).

### 3.8.27 DPH27: Land at Byanda, Hassocks

Policy DPH27 relates to Site 1101, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There have been wording updates to this policy, namely sewerage connections and that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	0	0	++	+	-	0	0	0	0	+/-	0	++	++

The policy sets out the allocation of the site for older persons' accommodation, which would be expected to cater for the housing needs of the elderly population, resulting in positive effects on housing and wellbeing. The site seeks to provide "Suitable vehicular, pedestrian and cycle access from Brighton Road", which would be expected to improve travel choice for site end users, including sustainable transport connections, which are already relatively good in the settlement of Hassocks.

However, the site is located within 200m of 'Mid Sussex AQMA No. 1' and adjacent to the A273, with potential adverse implications for the health of site end users. The policy requires the development to "Retain existing mature trees and hedgerows along site boundaries", which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Considering the trend

of improvements in NO<sub>2</sub> levels within the AQMA33, alongside the proposed screening measures, a negligible impact could be achieved overall with regard to health and wellbeing (SA Objective 2) and transport (SA Objective 10).

The site is located within 'Hurstpierpoint Southern Fringe' which has 'negligible/low' capacity, according to the Landscape Capacity Study<sup>34</sup>. The site is relatively small-scale and enclosed by trees and existing development, with some buildings currently on site. Policy DPH27 requires development to retain the existing mature trees and hedgerows along the site boundaries, which may help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The type and yield of development that would be delivered on site is unknown at the time of assessment, and so the potential impacts on energy and waste consumption are uncertain (SA Objective 11).

### 3.8.28 DPH28: Land at Hyde Lodge, Handcross

Policy DPH28 relates to Site 1106, which was assessed alongside reasonable alternatives. The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH28	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	0	+	+	-	0	-	0	0	+/-	0	0	++

The policy sets out the allocation of the site for older persons' accommodation, which would be expected to cater for the housing needs of the elderly population, resulting in positive effects on housing and wellbeing, and the local community (SA Objective 4). The site seeks



to “Provide a pedestrian access in the south-east corner of the site” and “Upgrade bus stop infrastructure”, which would be expected to improve travel choice for site end users, including sustainable transport connections.

However, the site is located adjacent to the A23, with potential adverse implications for the health of site end users. The policy requires the development to incorporate “Careful design to take into account and mitigate any impacts from noise and air quality from the A23” and retain and enhance the tree belt along the road. These measures would be likely to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a minor positive impact on health and wellbeing (SA Objective 2) would be expected, owing to the proposed emphasis on sustainable travel improvements and the provision of older persons’ accommodation.

The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to and from the site.

Landscape officer comments provided by the Council indicate that the development of the site could lead to a ‘moderate’ adverse impact on High Weald AONB. The site is also located within ‘Pease Pottage – Handcross High Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study. Policy DPH28 requires an LVIA to be undertaken to “inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB”, as well as ensuring that development proposals take into account the objectives of the High Weald AONB Management Plan, the High Weald Housing Design Guide and the Colour Study. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.

The site coincides with deciduous woodland, along the western edge. Policy DPH28 seeks to “Retain and enhance mature trees/ hedgerows on site boundaries and the tree belt in the west of the site”, with associated benefits to ecological corridors and habitat conservation. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The type and yield of development that would be delivered on site is unknown at the time of assessment, and so the potential impacts on energy and waste consumption are uncertain (SA Objective 11).

### 3.8.29 DPH29: Gypsies, Travellers and Travelling Showpeople

Policy DPH29 seeks to ensure a sufficient amount of suitable permanent accommodation for Gypsies, Travellers and Travelling Showpeople is delivered to meet identified needs.

An alternative to the policy was identified, as outlined below:

- 1) address need during the plan period



2) allocated site to address surplus need from neighbouring authorities

Policy Option DPH29	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	+	0	+	0	0	0	0	0	0	0	0	0	0
2	++	+	0	+	0	0	0	0	0	0	0	0	0	0

The policy is expected to meet the identified pitch targets for Travellers and Travelling Showpeople which address the likely permanent and transit accommodation needs and as such, have a positive impact on housing (Objective 1). Allocating surplus sites to address need from neighbouring authorities would have a major positive impact on housing.

This policy requires all proposed Gypsy and Traveller sites to meet various criteria including provisions for safe access and within reasonable distance to schools and other facilities. Additionally, development of these sites must be “appropriately located and designed or capable of being designed to ... ensure good quality living accommodation for residents and that the local environment (noise and air quality) of the site would not have a detrimental impact on the health and well-being of the residents”. Therefore, minor positive impacts on site end users’ health and wellbeing and access to community facilities would be expected from this policy (SA Objectives 2 and 4) for both alternative options.

Policy DPH29 seeks to ensure developments of Gypsy and Traveller sites minimise impacts on landscape settings, including the High Weald AONB as per Policy DPC4, and also requires the proposals to ensure that “Any site within the 7km zone of influence around Ashdown Forest will require an appropriate assessment under the Habitats Regulations to be undertaken and appropriate mitigation provided as required” as per Policy DPC6. Although this policy seeks to mitigate and minimise potential impacts on biodiversity and landscape assets, such as Ashdown Forest SPA and SAC and High Weald AONB, negligible impacts on receptors associated with these themes within the Plan area would be expected (SA Objectives 7 and 8) where the criteria set out within the policy would likely neither wholly protect nor enhance these assets.

Whilst Option 2 would facilitate allocation of further sites, it is not considered feasible and therefore Option 1 has been taken forward.

### 3.8.30 DPH30: Self and Custom Build Housing

Policy DPH30 relates to self and custom build housing and seeks to ensure a register is maintained of parties interested in building their own home.

There were two alternative policies identified to delivery this:

1. Rely on other policies in the plan and existing guidance for self and custom build housing to come forward: national guidance provide advice on how to meet the identified need so this could be addressed without a district-wide policy in place.
2. Develop policy led by local evidence to secure dedicated plots for self and custom build housing within proposed allocations.

Policy Option DPH29	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	0	0	0	0	0	0	+	0	0	0	0	0	0
2	+	0	0	0	0	0	0	+	0	0	0	0	0	0

This policy aims to secure a proportion of residential sites of 100 or more units to be available for selfbuild housing.

Both options for this policy would be likely to have a positive impact by ensuring that new housing delivered across the Plan area can accommodate the diverse requirements of residents within Mid Sussex, and therefore, have a minor positive impact on housing (SA Objective 1).

By encouraging the development of self and custom build housing, in accordance with local design guides, this policy could help to increase the diversity of buildings within neighbourhoods and provide visual interest. This could potentially result in a minor positive impact on the character of the local landscape and townscape (SA Objective 8).

Option 2 was considered preferable and chosen as the preferred option for the Regulation 19 Plan since it was led by local evidence and didn't rely on other policies and guidance to come forward.

### 3.8.31 DPH31: Housing Mix

Policy DPH31 seeks to “provide a mix of dwelling types and sizes from new development (including affordable housing) that reflects current and future local housing needs”, including the provision of specialist accommodation for those with particular needs, as well as accommodation for Gypsy and Traveller communities.

There have been minor wording updates to this policy since the Regulation 18 Plan and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	+	0	+	0	0	0	0	0	0	0	0	0	0

An appropriate mix of housing is required across the Plan area to help ensure that the varied needs of current and future residents are met. This in particular may include an increased number of smaller homes and affordable homes which would be likely to help provide appropriate accommodation for the elderly and first-time buyers entering the market.

This policy would be likely to have a minor positive impact on local housing provision (SA Objective 1). By providing a suitable mix of housing types and tenure, this policy would be expected to meet the varying needs of residents, as well as contribute to a vibrant and varied community, and as such a minor positive impact on health and wellbeing and community is expected (SA Objectives 2 and 4).

### 3.8.32 DPH32: Affordable Housing

Policy DPH32 seeks to ensure that, throughout the Plan area, the MSDPR delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents, whereby “proposals which do not provide a minimum of 30% affordable housing will be refused” unless there is clear evidence that the requirement is wholly unachievable.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	+	0	+	0	0	0	0	0	0	0	0	0	0

This policy sets out the requirements for provision of affordable housing, including those which are wheelchair accessible, to ensure that suitable residential development is provided to meet the social and economic needs of the population. Therefore, the policy would be expected to have a minor positive impact on housing provision (SA Objective 1). Through meeting the identified need of affordable housing, Policy DPH32 will enable residents to purchase more affordable homes within their means potentially resulting in positive impacts on financial wellbeing, with subsequent minor positive health impacts (SA Objective 2).

In seeking to integrate affordable housing into new development, the policy also has the potential to create more inclusive communities by meeting the needs of local people; therefore, a minor positive impact on SA Objective 4 could be expected.

