Mid Sussex

MID SUSSEX
DISTRICT COUNCIL

District Plan
Sustainability Appraisal
(Incorporating Strategic Environmental Assessment)

Submission Report

Accompanying:
- Pre-Submission Draft District Plan (June 2015)
- Focused Amendments to the Pre-Submission Draft District Plan (November 2015)
- Further Modifications to the Pre-Submission Draft and Focused Amendments (August 2016)

August 2016

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1. Introduction

The Sustainability Appraisal Report

1.1. This document comprises the Sustainability Appraisal (incorporating a Strategic Environmental Assessment – SEA) for the Mid Sussex District Plan.

1.2. The District Plan sets out a vision for how Mid Sussex wants to evolve and a delivery strategy for how that will be achieved. It will cover the period up to 2031 and will replace the majority of the Mid Sussex Local Plan which was adopted in 2004.

1.3. Local Plans such as the District Plan must aim to meet the objectives of sustainable development. To ensure this is the case, a Sustainability Appraisal (SA) and SEA Report is prepared to accompany them in order to demonstrate that the plan being prepared is the most sustainable given all realistic alternatives. The rest of this report documents the alternatives that were considered to strategy, sites and policies within the District Plan and uses the methodology outlined in the Sustainability Appraisal Scoping Report (July 2014) to assess which options are the most sustainable.

1.4. The Sustainability Appraisal and SEA follow an iterative process, providing a view of the likely implications on sustainable development arising from the District Plan, at each stage of the plan's production. A range of sustainability issues have been considered during the process of undertaking SA and SEA – Social, Environmental and Economic.

1.5. This Sustainability Appraisal Report contains the following tasks:

- **Section 2** – Background and Methodology
- **Section 3** – Sets out the baseline information for the District
- **Section 4** – Identifies current sustainability issues and challenges
- **Section 5** – Sustainability Framework – introduces the sustainability objectives and indicators by which to measure them.
- **Section 6** – Introduces the District Plan and potential sustainability issues
- **Sections 7 and 8**- Appraises the strategy and policies within the District Plan, and reasonable alternatives
- **Section 9** – Conclusions
- **Section 10** – Monitoring – how will this be monitored, and how frequently
- **Section 11** – Next stages

1.6. The Sustainability Appraisal report was originally published in March 2015. It was updated and consulted upon in July 2015 to account for any significant developments since original publication, and again in November 2015 to accompany the Focused Amendments District Plan. This was to take into account the update to the Housing and Economic Development Needs Assessment (HEDNA) which revised the District's housing need number (Objectively Assessed Need), publication of a revised Strategic Housing Land Availability Assessment (SHLAA) which identified further potential site options, and minor amendments to policies following changes in guidance/advice.

1.7. This version of the Sustainability Appraisal report appraises further changes since the Focused Amendments consultation (between 19th November 2015 and 15th January 2016) to take into account responses made during the consultation period, factual updates and alternative options that have arisen. A schedule, entitled "Further Modifications to the Pre-Submission Draft and Focused Amendments" has been published – this version of the Sustainability Appraisal appraises these modifications. The next stage will be for the District Plan and accompanying Sustainability Appraisal to be examined by an independent Inspector appointed by the Planning Inspectorate.

2. Background and Methodology

What is Sustainable Development?

2.1. Sustainable development is defined as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs"[1]. It is about ensuring better quality of life for everyone, now and for generations to come. The three key strands of sustainability and therefore sustainable development are:

- Social
- Environmental
- Economic

Sustainability and the National Planning Policy Framework

2.2. The National Planning Policy Framework (NPPF) was published in March 2012. This document sets out the Government's planning policies for England, and replaces the various Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs) previously published by the Government.

2.3. The NPPF states the Government's intentions with regards to sustainable development, in particular the need for the planning system to perform a number of roles:

- **Social Role –** supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of the present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being.
- **Environmental Role –** contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- **Economic Role –** contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land and the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.

2.4. Paragraph 15 of the NPPF also states that *"all plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally".* The District Plan will support the 'presumption in favour of sustainable development'.

2.5. The National Planning Practice Guidance (NPPG) was published in March 2014. This guidance accompanies the NPPF and provides more detail on how to implement the policy within the NPPF. Included within this is guidance on how to undertake Sustainability Appraisal and/or Strategic Environmental Assessment.

Sustainability Appraisal and Strategic Environmental Assessment

Sustainability Appraisal (SA)

2.6. This Sustainability Appraisal (SA) report is a requirement of the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires documents such as the District Plan to be prepared with a view to contributing to the achievement of sustainable

[1] The Report of the Brundtland Commission, 1987

development. The Sustainability Appraisal report is a tool to demonstrate how social, environmental and economic issues have been considered during production of Local Plans such as the District Plan – promoting strategy or policy that is sustainable, and ruling out strategy or policy which is deemed unsustainable. Undertaking this process can improve the overall sustainability of the District Plan, whilst documenting how the plan meets the legal and policy requirements.

Strategic Environmental Assessment

2.7. Strategic Environmental Assessment (SEA) involves evaluation of the environmental impacts of a plan or programme. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law as the "Environmental Assessment of Plans or Programmes Regulations 2004".

2.8. The SEA process is very similar to the Sustainability Appraisal process. The key difference is that it is only concerned with environmental impacts as opposed to social and economic impacts within the SA. There is also more prescriptive guidance and tasks that need to be followed in order to meet the SEA Directive's requirements.

2.9. Best practice suggests incorporating the SEA process into the Sustainability Appraisal due to their similarity in aim and methodology. This enables social, environmental and economic effects to be considered together in order to document the full picture of sustainability and to show a holistic outcome. The NPPG states that "where the [SEA] Directive applies there are some specific requirements that must be complied with and which, in the case of Local Plans, should be addressed as an integral part of the sustainability appraisal process"[2].

2.10. This report will therefore include the elements required by the SEA Directive. Where practical, it will be signposted throughout the document where the requirements have been met, and what elements relate to SEA specifically. For simplicity, the rest of this report and future stages will be referred to as the Sustainability Appraisal report, however it incorporates a SEA.

2.11. The SEA Directive sets out a legal assessment process that must be followed. In order to ensure demonstrate compliance with the Directive, the table below indicates how the SEA Directive's requirements will be met during the Sustainability Appraisal process for the District Plan.

The SEA Directive's Requirements [3]	Where Covered in the Sustainability Appraisal Process
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans or programmes	Scoping Report (2014). Updated in section 2 of the consultation draft, and this report.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Scoping Report (2014). Updated in section 3 of the consultation draft, and this report.
c) The environmental characteristics of areas likely to be significantly affected	Scoping Report (2014). Updated in section 3 of the consultation draft, and this report. Used in appraising potential strategy and policies in sections 7 and 8

[2] National Planning Practice Guidance, Ref: 11-003-20140306
[3] Derived from 'Figure 1: The SEA Directive's Requirement' in "A Practical Guide to the Strategic Environmental Assessment Directive" (ODPM, 2005).

d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Scoping Report (2014). Updated in section 3 of the consultation draft, and this report, in particular 3.49-3.58.
e) The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Scoping Report (2014). Updated in section 5 and appendix 2 of the consultation draft, and this report. Taken into account in appraisals in sections 7 and 8.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors	Section 3 outlines the baseline, sections 7 and 8 appraise likely significant effects
g) The measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Mitigation is discussed in individual policy appraisals. Cumulative effects assessed in section 9.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Alternatives outlined in sections 7 and 8. Methodology described in section 2. Problems encountered collecting baseline data in paragraph 3.86.
i) A description of measures envisaged concerning monitoring in accordance with Article 10	Section 10
j) A non-technical summary of the information provided under the above headings	A non-technical summary has been prepared and accompanies this document.

Table 1 - Where SEA Directive Requirements are met

Consultation and Implementation

2.12. An important part of the Sustainability Appraisal process is consultation with Statutory Environmental Bodies (English Heritage, Environment Agency and Natural England), wider statutory consultees (as defined in the Council's adopted Statement of Community Involvement) and members of the community.

2.13. The Sustainability Appraisal Scoping Report, which sets out the methodology and scope for this report, was consulted on for 5 weeks during July 2014. The findings of this consultation have been taken into account whilst drafting subsequent versions of the SA.

2.14. The consultation draft Sustainability Appraisal was consulted upon, alongside the District Plan, in November 2014 - January 2015. Comments made during the consultation process have been incorporated within this report where relevant.

2.15. The Pre-submission SA report was consulted upon between June - July 2015. This version of the SA appraised a range of alternative options for housing provision, broad locations and neighbouring unmet housing need based on newly arising information and updates to the evidence base since the previous consultation.

2.16. A further iteration of the SA was published in November 2015 to accompany the "Focused Amendments to the District Plan" document. This outlined a number of amendments to the District Plan based on consultation responses, the need to increase the housing provision and the identification of a further strategic site. This was consulted upon between November 2015 and January 2016.

2.17. This version of the SA is the final version prior to Submission to Government. This appraises further modifications made to the District Plan ahead of Submission (as published within the "Further Modifications to the Pre-Submission Draft and Focused Amendments" document).

2.18. The SEA Directive makes a number of requirements regarding consultation on the report. The table below shows where these requirements have or will be met in the future.

The SEA Directive's Requirements	Where / When this will be Undertaken
Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report	A Scoping Report consulted upon in 2014. Comments received were addressed in the next stage of the Sustainability Appraisal process.
Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme	The Sustainability Appraisal Report, which incorporates an Environmental Report, will undergo the same consultation arrangements as the District Plan. This will be in accordance with the District Council's Statement of Community Involvement (SCI)
Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country	Not applicable.
Taking the environmental report and the results of the consultations into account in decision-making	The Environmental Report has informed the contents of the District Plan. The final report and consultation responses will be used to inform the content of the District Plan to be submitted.
When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed: - The plan or programme as adopted - A statement summarising how environmental considerations have been integrated into the plan or programme - The measures decided concerning monitoring	Not applicable yet, these requirements will need to be considered and acted upon when the District Plan is adopted.
Monitoring of the significant environmental effects of the plan's or programme's implementation	Not applicable yet, the significant effects of the District Plan will be monitored when adopted, as per the monitoring arrangements set out in section 10.

Table 2 - Where SEA Consultation Requirements are met

Mid Sussex Planning Context - The District Plan

2.19. The District Plan will be the key document in the Development Plan for Mid Sussex. It will replace the majority of the Mid Sussex Local Plan which was adopted in 2004. It will set out the vision for how Mid Sussex wants to evolve and a delivery strategy for how that will be achieved and sets out broad guidance on the distribution and quality of development in the form of 'higher level' strategic policies. It also provides the framework for all subsequent planning documents, including Neighbourhood Plans which are being prepared by Town and Parish Councils in the District.

2.20. Upon adoption of the District Plan, the Development Plan for Mid Sussex will consist of:

- Mid Sussex District Plan;
- Small Scale Housing Allocations Development Plan Document (adopted 2008);

- Saved Mid Sussex Local Plan Policies (as listed in Appendix A of the District Plan – when adopted);
- Neighbourhood Plans (various, throughout the district);
- Site Allocations DPD; and
- Supplementary Planning Documents (as required).

2.21. The vision for the District is:

"A thriving and attractive District, a desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental wellbeing of our District and the quality of life for all, now and in the future."

Undertaking Sustainability Appraisal

2.22. Undertaking Sustainability Appraisal (incorporating Strategic Environmental Assessment) is a five-stage process, as outlined in the SEA Guidance and the National Planning Practice Guidance[4]:

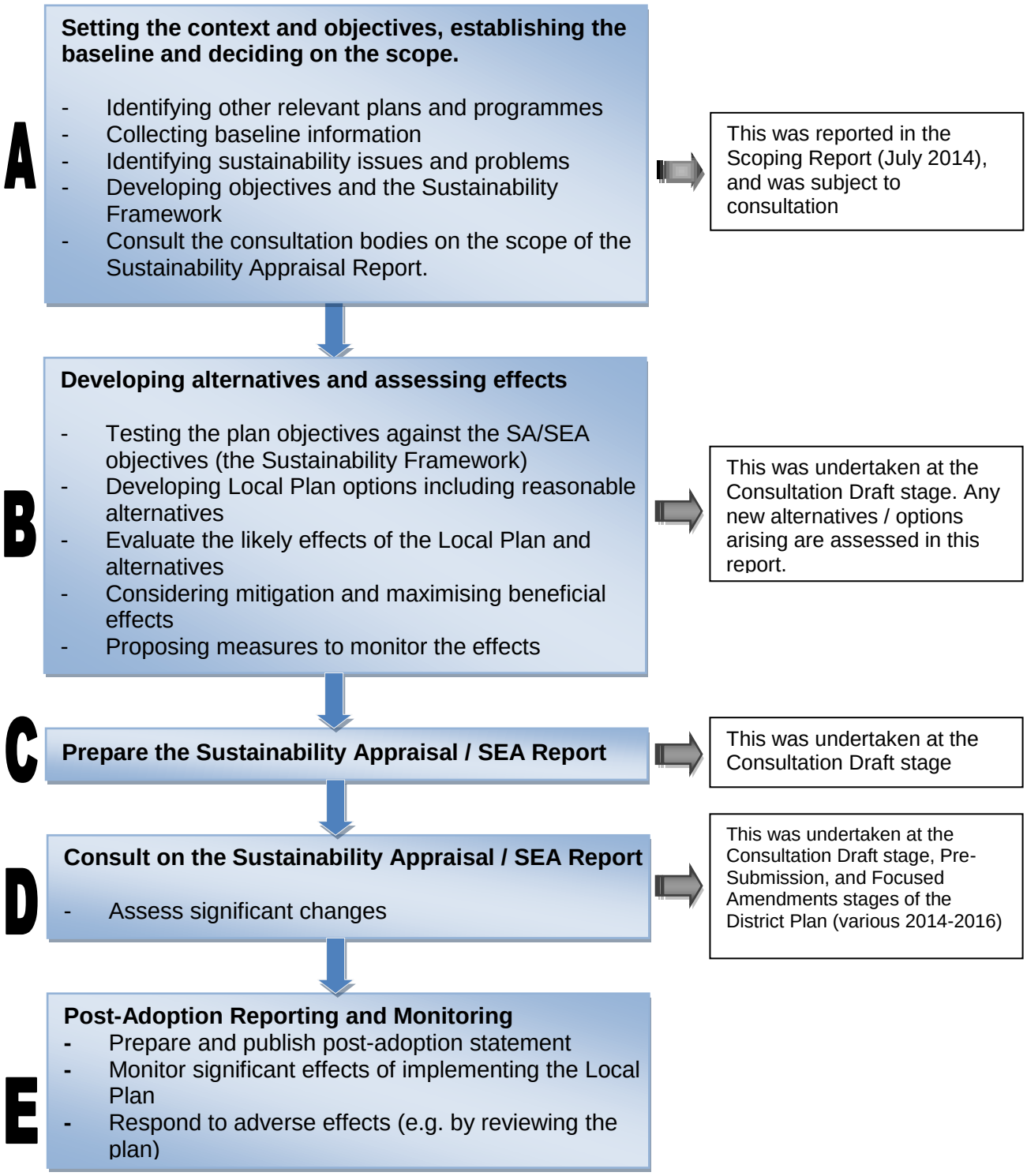


Figure 1 – Stages of the Sustainability Appraisal Process

[4] "A Practical Guide to the Strategic Environmental Assessment Directive" (ODPM, 2005), within the National Planning Practice Guidance (ID: 11-014-20140306)

Methodology for the Sustainability Appraisal

Stage A: Scoping Report

2.23. The Scoping Report is the first stage of the Sustainability Appraisal process **(Stage A)**. The Scoping Report outlines the baseline for the district – in other words, what the situation is at the present time. It determined the current issues related to sustainability, and developed a set of Sustainability Objectives to help address these issues.

2.24. The Scoping Report was published in July 2014 and was subject to a 5-week consultation with the statutory bodies with environmental responsibilities: English Heritage, Environment Agency and Natural England (this is the minimum requirement for consultation at this stage). A number of responses were also received from members of the public and other interested parties. A total of 10 responses were received overall.

2.25. As a result of this consultation, a few changes were made to the baseline section and the Sustainability Objectives and Indicators (the Sustainability Framework) in order to take into account added information provided in the consultation responses, for clarity, or to update information held.

Stage B: Developing Alternatives, Assessing Effects

2.26. Stage B involves measuring the likely significant social, environmental and economic effects of the strategy and policies contained within the consultation draft District Plan. A set of 'reasonable alternatives' for each part of the strategy and policies was identified whilst drafting the District Plan.

2.27. The main objective of appraising policy options is to highlight the different advantages and disadvantages of each option, with the aim of showing that the preferred policy option is the most sustainable option, given all reasonable alternatives. Symbols, alongside explanatory text, are used to record the performance of each option against each objective in the sustainability framework.

2.28. The consultation draft Sustainability Appraisal undertook this task, and was consulted upon alongside the consultation draft District Plan. The Pre-submission, Focused Amendments and Submission (this version) SA updates and amends the appraisals following comments received during consultation. This may be addressing factual errors, taking into account new evidence submitted to justify the appraisal scoring, taking into account any change in legislation/policy that has occurred since the previous round of consultation, as well as assessing any further alternative options that were put forward.

2.29. Section 5 of this document explains the Sustainability Framework and tests the District Plan objectives against this framework. Section 6 goes on to test the strategy and policy options for the District Plan against the framework as well.

2.30. The following symbols and colours are used in order to record this:

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

2.31. The scoring system (using a range between '++' and '--') is consistent with other Sustainability Appraisals undertaken by the District Council and is suggested as an appropriate method to take in the SEA guidance. The symbol chosen depicts the predicted impact/effect each realistic option will have on each sustainability objective and to what extent, accompanied with explanatory text as justification. It will evaluate any cross boundary impacts (i.e. impacts outside Mid Sussex district) and suggest mitigation where necessary. No mathematical models or calculations have been made in order to conclude whether the policy will perform positively or negatively against each sustainability objective. This is due to the nature of the District Plan; being a broad strategic document, data for every policy option and its likely effect is not always readily available, therefore making it impractical to quantify the effects and their extents in this way. A qualitative approach is therefore more appropriate and manageable.

2.32. Predictions of the effect the policy options will have on the objectives is justified in the appraisal tables in sections 7 and 8. These predictions are based on the evidence contained within the evidence base that accompanies the District Plan and discussions between officers within the Planning Policy team, using their professional judgement. Indeed, through consultation on this document, further evidence may arise or discussions take place which could alter the scoring for some of the objectives. This will be documented in the Submission version of this Sustainability Appraisal. Similarly, further options or policy areas may be suggested, and these will be appraised at the next stage if considered realistic options.

2.33. The main objective of appraising different options or alternatives is to assess the impact of each option with regards to sustainability, highlighting which of the options performs the best over social, environmental and economic aspects. The option that has the most positive impact on the sustainability objectives should then be chosen as the option to be included within the District Plan. This ensures that the plan on the whole is the most sustainable plan, given all reasonable alternatives and will therefore contribute to sustainable development.

Predicting Sustainability Effects - Baseline Data

2.34. Section 3 outlines the Baseline for the District. This is the current situation in Mid Sussex – the predicted effect (positive, neutral, negative) the District Plan strategy and policies will have will be measured against the baseline. Compiling the baseline will also identify a number of sustainability challenges for the District. These challenges should be taken into account when determining the type and range of policies that may be required in the District Plan, as well as the overall plan strategy.

Stages C, D and E:

2.35. Stage C of the process outlined above is the preparation of the Sustainability Appraisal / SEA report. This report documents Stage A and undertakes Stage B of the process and therefore provides the report for Stage C. This was prepared to accompany the consultation draft District Plan, and has been updated within this document. This report will be consulted upon alongside the District Plan, which will therefore meet the requirements of Stage D of this process. Stage E will not take place until the District Plan is adopted, and the effects monitored. More detail on the arrangements for monitoring the plan can be found in section 10.

3. A Profile of Mid Sussex - Context and Baseline

3.1. This section introduces the context of the District Plan and the baseline information relating to Mid Sussex. The purpose of this section is to establish the current position with regard to Social, Environmental and Economic aspects (i.e the baseline position) so that predicted future impacts of strategy, policies and sites within the District Plan can be predicted.

3.2. This exercise will help to identify any current sustainability issues and also predict where they could arise in the future – both with and without a plan such as the District Plan in place. By understanding these issues, it will enable a range of "Sustainability Objectives" and accompanying indicators, known collectively as the Sustainability Framework, to be drawn up. It will be these objectives that all reasonable alternatives will be measured against in sections 7 and 8.

3.3. The context and baseline is undertaken in two halves, as set out in the Strategic Environmental Assessment guidance:

- Identifying Other Relevant Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) that have influenced the development of the District Plan
- Collecting Baseline information

Task A1 - Identifying Other Relevant Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) that have influenced the development of the District Plan

3.4. A review of the other plans, programmes, policies, strategies, guidance and initiatives (PPPSGIs) that may influence the District Plan was undertaken. This enables the District Plan to be read in context, so that any inconsistencies or constraints placed upon the plan by other plans can be understood. This review also highlights many useful sources of evidence – for example, the District Council's Strategic Flood Risk Assessment and Landscape Character Assessment which can help to build a picture of the current baseline situation in Mid Sussex with respect to sustainability.

3.5. The PPPSGIs identified range from documents produced at an international level, right down to those produced locally. It should be noted that this is not an exhaustive list, however as many of the PPPSGIS as possible that could influence the development of the District Plan are listed. The relevant PPPSGIs are listed in Appendix 1.

Task A2 - Collecting Baseline Information

3.6. The majority of this section was published within the Scoping Report (July 2014) and subject to consultation. Some elements have been updated since this was published to take into account comments made during consultation, the identification of new sources of data or updated data releases, or to correct inaccuracies.

3.7. The baseline provides the basis for predicting the impact that policies and strategy within the District plan will have now and in the future, and providing a base from which to monitor these effects in the future (a requirement of the SA process). It also helps identify any current sustainability issues- by understanding the situation now; it will be easier to draw up policies or alternatives that could address these issues.

3.8. The Baseline contains information for Social, Environmental and Economic aspects. Some information falls into more than one category (for example, employment –which is both social and economic) which should be borne in mind when drawing up sustainability objectives, and predicting impacts against these at the next stage.

Mid Sussex District

3.9. Mid Sussex District is located in South-East England within the county of West Sussex (Figure 1). The District is bordered by Wealden and Lewes to the east (within East Sussex County), Brighton and Hove to the South, Tandridge to the north (in Surrey County). It is bordered by Crawley and Horsham to the west – Mid Sussex, Crawley and Horsham form the Northern West Sussex Housing Market Area (as defined in the Strategic Housing Market Assessment 2012 and confirmed in the 2014 update).

3.10. The District covers approximately 128 square miles (approximately 334 square kilometres) and is a largely rural District. There are three main towns – Burgess Hill, Haywards Heath and East Grinstead – as well as twenty-five villages and other smaller hamlets.

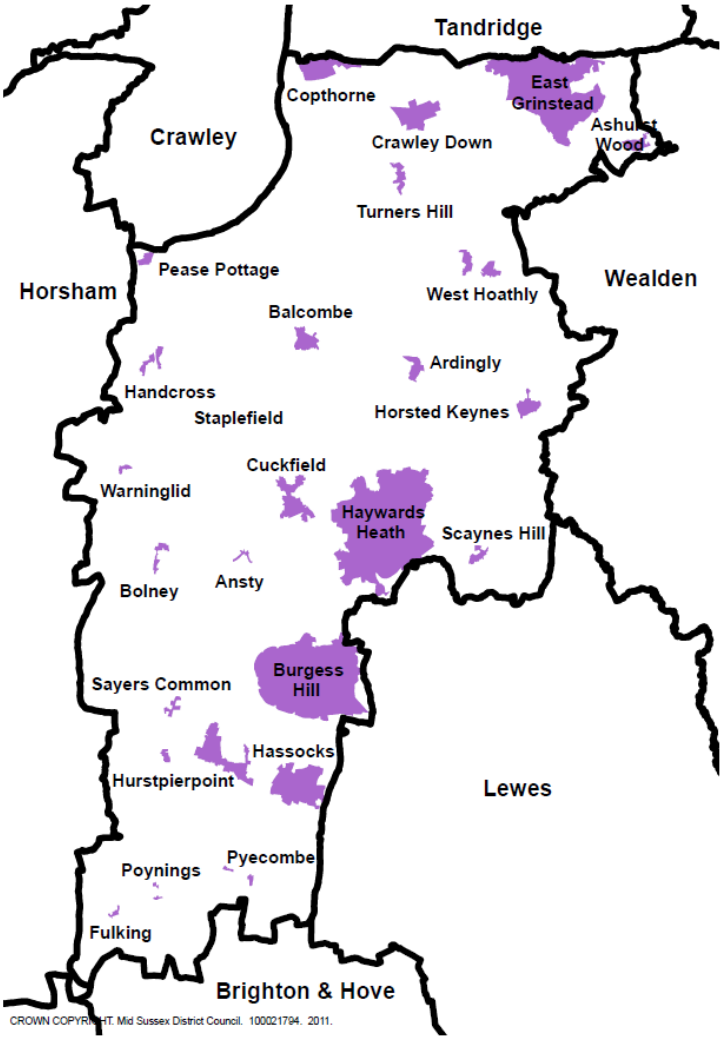


Figure 2 - The Location of Mid Sussex

Social Baseline

Human Characteristics

3.11. The population of Mid Sussex has grown steadily since 1981 when the population was 117,300 rising to 139,860 in 2011 (Figure 2), and approximately sixty percent live in the three main towns, each having a population of around 28,000 (Census, 2011). Note that the 2011 population number is an actual figure from the 2011 Census, whereas previous years from 2001 were based on population estimates published by the Office of National Statistics (ONS).

3.12. Trend-based population projections (ONS 2014) suggest that the population will increase by a further 11.9% between 2014 and 2031 (the District Plan period). An increasing population can place more pressure on services and infrastructure, create further demand for housing and require increased education and health capacity.

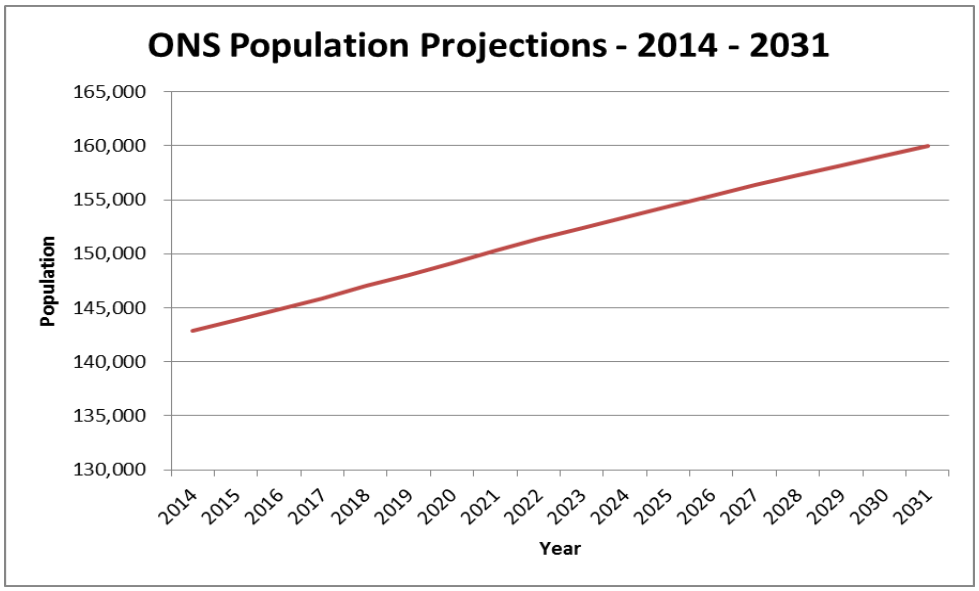


Figure 3 - Population Projections for Mid Sussex (ONS Subnational Population Projections (2012 Base) – 2014)

3.13. Although the total population is projected to increase by 11.9% over this time, the working age population (16 - 64) is projected to increase by only 3.49% from 2014 to 2031. The working age population of Mid Sussex will account for 57.4% of the total population (62.1% at present).

3.14. Both nationally and in Mid Sussex the population is aging – the age group 65+ is predicted to increase by 45% over the plan period, with an increase of 112% of those aged over 90. This pattern is not specific to Mid Sussex, as life expectancy is increasing nationally, however life expectancy in Mid Sussex is higher than the national average. Life expectancy for males is 83.9 years and for females 85.5 years. This is similar to the figures for the South East (79.7 years for males and 83.5 years for females) and higher than the figures for England (78.2 years for males and 82.3 years for females) (ONS, 2011).

3.15. The potential impact of an aging population includes increased pressure on healthcare and social services as well as the possibility that if the working age population were to shrink then there might be gaps in the jobs market with businesses and public services lacking the workforce required. It is important that new and existing housing stock is suitable to meet the needs of households in the future including an aging population. Appropriate housing offers the potential to reduce expenditure on public services and promote older people's independence and wellbeing. It will also be important to ensure there are suitable employment opportunities to reduce out-migration of residents of working age.

AGE GROUP	2014	2031	% Change	% of 2014 Population	% of 2031 Population
0-4	8,500	8,200	- 3.53	5.9	5.1
5-9	8,800	9,000	2.27	6.2	5.6
10-14	8,500	9,700	14.12	5.9	6.1
15-19	8,300	9,200	10.84	5.8	5.8
20-24	6,000	6,100	1.67	4.2	3.8
25-29	7,500	7,000	- 6.67	5.2	4.4
30-34	8,400	8,100	- 3.57	5.9	5.1
35-39	8,900	9,700	8.99	6.2	6.1
40-44	10,600	10,700	0.94	7.4	6.7
45-49	11,200	10,500	- 6.25	7.8	6.6
50-54	10,500	10,100	- 3.81	7.3	6.3
55-59	9,000	9,900	10.00	6.3	6.2
60-64	8,300	10,500	26.51	5.8	6.6
Working Age (16-64)	**88,700**	**91,800**	**3.49**	**62.1**	**57.4**
65-69	8,900	10,300	15.73	6.2	6.4
70-74	6,300	8,600	36.51	4.4	5.4
75-79	4,900	7,300	48.98	3.4	4.6
80-84	4,000	6,900	72.50	2.8	4.3
85-89	2,700	4,700	74.07	1.9	2.9
90+	1,600	3,400	112.50	1.1	2.1
Older Population (65+)	28,400	41,200	45.07	19.9	25.8
TOTAL POPULATION	**142,900**	**160,000**	**11.97**	**100.0**	**100.0**

Table 3 - Age Profile of Mid Sussex. (ONS Subnational Population Projections (2012 Base) – 2014). Figures rounded to nearest 100.

Living Standards

3.16. Mid Sussex benefits from a high standard of living and according to the Index of Multiple Deprivation 2010, Mid Sussex District is one of the least deprived local authorities in the country; it ranks as 315 out of 326 (Figure 3). Whilst this indicates that Mid Sussex is not a deprived area, there are residents and communities in the District that find it difficult to access some services and facilities. In particular, Mid Sussex has a lower (more deprived) score on the health and disability, and barriers to housing and services indicators, when compared to the income and education indicators.