### 3.8.33 DPH33: First Homes

Policy DPH33 seeks to ensure that First Homes are provided as part of the overall residential mix, type and tenure of houses delivered within the Plan period. First Homes, as set out by the policy, will make up 25% of the total number of affordable housing units (as set within Policy DPH32).

There have been minor wording updates to this policy to include consideration of members and family of the Armed Forces. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	+	0	+	0	0	0	0	0	0	0	0	0	0

This policy sets out the requirements for the development of First Homes and First Home Exception Sites which would be supported by the Council, and therefore by meeting the identified need for first time buyers within the Plan area, a minor positive impact on housing is expected (SA Objective 1). Through meeting the identified need of First Homes, Policy DPH33 will enable residents to purchase more affordable homes within a community of their choice potentially resulting in positive impacts on financial wellbeing and subsequent positive health impacts, as well as helping to create more vibrant and inclusive local communities. A minor positive impact on health and wellbeing and community and equality could therefore be expected (SA Objectives 2 and 4).

### 3.8.34 DPH34: Rural Exception Sites

Rural exception sites are small sites used for affordable housing in perpetuity where sites would not typically be used for housing. Policy DPH34 makes provision for these as required under national planning policy.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	0	+	0	0	-	0	+	0	+	0	0	0	0

This policy would be expected to help meet the housing requirements and increase the provision of affordable housing across the Plan area. Therefore, a minor positive impact on housing would be expected (SA Objective 1).

Through Policy DPH34, the development of rural exception sites for affordable housing will only be permitted if certain criteria are met including “The scale of the development respects the setting, form and character of the settlement and surrounding landscape” and “The development is adjacent to, or in close proximity to, a rural settlement containing a local convenience shop and access to a bus stop with adequate bus services, and if possible a primary school”. Therefore, through ensuring landscape settings and accessibility to public transport and local services (potentially including primary schools) are considered, minor positive impacts on education, landscape and climate change and transport could be expected (SA Objectives 3, 8 and 10).

Rural exception sites could potentially be located on previously undeveloped land in the open countryside. As such, development proposals (although of a smaller scale) would be likely to result in the loss of soil resources, and therefore, have a minor negative impact on natural resources (SA Objective 6).

### 3.8.35 DPH35: Dwelling Space Standards

The Nationally Described Space Standards<sup>10</sup> help to ensure that all development satisfies the requirement for internal space ensuring more affordable homes still provide new residents with enough internal space.

<sup>10</sup> HCLG (2015) Technical housing standards – nationally described space standards. Available at:

<https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard> [Date Accessed: 09/11/2023]

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	+	0	0	0	0	0	0	0	0	0	0	0	0

It is expected that the greater the internal space within a property, the better the standard of living for residents. An increased amount of residential space facilitates an improved standard of living, leading to a more comfortable and higher quality life. As such, a minor positive impact on health and wellbeing is expected from this policy (SA Objective 2).

### 3.8.36 DPH36: Accessibility

Policy DPH36 ensures all development meets and maintains a high standard of accessibility for the safe and easy use for all.

There has been a minor wording update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPH36	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	0	0	0	0	0	0	0	0	0	0	0	0



Mid Sussex is an area with an increasingly high population of older people, with approximately 21% of the population aged 65 or over in 2021<sup>11</sup>. As such, future residential development needs to consider accessibility requirements for the elderly, as well as families with young children and those with specific needs.

Policy DPH36 would be likely to help ensure residential developments allow for the safe and convenient access for a variety of residents, including older people and wheelchair users. Therefore, this policy would be likely to have a minor positive impact on housing, through meeting requirements of the whole population including older people, and residents' health and wellbeing through such provisions (SA Objectives 1 and 2).

### 3.9 Infrastructure

#### 3.9.1 DPI1: Infrastructure Provision

#### 3.9.2 DPI2: Planning Obligations

Policy DPI2 sets out the use of planning obligations in relation to the provision of affordable housing, appropriate mitigation of a multitude of potential development impacts, and monitoring of these obligations.

There has been a significant wording update to this policy which provides more clarity on the impacts that a development may cause and removes reference to the Community Infrastructure Levy 2010. The revised assessment since the Regulation 18 SA is included below.

Policy Option DPI2	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	+	+	+	0	++	+	0	+	+	0	0	+

<sup>11</sup> ONS, 2021. How has life changed in Mid Sussex: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000228/> [Accessed 09/11/2023]

The impact of development criteria includes measures related to employment opportunities, health and wellbeing, education, social and community facilities, flood management, GI, biodiversity net gain and consideration of the integrity of the Ashdown Forest SAC and SPA, traffic improvements, active travel improvements, and waste management. The policy could help to ensure that site users are served by suitable infrastructure and are located in areas with good access to these services and facilities. Therefore, minor positive impacts relating to these SA Objectives could be expected (SA Objectives 2, 3, 4, 5, 8, 10, 11 and 14) and a major positive impact on biodiversity (SA Objective 7).

### 3.9.3 DPI3: Major Infrastructure Projects

### 3.9.4 DPI4: Communications Infrastructure

Policy DPI4 supports the provision of high-quality digital infrastructure, such as superfast broadband, and electronic communications throughout the Plan area, in order to meet the needs of the current and future population.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPI4	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	0	+	0	0	0	+	0	0	+	+

With improvements to broadband and electronic communications in the area under this policy, residents would be likely to have greater access to essential services from home. This would provide increased opportunities to work from home and access a wider range of employment opportunities, resulting in a minor positive impact on economic growth (SA Objective 14). Through increasing the range of employment opportunities available within the district, this policy could also result in a minor positive impact on economic regeneration (SA Objective 13).

Additionally, with improved access to online facilities and home working, this policy could potentially help to reduce the need to travel and reliance on private car use such as for

commuting to workplaces, and in turn, reduce local congestion. This could potentially lead to a minor positive impact on climate change and transport, due to reduced emissions associated with less traffic, and transport (SA Objective 10).

Through preferring that communications infrastructure proposals “use to be made of existing sites rather than the provision of new sites” there may potentially be less undeveloped land and associated soil resources used for development, leading to minor positive impacts on natural resources (SA Objective 6).

### 3.9.5 DPI5: Open Space, Sport and Recreational Facilities

Policy DPI5 seeks to increase the provision of green spaces and recreational facilities, helping to ensure residents have access to a diverse range of natural spaces and habitats.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPI5	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	+	0	0	+	+	0	0	0	0	0	0

This policy would be likely to help ensure residents have good access to open space, sport and recreational facilities, including play facilities for children and sports pitches. This would be expected to encourage outdoor exercise and provide space for reflection. Therefore, a minor positive impact on mental and physical health would be expected (SA Objective 2).

The provision of green spaces can help create attractive places to live and strengthen a sense of place for local communities and help contribute to a sense of community and social cohesion. By supporting the provision of green space across the Plan area, this policy would be expected to have a minor positive impact regarding community cohesion (SA Objective 4), as well as enhancing the multi-functional benefits of GI including in terms of biodiversity and landscape (SA Objectives 7 and 8).

### 3.9.6 DPI6: Community and Cultural Facilities and Local Services

Policy DPI6 seeks to protect existing community facilities and support development proposals for new or improved facilities.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DPI6	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	+	0	0	0	0	0	0	0	0	0	+

This policy would be expected to ensure that existing local facilities are retained and enhanced, which would be likely to improve local residents' access to services such as health facilities, sports facilities and schools.

By encouraging the retention or provision of these community facilities, this policy would be expected to have a minor positive impact in regard to health, access to community facilities and supporting local businesses, potentially leading to economic growth (SA Objectives 2, 3, 4 and 14).

### 3.9.7 DPI8: Viability

Policy DPI7 sets out a range of criteria which must be adhered to, in exceptional circumstances where a development proposal may generate insufficient value to support the full range of requirements set out in other District Plan policies.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Policy Option DP18	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+/-	+/-	+/-	+/-	0	0	0	0	0	+/-	+/-	+/-	+/-	+/-

The policy could potentially result in a benefit in terms of requiring applicants to robustly demonstrate through a Viability Appraisal how the proposal is economically unviable, to ensure there are valid reasons for departing from the required contributions. By setting the requirements out in a planning policy, this could give greater certainty regarding the delivery of appropriate infrastructure depending on the circumstance for each scheme.

However, the potential for “reductions in infrastructure contributions and/ or affordable housing provision” set out through this policy could result in possible adverse effects on the provision of social and community infrastructure including schools, affordable housing and choice in housing, open space and GI, transport infrastructure and renewable energy schemes. The effects of this policy on SA Objectives 1, 2, 3, 4, 10, 11, 12, 13 and 14 are uncertain.