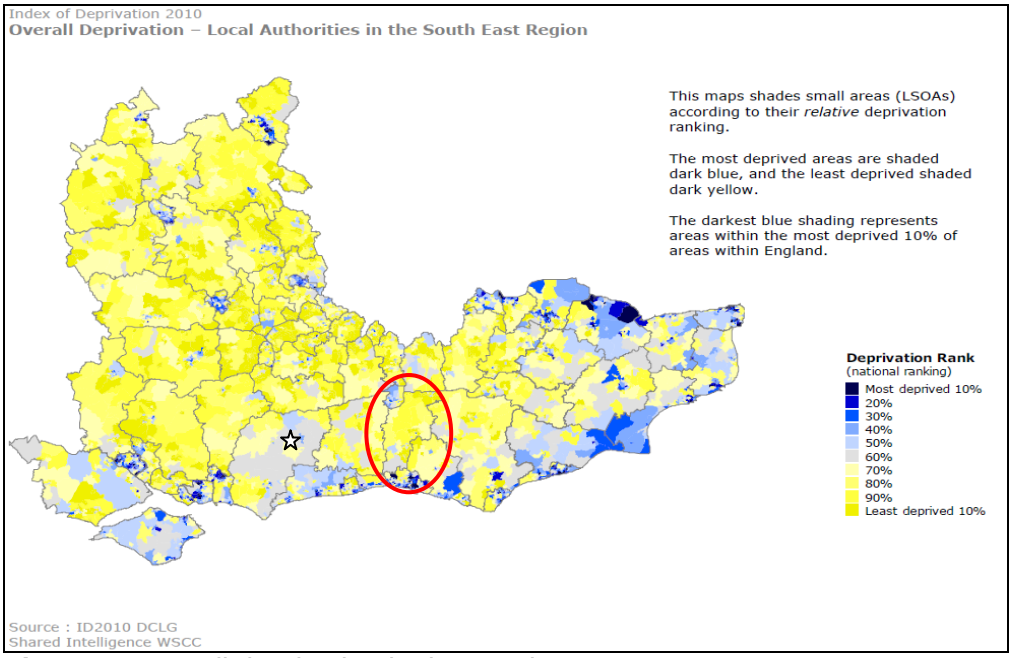


Figure 4- Overall deprivation in the South East

House Prices

3.17. As Mid Sussex has a high standard of living and is an attractive place to live, there is a greater demand for housing and this has an impact on house prices. House prices are higher when compared to adjacent authorities and there was a 48% increase in house prices between 2002 and 2007. Median prices in Mid Sussex are 9% above the South East average at £249,499.

Households

3.18. In 2001, there were 51,969 households in Mid Sussex but by 2011 the figure was 57,409 households (Census, 2011), an average annual increase of 544 households. The increasing population locally and nationally is a key factor in the growing number of households and may present challenges where infrastructure cannot be improved or additional capacity created to meet increased demand from new households. The District Plan housing provision for the plan period will be based on the "Objectively Assessed Need" for housing as required by the NPPF and NPPG, which takes into account changing demographics (births/deaths/migration) alongside other factors and influences.

3.19. The average number of new houses built within Mid Sussex from 2004-2013 was 473.

2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
458	611	337	502	480	353	179	522	749	536

Table 4 - Previous Housing Completions (net)

Housing Stock

3.20. The housing stock in Mid Sussex is predominantly larger detached and semi-detached properties, and this type of housing accounts for 60% of the housing stock in the three towns. The majority (74%) of the housing stock in the District is in private sector ownership. This compares to the regional average of 68% and the county average of 63%. The high percentage of private sector ownership means that there are low levels of social housing (12%) and private renting (13%). Second homes account for just over 0.4% of the total housing stock (SHMA, 2009; Census 2011) There is a Vacancy Rate of 2.3%..

Affordable Housing

3.21. Between April 2004 and April 2013 there have been 1,076 new affordable homes built across the District at an average of 120 affordable homes per annum with a low of 68 (2004/05) and a high of 202 (2011/12). The Affordable Housing Needs Model Update (2014) states that the net affordable housing need in Mid Sussex ranges from 116 to 223 homes per annum.

2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14
68	104	89	105	158	157	85	202	108	122

Table 5 - Previous Affordable Housing Completions (gross)

Health

3.22. Overall, the health of residents in Mid Sussex is generally good; in 2011 85% reported their health as 'Good' or 'Very Good'. This compares to 81% of people in the South East. 14.2% of people in Mid Sussex had a limiting long-term illness. This is lower than the West Sussex figure of 17%, the South East figure of 15.7% and the England figure of 17.6%, which also indicates a relatively good standard of health in Mid Sussex (Census, 2011).

3.23. The primary and community health estate is in good overall condition however there are localised capacity problems at some clinics. West Sussex Primary Care Trust indicated through the District's Infrastructure Development Plan (IDP, 2013) that primary care provision in the form of community health services will need to be improved in all the major settlements

in the District. From 1st April 2013, the Horsham and Mid Sussex Clinical Commissioning Group has been responsible for the majority of the local health services.

3.24. In terms of access to Health facilities, 82.2% of households are within a 15 minute walk (approximately 1.2km) from a GP Surgery, Health Centre or Hospital. This figure is largely swayed by the proportion of households close to facilities within the three towns, and there are large rural areas of the District that are not within a reasonable walking distance from health facilities.

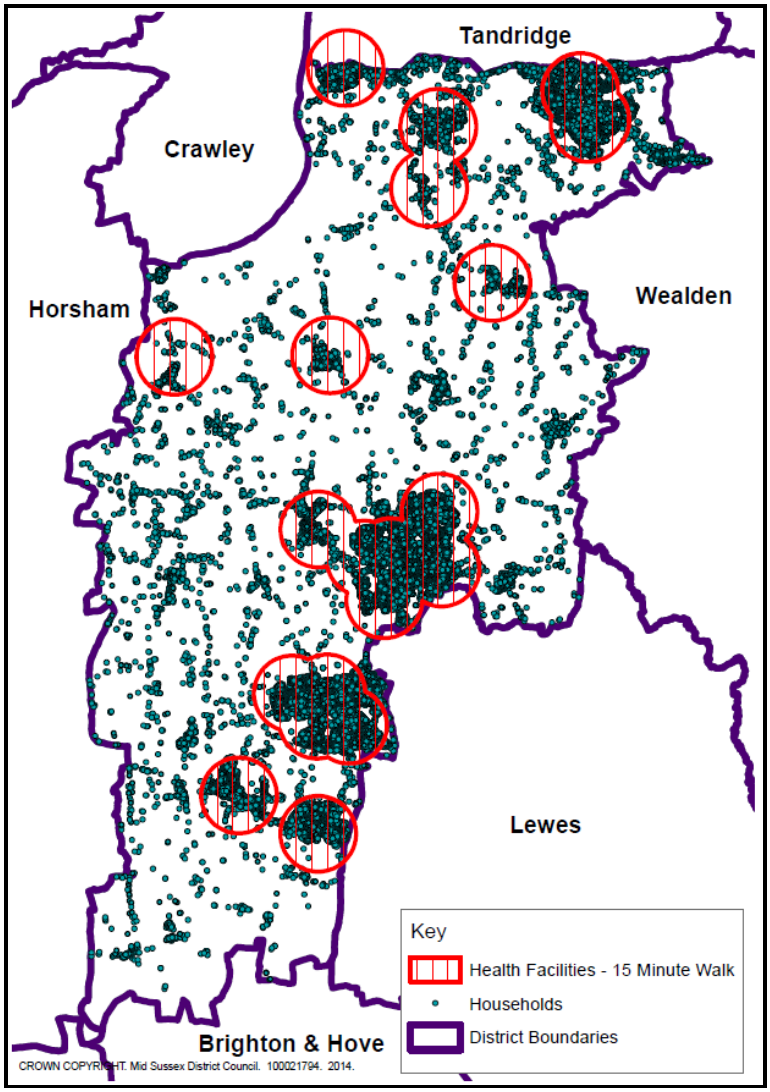


Figure 5 – Access to Health Facilities

Education

3.25. In Mid Sussex, there are 27 primary schools and 7 secondary schools serving the District. West Sussex County Council has consulted on primary school expansion proposals to cater for existing and forecast future demand, and has indicated that large-scale strategic development will require new and additional educational facilities while other development may require improved facilities.

3.26. In 2011, 14.8% of the District's population had no qualifications, which is less than the average for the South East (19.1%) and for Great Britain (22.5%). More people in Mid Sussex were educated to NVQ Level 4 and above (33.6%) than the average for the South East (29.9%) and Great Britain (27.4%) (ONS, 2010 and 2011).

3.27. In terms of primary school provision, the County Council Pupil Forecasting work has identified that schools in the south of the District in Hassocks, Hurstpierpoint and Twineham

will be oversubscribed. Likewise, in the central area of the District, Balcombe, Blackthorns, Bolney, Handcross, and Lindfield primary schools will experience capacity issues of varying severity. While in the north of the District some localised capacity problems exist, the overall level of provision is expected to be able to cater for estimated need. In these areas, new development is likely to increase these capacity problems, and depending on the size and scale of development will need to be accommodated through extensions to the existing provision.

3.28. West Sussex County Council has indicated that secondary schools in the East Grinstead area will be approaching capacity in the early part of the plan period. Existing secondary schools in Haywards Heath are not currently expected to experience significant increases in pupil numbers over the plan period. Enrolment information has identified that secondary school provision in Hassocks is anticipated to be oversubscribed at present and for much of the early part of the plan period. New development is likely to increase capacity problems, and depending on the size and scale of development will need to be accommodated through extensions to the existing provision.

3.29. 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. This figure is largely swayed by the proportion of households close to schools within the three towns, and there are large rural areas of the District that are not within a reasonable walking distance from educational facilities.

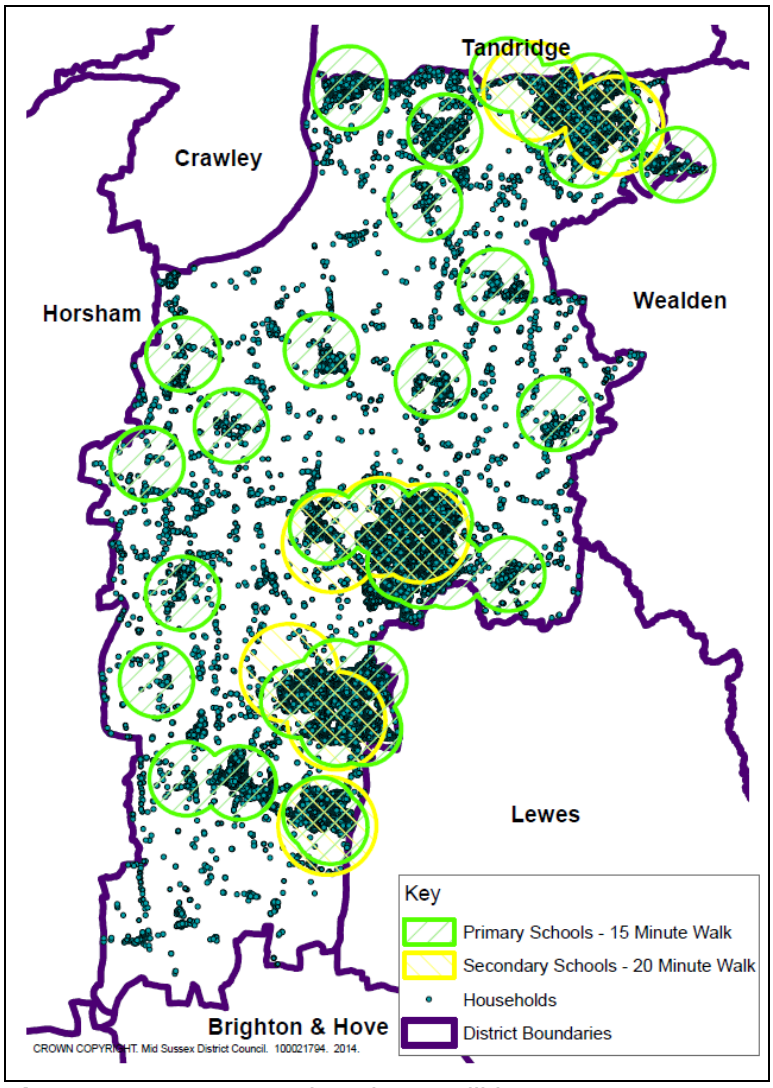


Figure 6 - Access to Education Facilities

Crime

3.30. Mid Sussex is generally a safe place to live with low levels of crime with only 36.98 crimes per 1000 residents in 2012/13 (Sussex Police).

3.31. Sussex Police have Crime Prevention Design Advisors who champion a scheme called, 'Secured by Design' and provide advice on crime prevention. The 'Secured by Design' scheme combines 'designing out crime' with enhanced security to reduce crime and create safe and sustainable communities. The aim of 'designing out crime' is to reduce the vulnerability of people, property and businesses to crime as well as reducing the fear of crime. This is through designing the built environment so that opportunities for crime are removed. This includes addressing access and movement, surveillance, defensible space, and lighting.

Leisure and Recreation

3.32. A refresh (2010) of the 'Assessment of Open Space, Sport and Recreation' audit found that there have been improvements in the deficiencies of outdoor provision both in terms of quality and quantity, particularly in artificial pitches, play and skate park areas. There are still, however, deficiencies in most areas and new residential development is likely to increase demand and further burden current provision. Facilities maintained by Mid Sussex District Council include:

- 3 leisure centres
- 9 parks
- 3 bowling greens
- 4 skate parks
- 23 senior and 15 junior football sites
- 10 tennis court sites
- Over 200 equipped playgrounds
- 2 allotment sites

3.33. There is a wide range of sport and recreation facilities across the District including health and fitness clubs, sports halls, swimming pools, golf courses, synthetic turf pitches, grass pitches and bowls facilities. There are leisure centres in Burgess Hill, East Grinstead, Hassocks and Haywards Heath offering a range of sporting activities.

3.34. The District Plan, alongside other relevant plans, will need to ensure that there is sufficient indoor and outdoor leisure activities and premises to cater for both residents and visitor requirements in the future. The Sport England Active People survey demonstrates that Mid Sussex has a comparatively high level of club membership and sports participation. It is likely that demand for leisure facilities will increase in the future so it is important that this demand is met.

Roads and Transport

3.35. Car ownership in the District is high with 86.4% of households having one or more cars or vans, compared to 74.2% nationally. 44.2% of all households have two or more cars compared to 32.1% nationally which raises the risk of traffic congestion issues. A number of interventions such as improved signalling, junction improvements and priority bus corridors may be necessary to support proposed growth.

3.36. Stage 2 of the Mid Sussex Transport Study was published in September 2013. The Study showed that planned development would cause potential network congestion problems at the following junctions:

- A2300 / Northern Arc Spine junction, Burgess Hill;
- A2300 / Cuckfield Road junction, Goddards Green (outskirts of Burgess Hill);
- A23 / A2300 Hickstead interchange;
- A272 / A273 Butlers Green junction, Haywards Heath;

- B2115 / B2110 Leechpond Hill junction, Lower Beeding;and potential for congestion at:
- A272 / B2036 junction, Ansty.
- M23/A23 junction

3.37. In addition to certain junction problems there was the potential for highway link congestion issues at the following locations:

- A272 eastbound between A273 Butlers Green and Haywards Heath;
- A264 westbound between A2220 Copthorne and M23 Crawley;
- B2036 northbound between Ardingly Road and Staplefield Road, Cuckfield;
- B2115 westbound between B2036, Cuckfield and B2114 Slough Green.

3.38. Air quality is an issue, particularly as habitats within the Ashdown Forest Special Area of Conservation are sensitive to atmospheric pollution, especially from road traffic emission. Additional sources of pollution should be avoided or mitigated to prevent additional adverse effects on ecological integrity.

3.39. There are six mainline railway stations in Mid Sussex, five of which are on the main Brighton to London line: Hassocks, Burgess Hill, Wivelsfield (Burgess Hill), Haywards Heath and Balcombe. East Grinstead railway station is on the East Grinstead to London line. The Bluebell Railway, a privately-owned heritage railway now provides services south from East Grinstead and has long-term plans to reinstate the disused branch line westwards from Horsted Keynes (via Ardingly) to a terminus at Haywards Heath.

3.40. In terms of access to train stations, 42.1% of the District's households are within a 15 minute walking time (approximately 1.2km) from a train station.

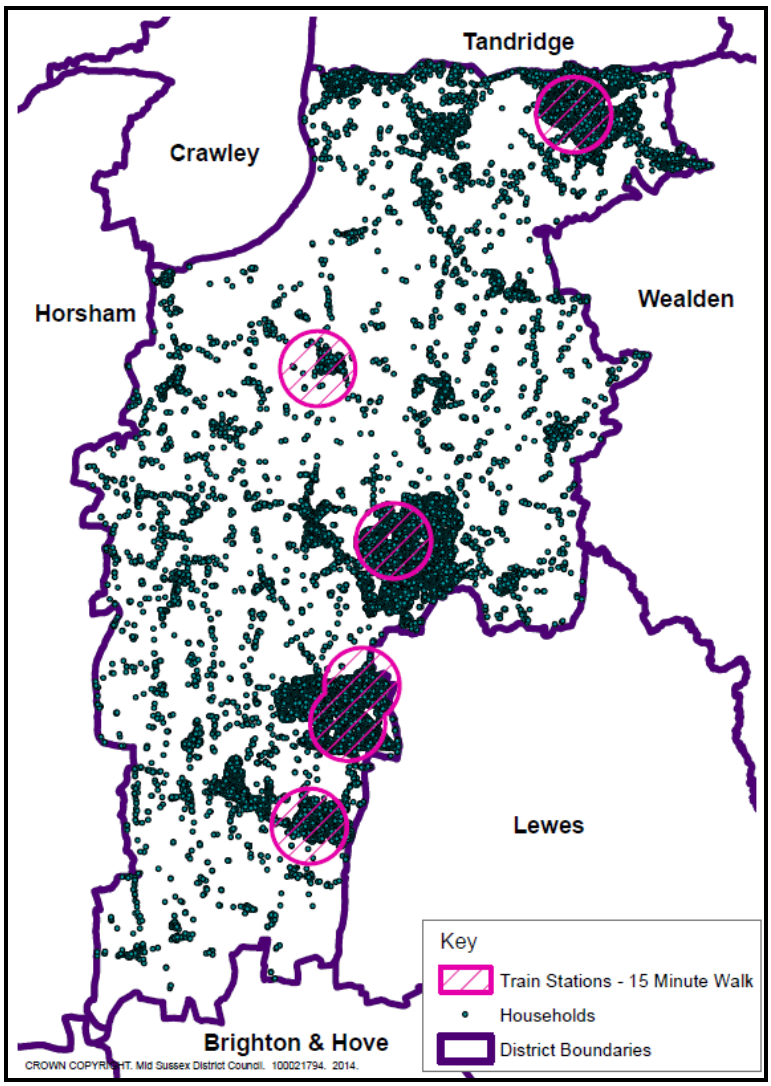


Figure 7 - Access to Train Stations

3.41. Private bus operators run services connecting the three towns with many of the District's villages and larger regional centres such as Horsham, Crawley and Brighton, although some services are infrequent and many do not operate in the evening or at weekends. Low passenger numbers have meant several bus services have been lost in recent years due to not being economically viable. Several community transport services also run in the District. In 2011, nearly 65% of journeys to work were by private motor vehicle, around 15% are by public transport and just over 12% are by bicycle or on foot (Census, 2011).

3.42. In terms of access to bus stops, 91% of the District's households are within a 5 minute walk (approximately 400m) from a bus stop. Whist this is an encouraging figure, this does not account for the frequency of bus service as many of the rural bus stops have an infrequent service (less than 3 an hour and in some cases less than 3 a day).

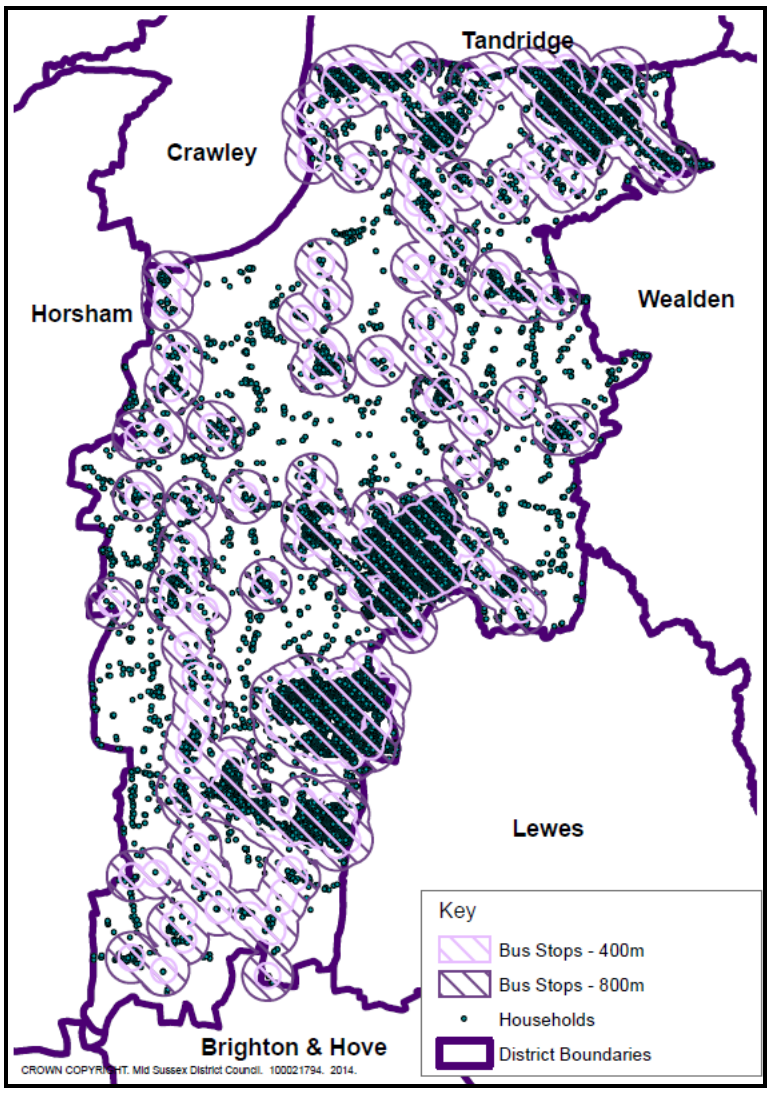


Figure 8 - Access to Bus Stops

3.43. Sustainable transport links and routes perform a key role in the District. Opportunities to enhance and upgrade existing pedestrian and cycle routes and new provision have been identified in the Council's Infrastructure Development Plan (May 2013).

3.44. High vehicle ownership and the potential for highway congestion arising from development present a significant issue. Opportunities to promote sustainable modes of transport and interventions and schemes that mitigate the impact of developments on the transport network and environment should be encouraged within the District Plan.

3.45. Mid Sussex District also benefits from an extensive network of public rights of way totalling around 597.8km (MSDC GIS), including:

- Footpaths – 475.2km
- Bridleways – 117.2km
- Byways – 4.8km
- Restricted Byways – 0.6km

Environmental Baseline

3.46. Mid Sussex has a high quality natural and built environment. Around 60% of the District is covered by protected landscape designations – nearly 50% is within the High Weald Area of Outstanding Natural Beauty (AONB) and over 10% is within the South Downs National Park (Figure 4). The South Downs National Park Authority is the planning authority for the National Park, and will be producing its own Local Plan for the Park area. The area designated as the South Downs National Park will not therefore be subject to the policies within the District Plan.

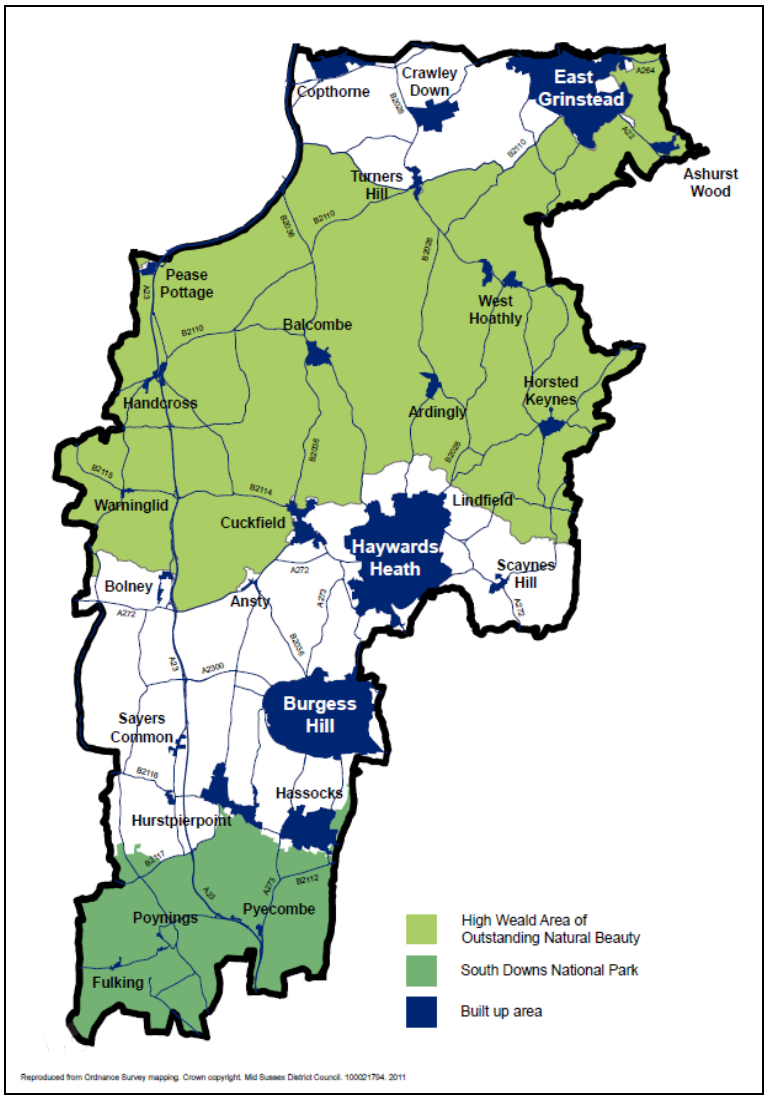


Figure 9- The High Weald Area of Outstanding Natural Beauty and the South Downs National Park

Nature Conservation

3.47. There are a variety of nature conservation sites within the District (Table 6 and Figure 10) which are important for biodiversity. In 2011-2012, 95.2% of Sites of Special Scientific Interest (SSSI) units in Mid Sussex have been found to be in 'favourable' or 'unfavourable but recovering' condition. The District is also important for species identified in the Sussex Biodiversity Action Plan (BAP), which are also subject to protection under British and European legislation. Species include the great crested newt, dormice, nesting birds, badgers and bats.

3.48. Mid Sussex is the tenth most wooded district in the South East and two-thirds of this woodland is classified as 'ancient', according to the Ancient Woodland Inventory for Mid Sussex (2006).

Designation	Description	Number of Sites within the District	Area of the District covered by the Designation	Percentage of the District covered by the Designation
SSSI	Site of Special Scientific Interest – a national designation for nature conservation or geological value	13	639.7 Ha	1.9%
SNCI	Site of Nature Conservation Importance – local designation for flora and fauna interest and value	50	1,094 Ha	3.3%
LNR	Local Nature Reserve – local designation for wildlife or geological importance.	6	158 Ha	0.5%
Ancient Woodland	Areas with continuous woodland cover since 1600AD.	1443	5,282 Ha	15.81%

Table 6 - Nature Conservation Sites in Mid Sussex

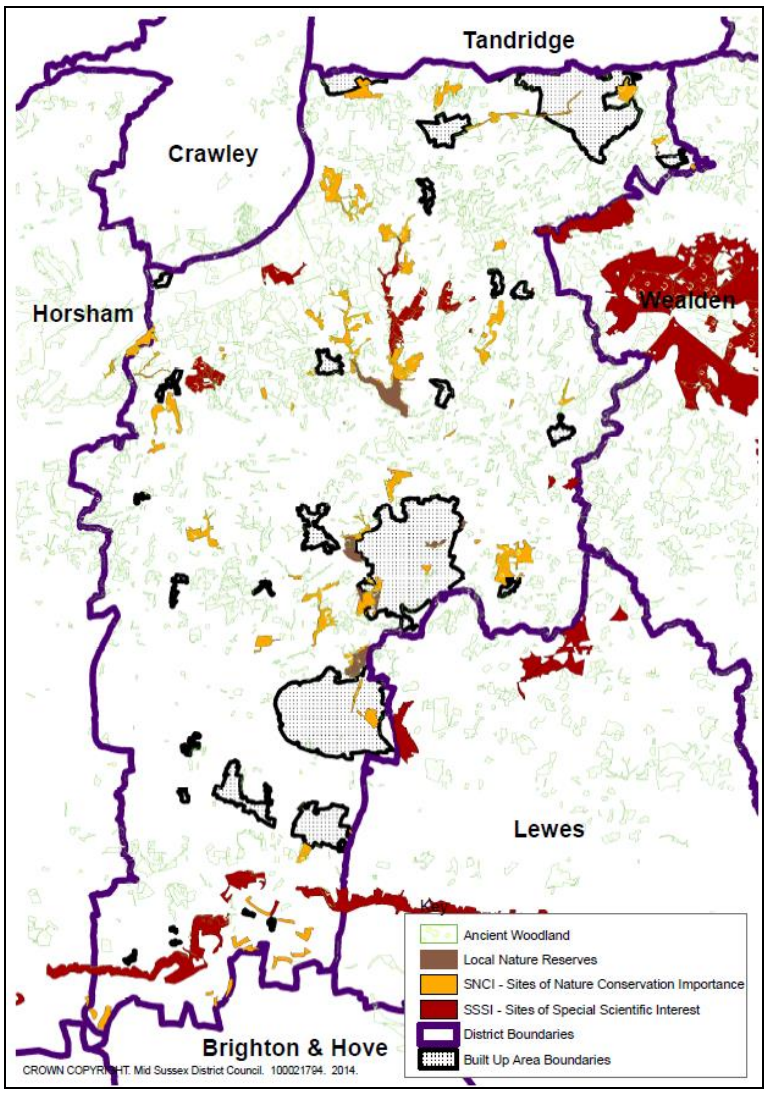


Figure 10 - Nature Conservation Sites in Mid Sussex

Ashdown Forest SPA/ SAC

3.49. The Natura 2000 network consists of sites across Europe designated for their nature conservation importance. It aims to be an ecologically coherent network of designated sites that protect threatened species and habitats. The Natura 2000 network is formed of Special Areas of Conservation (SAC) for species, plants and habitats (designated under the Habitats Directive) and Special Protection Areas (SPA) for bird species (classified under the Birds Directive).

3.50. There are no European-designated or Ramsar sites within the District, but the Ashdown Forest SPA/ SAC lies adjacent to the north-east boundary of Mid Sussex and within Wealden District (Figure 11).

3.51. The Ashdown Forest SPA was classified in 1996. It is a 3,200Ha site comprising predominantly of lowland heathland and woodland. The Ashdown Forest SPA is an internationally important habitat classified because of the presence of breeding populations of Dartford warbler *Sylvia undata* and European nightjar *Caprimulgus europaeus*. It is also a Site of Special Scientific Interest (SSSI).

3.52. The Ashdown Forest SAC was designated in 2005 and covers 2,700Ha. It has a different boundary to the SPA, but the two designations overlap. The qualifying features for the designation are the Annex I habitats: Northern Atlantic wet heaths with *Erica tetralix* and European dry heaths, and the Annex II species: Great crested newt *Triturus cristatus*. It is also part of the SSSI.

3.53. Under the Conservation of Habitats and Species Regulations 2010, any proposed plan (including the District Plan) that may affect a European site must first undergo an assessment to look at its potential impacts. This is to determine if the plan will adversely affect the integrity of the European site(s) concerned (the Ashdown Forest SPA/ SAC).

3.54. The potential effects of development on Ashdown Forest were assessed during the Habitats Regulations Assessment (HRA) process for the Mid Sussex District Plan. The screening exercise carried out in late 2007 and early 2008 found likely significant effects on the Ashdown Forest SPA as a result of increased recreational activity arising from new residential development and related population growth that is likely to disturb the ground-nesting birds.

3.55. A 2008 survey investigating visitor patterns at Ashdown Forest found that the majority (83%) of visitors originated from within a 7km distance from Ashdown Forest. Within this '7km zone of influence', measures to reduce recreational pressure would be most effective, therefore, residential development leading to a net increase in dwellings will need to contribute to an appropriate level of mitigation. This will be in the form of providing a Suitable Alternative Natural Greenspace (SANG), either on the development site itself or through a financial contribution towards a strategic SANG, and a separate financial contribution towards a Strategic Access Management and Monitoring (SAMM) strategy.

3.56. The East Court & Ashplats Wood SANG Strategy has been agreed by the District Council and a series of enhancement works will help to make the site more attractive to visitors. Work with the other affected local authorities (Wealden District Council, Lewes District Council and Tunbridge Wells Borough Council) on a joint SAMM strategy is currently in progress, although the District Council is currently implementing an interim SAMM mitigation strategy applicable to relevant planning applications.

3.57. The screening exercise also identified that atmospheric pollution could have an impact on the Ashdown Forest SAC, however, the Mid Sussex Transport Study indicates that projected traffic increases are well below the threshold deemed as significant and, therefore, the District Plan HRA report concludes that adverse effects are unlikely and no further measures are necessary.

3.58. Further issues to do with the Ashdown Forest SPA/ SAC will be discussed in revised versions of the Habitats Regulations Assessment for the Mid Sussex District Plan, and there will be policies regarding Ashdown Forest in the District Plan in order to implement mitigation measures.

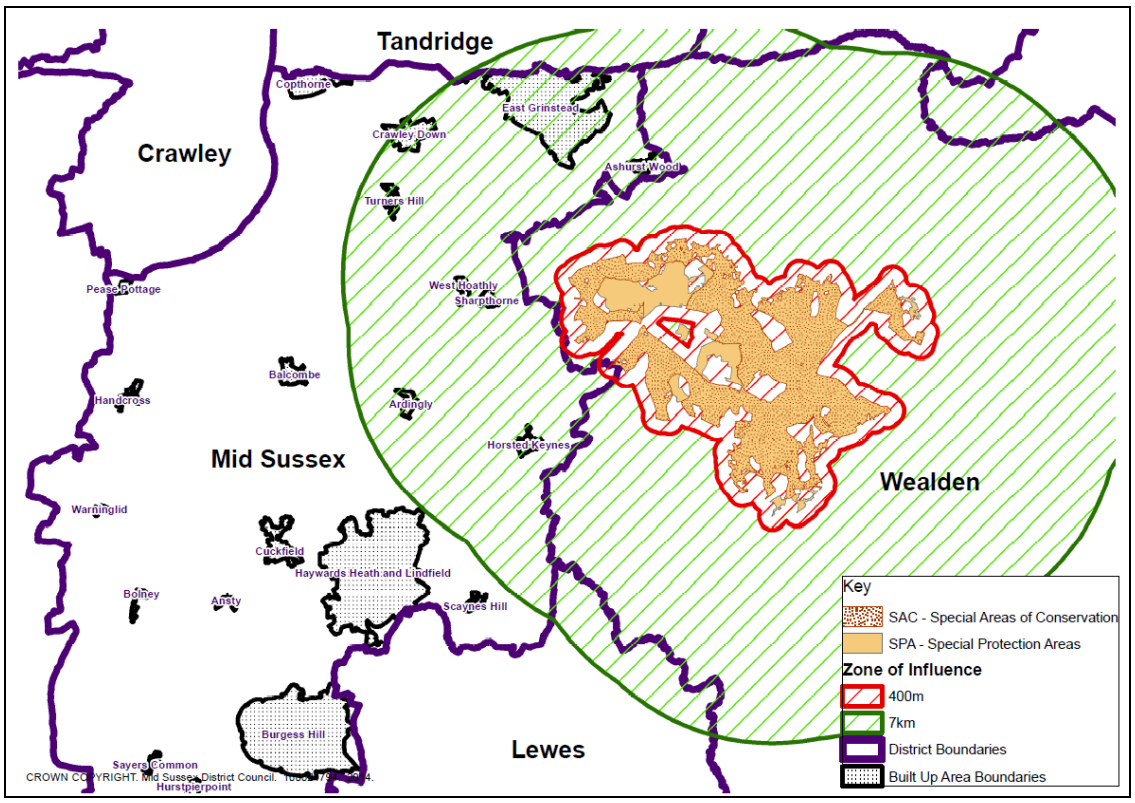


Figure 11 - Ashdown Forest Special Protection Area and Special Area of Conservation, plus zones of influence.

Landscape

3.59. There are three landscape character areas within the District: the High Weald, the Low Weald and the Sussex Downs. Mid Sussex contains areas of ancient and ghyll woodland within the stream valleys of the High Weald. There are a significant number of standing water and wetland habitats such as ponds (including historical mill sites and hammer ponds), lakes, reservoirs and water meadows. There are also many linear/ running water habitats of small streams and ditches, for example, the Upper Adur Streams, which act as a network of wildlife corridors throughout the District.

Heritage

3.60. The towns and villages of Mid Sussex are attractive and the historic environment is of a high quality. This helps to shape the areas unique character and identity. Within Mid Sussex District, there are:

- 36 Conservation Areas, designated for their special architectural or historic interest
- 1,040 Listed Buildings, of which 18 are of the highest grade (Grade I) which are considered to be of exceptional importance.
- 10 Registered Parks and Gardens
- 25 Scheduled Ancient Monuments, predominantly within the South Downs National Park
- Over 1,660 reported archaeological sites and find-spots

3.61. The District Plan will have to ensure that the District's historic environment is offered a high level of protection so as not to put any of these important historical assets at risk, in accordance with the National Planning Policy Framework.

Air and Climate

3.62. In general, air quality in Mid Sussex is good. There is one Air Quality Management Area (AQMA) in the District in Hassocks, designated due to levels of nitrogen dioxide being above the target at Stonepound Crossroads. The main reasons for the crossroads being affected by air pollution are the volumes of road traffic and the stop/start routine of driving conditions at peak times caused by the queuing traffic at the traffic lights. The area is on the brow of a hill and is partly lined with trees. An Air Quality Action Plan was consulted upon and published in 2013 to identify actions to improve air quality. An annual progress report will be published in order to monitor and report on this area.

Water

3.63. The Strategic Flood Risk Assessment (SFRA) has identified that approximately 9.7km^2 of the District (2.9% of the total land area) is at a medium risk from flooding – within Flood Zone 2. Approximately 2.2% is at a high risk of flooding – within Flood Zone 3 (Figure 7). Additionally, approximately 1.7km^2 of the District is affected by drainage problems, groundwater flooding and overland flows. The SFRA mapping is a 'live' document which is updated with new flood events as they arise. It includes areas that have flooded historically, as well as the recently published Flood Map for Surface Water which accompanies the National Flood Risk Assessment (NaFRA).

3.64. Demand for water is rising and residents in Mid Sussex use approximately 181 litres of water a day. This is higher than the UK average of 154.1 litres. Most of the District is within an area identified as having a deficit in water supply and, therefore, during a dry year the demand for water will be more than the water available for use.

3.65. Under the Water Framework Directive, water quality targets are set in River Basin Management Plans. The majority of water bodies in the District are failing to meet the Good Status objective, and it is recognised that both ground and surface waters face threats from abstraction and pollution. Some of the existing sewerage infrastructure within the District is operating at or near capacity and unless significant investment is made to existing or through new infrastructure, water quality within the watercourses in the District may be at risk (Water Cycle Study, 2011). In particular, Goddards Green Wastewater Treatment Works (on the outskirts of Burgess Hill) has been identified as having constraints with regards to capacity and odour, which will need to be taken into account when planning for development that would drain to this particular works.

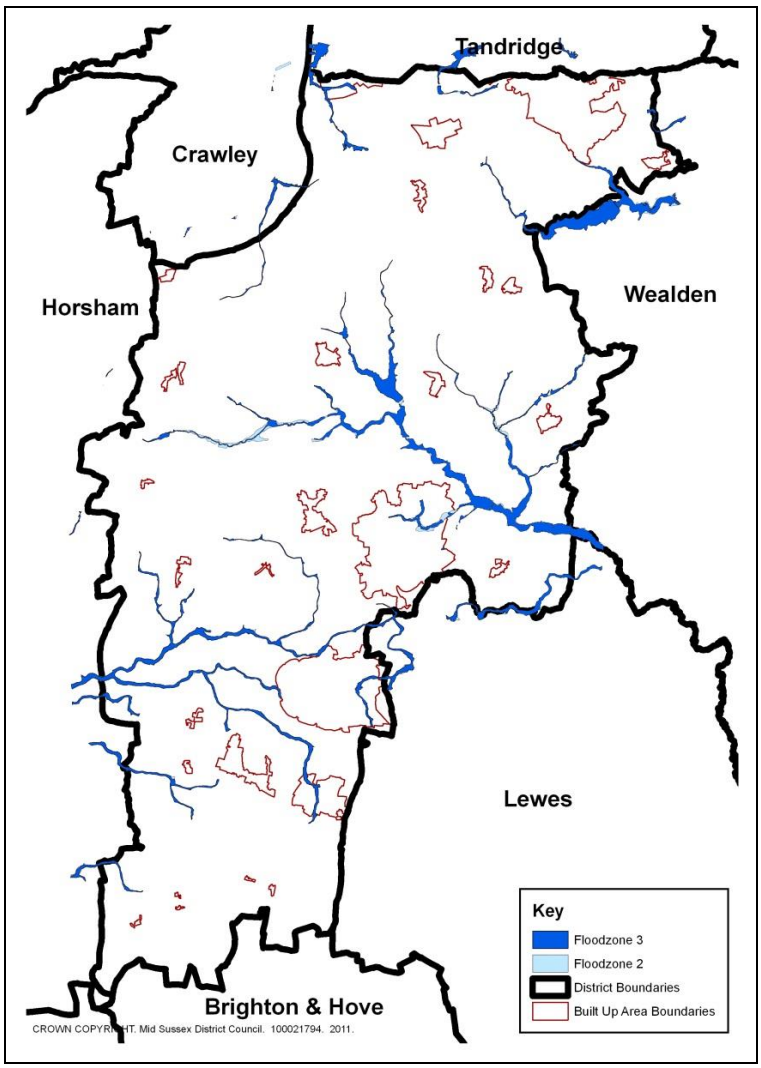


Figure 12 – Areas within an Environment Agency defined Flood Risk Zone (2 or 3)

Soils

3.66. The Agricultural Land Classification classifies land into 5 grades (Grade 1: Excellent Quality – Grade 5: Very Poor Quality) based on long-term physical limitations of land for agricultural use. Grades 1, 2 and 3a form the Best and Most Versatile Agricultural Land definition, however, the data available does not divide Grade 3 into categories 3a and 3b.

- There is no land classified as Grade 1 within the District.
- 1.4% of the District is classified as Grade 2 and the majority of this is within the South Downs National Park or the High Weald AONB.
- 63.7% of the District is classified as Grade 3, some of which is likely to fall into the Grade 3a category.
- 23.2% of the District is classified as Grade 4.

3.67. Whilst there are relatively few large-scale contaminated sites in the District, there are some small-scale contaminated sites such as former gas holders.

Energy

3.68. The Sustainable Energy Study (2009) assessed different renewable energy sources in order to gauge the potential and possible yield. This also took into account landscape sensitivity. For instance, the potential wind resource in Mid Sussex is 62MW for medium-scale turbines, however, when taking infrastructure, wind speeds, designations and landscape sensitivity into account, the potential is reduced to only 7MW. The study also provides some recommendations, including:

- A target for reduction in carbon emissions (expressed in terms of the Code for Sustainable Homes for residential development and BREAAM for non-residential development).
- A target for the percentage of renewable energy to be generated on-site, i.e. within or in very close proximity to the development site.

3.69. As at March 2014, the following renewable energy installations were present in the District:

Type	Number	Installed Capacity (kW)
Photovoltaics	1,347	5,676
Wind	4	15
Hydro	0	0
Anaerobic Digestion	0	0
Micro CHP	3	3
Total	**1,354**	**5,694**

Table 7 - Renewable Energy installations and capacity in Mid Sussex. (Source: Department of Energy and Climate Change, 2014)

Waste

3.70. The majority of waste produced in the District currently goes to landfill sites, but around 43% is recycled. The District Council operates a kerbside recycling scheme and there are 15 recycling 'bring sites' throughout the District (MSDC monitoring).

Economic Baseline

Economic Characteristics

3.71. Mid Sussex District is well-connected to the strategic road and rail networks between London and the south coast. Gatwick Airport is close by in the neighbouring borough of Crawley. This has meant that the local economy is influenced by these factors as well as being within commuting distance from London and the south coast. The District's location attracts businesses resulting in a healthy and vibrant economy. There are approximately 63,900 jobs in Mid Sussex (Economic Growth Assessment, 2013).

3.72. Just over half (56.4% - Census 2011) of the workforce both live and work in the District and around 43.6% of the total workforce of Mid Sussex work outside of the District. The relatively high level of out-commuting is an issue in terms of sustainability – this can lead to overcrowded trains and congestion on the road network. It also means that many of the District's highly qualified workforce are not using their skills within Mid Sussex-based businesses.

Employment Sectors

3.73. In 2011, the residents of Mid Sussex were predominantly employed in:

- Public administration (26.7%)
- Distribution, hotels and restaurants (25.9%)
- Banking, finance and insurance (24.4%)

3.74. Also in 2011, 12.4% of the workforce was self-employed (Census, 2011). The increase in broadband availability within the District is likely to have encouraged more people to have set up business from home, or work from home.

Employment Rate

3.75. Mid Sussex has an employment rate of 78.2%; this is higher than the regional average of 74.6%. This suggests that there is a strong labour market in Mid Sussex. The unemployment rate is 3.8% in Mid Sussex, which is lower than the average figure for the South East of 5.8%. The claimant count rate (i.e. the number of people claiming Job Seekers Allowance) is 1.3%, which is lower than the South East average of 2.6% (ONS, 2013).

Economic Activity Rate

3.76. The economic activity rate is the percentage of people who are in work or are seeking work. In 2001, 52.06% of the total population of Mid Sussex was economically active (66,324 residents). By 2011, this figure had risen to 53.64% which equates to 75,025 residents (Census, 2011).

Business Activity

3.77. There are 6,990 active enterprises in Mid Sussex (2012) and this is similar to the figure for the previous year (6,910).

Earnings

3.78. In 2013, the average gross weekly pay for workers who live in the District was £574.70. This is higher than the averages for the South East (£547.60) and Great Britain (£489.90). The average gross weekly pay, however, for those who work (but do not necessarily live) in the District is lower at £447.40. This figure is lower than the average for the South East (£504.70) and for Great Britain (£489.10) (ONS, 2011).

Retail

3.79. The District Council commissioned consultants to undertake a retail study of Mid Sussex in 2014 as an update of the previous study in 2009. It provides a high level assessment of the need for new retail floor space in the three main town centres of Burgess Hill, East Grinstead and Haywards Heath and the village centres of Hassocks and Hurstpierpoint over the plan period, up to 2031.

3.80. The Retail Study Update 2014 found that for convenience goods, there is no district-wide capacity for new retail floor space until 2024 as the supermarket permitted as part of the Haywards Heath railway station redevelopment will effectively 'soak up' any quantitative need for new retail floor space over the short/medium term. Over the plan period until 2031, the study found that there is a forecast capacity for 3,232m² net of new convenience goods floor space, the majority of which should be directed towards Burgess Hill and East Grinstead.

3.81. For comparison goods, the study forecasts a quantitative need for new retail floor space of 10,487m² net by 2031. This capacity is fairly evenly distributed between Haywards Heath (2,659m^2), Burgess Hill (3,985m^2) and East Grinstead (3,447m^2). There is more limited capacity forecast for Hassocks, Hurstpierpoint and the district's other main village centres (395m^2).

Impact of Gatwick Airport

3.82. Gatwick Airport is located just outside the District within Crawley Borough. Around 29% of all Mid Sussex residents commuting out of the District for work travel to Crawley, with a large proportion of these likely to work at the airport itself or related businesses off-site.

3.83. In 2012, the Government announced the setting up of the Airports Commission to consider the UK's runway capacity needs. The Airports Commission has shortlisted a second runway at Gatwick and will recommend to Government where the next runway should be built. Gatwick Airport held a consultation in April/May 2014 into options for a second runway at Gatwick. This will inevitably have consequences for Mid Sussex – it should present further employment opportunities, although this will encourage Mid Sussex residents to 'out-

commute' for work. New businesses setting up in and around the airport may have an impact on the viability (and need) for some existing related businesses in Mid Sussex.

3.84. Whilst it is likely a decision will be made whilst the District Plan is in production, proposals won't be seen on the ground until later in the plan period. This is something that will be kept under review during all stages of plan preparation.

Tourism

3.85. Tourism plays an important role in Mid Sussex and 9% of jobs in the District are tourism-related. There are a variety of attractions in Mid Sussex including gardens, historic buildings, windmills, a steam railway, museums, farms and nature reserves as well as numerous local events. Between 2010 and 2012 there were 154,000 trips to Mid Sussex for tourist purposes, with a total tourist spend of £17m (Visit England – Great British Tourism Survey 2013).

Challenges Collecting the Baseline Data

3.86. There are some challenges collecting the baseline information, which mean that there are some data limitations:

- The most up-to-date and reliable data source has been used at all times where possible.
- One of the difficulties in collecting the data has been obtaining data at a district level. For example, some data is only available at a county or regional level.
- It is necessary for the data to be collected on an annual basis for monitoring purposes. Some data is released or collated yearly which is ideal for monitoring purposes. Other datasets are released at longer time intervals. Where data has to be collated by the District Council using its own internal systems (for example, the planning application database or mapping software (GIS)), this has to be done with limited resources in terms of time and cost. Where collecting data would be unreasonable in terms of time and cost, alternatives have been sought where possible. It is important that the task of collecting data is not onerous, and the benefit from collecting it outweighs the time spent doing so.
- As external organisations collect some of the data, Mid Sussex District Council has little control over the spatial and temporal nature of data collected and whether this may change in the future. It is important, for monitoring purposes, that the information is from a reliable source and can be compared with similar data retrieved over time in order for reasonable comparisons/ trends to be made.
- Baseline data relates to Mid Sussex only, unless noted otherwise. It is possible that some of the strategies and policies within the draft District Plan will have an effect outside of the District. It would not be practical to collate baseline data for all neighbouring areas on every subject considered within this baseline section, however the potential impact outside of Mid Sussex and 'cross-boundary effects' will be considered when appraising the strategy/sites/policy within the draft District Plan.

4. Identifying Sustainability Issues and Problems

Task A3 - Identifying Sustainability Problems

4.1. The review of Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) and analysis of the baseline position within Mid Sussex undertaken in Section 3 help to determine the sustainability issues and challenges facing Mid Sussex District. Whilst Mid Sussex offers a high quality of life, the District Plan will need to manage a series of issues over the lifetime of the District Plan if the District is to continue to be successful and the negative impacts of development are to be properly mitigated.

4.2. These issues and challenges include:

Social

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

Environmental

- There is a need to encourage sustainable, attractive and inclusive communities to ensure that the District continues to benefit from good health and an attractive natural and built environment.
- The need to maintain and enhance the high quality natural, built and historic environment and biodiversity of the District.
- Water usage is increasing, putting further pressure on water resources, which is further exacerbated by climate change.
- Water quality, both in watercourses and aquifers, needs to be maintained and enhanced.

- Flood risk is an issue for the District, in particular relating to surface water drainage from new developments.
- The amount of waste produced in Mid Sussex is increasing, while at the same time, the land available to dispose of waste (landfill) is reducing. However, this is seen as the most unsustainable option by which to manage waste.
- There is a need to promote more sustainable forms of development that are energy and resource efficient, and increase the environmental as well as economic 'self-sufficiency' of communities within Mid Sussex and its ability to adapt to climate change.

Economic

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

5. Sustainability Framework – Objectives and Indicators

Task A4 – Developing the Sustainability Appraisal / SEA Objectives

Sustainability Objectives and Indicators

5.1. In order to assess the contribution the draft District Plan will make towards achieving sustainable development, a range of sustainability objectives have been developed. These objectives are based on the three strands of sustainability: **Social**, **Environmental** and **Economic**.

5.2. The Sustainability Appraisal must test the proposed strategy, policies and potential sites within the District Plan against the sustainability objectives. It must test a range of reasonable alternatives for the strategy, policies and sites. By doing this, all reasonable alternatives will have been considered and their relative sustainability recorded to determine the most sustainable strategy, policies and sites for inclusion within the District Plan. This ensures that the plan itself is the most sustainable given all reasonable alternatives.

5.3. The impact of each strategy/policy/site option on each of the objectives will be appraised accordingly using the '++' to '--' method as described in section 2 - a prediction as to whether the baseline status of each objective will improve, stay the same or get worse as a result of the policy option in question.

5.4. Each objective is quantified by a number of measurable indicators which can be monitored over time to ensure the strategy and policies within the District Plan are performing as predicted by the appraisal, once adopted. The sustainability objectives and associated indicators make up the 'Sustainability Framework'.

5.5. The objectives chosen represent the issues and challenges facing the District throughout the plan period as identified in section 4. The indicators have been chosen to provide the best possible sources in order to quantify and measure the achievement of each objective. Appendix 2 shows the current baseline figures for as many indicators as possible, the data source from where this has been obtained, and predicted future impacts. Where it is not currently possible to obtain data for an indicator, a reason has been provided. The Council will be investigating ways to collect this data in future, and progress on this will be reported in future stages of this Sustainability Appraisal report where possible.

5.6. The proposed sustainability objectives and their corresponding indicators are:

SOCIAL

Social	**1**	**To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford**
		- *housing completions per annum (net)* - *number of affordable homes completed annually (gross)* - *financial contributions towards affordable housing provision* - *number of low cost home ownership households delivered annually* - *number of households accepted as full homeless*

Social	**2**	**To improve the access to health, leisure and open space facilities and reduce inequalities in health.**
		- *number of applications resulting in new, extended or improved health facilities* - *number of households within a 15 minute walk (approx. 1.2km) from GP surgery/health centre/hospital* - *number of households within 300m of leisure and open space facilities (as defined in*

	the Mid Sussex Assessment of Open Space, Sport and Recreation – PPG17 Study) - *financial contributions towards leisure facilities* - *amount of leisure floorspace (Use Class D2) completed per annum (gross)*

Social	**3**	**To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities.**
	- *percentage of population of working age qualified to at least NVQ level 3 (or equivalent)* - *percentage of adults with poor literacy and numeracy skills* - *number of households within a 15 minute walk (approx. 1.2km) from a Primary School* - *number of households within a 20 minute walk (approx. 1.6km) from a Secondary School*	

Social	**4**	**To improve access to retail and community facilities.**
	- *number of households within a 15 minute walk (approx. 1.2km) from a superstore/town centre/high street shopping facilities)* - *number of households within a 15 minute walk (approx. 1.2km) from a convenience store* - *number of households within a 15 minute walk (approx. 1.2km) from community facilities (e.g. community hall, place of worship, library)*	

Social	**5**	**To create cohesive, safe and crime resistant communities**
	- *all crime – number of crimes per 1000 residents per annum* - *number of domestic burglaries per 1,000 households*	

ENVIRONMENTAL

Environmental	**6**	**To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere (taking into account and aiming to reduce the potential impact of climate change), and seek to reduce the risk of flooding. (SEA)**
	- *percentage of the District that is within Flood Zone 2/Flood Zone 3* - *number of properties at risk from flooding, as defined by the Environment Agency* - *number of planning applications approved contrary to advice given by the EA on flood risk/flood defence grounds*	

Environmental	**7**	**To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance.**
	- *percentage of new and converted homes developed on brownfield land* - *percentage of new employment floorspace on previously developed land* - *density of new housing developments* - *amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development*	

Environmental	**8**	**To conserve and enhance the District's biodiversity. (SEA)**
	- *number and area of SNCIs and LNRs within the District* - *area of ancient woodland within the District* - *condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC & Ramsar)* - *number of planning applications approved contrary to advice given by Natural England on biodiversity issues* - *Number of dwellings permitted within the 7km Zone of Influence (SPA)*	

Environmental	**9**	**To protect, enhance and make accessible for enjoyment, the District's countryside. (SEA)**
	- *open spaces managed to green flag standard* - *number of major developments in the South Downs National Park / High Weald AONB* - *number of households within 300m of multi-functional green space (as defined in the Mid Sussex Assessment of Open Space, Sport and Recreation – PPG17 Study)*	

Environmental	**10**	**To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA)**
	- *number of Listed Buildings in the District* - *buildings of Grade I and II* and scheduled monuments at risk* - *number of Conservation Areas in the District* - *number of Conservation Areas with appraisals and management proposals*	

Environmental	**11**	**To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)**
	- *number of households within a 5 minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour)* - *number of households within a 10 minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour)* - *number of households within a 15 minute walk (approx. 1.2km) of a train station* - *proportion of journeys to work by public transport* - *percentage of residents living and working within Mid Sussex* - *monetary investment in sustainable transport schemes (value of s.106 agreements)* - *Number of Air Quality Management Areas (AQMAs) within the District*	

Environmental	**12**	**To reduce waste generation and disposal, and achieve the sustainable management of waste, including the amount of waste that is either re-used or recycled.**
	- *percentage of domestic waste that has been recycled* - *percentage of domestic waste that has been composted*	

Environmental	**13**	**To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management. (SEA)**
	- *Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate"* - *incidents of major and significant water pollution within the District* - *number of planning applications approved contrary to advice given by the EA on water quality issues* - *number and area of developments where appropriate remediation of contaminants has taken place* - *number of developments built to BREEAM / Code for Sustainable Homes standards*	

Environmental	**14**	**To increase energy efficiency and the proportion of energy generated from renewable sources in the District and to utilise sustainably produced and local products in new developments where possible.**
	- *number of developments built to recognised renewable energy standards* - *domestic energy consumption per household* - *number of renewable energy installations within Mid Sussex* - *installed capacity of renewable energy installations within Mid Sussex*	

ECONOMIC

Economic	**15**	**To encourage the regeneration of the District's existing Town Centres and support the viability and vitality of village centres.**
	- *Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2)* - *number of households within a 15 minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities)*	

Economic	**16**	**To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.**
	- *percentage of Mid Sussex residents who are unemployed* - *percentage of Mid Sussex residents who are economically active* - *average weekly income for those who are employed in the District* - *percentage of residents living and working within Mid Sussex* - *job density (ratio of jobs to working age population)*	

Economic	**17**	**To support economic growth and competitiveness across the District.**
	- *net increase/decrease in commercial (Use Classes B1(b,c), B2, B8) and office (B1(a) and A2) floorspace* - *number of businesses within the District* - *number of new businesses setting up in the District*	

Economic	**18**	**To encourage the development of a buoyant, sustainable tourism sector.**
	- *percentage of jobs in the tourism sector* - *total trips to Mid Sussex for tourism purposes* - total spend by those visiting Mid Sussex for tourism purposes - *number of visitors staying overnight*	

5.7. The SEA directive makes a requirement for specific objectives on Soil and Air Quality. In analysing the baseline for the District it has not been considered that there are District-wide issues concerning these two areas. It has been difficult to obtain any relevant up-to-date information on these issues at a District-wide scale. For this reason, it has not been possible to include specific objectives for soil and air quality, however there are indicators related to Soil in objective 7 (development on previously developed land and best and most versatile agricultural land) and 13 (contaminated land) and Air Quality in objective 11 (reduction in transport congestion) and 14 (reduction in unsustainable energy that can lead to poor air quality).

5.8. The amount of Best and Most Versatile agricultural land within Mid Sussex is reported in Section 3 and Appendix 2, however there are issues related to the collection of this data which are explained in the appendix. For this reason, it cannot be reported accurately and therefore an objective on this issue would be difficult to monitor with any accuracy.

5.9. There is one Air Quality Management Areas (AQMA) in the District (Stonepound Crossroads, Hassocks) and there are issues with atmospheric pollution that could affect the Ashdown Forest SPA/SAC. It is not anticipated that the strategy and policies within the District Plan will affect the numbers of AQMAs in the District, however if this status changes, and it is deemed necessary to include an objective for air quality, one can be included in the next stage of this report.

5.10. Some objectives relate to walking distances/times. It is recognised that some groups of people (ill health/older groups/etc) would not be able to walk these distances or at the times suggested. These distances and times are provided as an approximate walking distance for most members of the community, and as a benchmark in order to aid comparison between options.

Compatibility of Sustainability Objectives

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

Key:

✓	Compatible
×	Incompatible
	No Link / Neutral

	1 - Housing	2 - Health	3 - Education	4 - Retail	5 - Crime	6 - Flood Risk	7 - Land Use	8 - Biodiversity	9 - Countryside	10 - Historic	11 - Transport	12 - Waste	13 - Water	14 - Energy	15 - Regeneration	16 - Employment	17 - Ec. Growth
2 - Health	✓																
3 - Education																	
4 - Retail		✓															
5 - Crime	✓		✓	✓													
6 - Flood Risk	×																
7 - Land Use	✓					✓											
8 - Biodiversity	×																
9 - Countryside	×			✓		✓	✓	✓									
10 - Historic				✓			×	✓	✓								
11 - Transport	×	✓		✓			✓	✓									
12 - Waste	×						✓	✓		✓							
13 - Water	×					✓	✓	✓	✓			✓					
14 - Energy	✓						✓			✓		✓					
15 - Regeneration	✓			✓	✓		✓			×	✓						
16 - Employment	✓		✓		✓	×		×	×						✓		
17 - Ec. Growth	✓		✓	✓	✓	×		×	×						✓	✓	
18 - Tourism	×			✓	✓		✓	✓	✓	✓	✓				✓	✓	✓

Table 8- Compatibility of Sustainability Appraisal Objectives

5.12. It is evident that most of the objectives are compatible with each other, or have no link/neutral impact. Cases where objectives are not compatible with one another were where objectives that result in the need for growth/development are compared against those concerned with conserving and enhancing the environment – i.e. the need for development to be minimised (for example, the conflict between objective 1 and objectives 8-13).