The policy would be unlikely to directly impact SA Objective 5, 6, 7, 8 and 9.

## 4 Site Assessment

### 4.1 Context

To inform the Regulation 18 Plan development and Sustainability Appraisal (SA), Mid Sussex District Council undertook a Strategic Housing and Economic Land Availability Assessment (SHELAA) and Site Selection Process to identify potential suitable sites for allocation within the District Plan to meet housing needs. This process involved assessing all potential sites against fourteen assessment criteria set out within a Site Selection Methodology paper, covering a range of topics including national policy requirements and national and local designations, to determine their suitability for allocation.

Following assessment against the Site Selection methodology, 42 reasonable alternative sites for housing, and two reasonable alternative sites for C2 use were identified. All of these reasonable alternative sites are outlined in Table 1-1 below.

The Regulation 18 SA, prepared by Lepus Consulting in 2022, presented an appraisal of these reasonable alternative sites for residential development and C2 use identified by Mid Sussex District Council, in accordance with the SA framework and methodology.

During consultation on the draft Regulation 18 District Plan, the Council received several comments from members of the public and consultees on the results of the SHELAA and supporting SA. Some of these comments related to questions over the scoring of particular sites and consistency of scoring between sites.

Following review of these comments, the Council reviewed the site assessment scores assigned against the Site Selection Methodology and updated scores for 14 of the 42 reasonable alternative sites, where appropriate, to address concerns over inconsistency of assessment across all reasonable alternative sites. These changes and the updated assessment findings are described in Section 4.2. In addition, since the publication of the Regulation 18 Plan, eight new reasonable alternative sites have been identified as outlined. All of these sites and their respective status are outlined in Table 4-1 and shown on Figure 1-1 below.

This SA site assessment therefore presents an updated assessment of 14 reasonable alternative sites against the SA framework where updates have been made to the Site Selection conclusions following receipt of consultee comments, along with an assessment of the eight new reasonable alternative sites that have been identified. Where existing reasonable alternative sites have been assessed against the SA Framework at Regulation 18, and remain unchanged from the consultation process, no further assessment has been undertaken.

Table 4-1: Reasonable alternative sites

SHEELA Ref	Site	Settlement	Yield
13	Land west of Kemps, Hurstpierpoint	Hurstpierpoint	90

SHEELA Ref	Site	Settlement	Yield
18	Crabbet Park, Old Hollow, Near Crawley	Copthorne	<b>2,300</b>
19	Land east of College Lane, Hurstpierpoint	Hurstpierpoint	<b>80</b>
198	Land off West Hoathly Road, East Grinstead	East Grinstead	<b>45</b>
210	Land rear of 2 Hurst Road (Land opposite Stanford Avenue) Hassocks	Hassocks	<b>25</b>
503	Haywards Heath Golf Course, High Beech Lane, Haywards Heath	Lindfield	<b>700</b>
508	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath	Haywards Heath	<b>30</b>
526	Land east of Paynesfield, Bolney	Bolney	<b>30</b>
543	Land West of London Road (north), Bolney	Bolney	<b>65</b>
556	Land east of Borde Hill Lane, Haywards Heath	Haywards Heath	<b>60</b>
573	Batchelors Farm, Keymer Road, Burgess Hill	Burgess Hill	<b>33</b>
575	Land north east of Hurstpierpoint	Hurstpierpoint	<b>150</b>
601	Land at Coombe Farm, London Road, Sayers Common	Sayers Common	<b>210</b>
617	Land at Foxhole Farm, Bolney	Bolney	<b>100</b>
631	Challoners, Cuckfield Road, Ansty	Ansty	<b>21</b>
678	Broad location West of A23	Twineham	<b>900</b>
686	Land to the rear of The Martins (south of Hophurst Lane), Crawley Down	Crawley Down	<b>125</b>
688	Land to west of Turners Hill Road, Crawley Down	Crawley Down	<b>350</b>
736	Land at Ansty Farm, Cuckfield Road, Ansty	Ansty	<b>1,400 - 1,600</b>
740	Broad location to the West of Burgess Hill / North of Hurstpierpoint	Burgess Hill	<b>1,350</b>



SHEELA Ref	Site	Settlement	Yield
743	Hurst Farm, Turners Hill Road, Crawley Down	Crawley Down	37
784	Extension to allocated Land at Bolney Road, Ansty	Ansty	45
789	Phase 1 Swallows Yard, London Road, Albourne	Albourne	46
799	Land south of Reeds Lane, Sayers Common	Sayers Common	2,000
830	Land to the west of Kings Business Centre, Reeds Lane, Sayers Common	Sayers Common	100
844	Land at North Colwell Farm, Lewes Road, Haywards Heath	Haywards Heath	100
858	Land at Hurstwood Lane, Haywards Heath	Haywards Heath	36
984	The Paddocks Lewes Road, Ashurst Wood	Ashurst Wood	8
986	Land to the West of Albourne Primary School Henfield Road, Albourne	Albourne	125
1003	Land to South LVS Hassocks, London Road, Sayers Common	Sayers Common	200
1018	Extension south west of Meadow View, Sayers Common	Sayers Common	250
1020	Ham Lane Farm House, Ham Lane Scaynes Hill	Scaynes Hill	30
1022	Former Hassocks Golf Club, London Road, Hassocks	Hassocks	500
1026	Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common	Sayers Common	33
1030	Land at South of Appletree Close, Janes Lane, Burgess Hill	Burgess Hill	25
1063	Phase 2 Swallows Yard, London Road Albourne	Albourne	46
1075	Land north of Willow way and Talbort Mead, Cuckfield Road, Hurstpierpoint	Hurstpierpoint	153
1095	Land at West Town Farm Hurstpierpoint	Hurstpierpoint	500
1101	Land at Byanda, Hassocks	Hassocks	C2

SHEELA Ref	Site	Settlement	Yield
1105	Land east and west of Malthouse Lane	Burgess Hill	<b>750</b>
1106	Land at Hyde Lodge, Handcross	Handcross	<b>C2</b>
1120	Land east of Foxhole Lane	Bolney	<b>200</b>
1121	Orchards Shopping Centre	Haywards Heath	<b>100</b>
1123	Burgess Hill Station	Burgess Hill	<b>300</b>
<b>New reasonable alternative sites</b>			
1146	Swallows Yard (Phases 1&2)	Hassocks	<b>90</b>
1135	Land r/o Challoners, Cuckfield Road	Ansty	<b>9</b>
1141	Land west of Cuckfield Road	Ansty	<b>6</b>
1148	Land west of North Cottages and Challoners		<b>30</b>
1133	Land west of Bolney Place	Bolney	<b>10</b>
1137	Land to the west of Ockley Lane	Hassocks	<b>400</b>
1122	Sussex House and Commercial House and 54 and 56 Perrymount Road	Haywards Heath	<b>100</b>
29	Land off Snowdrop Lane	Lindfield	<b>40</b>