5.13. Due to the broad nature of the District Plan, covering rural as well as urban areas, it will need to contain policies for growth as well as conservation. It will therefore not be realistic for these objectives to be removed or altered. In appraising the strategy and policies, it is likely that these conflicts will arise. It will be the job of the appraisal to identify where conflicts occur, minimise adverse impacts by promoting the most suitable policy options, and identify mitigation where adverse impacts cannot be avoided. Due to the nature of policies expected to be within the District Plan, it is likely that some policies will in fact mitigate the negative impacts of others. It will be important to consider the impact of the plan policies on overall sustainability as a whole.

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

5.15. In recommending the preferred policy option, weight has been placed on the sustainability objectives most closely linked with the particular policy being appraised at the time, e.g. for a policy on affordable housing, its impact on the 'provision of housing objective' has been

deemed more important than its impact on the 'tourism' objective, for example. Where this has been the case, reference has been made to the decision taken in the conclusion.

Appraisal of the District Plan Strategy and Policy Options against the Sustainability Framework

5.16. The District Plan contains a vision for how Mid Sussex wants to evolve, and a delivery strategy for how that will be achieved. The District Plan aims to deliver this vision using a number of strategic policies, which will also deliver the aims of the Sustainable Community Strategy and provide a framework for all subsequent planning documents, including Neighbourhood Plans.

Task B2 – Developing Options

5.17. In preparing the District Plan, a number of policy areas were considered, and a range of options for each policy area were identified. The policy areas have been based largely on:

- The need for the policy to meet the objectives of the District Plan vision and the Sustainable Community Strategy.
- Issues for the District that have been identified through baseline information collected or consultation (for example, in consultation with Town and Parish Councils).
- Identification of need through the evidence base – for example, the need for policies on sustainable resource use, affordable housing and employment space.
- Identification of the need to enhance or supplement existing national planning policies at a local level, often based on local targets.

5.18. Whilst it is a requirement of Strategic Environmental Assessment to appraise all reasonable alternatives, there is no need to devise alternatives just to comply with this directive – hence only realistic alternatives have been identified. Any further reasonable alternatives that were suggested during the consultation on the draft District Plan and accompanying Sustainability Appraisal have been considered, and if significantly different from existing options, have been appraised.

5.19. All policy areas and the various alternative options developed for each policy have been appraised in order to assess their impact on the 18 sustainability objectives outlined in section 5. Where it was considered that there was only one realistic option for a policy area, this has been appraised against a 'Do Nothing' scenario – in other words "To not have a policy".

5.20. The term "To not have a policy" refers to the fact there will not be a policy on the subject within the District Plan. It does not ignore the fact that some policy topics are still covered by legislation, national planning policy, or other material guidance. These, however, may be less locally specific, less stringent, or more generic in their requirements. In some cases, not having a policy would mean there being no policy cover on that particular topic at any level. The difference between these two is noted where appropriate.

Task B1 – Testing the plan or programme against the SA / SEA Objectives
Task B3 – Predicting the effects of the plan or programme, including alternatives
Task B4 – Evaluating the effects of the plan or programme, including alternatives

5.21. The policy appraisals are tabulated in the next sections. This exercise ensures that the policies within the District Plan are the most sustainable, given all reasonable alternatives. In some cases, a number of alternative policy options have been developed but not appraised – the reasons for not appraising these has been given. In most cases this is because the

option is either not realistic (in that it is undeliverable or unlikely to be implemented) or is not significantly different to option(s) already appraised.

5.22. The appraisal process has been undertaken using the methodology outlined in section 2. The appraisal focuses on the significant effects on the objectives, and the likely direction of change based on a prediction of how the policy would impact on the various indicators for each objective (explained in section 5). A summary of the appraisal is given, giving reasoned justification for how the options were appraised and explaining the significant differences between the impacts.

5.23. Determining the preferred policy option has been based on the overall impact against the sustainability objectives, with the option with the most positive predicted impact determined as the 'preferred option'. Where it is unclear which option performs best, the predicted impact on the sustainability objective(s) most closely related to the policy topic have been given more importance. For example, the option with the most positive score on the flooding objective would be seen as preferable for a policy on flood risk, if all other objectives score similarly overall.

5.24. Once the preferred option is determined, it is then assessed for its short, medium and long-term impact. Where an impact is likely only to be temporary, this has also been noted.

5.25. The following symbols have been used to record the impact of each option against each objective:

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

Task B5 – Considering ways of mitigating adverse effects

5.26. Whilst it is predicted that many of the preferred options will have an overall positive or neutral/unknown impact, it is inevitable that some will present negative sustainability impacts. This is predominantly in cases where the sustainability objectives are not compatible with one another (for example, objectives on development of housing/employment/community facilities will not always be compatible with objectives on protection of the countryside or biodiversity). The exercise outlining the compatibility of objectives, and where these conflicts may lie should be considered when drawing conclusions. Where negative impacts are predicted to arise, mitigation has been suggested, often in the form of another policy within the District Plan.

6. District Plan – Broad Sustainability Impacts

6.1. The District Plan sets out a number of strategic objectives. These are important as they state what the District Plan is aiming to achieve through its overall strategy and accompanying policies. The strategic objectives have been chosen in order to help solve or mitigate as many of the issues and challenges for the District as possible through the planning system.

6.2. An assessment has been made as to whether the 15 District Plan objectives are consistent with the 18 objectives of the Sustainability Appraisal, as identified earlier in this section. This exercise helps to identify where potential areas of conflict lie, and where mitigation may be required.

Priority themes	Strategic Objectives for the District Plan
Protecting and enhancing the environment	1. To promote development that makes the best use of resources and increases the sustainability of communities within Mid Sussex, and its ability to adapt to climate change 2. To promote well located and designed development that reflects the District's distinctive towns and villages, retains their separate identity and character and prevents coalescence 3. To protect valued landscapes for their visual, historical and biodiversity qualities 4. To protect valued characteristics of the built environment for their historical and visual qualities 5. To create and maintain easily accessible green infrastructure, green corridors and spaces around and within the towns and villages to act as wildlife corridors, sustainable transport links and leisure and recreational routes 6. To ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes the provision of efficient and sustainable transport networks
Promoting economic vitality	7. To promote a place which is attractive to a full range of businesses, and where local enterprise thrives 8. To provide opportunities for people to live and work within their communities, reducing the need for commuting 9. To create and maintain town and village centres that are vibrant, attractive and successful and that meet the needs of the community 10. To support a strong and diverse rural economy in the villages and the countryside 11. To support and enhance the attractiveness of Mid Sussex as a visitor destination
Ensuring cohesive and safe communities	12. To support sustainable communities which are safe, healthy and inclusive 13. To provide the amount and type of housing that meets the needs of all sectors of the community 14. To create environments that are accessible to all members of the community
Supporting healthy lifestyles	15. To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations

Table 9: District Plan Objectives

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

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

Key:

✓	Compatible
✗	Incompatible
	No link / Neutral

Table 10: Compatibility between District Plan and Sustainability Appraisal Objectives

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

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

Sustainability Framework - Baseline Information

6.6. Section 3 of this document presents the overall baseline position for the District, which has helped determine the social, environmental and economic characteristics and challenges for Mid Sussex. In turn, this information helped formulate the Sustainability Framework.

6.7. The baseline data for each of the indicators listed above have also been collected for as many indicators as possible. Where it has not been possible for this information to be obtained, reasoning is given. It is important that baseline statistics are from reliable sources,

are of a suitable spatial scale (in other words, are for Mid Sussex rather than national or regional figures) and can be collected efficiently without being onerous, as the baseline information will be updated yearly.

6.8. This is documented in Appendix 2 and also forms the basis for monitoring the effectiveness of the District Plan upon its adoption. The measures for monitoring are also outlined in Section 10.

6.9. An assessment has also been made as to whether the baseline situation relating to each indicator is likely to get better (↑), get worse (↓) or stay the same (~) with and without the strategy and policies within the District Plan. Where this is unknown or difficult to assess, this is denoted by '**?**'.

Policies within the District Plan

6.10. In order to meet the strategic objectives for the District Plan and to address some of the issues and challenges for the District that have arisen (through consultation, the evidence base and the collection of baseline information through this Sustainability Appraisal), a range of policy areas have been chosen for inclusion in the District Plan. It will be these policy areas that will be appraised in Sections 7 and 8 to evaluate whether they have a positive or negative impact on the baseline, using the Sustainability Framework to undertake this evaluation.

6.11. The table below shows how District Plan objectives, which were based upon the issues and challenges for the District identified by the baseline section of this report, have been met by the range of policy areas to be included within the District Plan.

Policy Area	Meets District Plan Objectives
DP1: Sustainable Development in Mid Sussex	All
DP2: Sustainable Economic Development	7, 8
DP3: Town Centre Development	9
DP4: Village and Neighbourhood Centre Development	9, 10
DP5: Housing	All
DP6: Settlement Hierarchy	2, 8, 9, 12, 13
DP7: General Principles for Strategic Development at Burgess Hill	All
DP8: Strategic Allocation to the east of Burgess Hill at Kings Way	All
DP9: Strategic Allocation to the north and north-west of Burgess Hill	All
DP9a: Strategic Allocation to the east of Pease Pottage	All
DP10: Protection and Enhancement of Countryside	3, 11, 15
DP11: Preventing Coalescence	2
DP12: Sustainable Rural Development and the Rural Economy	7, 8, 10, 11
DP13: New Homes in the Countryside	3, 13
DP14: High Weald Area of Outstanding Natural Beauty	3, 11
DP15: Ashdown Forest Special Protection Area and Special Area of Conservation	3
DP16: Setting of the South Downs National Park	3, 11
DP17: Sustainable Tourism	7, 10, 11
DP18: Securing Infrastructure	6
DP19: Transport	6, 15
DP20: Rights of Way and other Recreational Routes	5, 15
DP21: Communication Infrastructure	6, 7, 8

DP22: Leisure and Cultural Facilities and Activities	6, 15
DP23: Community Facilities and Local Services	6, 12
DP24: Character and Design	2, 4, 12, 14
DP24a: Housing Density	1, 2, 4
DP25: Dwelling Space Standards	12, 13, 14
DP26: Accessibility	12, 13, 14
DP27: Noise, Air and Light Pollution	3, 12
DP28: Housing Mix	13
DP29: Affordable Housing	13
DP30: Rural Exception Sites	13
DP31: Gypsies, Travellers and Travelling Showpeople	13
DP32: Listed Buildings and Other Buildings of Merit	2, 4, 11
DP33: Conservation Areas	2, 4, 11
DP34: Historic Parks and Gardens	3, 11
DP35: Archaeological Sites	3
DP36: Trees, Woodland and Hedgerows	3, 4, 5
DP37: Biodiversity	3, 5
DP38: Green Infrastructure	3, 5, 6, 15
DP39: Sustainable Design and Construction	1
DP40: Renewable Energy Schemes	1
DP41: Flood Risk and Drainage	1, 12
DP42: Water Infrastructure and the Water Environment	1, 6

Table 11: District Plan Policy Areas

Future change *without* the District Plan

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

Social and Economic Change

6.13. Subject to the health of the national economy, there is no reason to suggest that the overall economic situation in the District will significantly change. The population of Mid Sussex is predicted to continue to rise in the future and it is likely that Mid Sussex will continue to have an ageing population. For example, by 2031 it is predicted the population of the District will be approximately 160,000 (ONS) should demographic trends continue.

6.14. It is expected that the number of households in Mid Sussex will still increase without the District Plan due to existing allocated and windfall sites, but there is no reason to suggest that the condition of the housing stock will decline. Without the District Plan it is possible that less favourable locations (in terms of sustainability) could be developed in order to meet the District's housing provision and maintain a five-year supply of housing.

6.15. It is not likely that the overall deprivation in the District would be significantly worsened, although some of the more deprived areas would not have a policy framework in place to address the problems that exist. There is also no indication that crime levels will significantly rise.

6.16. In particular, without the District Plan, opportunities for the following issues may be compromised:

- Town centre revitalisation
- Local employment
- Housing delivery (especially affordable housing)
- Infrastructure improvements such as transport, health and education
- Improvements in open space, sport and recreation facilities

Environmental Change

6.17. In the future, climatic factors may impact the ecological and landscape resources in the District such as effects on flora and fauna. The District Plan is able to set policies on climate change mitigation and adaptation, and without these the effects of climate change may be more pronounced. Flood events may be worsened as the District Plan can set out and deliver a holistic approach to sustainable drainage and flood risk management. There is no indication that air quality will deteriorate in the District, although factors outside of the control of the District Plan may impact on air quality, for example, possible expansion of Gatwick Airport. It may become increasingly difficult to direct development towards sites that are either contaminated or of poor agricultural value, so there could be a negative impact on soil quality.

6.18. In particular, without the District Plan opportunities for the following issues may be compromised:

- Protecting the integrity and quality of biodiversity assets, particularly those that are not protected by national policy and legislation
- Creating and enhancing biodiversity and natural habitats
- Creating and managing green infrastructure
- Conservation and enhancement of the historic environment
- Improvements in sustainability such as water efficiency

7. District Plan – Appraisal of the Plan Strategy and Strategic Issues

7.1. This section outlines the different options for the overall Plan Strategy, taking into account the strategic issues for the District (and beyond):

- **Housing – Objectively Assessed Need and Plan Provision:** Determining the most sustainable level of housing that the District could accommodate, including consideration of unmet housing needs from neighbouring authorities
- **Distribution of Development - Principles:** Assessing the most sustainable way to distribute planned growth within Mid Sussex
- **Distribution of Development - Broad Locations for Strategic Development:** Based on the District's capacity, a number of broad location options for strategic development have been identified and appraised to determine the most sustainable
- **Strategic Sites:** Identifying specific site locations that could accommodate growth on a strategic scale
- **Sustainability Hierarchy of Settlements:** What settlements are deemed the most sustainable, and how could development be distributed between them
- **Employment:** Identifying specific site locations that could accommodate strategic employment growth
- **Neighbourhood Plans:** Assessing the principle of allowing Neighbourhood Plans to allocate land for housing/employment/community facilities/etc.

Housing – Objectively Assessed Need (OAN) and Housing Provision

7.2. The National Planning Policy Framework (NPPF) requires local planning authorities to undertake an assessment of the need for housing. The Objectively Assessed Need (OAN) is the total amount of housing that would be needed to meet, as a minimum, the expected levels of growth in population over the plan period. This is predominantly based around meeting demographic need – the need arising from natural change (births minus deaths) and migration (both internal from other UK authority areas and external from overseas). The OAN should be calculated without any influence from constraints.

7.3. The Housing Provision number is the amount of housing the plan (in this case, the District Plan) is proposing to provide. This number can be influenced by constraints, policy and other factors. The Housing Provision number may equal OAN, but may be different:

- It may be lower than OAN. This may be because there are constraints to development which means that OAN cannot be met. An authority in this situation will have 'unmet needs' for housing and will need to seek assistance from neighbouring/nearby authorities to see if these needs can be met elsewhere.
- It may be higher than OAN. This may be because, for example, the authority has aspirations for economic growth (so wants to increase population in the area), and/or is able to assist in meeting unmet needs of neighbouring authorities.

7.4. This section explains the work undertaken to establish the OAN, and outlines the considerations that need to be made in order to determine the plan provision number. The NPPG sets out the process for determining the OAN - this must be unaffected by constraints or policy decisions. There will, however, be a range of alternative options for the plan provision number as it is a policy-based decision. It is these options that will be subject to sustainability appraisal.

Objectively Assessed Need

7.5. In order to establish the OAN, a Housing and Economic Development Needs Assessment (HEDNA) was published by the District Council in February 2015, updated in November 2015 (HEDNA Update) and August 2016 (HEDNA Addendum) to reflect newly released data sources. This follows the guidance within the NPPG, which states that the following steps should be taken:

1) **Starting Point: CLG Household Projections.** These Government projections use population projections and headship rates to predict the number of households within the area for future years. The HEDNA Addendum uses the most recent CLG 2014 figures, released in July 2016.

2) **Sensitivity Testing.** This involves analysing the components that make up the household projections, and assessing whether they are appropriate for predicting into the future. For example, are past trends in migration appropriate to predict future trends in migration, and if not, an adjustment to the published figures should be made.

3) **Assess Market Signals.** These are analysed to help understand whether past housing supply or household formation has been constrained in the past. If market signals indicate there was a constraint, the OAN figure should be uplifted in order to improve affordability of housing.

4) **Affordable Housing.** The number of households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market should be calculated.

Starting Point: CLG Household Projections

7.6. The HEDNA Addendum (August 2016) uses the most up-to-date household projections, published by the CLG in July 2016. As stated in the NPPG, these projections should be used as the starting point when calculating OAN.

7.7. The CLG Household Projections show that there is projected to be an increase of 12,139 households over the District Plan period 2014-2031. The OAN Starting Point is therefore **714** dwellings per annum.

Sensitivity Testing

7.8. Whilst the CLG Household Projections are a statistically robust starting point, they shouldn't necessarily be taken as read. Although figures are provided for each local authority area, figures are produced at a national level using national assumptions, and won't necessarily take local circumstances into account.

7.9. All projections are based on past trends – i.e., assume events in the past will continue into the future. It is possible that past one-off events may have an impact on future trends which would lead to unreliable future projections. For instance, an abnormal level of housing development compared to previous/future predictions, or large employers moving in/out of the area which could 'spike' migration in one year, which would then be assumed to continue. The HEDNA and HEDNA Update analyse whether adjustments should be made to the baseline OAN of 714dpa to account for any possible unreliable elements of the population or household projections – it concludes that there is no reason to suggest that the CLG Household Projections are not appropriate for Mid Sussex and therefore the baseline 'starting point' of 714dpa is robust.

7.10. One further adjustment should be made – according to Census 2011 approximately 2.3% of households within the District were vacant. These are most likely second homes, holiday

lets, etc. These are included within the CLG Household Projections but are not contributing to meeting any household need.

7.11. Best practice has shown that an uplift should be applied to the CLG Household projections to account for this vacancy rate. The Baseline OAN is therefore uplifted by 2.3%, and is therefore established as **754** dwellings per annum.

Market Signals

7.12. The NPPG states that adjustments should be made to any forecasting due to 'Market Signals'. These include land prices, house prices, rents, affordability, rates of development and overcrowding. These are all indicators that could suggest that the supply of housing in the past had not met demand, and therefore the base level of need should be 'uplifted'.

7.13. All Market Signals have been analysed in the context of the South East authorities and at a wider level, as per the NPPG. The HEDNA shows that Mid Sussex is not unique, and that any issues with affordability and house prices (for example) are common across the South East.

7.14. The HEDNA and HEDNA Update conclude that the baseline OAN should be uplifted in order to assist in improving affordability. Whilst the HEDNA Update recognises that it would require a substantial increase in housing supply in order to improve affordability in Mid Sussex, and that it is a wider South East issue rather than solely a Mid Sussex one, a reasonable increase of 24 dwellings per annum on top of baseline OAN would assist in affordability and present an opportunity for more people (in particular those in younger age groups 20-34) to form their own household. This establishes the OAN as **754** dwellings per annum.

Affordable Housing

7.15. As required by the NPPF, the District Plan must meet the objectively assessed need for market and affordable housing. Therefore, the Plan Provision number could be uplifted further to promote delivery of affordable housing.

7.16. The HEDNA Update sets out the assessment of affordable housing need to help inform planning policies and housing targets.

7.17. Based on the Objectively Assessed Need of 754dpa:

754dpa	Reasonable Preference Groups	Total Housing Waiting List
Net Annual Housing Need	170dpa	274dpa

Table 12- Affordable Housing Need

7.18. Based on the OAN, 170dpa affordable homes would be required to meet the needs of those in "reasonable preference" groups, whilst 274dpa would be required to meet the entire waiting list.

7.19. The amount of affordable housing that would be generated and provided under different levels of plan provision is set out alongside the appraisal of options at the end of this section.

Summary of OAN

Step	Dwellings Per Annum
CLG Household Projections	714
+ Vacancy rate (2.3%)	16
+ Market Signals uplift	24
= Objectively Assessed Need (OAN)	**754**

Table 13 - Summary of OAN

Housing Provision Number

7.20. In setting the Housing Provision number in the plan, the following elements should be considered:

- **Constraints.** Environmental and land supply constraints can be taken into account and may reduce the plan provision lower than the OAN if the constraint outweighs the need for housing. This would mean the authority has 'unmet need'.
- **Unmet Needs of Neighbouring Authorities.** Local Authorities have a duty under the legal Duty to Co-Operate to consider the unmet needs of neighbours. The Plan Provision number could therefore be above the OAN in order to cater for the unmet needs of neighbouring authorities, whilst balancing this against constraints and adequate land supply.

Constraints

7.21. A number of evidence base studies have been undertaken in order to establish any constraints, and the impact of them, on the plan provision figure. Predominantly, the findings from these and other studies in the District Plan evidence base have been used in order to determine a suitable Plan Provision number and will be used as evidence when appraising the various housing provision options for the plan:

➢ **Capacity of Mid Sussex to Accommodate Development (2014)**

The Capacity of Mid Sussex to Accommodate Development Study (the 'Capacity Study') was undertaken by Land Use Consultants. It draws together all constraints to development in order to assess the capacity of the District to accommodate development. It brings together evidence on environmental designations, biodiversity, landscape, historic environment, air quality, water supply, water quality, flood risk, soil quality, energy supply, open space and transport. It also looks at access to services, based on the same sustainability criteria as used within this report. The study concludes that the District is heavily constrained – almost 2/3rds of the District is covered by a primary constraint (i.e. afforded the highest protection under national policy) and only 4% of the District is not covered by one or more secondary constraints (i.e. sensitive but have less weight applied in national policy) or is not already built on. This will limit the amount of development that is appropriate.

➢ **Mid Sussex Transport Study (Parts 1, 2 and 3) (2012/2013/2016)**

The transport study assesses the impact of planned and committed development on the transport network. Paragraphs 3.36 and 3.37 of this Sustainability Appraisal highlight the potential congestion problems that could occur within the District as a result of planned housing growth.

➢ **Sustainability Assessment of Cross-Boundary Options (2015)**

As detailed in paragraph 7.24, a "Sustainability Assessment of Cross-Boundary Options" was undertaken by consultants LUC on behalf of the District Council. This assessed the

relative sustainability advantages and disadvantages of Mid Sussex accommodating unmet needs from neighbouring authorities. One outcome was that providing homes in excess of 780dpa (as an indication) would be a reasonable assumption to distinguish between potential minor and significant effects.

- **Strategic Housing Land Availability Assessment (SHLAA) (2016)**

The SHLAA is an assessment of housing land within the District. It assesses the suitability, availability and achievability of sites for housing and the likely timescale for delivery. This forms the basis of the Council's Housing Trajectory and Five-Year Supply calculations and therefore gives a good indication as to the likely supply of potential housing sites across all year within the plan period. The SHLAA has been audited by LUC with respect to its conclusions on landscape impacts.

Unmet Needs of Neighbouring Authorities

7.22. The Duty to Co-Operate places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local planning on cross-boundary matters. The issue of housing need is an important strategic cross-boundary issue. As part of this duty, the District Council has engaged constructively with neighbouring authorities to determine whether they are able to meet their housing need. Should they not be able to meet this need, consideration should be made as to whether some of this unmet need could be met in Mid Sussex. Local Planning Authorities have a duty (under the legal Duty to Co-Operate) to consider these unmet needs, and assist in meeting these needs where it is sustainable to do so.

7.23. In order to assess whether it is sustainable to do so, and to what extent, Land Use Consultants (LUC) were appointed by the District Council to assess the level of neighbours' unmet need and the impacts for Mid Sussex and each authority of this unmet need being met (either in part or in full) in Mid Sussex, alongside implications for not meeting the unmet need. The "Sustainability Assessment of Cross-Boundary Options" was published in 2015. It can be read as standalone from this Sustainability Appraisal, however it uses the same sustainability objectives, methodology and scoring as this SA in order to remain consistent and to be read in conjunction.

7.24. The Sustainability Assessment of Cross-Boundary Options assessed the unmet need of all neighbouring authorities. At the time the study was produced, the total neighbouring unmet need was 37,733. Table 12 shows this amount of unmet need - this formed the basis of the Sustainability Assessment (note that these figures have, in some cases, increased since the Sustainability Assessment was published – in areas where this is the case, the findings of the Sustainability Assessment should be read as a 'best case' scenario).

Local authority	Objectively Assessed Need per annum (pa)	Supply proposed in most recent Local Plan documents[5] (pa)	Unmet need (pa)	Extrapolated unmet need 2011-2031 (i.e. x 20)
Adur (1)	240	182	58	1,160
Brighton & Hove (1)	1,200	660	540	10,800
Crawley (1) and (4)	535	326	209	4,173
Horsham (2)	560	650	-90	0 (as Horsham has no unmet need)
Lewes (2)	490	280	210	4,200
South Downs NPA (3)	0	0	0	0
Tandridge (1) and (5)	454	125	329	6,580
Wealden (1)	616	450	166	3,320
Worthing (1), (2) and (6)	600	225	375	7,500
Total	**4,695**	**2,898**	**1,797**	**37,733**

Table 14: Unmet Needs of Neighbouring Authorities (as at December 2014)

Notes:
(1) Data returned by LPA to MSDC's request for information in August 2014.
(2) Housing requirements set out in most recent Local Plan documents.
(3) For the purpose of this study it has been assumed that the entire SDNPA housing requirement is included within the housing figures of its constituent LPAs.
(4) Crawley's unmet need figure was for the period 2015-2030, so it has been extrapolated over 20 years to fit the average plan period used in this study of 2011-2031.
(5) The number for Tandridge is to be confirmed. The number presented here is derived from initial work and therefore does not set the OAN as it was not derived from a full SHMA and did not take into account the deficiencies in the 2011 ONS figures or adequately reflect local circumstances.
(6) The number for Worthing has not yet been tested. The Council is committed to a full plan review and will consider the amount of additional houses that can be planned for, which will in turn influence the level of shortfall.

7.25. In order to undertake the sustainability assessment, three options were determined for each authority, for Mid Sussex to:

- Meet all their unmet need
- Meet their unmet need based on historic travel to work data (i.e. one commuter to Mid Sussex equalled the need for one household)
- Meet their unmet need based on historic migration data (i.e. one in-migrant to Mid Sussex equalled the need for one household).

7.26. Whilst the last two options are approximate and only estimates, they enable a High – Medium – Low range of options to be tested.

7.27. The findings of the Capacity Study (LUC, 2014) were used within the Cross-Boundary Options assessment in order to determine a range of broad locations which are least constrained and therefore where development could take place in order to meet unmet need. This would be on top of existing commitments and sites required to meet Mid Sussex need

[5] Supply does not take into account under or over delivery

(which takes precedence). These were identified in order to assess the impact 'on the ground' of meeting varying levels of unmet need.

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

7.28. Not all broad locations are relevant for each authority – for example, it was felt that the "Around East Grinstead" area would not be appropriate for meeting Brighton's unmet need, due to the distance and lack of linkage between the two areas, however the East/South of Crawley broad locations were appropriate to assist in meeting Crawley's unmet need. The broad locations most likely to meet each authorities' need are listed within each appraisal, below.

7.29. These broad locations are appraised further in this section to understand where the most sustainable location for strategic development (both to meet Mid Sussex and potential unmet need from neighbours) is located.

7.30. Each authority is assessed in turn below; setting out the options, likely broad locations, and conclusions. As nearly every neighbouring authority has unmet need, there will be a conflict as to who best to provide for should there be limited capacity within Mid Sussex to assist. To supplement the appraisals by LUC, further work has also been undertaken to understand the linkage between the authority and Mid Sussex, based on historic commuting and migration patterns. It will be important to ensure that, in meeting unmet needs of authorities, it would not lead to unsustainable commuting and/or migration patterns.

All Areas

1: Meet full unmet need of all LPAs (37,733)

2: Meet 50% unmet need of all LPAs (18,367)

3: Meet all unmet need based on travel to work data (13,572)

4: Meet all unmet need based on internal migration data (2,761)

Broad potential locations for development:

- All

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

Social Effects

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

Given the high levels of housing proposed in Options 1, 2 and 3 the positive effect was judged to be significant in comparison to where a reduced amount of housing is provided in Option 4. However, there is also potential for negative effects on education provision, as some existing pressures on school places have been identified in the District (at Hurstpierpoint, Haywards Heath, East Grinstead and Burgess Hill in particular) and therefore an overall mixed effect is expected on access to education for these options, with Options 1-3 potentially having a significant negative effect due to the higher number of new residents that would be looking for school places.

All options were considered likely to have a mixed positive and negative effect on promoting cohesive and safe communities, as Options 1 to 4 would all result in provision of housing around the existing towns, villages and smaller villages in Mid Sussex. While this could benefit the larger towns and villages through provision of housing in areas of demand, but conversely could

adversely affect the character of smaller villages. Again, Options 1 to 3 would be likely to have significant effects due to the high levels of housing proposed, whereas Option 4 was considered to have minor mixed effects.

Environmental Effects

The high levels of housing provided for in Options 1 to 4 are judged as having a negative impact on all of the environmental objectives, namely flood risk, efficient land use, conservation and enhancement of biodiversity, reducing road congestion, reducing waste generation, improving water quality and increasing energy efficiency. These options could result in increased numbers of housing within areas of high risk of flooding (Flood Zone 3); decrease the amount of Grade 2 Agricultural Land which is available for farming; impacting negatively upon biodiversity features through loss or damage to habitats and disturbance to species (including the internationally designated Ashdown Forest SPA and SAC); contribute negatively to road congestion (particularly as more outward commuting by new residents would likely be required); increase the need for new waste management facilities as more waste is produced by an increased population; contribute to demand for water supply and treatment in an area which is already under pressure; and raise energy demand in the District. A number of these effects could be avoided depending on the specific location of the additional dwellings required. However, these effects are more likely to be significant under Options 1 to 3 due to the higher number of additional housing that would be required within Mid Sussex, and therefore the more development locations that would be required.

Mixed impacts are expected on SA objective 9 which seeks to protect the countryside, as despite potential for adverse effects on protected landscapes, development in close proximity to the High Weald AONB and South Downs National Park would provide new residents with easy access to high quality countryside and open spaces. Similarly, all four options could have mixed effects on SA objective 10 which seeks to enhance the historic environment as new development has the potential to negatively impact upon or conversely enhance the setting of historic assets depending on the development's exact location and design.

Finally, mixed effects SA objective 11 (reducing road congestion) are also identified for the four options, as while new residents could make use of public transport links where they exist currently, it is likely that there would be increased pressure on public transport systems from the increased population, and that there could be increased levels of out commuting by road, particularly in the shorter term, before new employment opportunities are delivered within the District to support additional housing.

Economic Effects

All four options would be likely to have a positive effect on the objectives which encourage town centre regeneration (SA objective 15) and high and stable employment levels (SA objective 16) as the new housing would mainly be provided around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites. Options 1, 2 and 3 propose higher levels of housing and therefore considering these higher levels it is considered that the positive effect they might have on these SA objectives is significant.

Options 1 to 3 are considered as having mixed positive and negative effects on encouraging economic growth (SA objective 17). While the construction and development of housing in the District is an economic activity in its own right, potentially providing job opportunities and increasing demand for services in the area, additional employment land may need to be provided within the District to provide growth space for new businesses and employment opportunities for new residents.

Option 4 provides lower levels of housing and is not expected to place as much pressure on the requirement for additional employment land meaning a minor positive effect only is expected. As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

Adur

5. Meet all Adur's unmet need (1,160 houses)

6. Meet Adur's unmet need based on travel to work data (779 houses)

7. Meet Adur's unmet need based on Internal Migration data (30 houses)

Broad potential locations for development:

- Around Haywards Heath / Lindfield
- Around Burgess Hill
- Around Hurstpierpoint / Hassocks
- New settlement/ Sayers Common

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

Social Effects

Option 5, Option 6 and Option 7 would provide housing required for Adur District within Mid Sussex. Option 5 requires meeting the full unmet need of Adur (1,160 homes); Option 6 requires meeting 50% of Adur's unmet housing need (779 homes); and Option 7 requires meeting Adur's unmet housing need based on recent travel to work patterns (30 homes). Therefore, Options 5 and 6 are anticipated as having a significant and minor positive effect respectively on increasing the amount of decent and affordable housing for Adur District. As Option 7 provides for only 30 additional houses and would mean that a significant number of houses would still be needed to meet Adur's unmet housing need, a negligible effect is expected.

Positive effects are predicted for the SA objectives which seek to improve access to education and health services. This is because additional housing will mainly be provided in close proximity to existing urban centres (Burgess Hill, Haywards Heath and Hurstpierpont) which should provide good access to existing services for the new residents.

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

Environmental Effects

Option 5 and Option 6 are anticipated as having a minor negative effect on objectives which relate

to flood risk, efficient land use, conserving and enhancing biodiversity, reducing waste, improving water quality and increasing energy efficiency. This is because the higher levels of housing provided for could be located in areas where flood risk is high (Flood Zone 3) and where they may adversely impact upon habitats and species through disturbance or damage, plus the additional homes and population could result in an overall increase in waste production, pressure on water resources and energy consumption. A number of these effects could be avoided depending on the specific location of the additional dwellings required.

Mixed impacts were identified on objectives relating to protecting the countryside, the historic environment and reducing congestion. This is because the potential development locations are in close proximity to the High Weald AONB as well the South Downs National Park which may potentially adversely affect the setting of these nationally protected landscapes; conversely, this proximity would mean new residents would have easy access to high quality green space. A mixed effect is recorded for the objective relating to the historic environment as it is acknowledged that development may enhance or detract from the setting of historic assets depending on the development's exact location and design.

As increased out commuting may result from accepting some or all of Adur's unmet housing need, but there is potential for new residents to make use of public transport links in Haywards Heath, Burgess Hill and Hurstpierpoint, a mixed effect is expected on SA objective 11 (reducing road congestion). Option 7 is considered unlikely to have an effect on any of the environmental objectives due to the low level of additional housing that would need to be developed in the District.

Economic Effects

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

Commuting Links

	2001			2011		
	Total Commuters	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total Commuters**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Commuters (FROM Adur)	15,227	609	4.00	16,465	779	4.73
In Commuters (TO Adur)	9,318	287	3.08	9,355	334	3.57
Net	5,909	322	-	7,110	445	-

Table 15 - Adur Commuting Links

7.31. More people travel from Adur to Mid Sussex for work (in-commute), than from Mid Sussex to Adur (out-commute). This means that Mid Sussex is an importer of workforce from Adur. Data only exists for 2001/2011 so a reliable trend is not possible, however in the 10 years between each Census the number of those commuting in and out between Mid Sussex and Adur has increased

7.32. In 2011, 4.73% of all people commuting out of Adur travelled to Mid Sussex to work, whilst 3.57% of all people commuting to Adur came from Mid Sussex.

7.33. In relation to Mid Sussex, 1.05% of all people commuting out of Mid Sussex travelled to Adur and 3.81% of all people commuting to Mid Sussex came from Adur. Of the seven

Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 7th/7 for out commuting and 6th/7 for in commuting. This means that there are weak links between the two authorities in terms of commuting.

Migration Links

	2002			2013		
	Total	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Migrants (FROM Adur)	3,100	60	1.93	2,850	100	3.50
In Migrants (TO Adur)	8,800	80	0.91	3,340	80	2.40
Net	-5,700	-20	-	-490	20	-

Table 16 - Adur Migration Links

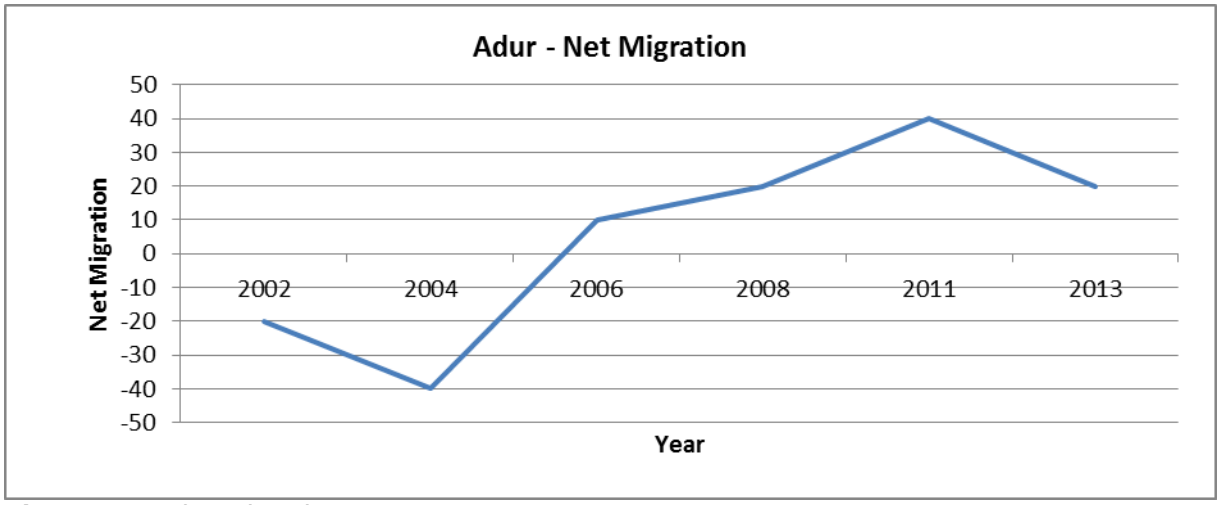


Figure 13- Adur Migration

7.34. Mid Sussex is an importer of Adur's population in terms of migration. Over the period 2002-2013 more people have moved from Adur to Mid Sussex than vice versa. This rate has remained fairly constant throughout the past 12 years.

7.35. Over the past 12 years, migration between Adur and Mid Sussex has been relatively low with the net figure never exceeding 40.

7.36. In 2011, 3.50% of all people migrating out of Adur moved to Mid Sussex to live, whilst 2.40% of all people migrating to Adur came from Mid Sussex.

7.37. In relation to Mid Sussex, 1.30% of all people migrating out of Mid Sussex moved to Adur and 1.27% of all people migrating to Mid Sussex came from Adur. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 7th/7 for out migration and 6th/7 for in migration. This means that there are weak links between the two authorities in terms of migration.

Brighton and Hove

8. Meet all of Brighton & Hove's unmet need (10,800)

9: Meet Brighton & Hove's unmet need based on Travel to Work data (4,008)

10: Meet Brighton & Hove's unmet need based on Internal Migration data (2,200)

Broad potential locations for development:

- Around Haywards Heath/Lindfield
- Around Burgess Hill
- Around Hurstpierpoint/Hassocks
- New settlement/ Sayers Common

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

Social Effects

Options 8, 9 and 10 would provide additional housing for Brighton & Hove in Mid Sussex. All options are likely to have a positive effect on increasing the amount of decent and affordable housing in the area, and as Option 8 meets all of the unmet housing need for Brighton & Hove a significant positive effect is expected on SA objective 1. However, in practice Option 8 would be very difficult to achieve, as there is unlikely to be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full.

Considering that housing would be provided in relatively close proximity to existing settlements and town centres (Hurstpierpoint, Burgess Hill and Haywards Heath) where services already exist, Options 8 to 10 are expected to have a positive effect on providing ease of access to health services and open spaces as well as to education and retail and community facilities.

Negative effects on education provision are also identified however, as some existing pressures on school places have been identified in the District (at Hurstpierpoint, Haywards Heath and Burgess Hill in particular) and therefore an overall mixed effect is expected on this SA objective, with a significant negative effect for Option 8. Given that Option 8 would provide for a large amount of housing at locations which are larger towns, smaller villages and new development locations, it is expected to have both significant positive and negative effects on SA objective 5 (encouraging community cohesion). Due to the lower number of houses provided for by Options 9 and 10 the mixed effect is more likely to be minor on community cohesion.

Environmental Effects

The high levels of housing provided for in Options 8, 9 and 10 are considered likely to have a negative impact on many of the environmental objectives, namely flood risk, efficient land use, conservation and enhancement of biodiversity, reducing waste generation, improving water quality

and increasing energy efficiency. These options could result in increased number of houses within areas of high flood risk (Flood Zone 3); potentially result in development occurring on Grade 2 Agricultural Land; adversely impacting upon biodiversity in the area through damage or disturbance to habitats and species; increase the need for waste management facilities as more waste is produced by an increased population; contribute significantly to demand for water supply and water quality in an area which is already under pressure; and raise energy demand in the District.

The negative effects are expected to be significant under Option 8 as it would deliver more than 5,000 additional homes within the District. Mixed impacts are expected on the objectives which seek to protect the countryside, reduce road congestion as well as the objective which seeks to enhance the historic environment. The provision of housing in close proximity to the nationally protected landscapes of the High Weald AONB and South Downs National Park will potentially negatively impact upon their setting but will also provide new residents with easy access to high quality greenspace.

It is recognised that good public transport connections already exist within the District and between Brighton & Hove and Mid Sussex, and that the potential development locations for the most part (with the exception of the potential new market town at Sayers Common) will provide relatively easy access to these connections. Nonetheless, given the scale of housing to be provided in Mid Sussex to meet Brighton & Hove's unmet need, particularly under Option 8, the potential for increased out commuting particularly to Brighton & Hove is considered likely to have a significant negative effect on reducing road congestion, giving an overall mixed effect on SA objective 11. Given that most of the locations are in and around existing settlements where heritage assets have been identified, a mixed effect is expected on protecting the historic environment as it is recognised that development may enhance or detract from the setting of historic assets depending on the development's exact location and design.

Economic Effects

All options will have a positive effect on the objectives which encourage town centre regeneration and high and stable employment levels as they mainly provide for housing around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites (Options 8 and 9 are considered to have significant positive effects). All three options are likely to have minor positive effects on encouraging economic growth (SA objective 17) as the construction of housing in the District would potentially provide job opportunities and increasing demand for services in the area.

However, additional employment land may need to be provided within the District to provide growth space for new businesses and employment opportunities for the larger number of new residents under Option 8; therefore, it is considered likely to have a negative effect as well. As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

Commuting Links

	2001			2011		
	Total Commuters	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total Commuters**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Commuters (FROM Brighton & Hove)	33,159	3,833	11.56	36,993	4,008	10.83
In Commuters (TO Brighton & Hove)	28,164	2,759	9.80	31,915	3,492	10.94
Net	4,995	1,074	-	5,078	516	-

Table 17- Brighton Commuting Links

7.38. More people travel from Brighton & Hove to Mid Sussex for work (out-commute), than from Mid Sussex to Brighton & Hove (in-commute). This means that Mid Sussex is an importer of workforce from Brighton & Hove. Data only exists for 2001/2011 so a reliable trend is not possible, however in the 10 years between each Census the number of those commuting in to Mid Sussex from Brighton & Hove has increased, and the number commuting out of Mid Sussex to Brighton & Hove has also increased. In net terms, the gap between in and out commuters has reduced.

7.39. In 2011, 10.83% of all people commuting out of Brighton and Hove travelled to Mid Sussex to work, whilst 10.94% of all people commuting to Brighton and Hove came from Mid Sussex.

7.40. In relation to Mid Sussex, 11.00% of all people commuting out of Mid Sussex travelled to Brighton and Hove and 19.64% of all people commuting to Mid Sussex came from Brighton and Hove. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 2nd/7 for out commuting and 1st/7 for in commuting. This means that there are strong links between the two authorities in terms of commuting.

Migration Links

	2002			2013		
	Total	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Migrants (FROM Brighton)	16,700	630	3.77	18,940	960	5.06
In Migrants (TO Brighton)	16,800	440	2.61	17,700	420	2.37
Net	-100	190	-	1,240	540	-

Table 18 - Brighton Migration Links

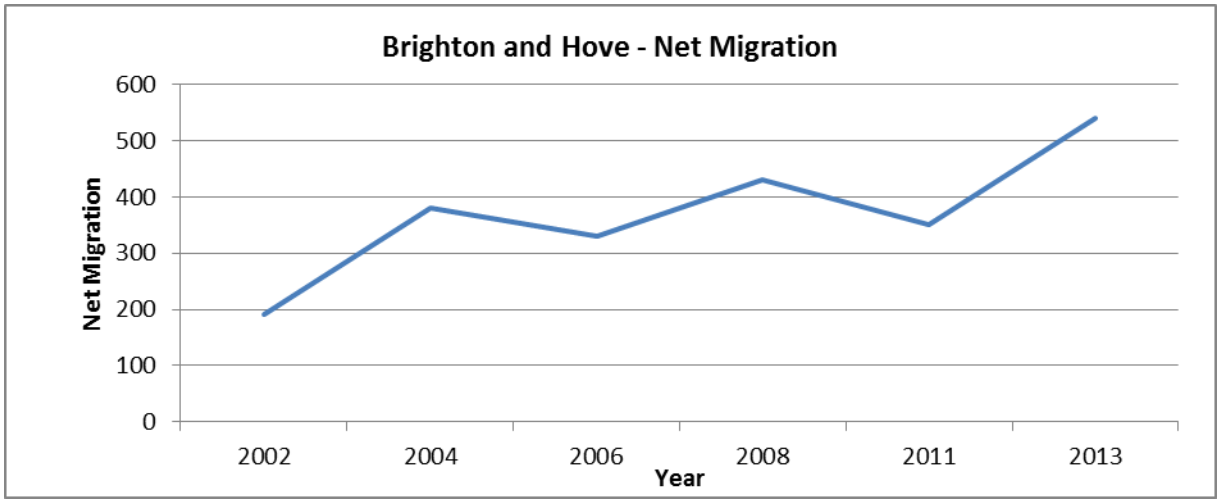


Figure 14 - Brighton Migration

7.41. Mid Sussex is an importer of Brighton & Hove's population in terms of migration. Over the period 2002-2013 more people have moved from Brighton & Hove to Mid Sussex than vice versa. This rate has remained fairly constant throughout the past 12 years although there was a significant spike in 2013.

7.42. Over the past 12 years, Brighton & Hove is only one of three neighbouring authorities (alongside Crawley and Tandridge) where more people have moved to Mid Sussex from the

authority than moved from the authority to Mid Sussex (i.e. Mid Sussex is an 'importer' of population).

7.43. In 2011, 5.06% of all people migrating out of Brighton and Hove moved to Mid Sussex to live, whilst 2.37% of all people migrating to Brighton and Hove came from Mid Sussex.

7.44. In relation to Mid Sussex, 7.00% of all people migrating out of Mid Sussex moved to Brighton and Hove and 12.01% of all people migrating to Mid Sussex came from Brighton and Hove. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 2nd/7 for out migration and 1st/7 for in migration. This means that there are strong links between the two authorities in terms of migration.

Crawley

11: Meet all Crawley's unmet need (4,173 homes)

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

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

Broad potential locations for development:

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

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

Social Effects

All options are anticipated as having some degree of positive effect on increasing the amount of decent and affordable housing in the area. Option 11 provides for the highest number of houses in the Mid Sussex District and also meets all of the unmet housing need; therefore a significant positive effect is expected on the SA objective. However, in practice Option 8 may be difficult to

achieve, as there may not be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full.

As the potential development locations that would need to be used to meet Crawley's unmet need are for the most part located around existing settlements (Crawley, Crawley Down, Copthorne, East Grinstead, Hurstpierpoint, Burgess Hill and Haywards Heath), a positive effect is expected on the objectives which relate to providing access to health services and open space as well as retail and community facilities. The established facilities at these locations should be easily accessible to new residents.

Mixed effects are expected on the objective which relates to access to education as although development at or around these existing settlements should mean new residents are within close proximity to existing education facilities, some existing pressures on school places have been identified in the District (at Hurstpierpoint, Haywards Heath, East Grinstead and Burgess Hill in particular). As the level of housing provided in all options is less than 5,000, the anticipated positive effects are minor for all social related SA objectives (except SA objective 1).

All options provide for housing at a mix of locations ranging from larger towns (Burgess Hill, Haywards Heath and East Grinstead), and villages (Hurstpierpoint, Cuckfield and Crawley Down) and new development locations. As such a minor positive and minor negative effect is expected on community cohesion for all three options, as the character of some villages may be adversely affected, but the provision of new homes in larger villages in towns may help contribute to community cohesion.

Environmental Effects

The varying levels of housing provided are considered to have a negative effect on all of the environmental SA objectives. Flood risk, efficient land use, conserving and enhancing biodiversity, reducing waste, maintaining and improving water quality and increasing energy efficiency could all be negatively impacted upon by the levels of houses proposed at the potential development locations identified.

Mixed effects are expected for all options on SA objectives which relate to protecting and enhancing the countryside, protecting and enhancing the historic environment and reducing road congestion. This is because potential development locations that might be used for these Crawley options are in close proximity to and even within (the site south of Crawley) the nationally protected landscapes of the High Weald AONB and South Downs National Park.

A significant negative effect on landscape could occur if the development location south of Crawley were used, however, it is likely that this location could be avoided (by steering development to the other broad potential development locations), therefore only minor negative effects are identified. In addition, there could also be a minor positive effect of providing housing near the AONB or National Park, as this would give new residents relatively easy access to high quality greenspace in close proximity.

The mixed effect on the historic environment is due to the potential for new development to enhance or detract from the setting of historic assets dependent on design and specific location. It is likely that the siting of development in and around existing settlements which have good transport links with Crawley may cause an increase in commuting of new residents back to Crawley for employment. This could be positive in terms of public transport due to existing rail links, but negative if increased commuting by private car occurs.

Economic Effects

All options will have a minor positive effect on the objectives which encourage town centre regeneration and high and stable employment levels as they mainly provide for housing around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites. All three options are likely to have minor positive effects on encouraging economic growth (SA objective 17) as the construction of housing in the District would potentially provide job opportunities and increasing demand for services in the area.

As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

Commuting Links

	2001			2011		
	Total Commuters	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total Commuters**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Commuters (FROM Crawley)	15,303	2,026	13.24	19,029	2,651	13.93
In Commuters (TO Crawley)	46,351	8,295	17.90	43,232	7,119	16.47
Net	-31,048	-6,269	-	-24,203	-4,468	-

Table 19 - Crawley Commuting Links

7.45. More people travel from Mid Sussex to Crawley for work (out-commute) than from Crawley to Mid Sussex (in-commute). This means that Mid Sussex is an exporter of workforce to Crawley. Data only exists for 2001/2011 so a reliable trend is not possible, however in the 10 years between each Census the number of those commuting in to Mid Sussex from Crawley has increased, and the number commuting out of Mid Sussex to Crawley has also increased.

7.46. In 2011, 13.93% of all people commuting out of Crawley travelled to Mid Sussex to work, whilst 16.47% of all people commuting to Crawley came from Mid Sussex.

7.47. In relation to Mid Sussex, 22.43% of all people commuting out of Mid Sussex travelled to Crawley and 12.99% of all people commuting to Mid Sussex came from Crawley. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 1st/7 for out commuting and 2nd/7 for in commuting. This means that there are strong links between the two authorities in terms of commuting.

Migration Links

	2002			2013		
	Total	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Migrants (FROM Crawley)	5,200	620	11.92	4,690	700	14.93
In Migrants (TO Crawley)	3,900	320	8.21	4,080	450	11.03
Net	1,300	300	-	610	250	-

Table 20 - Crawley Migration Links

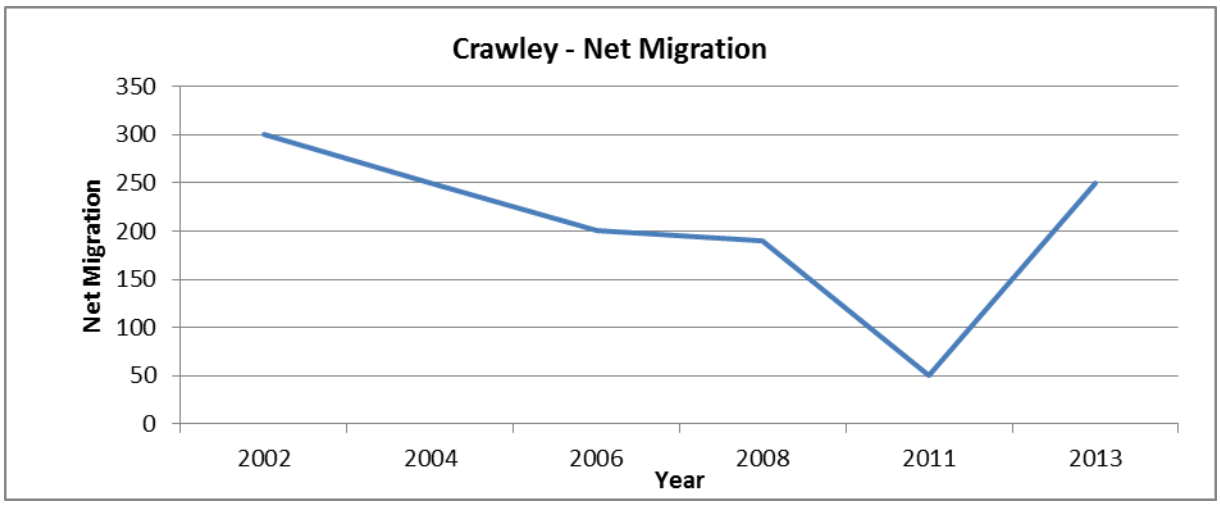


Figure 15 - Crawley Migration

7.48. Mid Sussex is an importer of Crawley's population in terms of migration. Over the period 2002-2013 more people have moved from Crawley to Mid Sussex than vice versa. This rate has remained fairly constant throughout the past 12 years although there was a significant drop in 2011.

7.49. Over the past 12 years, Crawley is only one of three neighbouring authorities (alongside Brighton & Hove and Tandridge) where more people have moved to Mid Sussex from the authority than moved from the authority to Mid Sussex (i.e. Mid Sussex is an 'importer' of population).

7.50. In 2011, 14.93% of all people migrating out of Crawley moved to Mid Sussex to live, whilst 11.03% of all people migrating to Crawley came from Mid Sussex.

7.51. In relation to Mid Sussex, 6.40% of all people migrating out of Mid Sussex moved to Crawley and 9.01% of all people migrating to Mid Sussex came from Crawley. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 4th/7 for out migration and 2nd/7 for in migration. This means that there are strong links between the two authorities in terms of migration.

Lewes

14: Meet all Lewes's unmet need (4,200 homes)

15: Meet Lewes' unmet need based on travel to work data (2,131 homes)

16: Meet Lewes's unmet need based on Internal Migration data (-380 homes: no contribution to unmet need)

Broad potential locations for development:

- Around Haywards Heath / Lindfield
- Around Burgess Hill
- Around Cuckfield
- Around Bolney
- Around Hurstpierpoint / Hassocks

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

Social Effects

Options which provide for additional housing in the District are anticipated as having a positive effect on the amount of decent and affordable housing in the area. As Option 14 would meet all of Lewes's unmet housing needs a significant positive effect is expected on this SA objective. Option 16 will not result in any additional housing in the District and therefore a minor negative effect is expected on the SA objective.

Positive effects are expected on SA objectives related to providing access to health services and open spaces as well as retail and community facilities in the options which provide for additional housing as these homes will, for the most part, potentially be in locations in and around existing settlements (Hurstpierpoint, Haywards Heath and Burgess Hill) where these types of services are already provided. Mixed effects are expected on the objective which relates to access to education as although development at or around these existing settlements should mean new residents are within close proximity of existing education facilities some existing pressures on school places have been identified in the District.

Given that they would provide for housing at locations which are larger towns (Haywards Heath and Burgess Hill), smaller villages (Hurstpierpoint, Cuckfield and Bolney) and new development locations, Option 14 and Option 15 are expected to have both minor positive and minor negative effects on SA objective 5 (encouraging community cohesion). Given that no houses would be provided for by Option 16 there is likely to be a negligible effect on community cohesion.

Environmental Effects

Options 15 and 16 will result in negative effects on all of the environmental SA objectives which

relate to flood risk, efficient land use, conserving and enhancing biodiversity, reducing waste generation, maintaining and improving water quality and increasing energy efficiency. Mixed effects are expected on SA objectives which relate to protecting and enhancing the countryside, protecting and enhancing the historic environment and reducing road congestion.

As the houses proposed may be sites in close proximity to the nationally protected landscapes of the High Weald AONB to the north and the South Downs National Park to the south there is potential for this development to adversely affect these landscapes' settings, while at the same time new residents at these locations would have immediate and easy access to high quality greenspace. It is also recognised that new development may negatively or positively impact upon the setting of historic assets depending on specific location and design.

While there are good public transport links between Haywards Heath, Burgess Hill and Hurstpierpoint, which have been identified as potential development locations for Options 15 to 17, there is potential for increased road commuting of new residents to Lewes for employment as the public transport links between Lewes and Mid Sussex are relatively weak.

Economic Effects

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

Commuting Links

	2001			2011		
	Total Commuters	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total Commuters**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Commuters (FROM Lewes)	17,471	2,080	11.91	19,816	2,131	10.75
In Commuters (TO Lewes)	12,230	1,452	11.87	14,417	1,803	12.51
Net	5,241	628	-	5,399	328	-

Table 21- Lewes Commuting Links

7.52. More people travel from Lewes to Mid Sussex for work (in-commute), than from Mid Sussex to Lewes (out-commute). This means that Mid Sussex is an importer of workforce from Lewes. Data only exists for 2001/2011 so a reliable trend is not possible, however in the 10 years between each Census the number of those commuting in to Mid Sussex from Lewes has increased slightly, and the number commuting out of Mid Sussex to Lewes has also increased.

7.53. In 2011, 10.75% of all people commuting out of Lewes travelled to Mid Sussex to work, whilst 12.51% of all people commuting to Lewes came from Mid Sussex.

7.54. In relation to Mid Sussex, 5.68% of all people commuting out of Mid Sussex travelled to Brighton and Hove and 10.44% of all people commuting to Mid Sussex came from Brighton

and Hove. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 4th/7 for out commuting and 4th/7 for in commuting.

Migration Links

	2002			2013		
	Total	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Migrants (FROM Lewes)	4,500	320	7.11	4,240	410	9.67
In Migrants (TO Lewes)	5,500	520	9.45	5,290	460	8.70
Net	-1,000	-200	-	1,050	-50	-

Table 22 - Lewes Migration Links

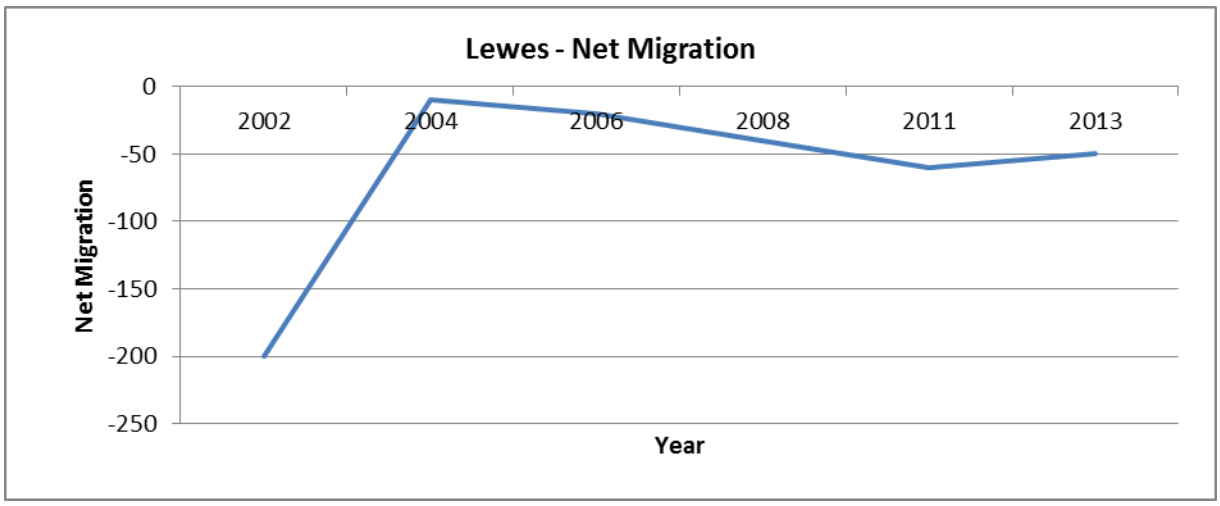


Figure 16 - Lewes Migration

7.55. Mid Sussex is an exporter of Lewes's population in terms of migration. Over the period 2002-2013 more people have moved from Mid Sussex to Lewes than vice versa. This rate has remained fairly constant throughout the past 12 years although there was a significant spike in 2002.

7.56. In 2011, 9.67% of all people migrating out of Lewes moved to Mid Sussex to live, whilst 8.70% of all people migrating to Lewes came from Mid Sussex.

7.57. In relation to Mid Sussex, 6.70% of all people migrating out of Mid Sussex moved to Lewes and 5.23% of all people migrating to Mid Sussex came from Lewes. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 3rd/7 for out migration and 4th/7 for in migration.