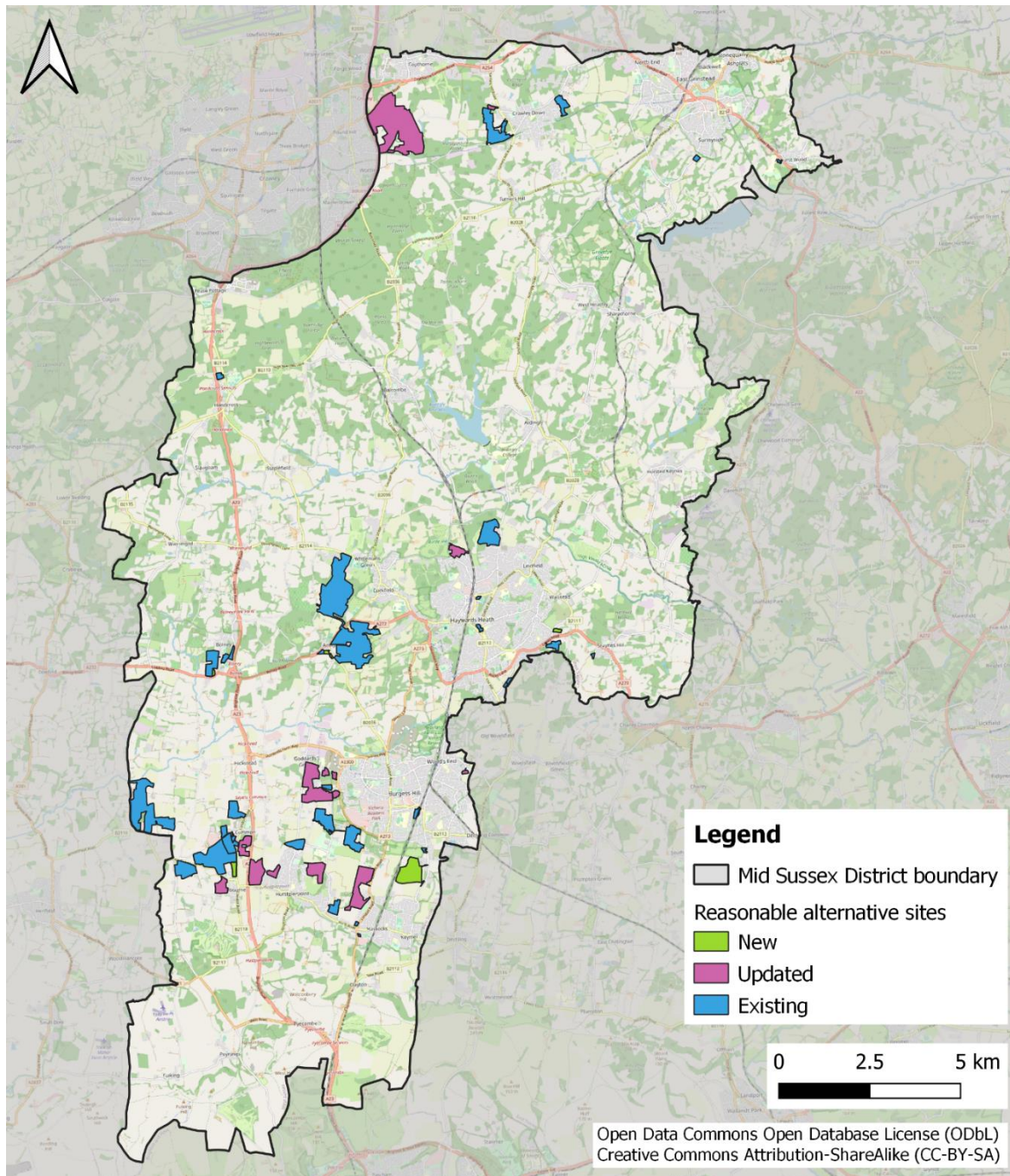


Figure 4-1: Map showing the existing sites, those with updated assessment results and new sites brought forward.

## 4.2 Updates to site assessment criteria

The Site Selection process involved assessing sites against 14 assessment criteria, one of which focussed on Listed Buildings (Criterion 5: Listed Buildings), and another on Conservation Areas (Criterion 6: Conservation Area), to consider the location of a potential site in relation to these designations. Since the Regulation 18 Plan, MSDC have amended these two criteria to reflect comments received from consultees, as well as review of the National Planning Policy Framework (NPPF).

These updated criteria outlined that for the Site Selection process, any site where scoring concluded 'Less than substantial harm' for Criterion 5 and Criterion 6 would result in an updated assessment score of 'negative impact', unless an assessment or review of heritage assets has been undertaken to enable the consideration of potential suitable mitigation on the identified heritage assets of the proposed scheme. All other criteria used for the Site Selection process remained as per the Regulation 18 Plan. Following consultee comments relating to the travel time data used to calculate distances for sites, the Council checked and updated the Site Selection conclusions as required.

The SA site assessment process is a separate process to the Site Selection process, providing an independent assessment of the likely environmental and socio-economic impacts of a site. It is considered that the amended Site Selection criteria, and potential for inclusion of mitigation, would not have an impact on the SA site assessment, therefore all Regulation 18 SA site assessment findings remain valid. However, where amendments have been made to the Site Selection process to correct erroneous travel time data, the SA site assessment has been updated to reflect this updated travel data. These changes are outlined in Table 1-2 below.

An overview of the updated assessments for the 14 sites which received comments from consultees is outlined below.

Table 4-2: Updated assessments results for 14 reasonable alternatives

SHEELA Ref	Topic	Previous score	Current score	Comment
575	Pedestrian Access to Community Facilities and Local Services(SA Objective 4 & 10)	-	-	Changed from Within to Over 20 minutes walk, over 30 minutes public transport
	Public Transport Access to Community Facilities and Local Services (SA Objective 4 & 10)	-	-	Changed from Within to Over 20 minutes walk, over 30 minutes public transport
	Pedestrian Access to Primary Schools (SA Objective 3)	-	-	Changed from Within to Over 20 minutes walk
	Pedestrian Access to GP surgery (SA Objective 2)	0	-	Changed from Within to Over 20 minutes walk
	Pedestrian Access to Convenience Store (SA Objective 10)	-	-	Changed from Within to Over 20 minutes walk

SHEELA Ref	Topic	Previous score	Current score	Comment
1022	Listed Buildings (SA Objective 9)	0	-	Replaced: No impact with: Less than substantial harm – Low impact
1030	Pedestrian Access to Community Facilities and Local (SA Objective 4 & 10) Services (SA Objective 4 & 10)	-	--	Changed from: Within to Over 20 minutes walk, within 30 minutes public transport



## 5 Site Assessment - pre-mitigation

### 5.1 Introduction

The following sections provide an appraisal of each of the new reasonable alternative sites identified by Mid Sussex District Council in accordance with the SA framework and methodology.

The SA site assessment is structured based on the SA objectives and supporting questions outlined by Lepus Consulting which form the SA framework. Each subsection below focusses on a particular SA objective, presenting a scoring matrix for all sites assessed against each SA objective, supported by a rationale for the recorded impacts.

The SA process can rely upon professional judgement, and therefore the Regulation 18 SA and the decision-making used throughout that site assessment has been used to inform this site assessment.

### 5.2 SA Objective 1 - Housing

SA Objective 1 is to ensure that everyone has the opportunity to live in a home for their need and which they can afford. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to...

- Meet the housing requirement of the whole community, including of older people?
- Deliver a range of type, tenures and mix of homes the district needs over the plan period?
- Increase the supply of affordable homes?
- Provide for the housing need of an ageing population?
- Meet Gypsy and Traveller accommodation needs?

Table 5-1: Site assessment matrix for Objective 1 - Housing

Site ref.	Score
1146	+
1135	+
1141	+
1148	+
1133	+
1137	++
1122	++
29	+

Of the eight new sites identified, those identified as having a yield of 100 or more dwellings would be expected to have major positive impacts on housing provision. Sites which have been identified as having an expected yield of less than 100 dwellings are expected to have a minor positive impact on dwelling provision.

Sites 1122, and 1137 are expected to provide a yield of 100, and 400 dwellings respectively, they are therefore assessed as having a major positive impact on housing. The remaining sites are assessed as having a minor positive impact on housing provision as they provide a yield ranging from 6-10 dwellings.

### 5.3 SA Objective 2 - Health and Wellbeing

SA Objective 2 is to maintain and improve access to health, leisure and open space facilities and reduce inequalities in health. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to...

- Provide for additional facilities to support the need of new and growing communities?
- Improve access to health care facilities and social care services?
- Promote health and encourage healthy lifestyle by maintaining, connecting, creating and enhancing multifunctional open spaces, green infrastructure and recreation and sports facilities?
- Promote healthy lifestyle choices by encouraging and facilitating walking and cycling?
- Support special needs and ageing populations?
- Increase access to open space facilities including the countryside?

Table 5-2: Sites impact matrix for SA Objective 2 - Health and Wellbeing

Site Ref.	Hospital with A&E	Access to GP Surgery	Leisure Centres	AQMAs	Main Road	Access to Greenspace	Loss of Greenspace	PROW/ Cycle Paths
1146	-	-	-	+	+	+	-	+
1135	+	-	-	+	-	+	-	+
1141	+	-	-	+	+	+	-	+
1148	+	-	-	+	-	+	-	+
1133	-	-	-	+	-	+	-	+
1137	+	-	-	+	+	+	-	+
1122	+	+	+	+	+	+	-	+
29	+	+	-	+	-	+	-	+



### 5.3.1 NHS hospital with A&E Department

There are two NHS hospitals with A&E Departments in Mid Sussex district, the Princess Royal in Haywards Heath and Queen Victoria in East Grinstead. The target distance, outlined by Lepus Consulting within Regulation 18 SA, for sustainable access to an NHS hospital with A&E department is 5km. Sites 29, 1141, 1135, 1148, 1122 and 771 are within a 5km buffer of either hospital, therefore the proposed development of these five sites is expected to have a minor positive impact on access to essential healthcare.

Sites 1146 and 1133 are located outside of the target distance, and therefore proposed development at these sites are expected to have a minor negative impact on access to essential healthcare.

### 5.3.2 Pedestrian Access to GP Surgery

There are twenty-six GP surgeries in Mid Sussex district, the target distance for sustainable access outlined by Lepus Consulting within the Regulation 18 SA to a GP surgery is approximately 1.2km or a 15-minute walk.

Sites 29 and 1122 are located within the target distance of 15 minutes' walk from the nearest GP surgery, therefore, proposed development of this site would be expected to have a minor positive impact on access to healthcare.

Sites 1133, 1135, 1137, 1141, 1146, 1148, are located over 20 minutes' walk from the nearest GP surgery. It would be expected that proposed development of these sites would have a minor negative impact on access to healthcare.

### 5.3.3 Leisure Centres

There are three leisure centres located in Mid Sussex district, these are located in Haywards Heath, East Grinstead and Burgess Hill. In the Regulation 18 SA by Lepus Consulting, the target sustainable distance from the proposed developments to a leisure centre is 1.5km.

All of the additional proposed development sites are located outside of the 1.5km target distance except for Site 1122, therefore, the remaining sites would be expected to have a minor negative impact on access to these facilities.

The development of site 1122 would be expected to have a minor positive impact on the health and wellbeing of site users.

### 5.3.4 Air Quality Management Areas (AQMAs)

The target distance outlined by Lepus Consulting within Regulation 18 SA from an AQMA is 200m.

All of the additional proposed development sites are located at least 200m from an AQMA therefore, a minor positive impact on human health would be expected for site users at these sites.

### 5.3.5 Main Roads

As outlined by Lepus Consulting within Regulation 18 SA, proposed sites located within 200m from a main road would be expected to have a minor impact on the health and wellbeing of site users. Development in these locations may have the potential to expose site users to higher levels of transport associated air and noise pollution<sup>1</sup>.

Sites 1133, 1135, 1148, 29 are located less than 200m from main roads. The proposed development of these four sites is therefore expected to have a minor negative impact on the health and wellbeing of site users.

Sites 1137, 1141, 1146, and 1122 are located at least 200m from a main road and are therefore expected to have a minor positive impact on the health and wellbeing of site users.

### 5.3.6 Access to Greenspace

Access to greenspace is associated with a range of mental and physical health benefits. As outlined by Lepus Consulting within Regulation 18 SA, if a site is located within 300m of an OS Greenspace site<sup>2</sup>, or a multi-functional greenspace, a minor positive impact is expected on site users' health and wellbeing.

All of the additional sites are located within 300m of OS Greenspace sites or multi-functional greenspaces, therefore development of these sites is expected to have a minor positive impact on site users health and wellbeing.

### 5.3.7 Net Loss of Greenspace

None of the proposed additional sites coincide with OS Greenspaces or multi-functional greenspace. Therefore no net loss of greenspace is expected from the additional sites.

### 5.3.8 PRow/Cycle Paths

Proposed sites which have good accessibility to the PRow and/or National Cycle Network would likely encourage engagement in physical activity and active travel resulting in a minor positive impact on health and wellbeing.

All sites are expected to provide access to Mid Sussex's PRow network and therefore, are likely to provide a minor positive impact on access to this amenity and health benefits.

## 5.4 SA Objective 3 - Education

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<sup>1</sup> For the purposes of this assessment, main roads were identified using the Major Road Network dataset published by the Department for Transport (2021) which contains public sector information licensed under the Open Government Licence v3.0.

<sup>2</sup> Ordnance Survey (2022) OS Greenspace. Available at:  
<https://www.data.gov.uk/dataset/4c1fe120-a920-4f6d-bc41-8fd4586bd662/os-open-greenspace>

SA Objective 3 is to maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to...

- Reduce crime/ fear of crime and anti-social activity?
- Promote sustainable mixed-use environments?
- Improve access to community facilities?
- Maintain existing community facilities and encourage the delivery of new ones?

Table 5-3: Site impact matrix for SA Objective 3 - Education

Site ref.	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Further Education
1146	++	-	+
1135	-	-	+
1141	-	-	+
1148	-	-	+
1133	++	-	-
1137	-	-	+
1122	+	+	+
29	+	-	+

#### 5.4.1 Pedestrian Access to Primary Schools

As outlined by Lepus Consulting within Regulation 18 SA, the sustainable target distance for a residential site to a primary school is within a 15-minute walk (approximately 1.2km).

Sites 1146 and 1133 are located within a 10-minute walk from a primary school. This is expected to have a major positive impact on access to primary school education for site users.

Sites 1122 and 29 are located within a 15-minute walk from a primary school. This is expected to have a minor positive impact on access to primary school education for site users.

Sites 1135, 1141, 1148 and 1137 are located over a 20-minute walk from a primary school. This is expected to have a minor negative impact on the access to primary school education for site users.

#### 5.4.2 Pedestrian Access to Secondary Schools

As outlined by Lepus Consulting within Regulation 18 SA, the sustainable distance to secondary education has been identified as 1.5km from a residential site.

Site 1122 is located within 1.5km of the Oathall Community College. Therefore, development of this site is expected to have a minor positive impact on access to secondary education for site users.

Sites 1133, 1137, 1141, 1145, 1146, 1148, and 29 are located outside of the target distance. Therefore it is expected that proposed development of these sites will likely have a minor negative impact on access to secondary education for site users.

#### 5.4.3 Further Education

As outlined by Lepus Consulting within Regulation 18 SA, residential sites which are located within 3km from a further education facilities are expected to have good access to these facilities.

The majority of the additional proposed sites are located within 3km of further educational facilities in Mid Sussex District. Therefore, the development of these proposed sites could be expected to have a minor positive impact on access to further education for site users.

Site 1133 is not located within 3km of a further educational facility and therefore a minor negative impact on access to further education could be expected for site users.

### 5.5 SA Objective 4 - Community and Crime

SA Objective 4 is to maintain and improve access to health, leisure and open space facilities and reduce inequalities in health. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to...

- Reduce crime/ fear of crime and anti-social activity?
- Promote design that discourages crime?
- Promote sustainable mixed-use environments?
- Improve access to community facilities?
- Maintain existing community facilities and encourage the delivery of new ones?

Table 5-4: Site impact matrix for SA Objective 4 - Community and Crime

Site Ref	IMD	Pedestrian Access to Community Facilities	Public Transport Access to Community Facilities	Loss of Community Facilities	Built Up Area Boundary
1146	0	-	-	0	0
1135	0	-	-	0	0
1141	0	-	-	0	0
1148	0	-	-	0	0

Site Ref	IMD	Pedestrian Access to Community Facilities	Public Transport Access to Community Facilities	Loss of Community Facilities	Built Up Area Boundary
1133	0	-	-	0	0
1137	0	-	+	0	0
1122	0	+	+	-	0
29	0	-	-	0	0

### 5.5.1 Index of Multiple Deprivation

The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation across Lower Layer Super Output Areas (LSOA), which is a geographical region of a population size of approximately 1,500. LSOAs are used for the reporting of small area statistics in England and Wales. The IMD utilises seven key domains and 39 indicators of deprivation which are weighted and used to calculate the index, all LSOAs are ranked into deciles. As outlined by Lepus Consulting within Regulation 18 SA, for the purposes of this analysis the proposed sites have been assessed for their location in an LSOA within the 10% most deprived in England and Wales.

Deprivation across the district varies, however, none of the proposed sites fall within an LSOA within the 10% most deprived areas, therefore each site has been given a neutral score.

### 5.5.2 Pedestrian Access to Community Facilities

For the purposes of this assessment, the term community facilities refer to convenience shops community halls, places of worship and libraries. As outlined by Lepus Consulting within Regulation 18 SA, the target distance from the proposed sites and community facilities is within a 15-minute walk.

Site 1122 is located within a 15 minute-walk from community facilities, therefore development at this site is expected to have a minor positive impact on access to community facilities.

Sites 1133, 1135, 1137, 1141, 1146, 1148, and 29 are located over 20 minutes-walk from community facilities. Therefore, development at these sites is expected to have a minor negative impact on access to community facilities.

### 5.5.3 Public Transport Access to Community Facilities

As outlined by Lepus Consulting within Regulation 18 SA, sites which are located within a 30-minute journey or less using public transport to access community facilities such as a

shop, a community hall, a place of worship or library would be expected to have a minor positive impact on accessibility of community facilities for site users.

Sites 1133, 1135, 1141, 1146, 1148, and 29 are located over a 30-minute journey using public transport to community facilities. Therefore, development at these proposed sites would be expected to have a minor negative impact on access to community facilities.

Sites 1137 and 1122 are located within a 20-minute journey using public transport to community facilities. Therefore, development at these locations would be expected to have a minor positive impact on access to community facilities.

#### 5.5.4 Loss of Community Facilities

Site 1122 coincides with the location of a convenience store and post office, therefore, the proposed development of this site could result in the loss of these amenities. Following the decision-making process applied by Lepus Consulting in the Regulation 18 SA, this could therefore be expected to have a minor impact on the provision of community facilities.