Tandridge

17: Meet all Tandridge's unmet need (6,580 homes)

18: Meet 50% of Tandridge's unmet need (3,290 homes)

19: Meet Tandridge's unmet need based on Internal Migration data (650 homes)

Broad potential locations for development:

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

Policy Option	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Community Cohesion	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Sustain Economic Growth	**18 –** Encourage Tourism
17	++	+?	+/- -?	+	++/ --	--?	-?	--?	+/- -?	+/- -?	+/- -	--?	--	--	++	++	+/-	0
18	+	+?	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/- ?	+/-	-?	-	-	+	+	+	0
19	+	+?	+/- ?	+	+/-	-?	-?	-?	+/- ?	+/- ?	+/-	-?	-	-	+	+	+	0

Social Effects

As all options provide for additional homes in the District, positive effects are expected on the objective related to the provision of decent and affordable housing. However, Option 17 provides for higher levels of homes in the District and also meets all of Tandridge's unmet need meaning that a significant positive effect is expected on this SA objective, although in practice Option 17 may be difficult to achieve, as there may not be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full. As housing is provided for at the potential development locations in and around existing settlements (Crawley, Copthorne, Crawley Down and East Grinstead) where relevant services are already provided, a minor positive effect is expected on the objectives of providing good access to health services and retail and community facilities.

A similar effect would be expected on access to education given the potential development locations identified, however, pressure exists on places for schools at some of the broad development locations that might be used to meet Tandridge's need (namely East Grinstead). Therefore, overall a mixed effect is expected on this SA objective for Options 17 to 19, with a potentially significant negative effect under Option 17 due to the higher number of homes proposed. Given that they would provide for housing at locations which are larger towns (Crawley and East Grinstead) as well as villages (Copthorne and Crawley Down), all three options are expected to have both positive and negative effects on SA objective 5 (encouraging community cohesion). However, effects are likely to be significant under Option 17 due to the higher number of homes proposed (6,580).

Environmental Effects

The location of housing in the north of the District if these options were implemented is expected to have a negative effect on the environmental objectives of flood risk, efficient land use, conserving

and enhancing biodiversity, reducing waste generation, maintaining and improving water quality and increasing energy efficiency. The potential development locations are all to the north of the High Weald AONB, and contain areas which are at high risk of flooding (Flood Zone 3), Grade 3 Agricultural Land, nature conservation sites and are within the Ashdown Forest SAC and SPA 7km zone of influence. Given the proximity of these potential development locations to areas of ecological interest, there is potential for adverse effects on biodiversity in general, and specifically on the Ashdown Forest SAC and SPA through disturbance and damage to habitats as well as air pollution caused by increased car journeys in the area.

All three options could lead to increased levels of waste by an increased population in the District and will lead to an increased energy demand for the same reason. The effects are considered to be more significant under Option 17 than 18 and 19 due to the higher number of homes to be delivered. The higher levels of housing under Option 17 also have potential to impact significantly upon water provision and quality in the area.

Mixed impacts are expected on the objectives which seek to protect the countryside and the historic environment, as well as the objective which seeks to reduce road congestion. As development locations are within close proximity to the nationally protected landscape of the High Weald AONB, both positive and negative effects are expected. New residents will have easy access to this high quality greenspace, however the provision of housing at this location has the potential to impact adversely upon the setting of the landscape.

A mixed effect is recorded for the objective relating to the historic environment as development may enhance or detract from the setting or historic assets depending on the development's exact location and design. As potential development locations are located in and around existing settlements, new residents will have good access to existing public transport links between for example Crawley and London. However, the need for new housing to meet Tandridge's needs is primarily in the north of Tandridge with close access to London. Therefore, providing housing in Mid Sussex to meet Tandridge's needs might encourage longer commuting patterns (e.g. to London by train) or commuting by road to employment sites in Tandridge to continue employment at these locations, hence the potential significant negative effect for SA objective 11 (reducing road congestion).

Economic Effects

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

However, additional employment land may need to be provided within the District to provide growth space for new businesses and employment opportunities for the larger number of new residents under Option 17, therefore, it is considered likely to have a negative effect as well. As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

Commuting Links

	2001			2011		
	Total Commuters	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total Commuters**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Commuters (FROM Tandridge)	22,446	1,011	4.50	22,560	940	4.17
In Commuters (TO Tandridge)	12,569	1,587	12.63	13,950	1,834	13.15
Net	9,877	-576	-	8,610	-894	-

Table 23 - Tandridge Commuting Links

7.58. More people travel from Mid Sussex to Tandridge for work (out-commute), than from Tandridge to Mid Sussex (in-commute). This means that Mid Sussex is an exporter of workforce to Tandridge. Data only exists for 2001/2011 so a reliable trend is not possible, however in the 10 years between each Census the number of those commuting in to Mid Sussex from Tandridge has decreased, and the number commuting out of Mid Sussex to Tandridge has increased.

7.59. In 2011, 4.17% of all people commuting out of Tandridge travelled to Mid Sussex to work, whilst 13.15% of all people commuting to Tandridge came from Mid Sussex.

7.60. In relation to Mid Sussex, 5.78% of all people commuting out of Mid Sussex travelled to Tandridge and 4.61% of all people commuting to Mid Sussex came from Tandridge. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 3rd/7 for out commuting and 5th/7 for in commuting.

Migration Links

	2002			2013		
	Total	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Migrants (FROM Tandridge)	5,100	320	6.27	4,300	340	7.91
In Migrants (TO Tandridge)	5,200	230	4.42	5,170	180	3.48
Net	-100	90	-	-870	160	-

Table 24 - Tandridge Migration Links

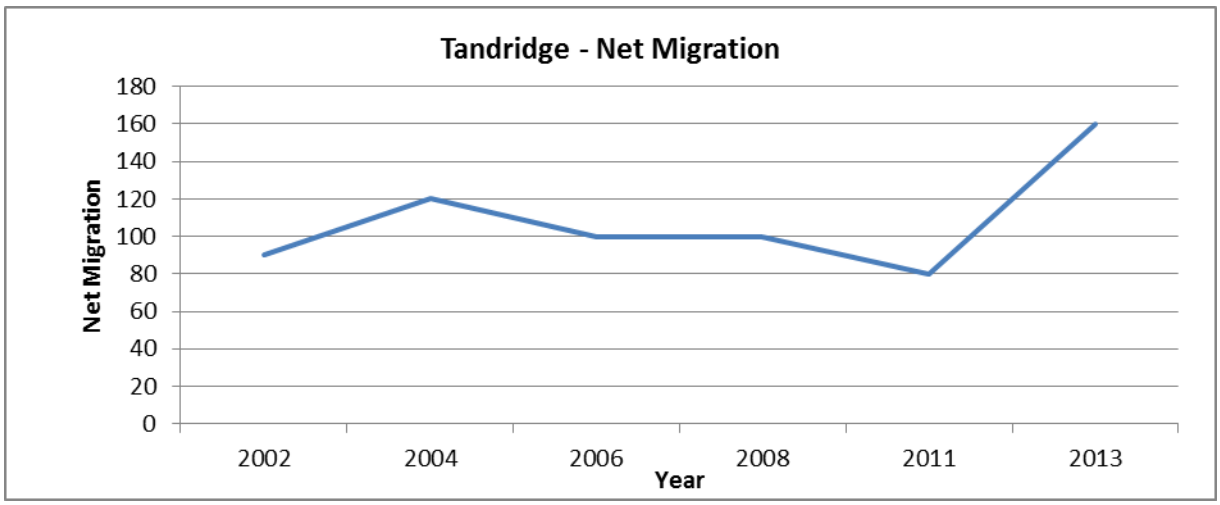


Figure 17 - Tandridge Migration

7.61. Mid Sussex is an Importer of Tandridge's population in terms of migration. Over the period 2002-2013 more people have moved from Tandridge to Mid Sussex than vice versa. This rate has remained fairly constant throughout the past 12 years although there was a significant spike in 2013.

7.62. Over the past 12 years, Tandridge is one of only three neighbouring authorities (alongside Brighton & Hove and Crawley) where more people have moved to Mid Sussex from the authority than moved from Mid Sussex to Tandridge (i.e. Mid Sussex is an 'importer' of population).

7.63. In 2011, 7.91% of all people migrating out of Tandridge moved to Mid Sussex to live, whilst 3.48% of all people migrating to Tandridge came from Mid Sussex.

7.64. In relation to Mid Sussex, 3.45% of all people migrating out of Mid Sussex moved to Tandridge and 4.80% of all people migrating to Mid Sussex came from Tandridge. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 5th/7 for out migration and 5th/7 for in migration.

Wealden

20. Meet all Wealden's unmet need (3,320 houses)

21. Meet Wealden's unmet need based on travel to work data (2,375 houses)

22. Meet Wealden's unmet need based on Internal Migration data (-931 houses: no contribution to unmet need)

Broad potential locations for development:

- Around Copthorne
- Around Crawley Down
- East of Crawley
- South of Crawley
- Around East Grinstead
- Around Haywards Heath / Lindfield
- Around Cuckfield

Policy Option	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Community Cohesion	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Sustain Economic Growth	**18 –** Encourage Tourism
20	++	+?	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-?	+	+	+	0
21	+	+?	+/-?	+	+/-	-?	-?	-?	+/-?	+/-?	+/-	-?	-	-?	+	+	+	0
22	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Social Effects

Options 20, 21 and 22 provide housing for Wealden within Mid Sussex based on different scenarios. Option 22 provides for Wealden's unmet housing needs based on Internal Migration data (which is an outward migration figure of 931 homes, meaning no homes would be provided in Mid Sussex District). Options which provide for additional housing in the District are anticipated as having a positive effect on the amount of decent and affordable housing in the area. As Option 20 provides for higher levels of housing as well as meeting all of Wealden's unmet housing needs a significant positive effect is expected on this SA objective. Option 22 will not result in any additional housing in the District and therefore a minor negative effect is expected on the SA objective.

Positive effects are expected on SA objectives related to providing access to health services and open spaces as well as retail and community facilities in the options which provide for additional housing as these homes will, for the most part, potentially be in locations in and around existing settlements (Crawley, Haywards Heath, East Grinstead, Copthorne and Crawley Down) where these types of services are already be provided. Given that they would provide for housing at locations which are larger towns (Crawley, Haywards Heath, East Grinstead), smaller villages (Copthorne and Crawley Down) and new potential development locations (east and south of Crawley), Options 20 and 21 are expected to have both minor positive and minor negative effects on SA objective 5 (encouraging community cohesion). Given that no houses would be provided for by Option 22, this option is likely to have a negligible effect on community cohesion.

Environmental Effects

Options 20 and 21 will result in negative effects on SA objectives which relate to flood risk, efficient

land use, conserving and enhancing biodiversity, reducing waste generation, maintaining and improving water quality and increasing energy efficiency. Given that most of Wealden's unmet need would be provided in the north of the District it is expected that a negative effect would result on the Ashdown Forest SAC and SPA which are sensitive to air pollution due to increased car journeys in the area. Biodiversity would also be adversely affected if housing was to be sited around this area through disturbance from recreation pressure or damage to habitats.

Mixed effects are expected on SA objectives which relate to protecting and enhancing the countryside, protecting and enhancing the historic environment and reducing road congestion. As the houses proposed may be on sites in close proximity to the nationally protected landscapes of the High Weald AONB to the north and the South Downs National Park to the south there is potential for this development to adversely affect these landscapes' settings, while at the same time new residents at these locations would have easy access to the high quality greenspace provided. It is also recognised that new development may negatively or positively impact upon the setting of historic assets depending on specific location and design.

Good internal public transport links to existing settlements within the District at potential development locations may positively affect road congestion; however public transport links from the District to Wealden are relatively weak meaning that there is potential for increased road journeys by new residents to employment locations in Wealden.

Economic Effects

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

Commuting Links

	2001			2011		
	Total Commuters	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total Commuters**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Commuters (FROM Wealden)	29,126	2,488	8.54	30,300	2,375	7.84
In Commuters (TO Wealden)	12,111	1,062	8.77	15,009	1,358	9.05
Net	17,015	1,426	-	15,291	1,017	-

Table 25 - Wealden Commuting Links

7.65. More people travel from Wealden to Mid Sussex for work (in-commute), than from Mid Sussex to Wealden (out-commute). This means that Wealden is an exporter of workforce to Mid Sussex. Data only exists for 2001/2011 so a reliable trend is not possible, however in the 10 years between each Census the number of those commuting in to Mid Sussex from Wealden has decreased, and the number commuting out of Mid Sussex to Wealden has increased.

7.66. In 2011, 7.84% of all people commuting out of Wealden travelled to Mid Sussex to work, whilst 9.05% of all people commuting to Wealden came from Mid Sussex.

7.67. In relation to Mid Sussex, 4.28% of all people commuting out of Mid Sussex travelled to Wealden and 11.64% of all people commuting to Mid Sussex came from Wealden. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 5th/7 for out commuting and 3rd/7 for in commuting.

Migration Links

	2002			2013		
	Total	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Migrants (FROM Wealden)	7,600	410	5.39	6,520	370	5.67
In Migrants (TO Wealden)	8,600	610	7.09	8,430	490	5.81
Net	-1,00	-200	-	-1,910	-120	-

Table 26 - Wealden Migration Links

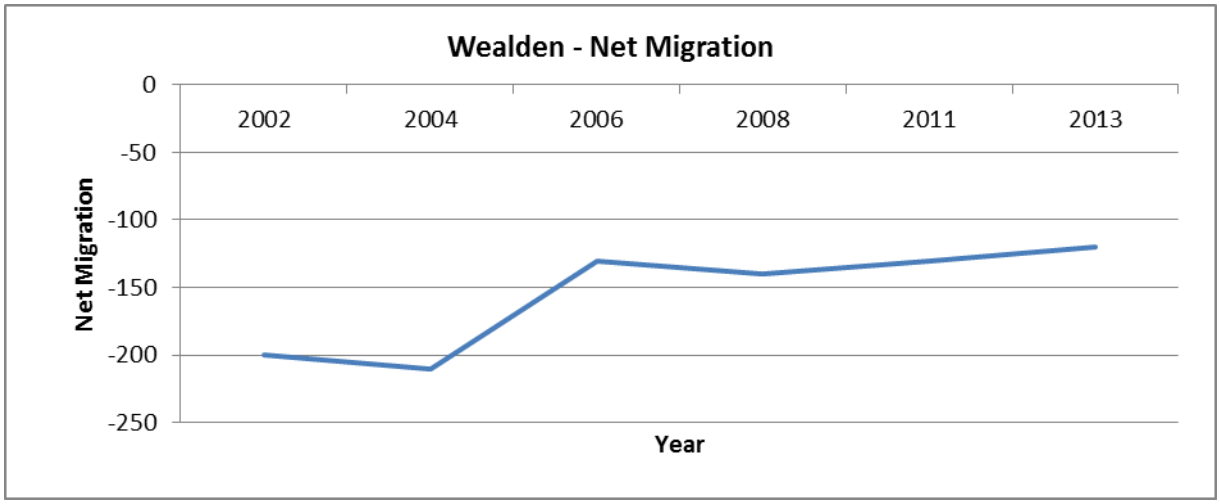


Figure 18 - Wealden Migration

7.68. Mid Sussex is an exporter of population to Wealden. Over the period 2002-2013 more people have moved into Wealden from Mid Sussex than vice versa. This rate has remained fairly constant throughout the past 12 years.

7.69. In 2011, 5.67% of all people migrating out of Wealden moved to Mid Sussex to live, whilst 5.81% of all people migrating to Wealden came from Mid Sussex.

7.70. In relation to Mid Sussex, 8.44% of all people migrating out of Mid Sussex moved to Wealden and 5.45% of all people migrating to Mid Sussex came from Wealden. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 1st/7 for out migration and 3rd/7 for in migration.

Worthing

23: Meet all Worthing's unmet need (7,500 houses)

24: Meet 50% of Worthing's unmet need (3,750 houses)

25: Meet Worthing's unmet need based on Internal Migration data (-70 houses: no contribution to unmet need)

Broad potential locations for development:

- Around Haywards Heath / Lindfield
- Around Burgess Hill
- Around Hurstpierpoint / Hassocks
- New settlement/ Sayers Common

Policy Option	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Community Cohesion	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Sustain Economic Growth	**18 –** Encourage Tourism
23	++	+?	+/--?	+	++/--	--?	--?	--?	+/--?	+/--	--	--?	--	--	++	++	+/-	0
24	+	+?	+/-?	+	+/-	-?	-?	-?	+/-?	+/-	-	-?	-	-	+	+	+	0
25	-	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Social Effects

Options 23, 24 and 25 provide housing for Worthing within Mid Sussex based on different scenarios. Option 25 provides for additional housing in the District based on internal migration data (which is a commuting outflow figure of 70 homes, meaning no housing would be provided within Mid Sussex in this option). All options which provide extra housing in the District (Option 23 and Option 24) are anticipated as having some degree of positive effect on increasing the amount of decent and affordable housing in the area. Option 23 provides for the highest number of houses in the Mid Sussex District and also meets all of the unmet housing need; therefore a significant positive effect is expected on the SA objective, while Option 25 would have a minor negative effect as it does not contribute to Worthing's unmet need, although in practice Option 23 may be difficult to achieve, as there may not be sufficient available and suitable land (as determined through the Council's SHLAA work) to meet its housing provision in full.

Considering that housing will mainly be provided in relatively close proximity to existing settlements and town centres (Hurstpierpoint, Burgess Hill and Haywards Heath) where services already exist these options are expected to have a positive impact on providing ease of access to health services and open spaces as well as to retail and community facilities. A negative effect on education provision is identified as some existing pressures on school places have been identified in the District (at Hurstpierpoint, Haywards Heath and Burgess Hill in particular) and this could be significant under Option 23 due to the high number of homes to be provided. There may be some minor positive effects in the short term as additional housing will be in close proximity to existing education facilities, therefore an overall mixed effect is expected on access to education for Option 23 and Option 24, with a negligible effect for Option 25.

Given that they would provide for housing at locations which are larger towns (Haywards Heath and Burgess Hill) as well as villages (Hurstpierpoint) and new development locations, Options 23 and

24 are expected to have positive effects on SA objective 5 (encouraging community cohesion), while Option 23 might also have negative effects on settlement character due to the higher number of homes to be delivered. Effects would be negligible under Option 25 due to no homes being provided under this option.

Environmental Effects

Option 23 and Option 24 will result in negative effects on SA objectives which relate to flood risk, efficient land use, conserving and enhancing biodiversity, reducing waste generation, maintaining and improving water quality and increasing energy efficiency. Significant negative effects are expected from Option 23 due to the higher number of homes to be provided making it more difficult to avoid sensitive environmental areas and placing more pressure on existing infrastructure.

Mixed effects are expected on SA objectives which relate to protecting and enhancing the countryside, protecting and enhancing the historic environment and reducing road congestion. As housing proposed may be located in areas in close proximity to the nationally protected landscapes of the High Weald AONB to the north and the South Downs National Park to the south, there is potential for this development to adversely affect these landscapes' setting, while at the same time new residents at these locations would have immediate and easy access to high quality greenspace. It is also recognised that new development may negatively or positively impact upon the setting of historic assets depending on specific location and design.

Although there are good internal public transport links which might positively affect road congestion at the existing settlements in the District identified as potential development locations, the potential for increased commuting of new residents to Worthing by road (due to limited public transport connections between these authorities and because Worthing does not abut Mid Sussex) means an overall negative effect on this SA objective has been identified.

Economic Effects

All options will have a positive effect on the objectives which encourage town centre regeneration and high and stable employment levels as they mainly provide for housing around existing centres which will be easily accessible for residents and additionally provide access to existing employment sites, and this could be significant under Option 23. Options 23 and 24 are likely to have minor positive effects on encouraging economic growth (SA objective 17) as the construction of housing in the District would potentially provide job opportunities and increasing demand for services in the area. Option 23 may also have minor negative effects as additional employment land may need to be provided within the District to provide growth space for new businesses and employment opportunities for the larger number of new residents under Option 23.

Option 25 would have negligible effects on these economic objectives as no housing would be provided under this option. As all options are to do with the provision of housing and do not provide for additional tourist facilities it is not thought that they will have an effect on SA objective 18 relating to encouraging tourism.

Commuting Links

	2001			2011		
	Total Commuters	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total Commuters**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Commuters (FROM Worthing)	15,520	566	3.65	17,782	688	3.87
In Commuters (TO Worthing)	14,735	282	1.91	16,698	351	2.10
Net	785	284	-	1,084	337	-

Table 27 - Worthing Commuting Links

7.71. Nearly twice as many people travel from Worthing to Mid Sussex for work (in-commute), than from Mid Sussex to Worthing (out-commute). This means that Mid Sussex is an importer of workforce from Worthing. Data only exists for 2001/2011 so a reliable trend is not possible, however in the 10 years between each Census the number of those commuting in to Mid Sussex from Worthing has increased, and the number commuting out of Mid Sussex to Worthing has also increased.

7.72. In 2011, 3.87% of all people commuting out of Worthing travelled to Mid Sussex to work, whilst 2.10% of all people commuting to Wealden came from Mid Sussex.

7.73. In relation to Mid Sussex, 1.11% of all people commuting out of Mid Sussex travelled to Worthing and 3.37% of all people commuting to Mid Sussex came from Worthing. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 6th/7 for out commuting and 7th/7 for in commuting.

Migration Links

	2002			2013		
	Total	**To/From Mid Sussex**	**% To/From Mid Sussex**	**Total**	**To/From Mid Sussex**	**% To/From Mid Sussex**
Out Migrants (FROM Worthing)	4,600	80	1.74	4,550	90	1.98
In Migrants (TO Worthing)	5,600	80	1.43	5,170	80	1.55
Net	-1,000	0	-	-620	10	-

Table 28 - Worthing Migration Links

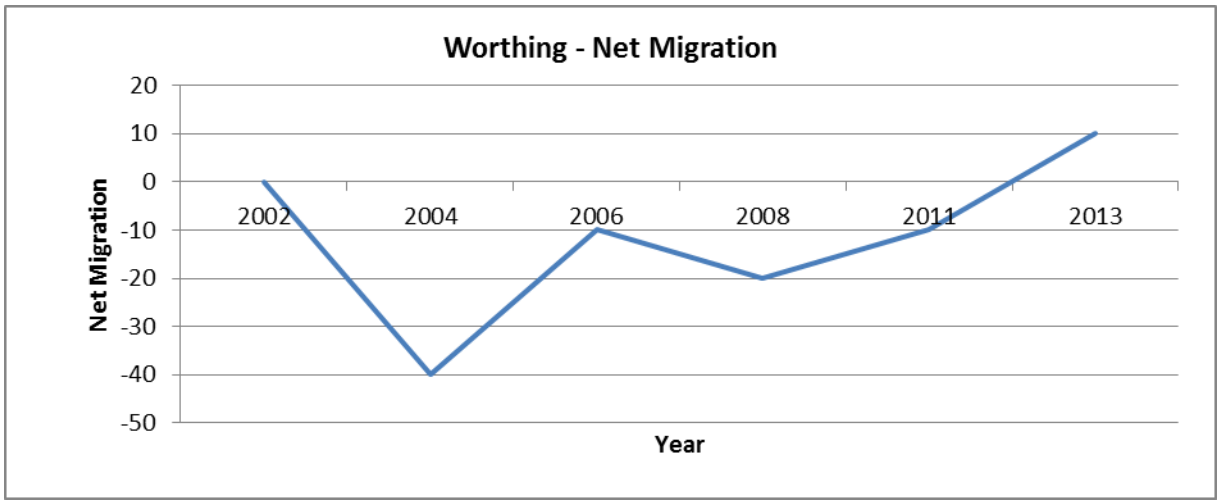


Figure 19 - Worthing Migration

7.74. Mid Sussex is an exporter of population to Worthing in terms of migration. Over the period 2002-2013 more people have moved from Mid Sussex to Worthing than vice versa.

7.75. In 2011, 1.98% of all people migrating out of Worthing moved to Mid Sussex to live, whilst 1.55% of all people migrating to Worthing came from Mid Sussex.

7.76. In relation to Mid Sussex, 1.49% of all people migrating out of Mid Sussex moved to Worthing and 1.2% of all people migrating to Mid Sussex came from Worthing. Of the seven Neighbouring Authorities subject to the Cross Boundary Sustainability Assessment, this ranks 6th/7 for out migration and 7th/7 for in migration.

Cross- Boundary Need - Overall Conclusion

7.77. The Sustainability Assessment of Cross-Boundary Options concludes[6]:

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

7.79. The greater the housing required under the options, the more likely that significant adverse effects would arise with respect to the environmental SA objectives. For example, under Options 1 to 3, which seek to cater for 100%, 50% and commuting-related need of all the neighbouring authorities, significant adverse effects would be experienced against all the environmental SA objectives 6 to 14, albeit sometimes mixed effects. If Mid Sussex District were to accommodate only Brighton & Hove's unmet needs and no other neighbouring authorities, this would be likely to result in significant adverse effects against all the environmental SA objectives, even if only half of the unmet need were to be provided for. Similarly, if Mid Sussex were to seek to cater for 100% of Tandridge's unmet needs alone, or 100% of Worthing's unmet needs alone, significant adverse effects against all the environmental SA objectives would be likely.

7.80. It is only for those neighbouring authorities that have low numbers of unmet housing needs, such as for Adur, Crawley, Lewes, Wealden, that the likelihood of significant adverse effects arising against the environmental SA objectives reduces, but this is on the assumption that only each authority's unmet needs and no others are provided for in Mid Sussex.

7.81. In conclusion, therefore, providing for additional development in Mid Sussex to meet the unmet housing needs of neighbouring local authorities is not without its own challenges. Mid Sussex District is constrained in its own right, and the greater the amount of development provided by the authority, the greater the likelihood of significant adverse effects arising. In addition, any negative impacts that have been identified in the assessments for meeting the unmet need of Mid Sussex's neighbours would be cumulative, on top of any potential negative impacts already identified from meeting Mid Sussex's own housing requirement in the District Plan. In terms of prioritisation, it makes more sense to provide for the needs of those neighbouring authorities where the neighbouring authorities have fully explored and assessed their own capacity to accommodate their own needs, where strong economic functional relationships exist, and where there are good public transport links to enable travel by more sustainable modes. This is most likely to be Crawley and Brighton & Hove." (LUC)

7.82. Further work (above) was undertaken to investigate the linkages between Mid Sussex and each neighbouring authority, in terms of commuting and migration. The aim of this exercise was to establish, should excess provision of housing exist in Mid Sussex, which authority(s) would be better suited to receiving assistance towards unmet housing need based on

[6] The full conclusion can be found in the "Sustainability of Cross-Boundary Options" (LUC) document.

existing links with Mid Sussex. This would enable existing commuting/migration links to continue and increase, and ensure that new, unsustainable patterns of (in particular) commuting did not arise.

Authority	Out Commuting Rank	In Commuting Rank	Out Migration Rank	In Migration Rank	Overall
Adur	7	6	7	6	=6
Brighton and Hove	2	1	2	1	1
Crawley	1	2	4	2	2
Lewes	4	4	3	4	4
Tandridge	3	5	5	5	5
Wealden	5	3	1	3	3
Worthing	6	7	6	7	=6

Table 29 - Summary of Neighbouring Authority Links

7.83. It can be concluded that there are weak links between Mid Sussex and Adur, Tandridge and Worthing based on past commuting and migration patterns. The strongest links are with Brighton & Hove and Crawley. These findings accord with the conclusions of the Cross-Boundary assessment. Therefore, any assistance towards meeting neighbouring authorities unmet needs should be directed towards Crawley and Brighton & Hove. As Crawley is in the same primary Housing Market Area (HMA) as Mid Sussex (the Northern West Sussex Housing Market Area as established in the HEDNA), meeting any unmet needs within this area should take precedence, as per the requirement in the NPPF to meet the housing needs of the HMA.

District Plan Housing Provision - Options for Appraisal

7.84. Based on findings within the HEDNA, HEDNA Update, HEDNA Addendum and Sustainability Assessment of Cross-Boundary Options studies, a range of options for the District Plan housing provision figure have been identified for appraisal.

7.85. The HEDNA Addendum (August 2016) has established the baseline Objectively Assessed Need as 714dpa based on the CLG 2014-based Household Projections (released 2016). A further 16dpa should be added for vacancies and 24dpa should be added to account for Market Signals (as per Planning Practice Guidance). Therefore, in order to meet its housing need, a minimum of 754dpa should be provided for in the plan period. The Sustainability Assessment of Cross-Boundary Options, and on-going Duty to Co-Operate work, has identified a large amount of unmet need in adjacent and nearby local authority areas. Whilst it is not intended for Mid Sussex to meet all of this unmet need, it is expected to make a contribution. It has been concluded that assisting towards meeting Crawley and Brighton & Hove's unmet need are the two most appropriate areas.

7.86. Any housing provision number must also be matched by housing supply. The Strategic Housing Land Availability Assessment (SHLAA) makes a site-by-site assessment of the suitability/availability/achievability of a number of potential sites, both strategic (500+ homes, as described at para 7.143) and non-strategic, within the District. Higher housing provision numbers will require more sites identified in the SHLAA to be developed, and will increase the likelihood of a need to develop sites of lower suitability. Sites in the SHLAA are assessed on an individual basis – the assessments do not take into account the in-combination effects of two nearby/adjacent sites coming forward for development. Higher housing provision numbers will also increase the likelihood of the need to develop nearby/adjacent sites identified in the SHLAA. This will need to be accounted for here, and in individual site sustainability appraisals.

7.87. The baseline information in section 3 and the Council's evidence base – particularly where related to constraints, infrastructure and housing supply will be used in order to provide an evidential element to the provision number appraisals.

7.88. The Plan Provision options identified are:

- **Option A – 700dpa**

  This option would not meet the Objectively Assessed Need for Mid Sussex. It would therefore not make any contribution towards the unmet needs of neighbouring authorities.

  As an indication, this option would need to be delivered using a mix of 1 or 2 strategic sites (i.e. those delivering over 500 units), plus a number of smaller sites. This is dependent on there being an adequate supply of such sites assessed as suitable/available/achievable within the SHLAA.

  This option would lead to a need for affordable housing of 147-250dpa. Based on a proposed District Plan policy of 40% affordable housing (20% 'traditional' and 20% starter homes), this would meet the needs of those in "reasonable preference groups" (there would be an excess of 44 units) however there would be a shortfall of 66 units against the total waiting list.

- **Option B – 750dpa**

  This option would almost meet OAN, including a reasonable uplift for Market Signals to improve affordability for younger age groups. Whilst Mid Sussex need would be met, it would not make any contribution towards the unmet needs of neighbouring authorities.

  As an indication, this option would need to be delivered using a mix of 2+ strategic sites (i.e. those delivering over 500 units), plus a number of smaller sites. This is dependent on there being an adequate supply of such sites assessed as suitable/available/achievable within the SHLAA.

  This option would lead to a need for affordable housing of 169-272dpa. Based on a proposed District Plan policy of 40% affordable housing (20% 'traditional' and 20% starter homes), this would meet the needs of those in "reasonable preference groups" (there would be an excess of 32 units) however there would be a shortfall of 78 units against the total waiting list.

- **Option C – 800dpa**

  This option would meet OAN, including a reasonable uplift for Market Signals to improve affordability for younger age groups. It would also provide around 46dpa towards meeting the unmet need of neighbouring authorities.

  As an indication, this option would need to be delivered using a mix of 3+ strategic sites (i.e. those delivering over 500 units), plus a number of smaller sites. This is dependent on there being an adequate supply of such sites assessed as suitable/available/achievable within the SHLAA.

  This option would lead to a need for affordable housing of 191-294dpa. Based on a proposed District Plan policy of 40% affordable housing (20% 'traditional' and 20% starter homes), this would meet the needs of those in "reasonable preference groups" (there would be an excess of 20 units) however there would be a shortfall of 90 units against the total waiting list.

- **Option D – 850dpa**

  This option would meet OAN, including a reasonable uplift for Market Signals to improve affordability for younger age groups. It would also provide around 96dpa towards meeting the unmet need of neighbouring authorities.

  As an indication, this option would need to be delivered using a mix of 4+ strategic sites (i.e. those delivering over 500 units), plus a number of smaller sites. This is dependent on there being an adequate supply of such sites assessed as suitable/available/achievable within the SHLAA.

  This option would lead to a need for affordable housing of 213-316dpa. Based on a proposed District Plan policy of 40% affordable housing (20% 'traditional' and 20% starter homes), this would meet the needs of those in "reasonable preference groups" (there would be an excess of 8 units) however there would be a shortfall of 102 units against the total waiting list.

- **Option E – 900dpa**

  This option would meet OAN, including a reasonable uplift for Market Signals to improve affordability for younger age groups. It would also provide around 146dpa towards meeting the unmet need of neighbouring authorities.

  As an indication, this option would need to be delivered using a mix of 4+ strategic sites (i.e. those delivering over 500 units), plus a number of smaller sites. This is dependent on there being an adequate supply of such sites assessed as suitable/available/achievable within the SHLAA.

  This option would lead to a need for affordable housing of 235-338dpa. Based on a proposed District Plan policy of 40% affordable housing (20% 'traditional' and 20% starter homes), there would be a shortfall in affordable housing supply against the needs of those in "reasonable preference groups"(4 units) and the total waiting list (114 units).

- **Option F – 1000+dpa**

  This option would meet OAN, including a reasonable uplift for Market Signals to improve affordability for younger age groups. It would also provide in excess of 246dpa towards meeting the unmet need of neighbouring authorities.

  As an indication, it is likely this option would need to be delivered using a mix of 5+ strategic sites and nearly all sites identified within the SHLAA as suitable/available/achievable.

  This option would lead to a need for affordable housing of 279-382dpa. Based on a proposed District Plan policy of 40% affordable housing (20% 'traditional' and 20% starter homes), there would be a shortfall in affordable housing supply against the needs of those in "reasonable preference groups"(28 units) and the total waiting list (138 units).

Housing Numbers – Housing Provision:

Options:

A) 700dpa – Would not meet OAN

B) 750dpa - Meets OAN, including an uplift for Market signals. Would not contribute towards unmet needs of neighbouring authorities.

C) 800dpa - Meets OAN, including an uplift for Market signals and 46dpa towards unmet needs

D) 850dpa - Meets OAN, including an uplift for Market signals and 96dpa towards unmet needs

E) 900dpa - Meets OAN, including an uplift for Market signals and 146dpa towards unmet needs

F) 1000+dpa - Meets OAN, including an uplift for Market signals and 246+dpa towards unmet needs

	Objective	A 700dpa	B 750dpa	C 800dpa	D 850dpa	E 900dpa	F 1000+dpa
Social	**1 –** Decent and Affordable Home	**-?**	**+**	**++**	**++**	**++**	**++**
		All options would provide a mix of market and affordable housing to varying degrees. The HEDNA Update shows that 44.2% of newly forming households are unable to buy or rent - increased housing provision therefore increases the need for affordable housing but at a higher rate than the amount that is supplied. Therefore, increasing housing provision does not necessarily satisfy more of the waiting list need, however all options would meet the waiting list for those people in reasonable preference groups. Option **(a)** would not meet the District's demographic need ('starting point' OAN). It does not make any allowance for assisting in meeting unmet needs of neighbouring authorities. Option **(b)** allows for market signals but makes no allowance towards meeting unmet housing need. Options **(c), (d), (e)** and **(f)** all exceed the OAN for Mid Sussex. The excess between the OAN and the plan provision number set by these options could be utilised to assist in meeting unmet needs of neighbouring authorities. As they are above demographic need, they would also allow for new households to form, particularly younger age groups who cannot currently afford to form their own household. Whilst options **(c), (d), (e)** and **(f)** score very positively on this objective, this would be contingent on identifying a sufficient supply of housing to meet the provision, and the balance between the potential positive impacts on social objectives and potential negative impacts on environmental objectives assessed throughout this appraisal.					
	2 – Access to Health	**+?**	**+**	**++**	**+**	**+?**	**+?**
		The provision of housing will facilitate improved health facilities through developer contributions. Option **(a)** could have positive impacts by contributing to improving existing facilities across the District (in accordance with the 'Distribution of Development' appraisal) as well as providing new facilities in some locations – particularly on strategic site(s). Option **(b)** would provide more certainty in this respect, as more sites would be needed. Option **(c)** is likely to require larger strategic site(s) and therefore improves the					

		probability of new facilities being included as part of the strategic site, or extensions to existing facilities nearby. The rest of the residential development would be spread across the District in accordance with the settlement hierarchy, and therefore improvements to existing facilities would be expected in these locations. Whilst options **(d), (e)** and **(f)** could also do this, the level of development associated with these options would require a quantum of development across the District that may put a strain on existing facilities, particularly in smaller settlements. If it was delivered on strategic sites (at the expense to growth of existing settlements), this would not benefit existing settlements. More positive impacts could be expected if adequate improvements are sought and overall capacity substantially increased to meet demand, with the support of the health authority.					
	3 – Opportunities for Education	**+?**	**+**	**++**	**+**	**+?**	**+?**
		The provision of housing will facilitate improved education facilities through developer contributions. Option **(a)** could have positive impacts by contributing to improving existing facilities across the District (in accordance with the 'Distribution of Development' appraisal) as well as providing new facilities in some locations – particularly on strategic site(s). Option **(b)** would provide more certainty in this respect, as more sites would be needed. Option **(c)** is likely to require larger strategic site(s) and therefore improves the probability of new facilities being included as part of the strategic site, or extensions to existing facilities nearby. The rest of the residential development would be spread across the District in accordance with the settlement hierarchy, and therefore improvements to existing facilities would be expected in these locations. Whilst options **(d), (e)** and **(f)** could also do this, the level of development associated with these options would require a quantum of development across the District that may put a strain on existing facilities, particularly in smaller settlements. If it was delivered on strategic sites (at the expense to growth of existing settlements), this would not benefit existing settlements. More positive impacts could be expected if adequate improvements are sought and overall capacity substantially increased to meet demand, with the support of the education authority.					
	4 – Access to Retail and Community Facilities	**+**	**+**	**++**	**++**	**++**	**++**
		All options will have a positive impact on this objective, as all will increase footfall for retail outlets or support community facility use. In smaller settlements, an increase in the level of housing in the settlement may ensure that existing retail and community facilities are more viable. Options **(a)** and **(b)** are likely to contribute to maintaining and improving existing facilities across the District. Options **(c), (d), (e)** and **(f)** will also do this on a larger scale, and are likely to include the need for larger, strategic sites. These are likely to include new retail facilities and community facilities that can be utilised by new residents as well as the existing population.					
	5 – Cohesive, Safe, Crime Resistant Communities	**+**	**+?**	**+?**	**-?**	**-?**	**-**
		Option **(a)** would mean housing development at a similar rate to the past few years. This would therefore represent organic growth to existing settlements, and allow for development to be provided in areas where the need is derived from. Options **(b)** and **(c)** would also allow for this, but are likely to increase levels of inward migration to the District which could make social cohesion more difficult, especially in settlements outside the three main towns. The housing provision associated with options **(d)** and **(e)** would increase the probability of allocating further sites across the District. These options also assume					

		levels of inward migration vastly above existing trends, increasing significantly with option **(f)**. This level of development would likely require development in settlements further down the settlement hierarchy set out in the Settlement Sustainability Review. This has the potential to limit social cohesion and change the character of existing settlements.					
Environmental	**6 –** Flood Risk	**0**	**0**	**0**	**-?**	**-?**	**-?**
		Options **(a)**, **(b)** and **(c)** are unlikely to impact on this objective. Development should be located outside of areas at risk of flooding, and it is likely that these housing provision numbers could be met without the need to develop flood risk sites – the SHLAA indicates that there are potentially enough suitable sites to satisfy these levels of housing provision. Options **(d)**, **(e)** and **(f)** cannot be satisfied by the pool of suitable sites within the SHLAA, which may increase the risk of requiring development of sites less suitable which may include some at risk of flooding.					
	7 – Efficient Land Use	**-**	**-**	**-**	**--**	**--**	**--**
		All options are likely to have a negative impact on this objective as all will involve building, most likely on greenfield sites. The SHLAA gives an indication of the likely sites available to meet the housing provision number. Options **(a), (b)** and **(c)** could be met with a mix of brownfield development, greenfield development plus 2/3 large strategic (greenfield) sites. However, options **(d)**, **(e)** and **(f)** would likely require 4+ greenfield strategic sites to be delivered therefore reducing the Districts percentage of development on brownfield land. The SHLAA has indicated that in order to meet a housing provision of over 800dpa, it is likely that all suitable sites identified within the SHLAA would need to be developed. Housing provision above 800dpa may mean that some borderline acceptable sites (in landscape, environmental and sustainability terms) may be required – these would likely be built at low density in order to be acceptable, which would not make efficient use of land. The impact on this objective may be mitigated by a potential policy requiring development to be built at higher density in urban areas or strategic sites.					
	8 – Conserve and Enhance Biodiversity	**-?**	**-?**	**-?**	**-**	**-**	**--**
		All options have the potential to impact negatively on this objective, dependant on the location of sites, level of development, and mitigation. The 'Capacity Study' (2014) notes that there are a number of relevant environmental designations within the District, and there are only a limited number of areas that are not affected by one or more of these – only around 4% of the District is relatively unconstrained or not already built on. Higher growth scenarios may increase the likelihood of development in proximity to the Ashdown Forest SPA/SAC which would need to be mitigated in order to be acceptable. The 'Sustainability Assessment of Cross Boundary Options' assumes that provision in excess of (indicatively) 780dpa would be a reasonable assumption for distinguishing between minor and significant effects, and has the potential to give rise to some significant environmental effects dependant on location and how development is delivered. It is therefore felt that there would be negative impacts predicted for options **(d)** and **(e).** Option **(f)** would propose levels of development vastly in excess of this, and would therefore have significant negative impacts.					

	9 – Protect and Enhance Countryside	-	-	-	--	--	--
		All options are likely to have a negative impact on this objective as all are concerned with development, most likely on sites within the countryside. The SHLAA gives an indication of the likely sites available to meet the housing provision number. Options **(a), (b)** and **(c)** could be met with a mix of brownfield development, greenfield development plus 2/3 large strategic (greenfield) sites. However, options **(d)**, **(e)** and **(f)** would likely require 4+ greenfield strategic sites to be delivered. It is likely that all deliverable (non-strategic) sites within the SHLAA would need to be developed if these options are pursued, which includes a number of sites within the AONB, a primary designation in the National Planning Policy Framework. It may also include sites that could impact upon the setting of the South Downs National Park. The 'Capacity Study' (2014) notes that there is only 4% of the District that is relatively "unconstrained", hence the very negative impacts predicted with higher growth scenarios. The 'Sustainability Assessment of Cross Boundary Options' assumes that provision in excess of (indicatively) 780dpa would be a reasonable assumption for distinguishing between minor and significant effects, and has the potential to give rise to some significant environmental effects dependant on location and how development is delivered.					
	10 – Protect and Enhance Historic Environment	0	0	0	0	0	0
		There are not thought to be any significant differences between the options on this objective – the impact upon this objective will be determined by individual site appraisals.					
	11 – Reduce Road Congestion	-?	-?	-?	-	--	--
		The Mid Sussex Transport Study models the impact on the transport network. As noted in section 3 of this SA, the transport study has identified a number of localised issues which could be worsened with a housing provision significantly beyond that modelled within the transport study (800dpa). Therefore, option **(d)** and to a greater extent options **(e)** and **(f)** could have a negative impact on the transport network. Higher levels of development than those modelled within the transport study could cause junctions/links currently operating at near to acceptable levels to operate over capacity. Dependant on location, increased development may lead to increased traffic which may impact on the Ashdown Forest SAC in terms of nitrogen deposition.					
	12 – Reduce Waste Generation	-	-	-	-	-	-
		All options are likely to have a negative impact on this objective, as all levels of development are likely to increase the generation of waste. This may be mitigated by the District Council's kerbside recycling scheme which is in place across the District. New developments would benefit from this service.					
	13 – Maintain and Improve Water Quality	-?	-?	-?	-	--	--
		All options will increase demand on water supply and for wastewater treatment. The Capacity Study updates the previous evidence undertaken within the Gatwick Sub-Region Water Cycle Study (WCS – 2011) which explored future development impacts on supply and treatment infrastructure. The WCS showed that there were severe wastewater capacity issues with development exceeding 850dpa. In particular, Goddards Green Wastewater Treatment Works just outside Burgess Hill was shown to have limits. Crawley Treatment Works could also have capacity issues. Southern Water has now confirmed that there is capacity to accommodate growth associated with proposed development at Burgess Hill, with existing planned mitigation. However, there may be capacity issues should housing					

		provision increase too far beyond baseline levels (i.e. those indicated by population projections, which are used for demand forecasting by the water companies). This is particularly relevant if increasing levels of development were to occur in areas that would drain to this particular works – i.e. Hassocks, Hurstpierpoint, Sayers Common and Bolney. This will be relevant to options **(e)** and in particular, **(f)**.					
	14 – Increase Energy Efficiency	**+?**	**+?**	**+?**	**+?**	**+?**	**+?**
		All options would involve development being built to the appropriate energy efficiency standards, and could include a proportion of energy being generated on-site, which could be to the benefit of existing as well as new households.					
Economic	**15 –** Encourage regeneration of Town and village Centres	**+**	**+**	**+**	**+?**	**+?**	**+?**
		Options **(a), (b)** and **(c)** propose levels of development that could predominantly require extensions to existing towns and villages, as well as strategic sites. This should encourage the regeneration of existing towns and village centres by increasing potential footfall and demand for services, therefore making the centres more attractive for new investment and helping to retain existing businesses. The level of development associated with options **(d), (e)** and **(f)** would require a further allocation of strategic site(s) (potentially at the expense of smaller scale development in villages). It is expected that strategic sites would provide retail/community facilities on-site but this could be to the detriment of existing town centres and therefore could limit any positive impacts.					
	16 – Ensure High and Stable Employment Levels	**+?**	**+?**	**+**	**+**	**+?**	**+?**
		All options would increase the potential workforce within the District. The Northern West Sussex Economic Growth Assessment (2014) suggests the baseline job growth is 521jobs per annum, however this is seen as unrealistic based on previous years trends – the EGA shows there have been moderate job losses in the District over the period 1997-2013. Option **(a)** would provide an increased workforce of approximately 216 jobs per annum, with **(b)** providing approximately 273 jobs per annum. Options **(c)** and **(d)** would generate the need for 370 and 386 jobs per annum respectively. Whilst options **(e)** and **(f)** would generate 443 and 556 jobs per annum respectively, this is higher than average job growth and may require additional employment allocations in order to satisfy, or the risk of increased out-commuting should there not be sufficient employment opportunities to match planned housing growth.					
	17 – Support Economic Growth	**+**	**+**	**+**	**++**	**++**	**++**
		All options would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon. Developments of larger, strategic level sites are likely to include areas of employment land. There will also be short/medium term jobs available in construction of planned development sites. Additional population increases within the District will have positive knock-on effects for local businesses, retail, and entertainment and community facilities, supporting economic growth.					
	18 – Encourage Tourism	**0**	**0**	**0**	**0**	**0**	**0**
		There are not thought to be any significant differences between the options on this objective – the impact upon this objective will be determined by individual site appraisals.					

Summary of Appraisal

All options will have positive impacts on providing new housing within the District as this is the aim of the policy, aside from option **(a)** which would not meet demographic housing

need. All options would meet the affordable housing need of those in reasonable preference groups, and would all meet around 80% of the total housing waiting list.

All options aside from option **(a)** would meet the Objectively Assessed Need for Mid Sussex. Option **(b)** would meet demographic need and makes an allowance for market signals, however would not assist in meeting unmet needs of neighbouring authorities. Other options proposed would make a contribution towards unmet need to varying degrees. In particular, options **(c), (d), (e)** and **(f)** would ensure the housing need in the Northern West Sussex Housing Market Area (Mid Sussex, Crawley and Horsham) is largely met.

It will be important to consider the deliverability of each option proposed. Delivery of all the options would require the development of a mix of strategic site allocations, and other non-strategic size sites identified within the SHLAA (i.e. potential deliverable and developable housing sites over the plan period). Any housing provision over approximately 800dpa would require the development of every non-strategic size site within the SHLAA to be developed, or the development of more strategic size sites (of which there are limited suitable sites to choose from in the SHLAA). Strategic sites are appraised further on in this section. In order to achieve higher levels of growth, it could mean needing to allocate less suitable/unsuitable sites to meet the housing provision. This would have knock-on effects on environmental objectives such as those concerned with biodiversity, protecting the countryside, road congestion and water quality.

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

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

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

Options **(a)** and **(b)** are more acceptable in environmental terms but may not deliver the social benefits compared to options proposing higher housing numbers, and won't assist in meeting unmet housing need from neighbouring areas. However, it is clear that options proposing over 800dpa (i.e. options **(d), (e)** and **(f)**) should be ruled out as the impact on environmental objectives are not outweighed by potential positive impacts on social objectives.

In order to achieve provision associated with options **(d), (e)** and **(f)** a large number of suitable/available/achievable sites would need to be identified, both of strategic size and non-strategic size. The SHLAA shows that options **(d), (e)** and **(f)** could not be achieved unless all sites identified as potentially developable are developed, plus further sites would still need to be found. The SHLAA follows a robust methodology and has been audited by external consultants; any additional sites would be far less suitable, which would have knock-on effects for a number of environmental objectives. Also, in developing every site in the SHLAA, this does not take account of the potential in-combination negative impacts that may occur should two adjacent/nearby sites be developed (which would be required in order

to meet these provision numbers).

The 'Sustainability Assessment of Cross Boundary Options' assumes that provision in excess of (indicatively) 780dpa would be a reasonable assumption for distinguishing between minor and significant effects, and has the potential to give rise to some significant environmental effects dependant on location and how development is delivered. This would be relevant for options **(d), (e)** and to a much greater extent, **(f)**.

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

Housing Numbers – Summary of Appraisal

	Objectives	A 700dpa	B 750dpa	C 800dpa	D 850dpa	E 900dpa	F 1000+dpa
Social	**1 –** Decent and Affordable Home	-?	+	++	++	++	++
	2 – Access to Health	+?	+	++	+	+?	+?
	3 – Opportunities for Education	+?	+	++	+	+?	+?
	4 – Access to Retail and Community Facilities	+	+	++	++	++	++
	5 – Cohesive, Safe, Crime Resistant Communities	+	+?	+?	-?	-?	-
Environmental	**6 –** Flood Risk	0	0	0	-?	-?	-?
	7 – Efficient Land Use	-	-	-	--	--	--
	8 – Conserve and Enhance Biodiversity	-?	-?	-?	-	-	--
	9 – Protect and Enhance Countryside	-	-	-	--	--	--
	10 – Protect and Enhance Historic Environment	0	0	0	0	0	0
	11 – Reduce Road Congestion	-?	-?	-?	-	--	--
	12 – Reduce Waste Generation	-	-	-	-	-	-
	13 – Maintain and Improve Water Quality	-?	-?	-?	-	--	--
	14 – Increase Energy Efficiency	+?	+?	+?	+?	+?	+?
Economic	**15 –** Encourage regeneration of Town and village Centres	+	+	+	+?	+?	+?
	16 – Ensure High and Stable Employment Levels	+?	+?	+	+	+?	+?
	17 – Support Economic Growth	+	+	+	++	++	++
	18 – Encourage Tourism	0	0	0	0	0	0

Table 30: Housing Provision - Summary of Appraisal

Housing Provision: The balance to be struck in Sustainability Assessment

7.89. As housing provision increases, positive benefits increase in terms of providing homes within Mid Sussex to meet the District's need, and unmet need from other authorities. However, negative impacts also get worse as the housing number increases, particularly on environmental objectives.

7.90. The point where negative impacts are greater than the positive impacts can be referred to as the 'tipping point'.

7.91. The Sustainability Assessment of Cross-Boundary Options assessed that there were significant positive social effects, but significant negative environmental effects predicted for any option that increased the District's housing provision by 5,000 (i.e. 300dpa at the time it was written) in addition to meeting the District's own need - at the time the Sustainability Assessment was written, it assumed the District's housing need as 516dpa as per CLG's 2011 household projections. The addition of 300dpa on top of the assumed housing need of 516dpa gave a total provision of around 800dpa. This represents a good basis for the 'tipping point' in sustainability terms and is consistent with the housing provision appraisal undertaken above.

7.92. A balance needs to be struck to ensure the option chosen has many positive benefits (particularly social/economic) but these are not markedly outweighed by negative impacts (particularly environmental). In conducting the assessment, the Council has had regard to the advice in paragraph 14 of the NPPF, and examined the evidence to identify the point at which the adverse impacts would significantly and demonstrably outweigh the benefits; in the context of Mid Sussex it is also highly relevant that a considerable proportion of the District is designated AONB; that is a designation which in terms of the NPPF indicates that development should be restricted.

7.93. In order to form a balanced and holistic view, therefore, the Council has assessed the sustainability of the various housing provision options (identified in terms of net new housing completions per annum) in various ways:

(1) By assessing the options against the full range of sustainability criteria, making judgements about the degree to which those criteria would or would not be met (the Housing Provision appraisal above, summarised in Table 30 and 31)

(2) By examining as a sub-set of that exercise the areas in which the various options most clearly diverged (Table 32)

(3) By making a judgment about the overall effect of the various options bearing in mind what the Council consider to be the key criteria for this policy: housing provision, economic growth, and environmental protection (principally landscape resource conservation). This is an important exercise because some of the criteria are incommensurable, and a tight focus on those that particularly matter to the overall sustainability of the plan has been thought to be helpful in judging between the different alternatives. It is also important to recognise that, where housing delivery is concerned, for instance, there are real constraints in the availability and deliverability of sites, such that the options involving higher housing numbers are to some extent theoretical rather than real.

7.94. The results are summarised below.

Total of Predicted Sustainability Impacts						
	A 700	B 750	C 800	D 850	E 900	F 1000+
++	0	0	4	3	3	3
+	4	6	3	3	0	0
+?	5	3	2	2	5	5
0	3	3	3	2	2	2
-?	3	3	3	2	2	1
-	3	3	3	4	2	2
--	0	0	0	2	4	5

Table 31: Housing Provision - Total of Predicted Sustainability Impacts

7.95. The full criteria assessment gives an indication that the benefits peak at around 800 units pa, and thereafter begin to fall away. However, the adverse impacts steadily mount and increase markedly between Options C and D.

	A 700	B 750	C 800	D 850	E 900	F 1000+
Major Positives (++)	0	0	4	3	3	3
Major Negatives (--)	0	0	0	2	4	5
Positives outweigh Negatives	**0**	**0**	**4**	**1**	**-1**	**-2**

Table 32: Housing Provision - Major Positives and Major Negatives

7.96. This exercise looks at the sustainability objectives likely to have major negative and positive impacts. Between C and D the positive case falls away, turning significantly negative by Option E. This exercise does not attempt to weight criteria.

Housing Provision - Key Criteria

7.97. The Council considers that the following are key to a plan which is overall sustainable:

- meeting housing needs,
- encouraging economic growth, and
- restricting harm to the environment, especially to the landscape of the District.

7.98. These criteria are accorded particular weight in the assessment of housing provision.

Option A – 700dpa:

7.99. No major positives, but no major negatives either. Scores positively on maintaining and improving existing community facilities, retail and town/village centres. It would contribute towards promoting economic growth, but isn't close to meeting the baseline economic growth level predicted. According to the SHLAA, there is potential supply to meet this requirement.

7.100. In respect of many objectives, it is unclear whether Option A would have a positive impact – it may impact negatively on providing housing as it would not meet the District's OAN and not be able to assist in meeting unmet needs of neighbouring authorities. Dependant on the distribution and delivery of this option, it could have positive impacts on access to health and education through the provision of new facilities. However, this is uncertain – this option is likely to be delivered using 1 or 2 strategic sites, with the rest on smaller sites. This may mean that there are fewer opportunities for new facilities to be built 'on-site' compared

to options requiring more strategic sites/larger sites to meet the housing requirement, which could put a strain on existing facilities.

7.101. Negative impacts are relatively minor compared to other options. The main negative impacts are predicted to occur on objectives which are negative for all options – protecting the countryside, making efficient use of land, reducing waste generation, reducing road congestion and improving water quality. This is because there is a clear conflict between building houses and protecting the environment, as identified in section 6 of the SA report.

7.102. In earlier assessments (at previous stages of the Sustainability Appraisal process), 700dpa has been seen as the tipping point. However, the Council has revised its assessment of the needs for housing and the approach to be taken to the meeting of some of its neighbours' housing needs, and 700dpa is now the lowest housing requirement option in this appraisal. It is clear that it has fewer predicted negative impacts than higher options put forward, but it is not as positive, particularly on the social objectives, compared to higher housing options.

7.103. Overall, positive benefits outweigh negative benefits. However, no major positives are likely to be achieved and the option scores negatively on the objective concerned with housing delivery – the key objective for this assessment.

Option B – 750dpa:

7.104. This option yields more positive effects than option (A); however there are still not any major positives expected for any of the objectives. Similarly, there are no major negatives either. According to the SHLAA, there is potential housing supply to meet this requirement.

7.105. Some of the uncertainties expected from option (A) are predicted to be more certain with this option. For instance, this option is more likely to meet the District's objectively assessed housing need, although still would not contribute towards unmet housing need arising from neighbouring authorities. As the overall provision is increased, this will probably require more sites for it to be delivered – by developing more smaller sites than (A), potentially requiring delivery of larger sites compared to (A), or an additional strategic site. With larger sites or a strategic site being delivered, this will provide more certainty regarding the provision of new medical/education facilities on site and greater contributions towards improving/extending existing sites compared to option (A).

7.106. As per (A), negative impacts are predicted against objectives which are commonly negative for all options to some degree.

7.107. Overall, positive benefits outweigh negative impacts. However, no major positives are likely to be achieved and the balance is once again a relatively fine one. The option does not in the Council's view achieve sufficient benefits overall.

Option C – 800dpa:

7.108. This option is considerably more positive than options (A) and (B) on the objective related to provision of new housing. This is because it meets the District's housing need and contributes 46dpa towards unmet need arising from neighbouring authorities. This would assist in meeting the housing need arising within the Northern West Sussex Housing Market Area (Crawley, Horsham and Mid Sussex). According to the SHLAA, there is potential housing supply to meet this requirement.

7.109. Due to there being a finite amount of suitable small brownfield sites and suitable greenfield sites within the District, in order for this level of provision to be delivered it is likely that a further strategic site would be required compared to option (B). This option would also

require development of nearly every suitable/available/achievable site identified within the SHLAA.

7.110. With regards to the health and education objectives, the scale of development associated with this option would require strategic sites as well as growth across the District at various scales. This is likely to involve new facilities being delivered on strategic sites, and a level of development across the District that should contribute towards extending/improving existing facilities, or providing new ones. This represents a level of growth that is much higher than in the past, but still at a manageable level in terms of infrastructure. Health and education capacity, particularly in the smaller settlements, has been highlighted as a potential constraint in the past.

7.111. This option is likely to have more of a positive impact on economic objectives compared to (A) and (B) – as this option accounts for a greater proportion of new Mid Sussex residents migrating from adjacent/other authorities, this could increase the economically active workforce and in turn result in demand for more jobs to be created in the District – supporting economic growth.

7.112. As per options (A) and (B), negative impacts are predicted against objectives which are commonly negative for all options to some degree. However, this option would involve the vast majority of sites identified as 'suitable/available/achievable' in the District Council's SHLAA to be developed, meaning that some of the negatives for objectives concerning efficient land use/biodiversity/countryside/historic environment could be more likely to arise compared to options (A) and (B). In particular, the impacts of Option C are greater on the key landscape criterion, as it inevitably entails greater use of greenfield sites, and indeed the need to allocate a strategic site in the AONB.

7.113. Overall, positive benefits are greater, but they are in tension with greater negative impacts.

Option D – 850dpa:

7.114. This option is equally as positive for Objective 1 as option (C) as it meets the District's housing need and contributes 96dpa towards unmet need arising from neighbouring authorities.

7.115. Due to there being a finite amount of suitable small brownfield sites and suitable greenfield sites within the District, in order for this level of provision to be delivered it is likely that a yet further strategic site would be required compared to option (C). Work on the SHLAA has not indicated that there is a site which could be added to the allocations which would not cause significant additional landscape impact. Although elevated housing numbers could in theory be met by developing a larger quantity of non-strategic sites compared to options (A), (B) or (C), the SHLAA shows that there are not enough suitable/available/achievable sites to meet this level of provision. The housing benefits would therefore come at a substantially increased environmental cost.

7.116. The major positive impacts predicted for option (C) for objectives 2 (health) and 3 (education) may not be as positive for this option. Should delivery of this provision be on a further strategic site compared to the delivery of option (C), facilities would be provided on-site and demand could be met, with major positive impacts predicted. However, it cannot be demonstrated that there are further suitable/available/achievable strategic sites to meet this housing provision, which increases uncertainty.

7.117. Major positive impacts are a lot less certain if delivery is achieved by using a range of smaller sites rather than an additional strategic site. With piecemeal development, delivery of new facilities is unlikely, any new facility would be small scale and likely benefit only one settlement. Contributions towards existing facilities would instead be expected, however

piecemeal development of smaller sites across the District may mean small increases in demand for a number of different facilities, without sufficient contributions to necessarily meet the increasing demand. This is less of a problem for option (C) as provision will be met by strategic sites and organic growth at smaller settlements (albeit at a greater rate than in the past). Option (D) would represent growth within smaller settlements that is significantly greater than in the past, potentially in areas where facilities are stretched. Major positives could be expected for this option should growth be accompanied by sufficient capacity within health and education facilities but at this point it is uncertain.

7.118. Some of the uncertain negative impacts associated with options (A), (B) and (C) start to become more certain with option (D). The 'Sustainability Assessment of Cross Boundary Options' suggests provision in excess of 780dpa would be a reasonable assumption as to where positive impacts become more positive (in this instance, mainly the 'social' and 'economic' objectives) whereas negative impacts are likely to become more negative (particularly 'environmental' objectives). For this option this is borne out in objectives 7 (efficient land use), 8 (biodiversity), 9 (protection of the countryside), 11 (reducing road congestion) and 13 (water quality).