None of the remaining proposed development sites coincide with existing community facilities.

#### 5.5.5 Built Up Area Boundary

As outlined by Lepus Consulting within Regulation 18 SA, proposed sites which are located over 150m from a built-up area boundary are expected to have a negative impact on community cohesion and integration with existing local communities. However, none of the additional sites proposed are located over 150m from a built-up area boundary, therefore each site has been given a neutral score.

### 5.6 SA Objective 5 - Flooding

SA Objective 5 is to reduce the risk to people, properties, the economy and the environment of flooding from all sources. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to..

- Minimise inappropriate development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change?
- Promote the use of Natural Flood Management schemes, SuDS and flood resilient design?
- Incorporate sustainable design and construction techniques?

Table 5-5: Site impact matrix for SA Objective 5 - Flooding

Site Ref	Fluvial Flood Risk	Surface Water Flood Risk
1146	+	-

Site Ref	Fluvial Flood Risk	Surface Water Flood Risk
1135	+	+
1141	+	-
1148	+	+
1133	+	--
1137	+	--
1122	+	-
29	+	-

### 5.6.1 Fluvial Flood Risk

All of the additional proposed sites are located in Flood Zone 1, where the risk of flooding is less than 0.1% each year. Therefore proposed development at this site would place site users at a low risk of flooding therefore a minor positive impact could be expected.

### 5.6.2 Surface Water Flood Risk

Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) risk relating to the probability of surface water flooding occurring in a given area.

Sites 1122, 1141, and 1146 coincide with areas of low risk from surface water flooding and Site 29 is at medium risk of surface water flooding. Therefore, the development of these sites could have a minor negative impact on flooding.

Sites 1133 and 1137 coincide with areas of high risk from surface water flooding. Therefore, the development of these sites could have a major negative impact for site users.

Sites 1135 and 1148 do not coincide with areas at risk of surface water flooding. Therefore development of these sites would be expected to have a minor positive impact.

## 5.7 SA Objective 6 - Natural Resources

SA Objective 6 is 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. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to...

- Support the redevelopment of previously developed land?
- Make best use of land?
- Encourage the construction of more sustainable homes?
- Minimise the loss of open countryside to development?
- Minimise the loss of the best and most versatile agricultural land to development?



- Maintain and enhance soil quality?

Table 5-6: Site impact matrix for SA Objective 6 - Natural Resources

Site Ref	Previously Developed Land	Agricultural Land Classification	Mineral Safeguarding Area
1146	-	-	-
1135	-	-	0
1141	-	-	-
1148	-	-	0
1133	-	-	-
1137	-	--	-
1122	+	0	0
29	-	-	0

#### 5.7.1 Previously Developed Land

Site 1122 is largely comprised of previously developed land, so development at this location would have a minor positive impact on natural resources through efficient use of land.

Sites 1133, 1135, 1146, 1141, 29, 1137 and 1148 partially or wholly comprise undeveloped land which may have minor negative impacts on natural resources through their permanent and irreversible loss.

#### 5.7.2 Agricultural Land Classification (ALC)

Site 1122 is located upon land which is classified as urban, therefore is expected to have negligible impacts on agricultural land.

Sites 1133, 1141, 1135, 1146, 1148 and 29 are located upon land in ALC Grade 3, and are less than 20ha. The proposed development of these sites would likely have a minor negative impact on agricultural land through the irreversible loss of Best and Most Versatile (BMV) soil resources.

Site 1137 is located upon ALC Grade 3 and is over 20ha. The proposed development at this site would be expected to have a major negative impact on agricultural land through the irreversible loss of BMV soil resources.

#### 5.7.3 Mineral Safeguarding Area

Areas of nationally and locally important mineral resources which should be protected from unnecessary sterilisation are designated as Mineral Safeguarding Areas (MSAs).

Sites 1122 and 1135, 1148 and 29 do not coincide with MSAs and therefore proposed development of these sites is expected to have a negligible impact on mineral resources.

Sites 1133, 1137, and 1146 are located within a MSA for Brick clay and Site 1141 is located within MSA for Consolidated bedrock. The development of these sites could potentially lead to the sterilisation of these mineral resources. Therefore, the proposed sites would have a minor negative impact on natural resources.

## 5.8 SA Objective 7 - Biodiversity and Geodiversity

SA Objective 7 is to conserve and enhance the district's biodiversity and geodiversity. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to...

- Avoid adverse effects on internally and nationally designated biodiversity and geodiversity assets within and outside the district, including Ancient Woodland?
- Seek to protect and enhance ecological networks, promoting the achievement of net gain where possible, whilst taking into account the impacts of climate change?
- Provide and manage the opportunities for young people to come into contact with wildlife whilst encouraging respect for and raising awareness of the sensitivity of biodiversity?

Table 5-7: Site impact matrix for SA Objective 6 - Biodiversity and Geodiversity

Site Ref	Habitat Sites	SSSI	Ancient Woodlands	Veteran Trees	Local Nature Reserves	Local Wildlife Sites	Priority Habitats
1146	0	0	0	0	0	0	0
1135	0	0	0	0	0	0	0
1141	0	0	0	0	0	0	0
1148	0	0	0	0	0	0	0
1133	0	0	0	0	0	0	0
1137	0	0	--	0	0	0	-
1122	0	0	0	0	0	0	0
29	0	0	--	0	0	0	0

### 5.8.1 Habitat Sites

Habitat sites are designated environmental sites which have been identified and protected for their ecological interest. There are no Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites located in the district. However Ashdown Forest SPA and SAC is located to the east in a neighbouring authority (East Sussex). As outlined by Lepus Consulting within Regulation 18 SA, the proposed sites have been assessed for

their location within Ashdown Forest SPA and SAC 7km Zone of Influence<sup>3</sup>, previously established by MSDC.

None of the proposed development sites are located within the 7km Zone of Influence, therefore, their development is likely to have negligible impacts on Ashdown Forest SPA and SAC.

#### 5.8.2 Sites of Special Scientific Interest

None of the proposed development sites are located within a SSSI impact risk zone, therefore, their development is likely to have negligible impacts on SSSIs in MSDC.

#### 5.8.3 Ancient Woodlands

There are several large areas of Ancient Woodland concentrated to the north of the district, including Worth Forest and Wakehurst Park.

Sites 1137 and 29 are located adjacent to or within Ancient Woodland within the district and therefore development at these locations are expected to result in a direct loss of these assets and a major negative impact.

Sites 1122, 1133, 1141, 1135, 1146, and 1148 are not located within or in proximity to Ancient Woodland, therefore development of these sites is expected to have a negligible impact on these biodiversity assets.

#### 5.8.4 Veteran Trees

None of the proposed development sites coincide with the location of veteran trees. Therefore development at these locations would have a negligible impact on veteran trees.

#### 5.8.5 Local Nature Reserves

None of the proposed development sites are located in proximity to Local Nature Reserves, therefore a negligible impact is expected.

#### 5.8.6 Local Wildlife Sites

There are several Local Wildlife Sites (LWSs) located across the district. All of the proposed sites are not located within or in proximity to an LWS. Therefore a negligible impact can be expected.

#### 5.8.7 Priority Habitats

Priority habitats are prevalent throughout the district and include deciduous woodland, grass moorland and traditional orchards. Site 1137 coincides with areas of priority habitat,

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<sup>3</sup> Mid Sussex District Council (2022) Protecting Ashdown Forest. Available at: <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/>

Therefore, development at this site could result in the loss or degradation of these habitats. As a result, a minor negative impact is assessed.

None of the other proposed sites coincide with priority habitat, therefore a negligible impact is assessed.

## 5.9 SA Objective 8 - Landscape

SA Objective 8 is to protect, enhance and make accessible for enjoyment the district's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to...

- Conserve and enhance the High Weald ANOB?
- Conserve and enhance the settings of the South Downs National Park?
- Protect and enhance settlements and their settings within the landscape across the district?
- Protect and enhance landscape character?
- Promote high quality design in context with its rural and urban landscape?
- Maintain and where possible increase accessibility to the countryside and more generally to open spaces?

Table 5-8: Site impact matrix for SA Objective 7 - Landscape

Site ref	AN OB	National Park	Landscape Capacity	County Park	Altered Views	Coalescence	Urban Sprawl	Multifunctional Greenspace	Tree Preservation Order
1146	0	0	-	0	-	0	0	+	-
1135	0	0	-	0	-	0	0	+	0
1141	0	0	-	0	-	0	0	+	0
1148	0	0	-	0	-	0	0	+	0
1133	0	0	-	0	-	-	0	+	0
1137	0	-	-	0	-	0	-	+	0
1122	0	0	+	0	-	0	0	+	0
29	0	0	0	0	0	0	0	+	0

### 5.9.1 High Weald Area of Natural Beauty

The High Weald Area of Natural Beauty (ANOB) is located to the north of Mid Sussex district. None of the proposed development sites are located in the ANOB and therefore a negligible impact can be expected.

### 5.9.2 South Downs National Park

The South Downs National Park is located to the south of the district. Site 1137 is located in proximity to the National Park, therefore development in this location may alter the park's setting resulting in a minor negative impact.

None of the other additional sites are located within proximity to the National Park and therefore, a negligible impact can be expected.

### 5.9.3 Landscape Capacity

As outlined by Lepus Consulting within the Regulation 18 SA, landscape capacity is defined as “the degree to which a particular landscape character type or area is able to accommodate change without significant effects on its character, or overall change of landscape character type”<sup>4</sup>.

Site 1122 is located in an area of high landscape capacity, therefore, development at this location could have a minor positive impact on local landscape.

Site 29 is located in an area of medium landscape capacity. Proposed development at this location is assessed as having a negligible impact on the landscape setting.

Sites 1137, 1135, 1141, 1146, 1148 and 1133 are located in an area of low or low to medium landscape capacity where development in this area could have the potential to significantly impact landscape character and setting. Therefore, development at this site could be expected to have a minor negative impact on landscape.

### 5.9.4 Country Park

There are several Country Parks located across the district. None of the proposed sites are located within or in proximity to a Country Park, therefore a negligible impact is expected for the development of all additional sites.

### 5.9.5 Alter Views for PRow Network Users

All proposed sites, except for site 29, are located in the vicinity of the PRow network and the development of these sites could potentially alter the views of countryside or open space currently experienced by the users of PRow. Therefore a minor negative impact on local landscape can be expected.

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

Site 29 is separated from PRowWs by existing built form, and its development would therefore be unlikely to significantly alter views experienced by PRow users, therefore having a neutral impact.

#### 5.9.6 Increased Risk of Coalescence

Site 1133 is located between the existing settlements of Crosspost and Bolney. Development at this location could lead to the loss of separation between settlements and potentially have a minor negative impacts in relation to coalescence.

The other proposed sites would be expected to have a negligible impact in relation to coalescence.

#### 5.9.7 Urban Sprawl

Site 1137 is located outside of existing settlements within Mid Sussex, therefore development at this location could increase the risk of urban sprawl resulting in a minor negative impact on landscape.

All other sites proposed are located adjacent to or within to existing settlements, therefore a negligible impact is assessed.

#### 5.9.8 Multi-functional Greenspace

As outlined by Lepus Consulting within the Regulation 18 SA, sites located within 300m of a multi-functional greenspace would expect to improve accessibility of countryside and open space for site users.

All of the proposed sites are located within target distance of multi-function greenspace, improving accessibility to the countryside and open space for site users resulting in a minor positive impact.

#### 5.9.9 Tree Preservation Order

A Tree Preservation Order (TPO) is an order created by local authorities in England to protect individual trees, groups of trees or areas of woodland. Site 1146 coincides with an individual tree designated under a TPO. The development of this site could directly harm this protected tree during construction and operational pressures, therefore a minor negative impact is expected.

### 5.10 SA Objective 9 - Cultural Heritage

SA Objective 9 is to protect, enhance and make accessible for enjoyment, the district's historic environment. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to...

- Protect, enhance and restore buildings, monuments, sites, places, areas and landscape of heritage interest or cultural value (including their setting) meriting consideration in planning decisions?
- Protect and enhance sites, features and areas of archaeological value in both urban and rural areas?
- Reduce the number of buildings at risk?
- Support the undertaking of archaeological investigations and where appropriate recommend mitigation strategies?
- Enhance accessibility to cultural heritage assets?

Table 5-9: Site impact matrix for SA Objective 9 - Cultural Heritage

Site ref.	Listed Buildings	Conservation Area	Scheduled Monument	Registered Parks and Gardens	Archaeology
1146	-	0	0	0	0
1135	-	0	0	0	-
1141	-	0	0	0	0
1148	-	0	0	0	0
1133	-	-	0	0	-
1137	0	0	0	0	-
1122	0	-	0	0	0
29	-	-	0	0	0

#### 5.10.1 Listed Buildings (Grades I, II\* and II)

There are numerous Listed Buildings across the district.

Sites 1133, 1135, 1141, 1146, 1148 and 29 are located in proximity to Listed Buildings and therefore have been identified to have potential to cause 'medium' or 'high' impact on these heritage assets. Therefore, development of these proposed sites would be expected to have a minor negative impact.

Sites 1122 and 1137 are identified as being unlikely to have significant impacts on the setting of any Listed Building.

#### 5.10.2 Conservation Area

There are 36 Conservation Areas (CAs) across Mid Sussex.

Sites 1122, 1133 and 29 are located in close proximity to CAs and have been identified with potential to cause moderate impact on the designation. Therefore a minor negative impact from the development of the proposed sites would be expected.



Sites 1135, 1137, 1141, 1146, 1148 are not located near to any CA and are therefore identified as being unlikely to have significant impacts on CAs.

#### 5.10.3 Scheduled Monument

None of the proposed additional sites are located in proximity to any Scheduled Monuments (SM) across the district. The proposed development at these sites is likely to have negligible impact on SMs.

#### 5.10.4 Registered Park and Gardens

None of the proposed additional sites are located in proximity from a Registered Park and Gardens, therefore, development at these sites is assessed as having a negligible impact on the setting of any Registered Park and Gardens.

#### 5.10.5 Archaeology

Sites 1122, 1141, 1146, 1148, and 29 are not located in areas of archaeological interest. Therefore the development at these locations is unlikely to have significant impacts on archaeological assets, for the purposes of this assessment a negligible impact is recorded.

Site 1133, 1135, 1137 is located in an area of archaeological interest. Therefore, development at these locations would be expected to have minor negative impact on archaeological assets.

### 5.11 SA Objective 10 - Climate Change and Transport

SA Objective 10 is to reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to...

- Develop more efficient land use patterns that minimise the need to travel by car through the location and design of new development and place which provide more opportunities for active travel for the provision and link to public transport infrastructure?
- Reduce CO2 emissions to contribute to identified national targets?
- Improve accessibility to work and services by public transport, walking and cycling?
- Protect and improve air quality?
- Avoid exacerbating existing air quality issues in designated AQMAs?
- Achieve a healthy living environment?

Table 5-10: Site impact matrix for SA Objective 10 - Climate Change and Transport

Site Ref.	AQMA	Main Road	Bus Services	Railway Station	Public Transport access to Local Services	Pedestrian Access to Local Services	Pedestrian Access to Convenience Store
1146	+	+	+	-	-	-	-
1135	+	-	+	-	-	-	++
1141	+	+	+	-	-	-	++
1148	+	-	+	-	-	-	++
1133	+	-	0	-	-	-	++
1137	+	+	0	-	+	-	-
1122	+	+	++	+	+	+	++
29	+	-	0	-	-	-	++

#### 5.11.1 Air Quality Management Areas

The target distance outlined by Lepus Consulting within the Regulation 18 SA from an AQMA is 200m.

All of the proposed additional development sites are located at least 200m from an AQMA therefore, a minor positive impact on climate change and transport is assessed as these sites are not expected to contribute further to areas generally associated with traffic congestion.

#### 5.11.2 Main Road

The target distance outlined by Lepus Consulting within Regulation 18 SA from a main road is 200m.

Sites 1133, 1135, 1148 and 29 are located less than 200m from main roads. Proposed development at these sites could have a minor negative impact on transport related emissions by potentially increasing congestion in the local area.

Sites 1137, 1141, 1146, and 1122 are located at least 200m from a main road. Proposed development at these sites would be expected to have a minor positive impact on congestion and consequential emissions.

#### 5.11.3 Bus Services

Bus service provision varies across the rural settlements in Mid Sussex District. Site 1122 has been identified as having the potential for excellent bus transport access.

Sites 1133, 1137 and 29 have been identified as having the potential for fair bus transport access. Therefore, proposed development at these sites would be expected to have a negligible impact on access to sustainable transport for site users.

Sites 1135, 1141, 1146 and 1148 have been identified as having the potential for good bus transport access. Proposed development at these sites would be expected to have a minor positive impact on access to sustainable transport for site users.

Site 1122 has been identified as having the potential for excellent bus transport access. Proposed development at this site would be expected to have a major positive impact on access to sustainable transport for site users.

#### 5.11.4 Railway Station

There are two railway lines through Mid Sussex running from north to south. There are several train stations including Haywards Heath and Burgess Hill. As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance of a 1.2km has been applied.

Site 1122 is located within the target distance and are therefore, expected to have a major positive impact on sustainable access to rail services.

Sites 1133, 1137, 1141, 1135, 1146, 1148 and 29 are located outside the target distance and therefore, proposed development at these locations is expected to have a minor negative impact on sustainable access to rail services.

#### 5.11.5 Public Transport Access to Local Services

As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to local services is a 30-minute journey by public transport.

Sites 1133, 1135, 1141, 1146, 1148, and 29 are located over a 30-minute journey using public transport to local services. Therefore, development at these proposed sites would be expected to have a minor negative impact on transport and accessibility.

Site 1137 and 1122 is located within a 20-minute journey using public transport to local services. Therefore, development at this location would be expected to have a minor positive impact on transport and accessibility.

#### 5.11.6 Pedestrian Access to Local Services

As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to local services is a 15-minute walk or cycle (1.2km).

Site 1122 is located within 15 minutes-walk from local services, therefore development at this site is expected to have a minor positive impact on accessibility.

Sites 1133, 1135, 1137, 1141, 1146, 1148, and 29 are located over 20 minutes-walk from community facilities. Therefore, development at the proposed sites is expected to have a minor negative impact on accessibility.

### 5.11.7 Pedestrian Access to Convenience Store

As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to a convenience store is a 15-minute walk or cycle (1.2km).

Sites 1122, 1133, 1135, 1141, 1148 and 29 are within a 15-minute walk of a convenience store. Therefore, a major positive impact on accessibility to these facilities for site users would be expected.

Sites 1146 and 1137 are located outside this target distance and therefore development at these sites would be expected to have a minor negative impact on site users accessibility to these facilities.

## 5.12 SA Objective 11 - Energy and Waste

SA Objective 11 is to increase energy efficiency and the proportion of energy generated from renewable sources in the district to help mitigate climate change and reduce waste generation and disposal. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to...

- Reduce energy consumption?
- Reduce waste generated per head of population?
- Increase rate per head of population of waste reuse and recycling?
- Encourage recycling (including building materials)?
- Incorporate sustainable design and construction techniques?

Table 5-11: Site impact matrix for SA Objective 11 - Energy Consumption

Site ref.	Household Waste Generation	Energy Consumption related to GHGs
1146	0	0
1135	0	0
1141	0	0
1148	0	0
1133	0	0
1137	-	-
1122	0	-
29	0	0

### 5.12.1 Increase in Household Waste Generation

As outlined by Lepus Consulting within the Regulation 18 SA, to some degree, residential development is likely to result in an increase in household waste generation.

Site 1137 is expected to yield approximately 400 dwellings, therefore, development of this site would be expected to increase household waste generation by more than 0.1% compared to current levels. Therefore, this could result in a minor negative impact on household waste generation.

All of the other proposed developments are expected to produce a yield of 100 dwellings or less, therefore, development of this site is expected to have negligible impacts on household waste generation in comparison to current levels.

#### 5.12.2 Increase in Energy Consumption Related Green House Gas Emissions (GHG)

As outlined by Lepus Consulting within the Regulation 18 SA to an extent, residential development is likely to result in an increase in energy related GHG emissions through the use of electricity sourced from fossil fuels.

Sites 1137 and 1122 are expected to have a yield of 100 dwellings or more. The proposed development at these sites could have major negative impacts on GHG emissions relating to energy consumption.

The remaining sites are expected to have a yield of less than 100 dwellings, therefore the proposed development at these sites could have a negligible impact on GHG emissions relating to energy consumption.

### 5.13 SA Objective 12 - Water Resources

SA Objective 12 is to maintain and improve the water quality of the district's watercourses and aquifers, and to achieve sustainable water resources management. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to...

- Protect and enhance water resources?
- Support the achievement of Water Framework Directive targets?
- Promote sustainable use of water?
- Maintain water availability or water dependant habitats?
- Support the provision of sufficient water supply and treatment infrastructure?
- Incorporate sustainable design and construction techniques?

Table 5-12: Site impact matrix on SA Objective 12 - Water Resources

Site ref.	Watercourse	Groundwater Source Protection Zones
1146	0	0
1135	0	0
1141	0	0
1148	0	0
1133	0	0

Site ref.	Watercourse	Groundwater Source Protection Zones
1137	-	0
1122	0	0
29	0	0

#### 5.13.1 Watercourse

There are several minor and major watercourses across the district. As outlined by Lepus Consulting within the Regulation 18 SA, sites have been assessed for their proximity (within 200m) to a watercourse<sup>5</sup>.

Site 1137 is located within 200m of a watercourse and therefore, proposed development at this site could potentially increase the risk of contamination of the watercourse during construction and operation. A minor negative impact on watercourse quality can be expected.

Sites 1122, 1133, 1141, 1135, 1146, 1148 and 29 are located outside a 200m buffer of a watercourse therefore, a negligible impact is assessed.

#### 5.13.2 Groundwater Source Protection Zones (SPZ)

None of the proposed sites coincide with any groundwater SPZ and are therefore not expected to increase the risk of groundwater contamination within these protected areas. Proposed development of these sites could therefore be expected to have a negligible impact on protected groundwater resources.

### 5.14 SA Objective 13 - Economic Regeneration

SA Objective 13 is to encourage the regeneration and prosperity of the district's existing Town Centres and support the viability and vitality of village and neighbourhood centres. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to...

- Protect key retail areas?
- Encourage rural diversification?
- Make land available for business development?
- Increase the range of employment opportunities, shops and services available in the town centres across the district?
- Decrease the number of vacant units in town centres?
- Enhance the viability and vitality of the district's town centres?

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<sup>5</sup> For the purpose of this assessment watercourses have been identified using the OS Open Rivers Dataset, published by Ordnance Survey. Contains OS data © Crown Copyright [and database right] (2023). <https://www.ordnancesurvey.co.uk/products/os-open-rivers#technical>

- Improve access to the district's town centres and services?
- Enhance the local distinctiveness in the town centres?
- Provide new or improved leisure, recreational or cultural activities?
- Maintain or increase the amount of floorspace provided for town centre uses within the town centres?

Table 5-13: Site impact matrix on SA Objective 13 - Economic Regeneration

Site ref.	Pedestrian Access to Local Services	Public Transport Access to Local Services
1146	-	-
1135	-	-
1141	-	-
1148	-	-
1133	-	-
1137	-	+
1122	+	+
29	-	-

#### 5.14.1 Pedestrian Access to Local Services

Access to local services including supermarkets, town centres or a high street shopping centre, can result in economic stimulation and regeneration. Increases in footfall could positively impact the local economy and provide opportunities for residents. As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to local services is a 15-minute walk or cycle (1.2km).

Site 1122 is located within 15 minutes-walk from local services, therefore development at this site is expected to have a minor positive impact on accessibility.

Sites 1133, 1135, 1137, 1141, 1146, 1148, and 29 are located over 20 minutes-walk from community facilities. Therefore, development at these proposed sites is expected to have a minor negative impact on accessibility.

#### 5.14.2 Public Transport Access to Local Services

As outlined by Lepus Consulting within the Regulation 18 SA, the target sustainable distance to local services is a 30-minute journey on public transport.

Sites 1133, 1135, 1141, 1146, 1148, and 29 are located over a 30-minute journey using public transport to local services. Therefore, development at these proposed sites would be expected to have a minor negative impact on accessibility.



Site 1137 and 1122 is located within a 20-minute journey using public transport to local services. Therefore, development at this location would be expected to have a minor positive impact on accessibility.

### 5.15 SA Objective 14 - Economic Growth

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

The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to...

- Improve business development and enhance competitiveness?
- Improve the resilience of business and the economy?
- Promote growth in key sectors?
- Reduce out commuting?
- At least maintain and possibly improve employment rate across the district?
- Increase the range of employment opportunities?
- Facilitate the provision of good quality infrastructure to promote economic growth?

Table 5-14: Site impact matrix on SA Objective 14 - Economic Growth

Site ref.	Employment floorspace	Access to Primary Employment Locations
1146	0	+
1135	0	+
1141	0	+
1148	0	+
1133	0	+
1137	0	+
1122	0	+
29	0	+

#### 5.15.1 Employment floorspace

All of the additional proposed sites are for residential use only and as a consequence are likely to have a negligible impact on economic growth through employment floorspace provision.

#### 5.15.2 Access to Primary Employment Locations

There is a number of employment locations within the district within or in proximity to settlements such as Burgess Hill, Haywards Heath and East Grinstead. As outlined by Lepus Consulting within the Regulation 18 SA, the target distance to key employment areas has been assessed as 5km from proposed sites.

All of the proposed sites are located within this target distance, therefore a minor positive impact on the local economy could be expected following development.

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