7.119. This largely reflect the findings of the SHLAA – further greenfield sites would be required to meet this level of housing provision, which would impact negatively on objective 7. As there are not enough suitable sites identified in the SHLAA, it is possible that further 'less suitable' sites would be required. The impact on these objectives would be dependent on why specific sites were classified 'unsuitable', but in general terms, they are likely to have a negative impact on landscape and/or biodiversity.

7.120. In terms of wastewater, modelling was undertaken in 2011 through the sub-regional Water Cycle Study, which identified constraints to development at levels above 850dpa. Whilst the capacity of Goddards Green Wastewater Treatment Works has improved since then, there is uncertainty regarding capacity well beyond baseline levels (i.e. those suggested by population projections). Therefore there could be negative impacts on this objective.

7.121. There are expected to be more positives in terms of the economic objectives, compared to option (C). This option is likely to contribute more to economic growth and go further towards meeting the baseline job target through housing growth (note that this jobs target could be achieved through non-housing factors such as reducing out-commuting or increasing the availability of employment land/development).

7.122. Overall, the assessment indicates that Option D represents the point at which the positives begin to plateau, whilst coming at significantly greater environmental cost. The Council's judgment is that a level of 850dpa would represent a level at which the plan would begin materially to infringe upon the AONB and policies in the NPPF which indicate development should be restricted; and also that the adverse effects of meeting the needs (particularly landscape) would significantly and demonstrably outweigh the benefits (housing and jobs).

Option E – 900dpa:

7.123. This option is as positive for Objective 1 as options (C) and (D) in terms of meeting the District's housing need as well as contributing 146dpa towards unmet need arising from neighbouring authorities.

7.124. Due to there being a finite amount of suitable small brownfield sites and suitable greenfield sites within the District, in order for this level of provision to be delivered it is likely that a yet further strategic site would be required compared to option (D). The SHLAA does not indicate that this level of growth could be delivered. Alternatively, it could be met by developing a larger quantity of non-strategic sites compared to options (A), (B), (C) or (D), but again the SHLAA suggests there are not enough suitable/available/achievable sites to

meet this level of provision. The theoretical positive effect on objective 1 would be contingent on further suitable/available/achievable sites being identified – this is highly unlikely with this option.

7.125. As the SHLAA demonstrated that supply would not meet the provision of option (D) without utilising less suitable sites (which, dependant on quantity and location of sites may impact other objectives), this option would be less certain regarding delivery.

7.126. The potential reduction in positive benefits compared to option (C) for the health and education objectives are exacerbated with this option compared to option (D). As the housing provision has increased, need for these services has increased, with less certainty regarding delivery unless new facilities are provided on-site as part of a further strategic allocation. Development of this scale is significantly greater than any levels of past development, which could put a strain on existing infrastructure. A few objectives are predicted to be more negative for this option compared to option (D), both related to infrastructure capacity. Transport and wastewater capacity problems have been highlighted at a lower housing provision than proposed by this option, so the impact is even more negative for this option.

7.127. Major negatives under option (D) remain major negatives for this option.

7.128. Overall, negative impacts very substantially outweigh positive benefits. A number of major negative impacts are predicted which are not outweighed by the any potential positives that could arise from this option.

Option F – 1000+dpa:

7.129. This option is as positive for Objective 1 as options (C), (D), and (E) in terms of meeting the District's housing need as well as contributing over 246dpa towards unmet need arising from neighbouring authorities. However, there is little or no likelihood of 1,000 dpa proving to be deliverable.

7.130. Due to there being a finite amount of suitable small brownfield and greenfield sites within the District, in order for this level of provision to be delivered it is likely that a further strategic site would be required compared to option (E).. The SHLAA shows this is not available. Alternatively, it could be met by developing a larger quantity of non-strategic sites compared to options (A), (B), (C), (D) or (E), although the SHLAA suggests there are not enough suitable/available/achievable sites to meet this level of provision. The positive effect on objective 1 would be contingent on further suitable/available/achievable sites being identified – this is extremely unlikely with this option.

7.131. Many of the major negatives associated with option (E) are a major negative for this option, and would be exacerbated. This option is likely to have more of a negative impact on objective 5 (cohesive communities) compared to other options as the level of development would be far greater than levels experienced in the past which could lead to very high levels of in-migration – this would potentially be an increase in people with no connection to the settlement. Whilst this is not a reason to prevent growth, this could be an issue in smaller settlements which would be required to grow at a rate much greater than in the past, which could change their character and composition.

7.132. Overall, this option shows a high number of 'major negative' impacts across a range of environmental objectives. The negative impacts are not outweighed by positive benefits. A number of major negative impacts are predicted which are not outweighed by major positive impacts. It is extremely unlikely that there will be a supply of housing to match this option, and overall the adverse effects of the option hugely outweigh its benefits.

Housing Provision - Conclusion

7.133. For these reasons, in the light of the criteria, the "key criteria", deliverability issues, and the tests in the NPPF relating to sustainable development, the Council has judged that **Option C** is the preferred option. Delivering 800 units a year will involve substantial greenfield development, and incursion into the AONB, and its adverse effects are therefore quite clear. However, they do not extend to the point where they significantly and demonstrably outweigh the benefits of the Option, and therefore, bearing AONB in particular in mind, Option C best fits with overall sustainability objectives. Options A and B provide too little by way of benefits; Options D to F provide greater benefits, but plateau quite soon, and come at a very greatly increased environmental cost as well as being undeliverable in practical terms. Those options lie on the wrong side of the tests for sustainable development in the NPPF and the Council rejects them.

Preferred Option:	**C**

Distribution of Development – Principles

7.134. Mid Sussex District is a predominantly rural District, with three main towns – Burgess Hill, East Grinstead and Haywards Heath. There is also a good mix of larger and smaller villages/hamlets with their own distinct character and heritage.

Development Distribution

7.135. Housing need will be generated District wide. There is also a need to consider housing need arising from outside the District, as many neighbouring authorities cannot meet their own housing need (see paragraph 7.25). Although the majority of the District's demographic need will be generated from the larger settlements, need for housing will arise from all settlements, and it will be important for them to grow in order to meet their own needs and support local services and facilities.

7.136. The District is made up of three main towns (Burgess Hill, East Grinstead and Haywards Heath), some large villages and a number of smaller villages/hamlets. The District is predominantly rural in nature. Based on the District's character, and in order to best assess where development should be focussed, a number of development distribution 'principles' have been appraised.

Principles of Distribution

Options:

A) Focus development within or adjacent to the three towns only (Burgess Hill, East Grinstead, Haywards Heath), maximising the use of brownfield land where possible, and restricting growth of other settlements.

B) Focus development within or adjacent to the three towns (as Option A) but allows the larger villages with good service provision to take some growth. Smaller villages would only take growth essential to meet local needs.

C) Focus development within or adjacent to the three towns (Burgess Hill, East Grinstead, Haywards Heath), but encourage both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs.

D) Focus development towards areas where housing and economic need is arising, including need arising from outside Mid Sussex. This will predominantly be within or adjacent to the three towns (Burgess Hill, East Grinstead, Haywards Heath), but encourages villages to take growth to support the provision of additional services and meet local needs. It will also focus development at strategic locations that could best assist in meeting the District housing need and the unmet needs of neighbouring authorities.

E) Focus development towards a new settlement.

Objectives		A	B	C	D	E	Summary of Appraisal
Social	**1 –** Decent and Affordable Home	-	+	+	++	-	Option **(a)** would restrict development in the villages, where a housing need exists. Both options **(b)** and **(c)** allow for development in the villages however **(c)** is more specific in allowing growth to provide for local services and to meet local needs. Option **(d)** would go further than **(c)** by being more specific, allowing for growth near to where the need arises. This includes need from outside the

							District. Option **(e)** would contribute to meeting the District's (and other authorities) needs, however is not likely to be meeting that need in the areas where it arises- which could be detrimental to the villages of Mid Sussex in particular.
	2 – Access to Health	**+?**	**+**	**++**	**++**	**+**	All options would encourage housing/employment development which would facilitate increased health facilities to meet the increased demand; however option **(a)** would be more restrictive in allowing for such facilities in village areas. Options **(c)** and **(d)** would encourage growth across the District, whereas option **(e)** would only allow for development in one location, which may not benefit all residents of the District.
	3 – Opportunities for Education	**+?**	**+**	**++**	**++**	**+**	All options would encourage housing/employment development which would facilitate increased education facilities to meet the increased demand; however option **(a)** would be more restrictive in allowing for such facilities in village areas. Options **(c)** and **(d)** would encourage growth across the District, whereas option **(e)** would only allow for development in one location, which may not benefit all residents of the District.
	4 – Access to Retail and Community Facilities	**-?**	**+**	**++**	**++**	**+**	All options would encourage housing/employment development which would facilitate increased retail and community facilities to meet the increased demand; however option **(a)** would be more restrictive in allowing for such facilities in village areas. Options **(c)** and **(d)** would encourage growth across the District, whereas option **(e)** would only allow for development in one location, which may not benefit all residents of the District.
	5 – Crime Resistant Communities	**0**	**0**	**0**	**0**	**0**	The options are not expected to have any impact on this objective.
Environmental	**6 –** Flood Risk	**0**	**0**	**0**	**0**	**0**	The options are not expected to have any impact on this objective.
	7 – Efficient Land Use	**+**	**+?**	**+?**	**+?**	**-**	Focussing development in the three towns would mean development is more likely to occur on previously developed land, and is more likely to be built to higher densities, which is why option **(a)** has the most positive impact. Options **(b)**, **(c)** and **(d)** will be encouraged to use brownfield sites first and higher densities within more urban areas where appropriate, or on strategic site(s). Option **(e)** would require a greenfield/countryside site.
	8 – Conserve and Enhance Biodiversity	**-?**	**-?**	**-**	**-**	**-**	As options **(a)** and **(b)** could focus most development towards towns (including previously developed sites), they may have a lesser negative impact on biodiversity. Options

							(c), (d) and **(e)** are more likely to use greenfield sites.
	9 – Protect and Enhance Countryside	**-?**	**-?**	**-**	**-**	**--**	All options are likely to use countryside sites for development, although options **(a)** and **(b)** may utilise more previously developed land. Option **(e)** would require a large area of countryside and will therefore have significant negative impacts on this objective.
	10 – Protect and Enhance Historic Environment	**0**	**0**	**0**	**0**	**0**	The options are not expected to have any impact on this objective.
	11 – Reduce Road Congestion	**+**	**+?**	**+?**	**+?**	**-**	As option **(a)** focusses development towards towns, where the majority of community, education and retail facilities exist, this may reduce the need to travel by private car and encourage public transport usage. Options **(b), (c)** and **(d)** focus more development to the villages than option **(a),** where public transport is not as frequent or convenient – however development in these areas may improve frequency and reliability as demand for these services rises. Option **(e)** would require a new public transport link (likely to be bus) so it is expected that private car usage will be greater than for the other three options.
	12 – Reduce Waste Generation	**0**	**0**	**0**	**0**	**0**	The options are not expected to have any impact on this objective.
	13 – Maintain and Improve Water Quality	**0**	**0**	**0**	**0**	**0**	The options are not expected to have any impact on this objective.
	14 – Increase Energy Efficiency	**+?**	**+?**	**+?**	**+?**	**+?**	All developments will be encouraged to comply with sustainable resources policies (both local and national) and should therefore impact positively on this objective.
Economic	**15 –** Encourage regeneration of Town and village Centres	**+**	**+**	**++**	**++**	**-**	By focussing development on the towns and larger villages (options **(a)** and **(b)**), this will encourage regeneration of town and village centres. Options **(c)** and **(d)** are likely to have even more of a positive impact as villages of all sizes would be accepting growth to meet local needs (including the needs for retail/community facilities and therefore village centre regeneration). Option **(e)** could be detrimental to existing towns and villages in the District as it would restrict the level of growth in these areas.
	16 – Ensure High and Stable Employment Levels	**+?**	**+**	**++**	**++**	**+**	Option **(a)** would focus development towards the three towns, and would be less likely to provide employment in village areas where a need exists. Option **(b)** would allow for growth in the larger villages as well. Options **(c)** and **(d)** would allow for growth in areas where need arises, and would therefore help provide a workforce close to where the need exists. Option **(e)** would provide an increased

							workforce but this would be located remotely from where the existing workforce exists.
	17 – Support Economic Growth	**+?**	**+**	**+**	**++**	**+**	Option **(a)** would focus development towards the three towns, and would be less likely to provide employment in village areas where a need exists. Options **(b), (c)** and **(e)** will support economic growth by providing new development. However option **(d)** will more likely provide development in areas where need arises.
	18 – Encourage Tourism	**-?**	**+**	**+**	**+**	**+**	Option **(a)** is more restrictive towards development in rural areas, where a large number of tourism related activities exist. All other options would allow for tourism related activities across the District.

Summary of Appraisal:

Focussing development towards the three towns, as per option **(a)** would be detrimental towards the many villages of the District. The villages each have their own housing and employment needs which need to be met and meeting these needs will have positive knock-on effects, as increased development in these areas (at an appropriate scale) can help improve local infrastructure such as health, education and retail/community facilities. It is therefore not surprising that options **(b), (c)** and **(d)** score more positively on the social and economic objectives as it allows for development outside of the towns as well as development in locations that require it most. Option **(e)** would in itself provide such facilities (due to the scale of development) but this may be to the detriment of existing facilities within the District and there would be uncertainty as to whether these facilities would be delivered in the short/medium term.

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

Other Options Considered and not Appraised:
None considered.

Preferred Option:	**D**

Distribution of Development - Broad Locations for Strategic Development

7.137. As the Principles of Distribution appraisal shows, the most sustainable approach is to focus development towards areas in the District where the need arises. This will predominantly focus development towards the three towns – as the towns account for around 60% of the District's population and existing households, these areas are most likely to generate housing need as the population increases or people look to form households. All settlements will generate need regardless of size, and therefore growth proportionate to settlement size will also be expected in order to meet housing needs. Strategic size sites (over around 500 dwellings) may be required in order to meet the housing need of the District, and potentially unmet housing need from neighbouring authorities. Sites of a strategic nature have the benefit of providing infrastructure (education, health, retail and employment) alongside new housing and can be an efficient way of meeting housing need.

7.138. Extensive work was undertaken in the "Capacity of Mid Sussex to Accommodate Development" and "Sustainability Assessment of Cross-Boundary Options" reports, both undertaken by consultants LUC, looking at the capacity of the District for growth. The

Sustainability Assessment of Cross-Boundary Options used the information from the Capacity study to understand the District's capacity for development, and the most likely broad location options for strategic development based on environmental capacity and sustainability considerations – both to meet the District's need, and potentially need arising from neighbouring authorities.

7.139. In addition to meeting Mid Sussex housing need (754dpa), the unmet need from neighbouring authorities is relevant. As explained in para 7.84, the unmet need from Crawley is particularly relevant as it lies adjacent to the District in the north-west and is within the same Housing Market Area. Crawley cannot demonstrate that they can meet their own housing need in full over the plan period; therefore there will be a large amount of need arising from this area, which would impact on Mid Sussex. It may be appropriate for Mid Sussex to assist in meeting this need should it be sustainable to do so.

7.140. At a high level (not accounting for the individual sites/site capacity/need within these areas), the following broad locations for strategic development were assessed within the Sustainability Assessment of Cross-Boundary Options as potential locations for strategic development, based on the findings of the Capacity Study:

A) Around Burgess Hill

B) Around East Grinstead

C) Around Haywards Heath / Lindfield

D) Around Bolney

E) Around Copthorne

F) Around Crawley Down

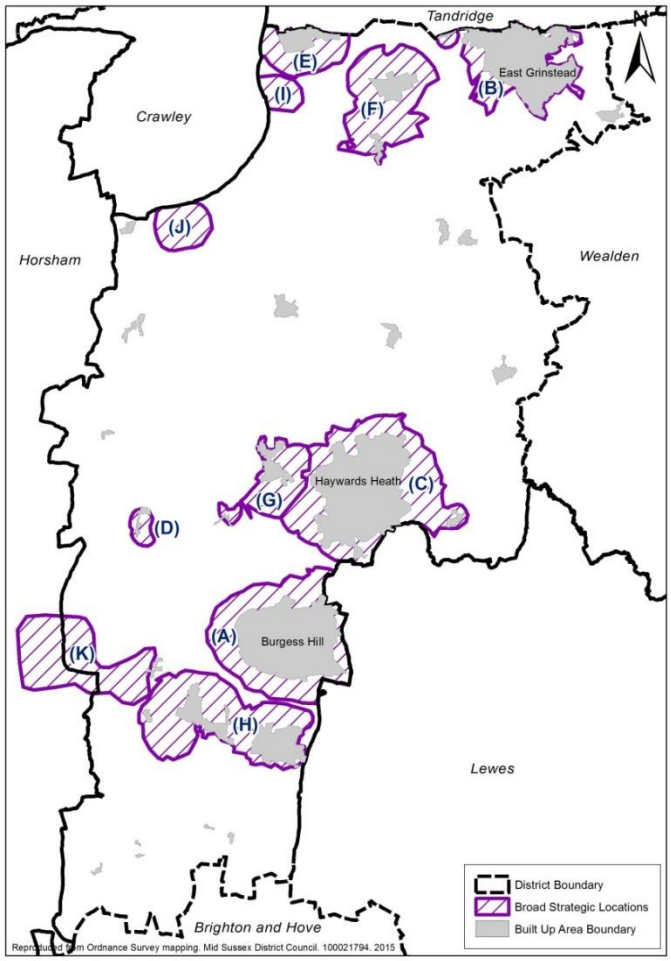
G) Around Cuckfield

H) Around Hurstpierpoint / Hassocks

I) East of Crawley

J) South of Crawley

K) New Settlement / Sayers Common



Broad Strategic Locations

Policy Options:

A) Around Burgess Hill
B) Around East Grinstead
C) Around Haywards Heath / Lindfield
D) Around Bolney
E) Around Copthorne
F) Around Crawley Down
G) Around Cuckfield
H) Around Hurstpierpoint / Hassocks
I) East of Crawley
J) South of Crawley
K) New Settlement / Sayers Common

Policy Option	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
A) BH	+	+	-?	+	+	-	-	-?	-?	0	+?	-?	-?	-?	+	++	+	0
B) EG	+	+	-	+	+	0	-	-?	-?	0	+?	-?	-	-?	+	++	+	0
C) HH	+	+	-?	+	+	-	-	-?	-?	-?	+?	-?	-?	-?	+	++	+	0
D) Bol	+?	+?	-	+?	-	-	-	-?	--	-?	-?	-?	-?	-?	+	+	+	0
E) Cop	+?	+?	-	+?	-	--	-	-?	-?	0	-	-?	-	-?	+	+	+	0
F) CDo	+?	+?	-?	+?	-	0	-	-?	-?	0	-	-?	-	-?	+	+	+	0
G) Cuc	+?	+?	-?	+?	-	0	-	-?	-	-?	-	-?	-?	-?	+	+	+	0
H) Hur	+?	+	-	+	-	-?	--	-?	-	-?	+?	-?	-	-?	+	++	+	0
I) E. Cr	+	+?	-?	+?	+	-	-?	-?	-	0	-	-?	-	-?	+	++	+	0
J) S. Cr	+	+?	-?	+?	+	0	-?	-?	--	0	-	-?	-	-?	+	++	+	0
K) NS	+?	-?	-	-?	-	--	-	-?	0	0	-	-?	-	-?	0	+	+	0

Summary of Appraisal:

Options for strategic development around the three towns (options **(a)**, **(b)** and **(c)**) and around Crawley (options **(I)** and **(J)**) show more positive impacts than other options as they are likely to be better placed to meet housing need where it arises most. Crawley have an unmet need for housing over the plan period, and strategic development adjacent to Crawley would assist in meeting housing need close to where it arises. All options score positively as they propose to deliver housing, however for most options they may be delivering large-scale strategic level housing in areas with lower levels of need.

In terms of access to health, education and retail/community facilities, new strategic development is likely to provide these facilities on site. However, for education and health, this is only where this is supported by the organisation responsible for the management of these services once development is completed (such as the health or education authority). It also cannot be guaranteed that these facilities will be completed and in operation in the early stages of development. It is

generally accepted that it is more sustainable to utilise existing facilities or expand them as opposed to creating new, where possible. Some broad locations do not benefit from existing services (option **(k)**), or there are potential capacity issues – particularly primary education in the south of the District (options **(d)** and **(h)**) and secondary education in East Grinstead (option **(b)**). In terms of retail and community facilities, strategic development adjoining existing town and villages centres can help these existing locations thrive and improve viability. For option **(k)**, this is likely to be of a significant size in a remote location, and may impact on existing nearby centres – in this instance, Hurstpierpoint/Hassocks and Burgess Hill.

Development at, or close to where need arises will help community cohesion, as people are able to form households where they have existing family ties – particularly younger age groups, and can remain in the location they are connected to. It is likely that options **(d), (e), (f), (g), (h)** and **(k)** will provide levels of housing disproportionate to the level of need arising in these areas, which could have negative impacts on community cohesion.

All options contain areas at risk of flooding, aside from options **(b), (f), (g)** and **(j)**. Whilst it is unlikely that development will occur in flood risk areas, any flood risk element will need to be mitigated, which could reduce the amount of developable land available for development in these broad locations.

As all strategic locations are greenfield sites, this will have a negative impact on the objective to make efficient use of land and utilise brownfield sites. However, option **(h)** includes some areas of high quality 'Grade 2' agricultural land. All other options contain large areas of 'Grade 3' agricultural land. Options **(i)** and **(j)** are predominantly non-agricultural or 'Grade 4' (one of the lowest classifications) agricultural land, so the impact of development on these options will be less negative on this objective.

All options are within countryside locations, so score negatively on objective 9. Options **(d)** and **(j)** are located within the High Weald AONB so score more negatively than other options. Options **(g)**, **(h)**, and **(i)** may impact on the High Weald AONB or South Downs National Park due to their location adjacent to these designations.

Due to the quantity of development associated with strategic sites, all options will generate more road traffic. However, the three towns (options **(a), (b)** and **(c)**) and Hassocks (option **(h)**) benefit from regular public transport by bus and are include a train station, which could help reduce the impact of journeys by private car, particularly for commuting.

All options would support economic growth as they would provide an increased workforce to the locality. A strategic site will also include employment generating uses. Options **(a), (b), (c), (h), (i)** and **(j)** would also provide employment nearest to the largest employment areas in the vicinity – notably the three towns, Gatwick and Crawley. Provision of housing near employment use will have knock-on positive sustainability effects for reducing commuting times and using public transport, as well as ensuring people can live and work within or close to the District without having to out-commute.

Overall Conclusion:

All options generally impact positively on the social and economic objectives. Options **(a), (b), (c), (i)** and **(j)** would provide housing that would meet housing need close to where it predominantly arises most – the three towns and Crawley, which has an unmet need for housing over the plan period. It would also provide workforce close to the main employment areas within the locality.

All options generally impact negatively on environmental objectives, as all propose strategic development in countryside locations. This is to be expected, as there is conflict between objectives to provide a large quantity of housing and preserve the countryside (as explained in section 5).

The need for housing and the aim to protect and enhance the countryside will need to be weighed against each other, as per the NPPF. In terms of broad locations for strategic development to meet housing need where it arises (the most sustainable principle for Distribution of Development, appraised above), the most sustainable broad locations are **(a)** – Around Burgess Hill, **(b)** – Around East Grinstead, **(c)** – Around Haywards Heath and **(j)** – South of Crawley.

This, however, is a broad appraisal of the sustainability of these locations. There may be over-riding factors which may limit the amount of development (if any) that occurs at these broad locations such as site specific issues, site supply/promotion, or site deliverability/viability. However, it gives a good indication to the most sustainable options for strategic development.

Strategic Sites

7.141. The housing provision number within the District Plan will be met in part by existing commitments (i.e. sites allocated through the Mid Sussex Local Plan 2004 or Small Scale Housing Allocations DPD, or sites with extant planning permission). The provision will mostly be met by allocating strategic sites within the District Plan. It is anticipated that the residual amount would be allocated within Neighbourhood Plans or a forthcoming Site Allocations DPD (both of which would be accompanied by their own Sustainability Appraisals).

7.142. The Council's Strategic Housing Land Availability Assessment (SHLAA) identifies a number of sites that could potentially be allocated and contribute towards meeting the housing provision number. Sites capable of delivering 6 units and above are identified within the SHLAA. It is intended that smaller sites would come forward through Neighbourhood Plans and the Site Allocations DPD, and that the District Plan should allocate strategic level sites.

7.143. In the context of the District Plan, a site of 500 units and above would be considered a significant size to meet local needs, trigger the need for additional services (at a strategic level) and contribute towards meeting demands across the Housing Market Area. This is an approach that has been agreed by the Northern West Sussex Housing Market Area authorities (Mid Sussex, Crawley and Horsham). Sites that could deliver less than 500 units would be more appropriately delivered through Neighbourhood Plans and future allocations DPD. This is set out more fully in the Strategic Site Selection Paper (2016).

7.144. The SHLAA has identified a number of sites that have potential to deliver 500+ units. These form the basis for the options appraised below. However, some of these sites have been assessed as unsuitable for development, and can therefore be discounted from the appraisal process ('rejected') as they are not considered a reasonable alternative.

7.145. The options appraised are therefore:

- All sites with potential capacity for over 500 units; and
- Fit at least 2 criteria (suitable, available, achievable) in the SHLAA
- Put forward during consultation on previous stages of the District Plan

7.146. Sites capable of delivering less than 500 units are considered potential sites for Neighbourhood Plans and forthcoming Site Allocations DPD and will therefore be appraised in the Sustainability Appraisals that accompany these.

7.147. The majority of the options presented below were appraised at the consultation draft stage. Further site options put forward during the consultations following this stage have been appended where they form a distinctly new option and are considered a reasonable alternative.

7.148. The following sites have been appraised:

A) Land to the North of Burgess Hill (known as the 'Northern Arc') – approx. 3,500 dwellings. SHLAA ref: #493

B) Land to the East of Burgess Hill (East of Kings Way) – approx. 500 dwellings. SHLAA ref: #233

C) Land to the South of Burgess Hill (South of Folders Lane) – approx. 1,000 dwellings SHLAA ref: #557

D) Land to the West of Burgess Hill (West of Jane Murray Way) – approx. 1,500 dwellings. SHLAA ref: #740

E) Land to East/South of Crawley (Crabbet Park) – approx. 2,300 dwellings. SHLAA ref: #18

F) New Market Town (Sayers Common area) – approx. 10,000 dwellings. SHLAA ref: #678

G) Land North of Cuckfield Bypass (Cuckfield) – approx. 500 dwellings. SHLAA ref: #240

H) Land adj. Great Harwood Farm (East Grinstead) – approx. 600 dwellings. SHLAA ref: #17

I) Land north east of Lindfield (Lindfield) – approx. 1,200 dwellings. SHLAA ref: #498

J) Land east of Northlands Brook and south of Scamps Hill (Lindfield) – approx. 500 dwellings. SHLAA ref: #483

K) Haywards Heath Golf Course (Haywards Heath) – approx. 500 dwellings. SHLAA ref: #503

L) Eastlands, Lewes Road (Scaynes Hill) – approx. 630 dwellings. SHLAA ref: #515

M) Hardriding Farm, Brighton Road (Pease Pottage) – approx. 600 dwellings. SHLAA ref: #666

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

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

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

Q) Imberhorne Farm, East Grinstead – approx. 550 dwellings. SHLAA ref: #770

Note: Since the original Sustainability Appraisal was first published in November 2014, further information regarding two sites has emerged (either via pre-application, planning application, or consultation responses to the District Plan. The following sites are now proposed with reduced yields. They therefore do not meet the definition of 'strategic' but the appraisals are still published here for completeness:

- **C)** Land to the South of Burgess Hill (Keymer Road / Folders Lane). 80 dwellings.
- **J)** Land East of Northlands Brook and south of Scamps Hill, Lindfield. 200 dwellings.

Objectives		A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
		Northern Arc, Burgess Hill	Kings Way, Burgess Hill	South of Folders Lane, Burgess Hill	West of Burgess Hill	Crabbet Park, East/South Crawley	New Market Town, Sayers Common	North or Cuckfield Bypass	Great Harwoods Farm, E. Grinstead	Land North East of Lindfield	Northlands Brook/Scamps Hill, Lindfield	Haywards Heath Golf Course	Eastlands, Scaynes Hill	Hardriding Farm, Pease Pottage	Land South of Pease Pottage	Land at Lower Tilgate, Pease Pottage	Broad Location North and East of Ansty	Imberhorne Lane, East Grinstead
Social	**1 –** Decent and Affordable Home	++	+	+	+?	+?	+	+	+	+	+	+	+	+	+	+	+?	+

All options could potentially contribute towards meeting local needs by delivering housing, including affordable need.

Option **(a)** could deliver a significant proportion towards meeting local need, including a number of units in the short-term (first 5 years). Options **(b)** and **(c)** could also potentially contribute towards meeting housing need at a smaller scale although option **(c)** would require transport mitigation to ensure it was deliverable. Whilst options **(d)** and **(e)** could potentially contribute to meeting housing need, there are issues regarding delivery. Option **(d)** would require significant sewerage and highways improvements, and it is unclear whether these costs would make a scheme here viable. Option **(e)** would also require significant sewerage and highways improvements, and at this point in time is not being actively promoted, meaning it is uncertain whether this site will be brought forward in the short-medium term.

Whilst option **(f)** could deliver a significant amount of housing, it would not be located where current housing need arises. It would almost meet the District's housing need in one location, which is not sustainable (see Distribution of Development – paras 7.2-7.4). Significant infrastructure improvements would be required due to its location and scale.

Options **(g), (h), (i), (j), (k), (l), (m), (n)** and **(o)** are all available and achievable within the SHLAA, and could contribute towards meeting housing need at a smaller scale, however they are not considered to be suitable. This is reflected in other objectives within this appraisal.

Option **(p)** could contribute towards meeting housing need; however there is a lack of information evidencing that this site is deliverable within the plan period. Its impact should be considered in combination with option **(a)** which is in the vicinity, which is shown as suitable/available/achievable and therefore deliverable within the plan period. Option **(q)** requires further evidence on its impact on the strategic road network, as the area suffers from highways issues.

		A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
	2 – Access to Health	++	+	+	+	+?	+?	+	+?	+	+	+?	+?	+?	-	+?	+?	+?

Option **(a)** is within an average 15 minutes walking time from existing health facilities, and is likely to provide new facilities on site. It will therefore have a significant positive impact on this objective. Options **(b)**, **(c)** and **(d)** are within an average 15 minutes walking time from existing health facilities and could contribute towards extending/enhancing existing facilities. Option **(e)** is remote from existing facilities, although is likely to be of a size that could provide new facilities on site.

Option **(f)** is remote from existing facilities, although is likely to be of a size that could provide new facilities on site. Options **(g)**, **(i)** and **(j)** are within an average 15 minutes walking time from existing health facilities and could contribute towards extending/enhancing

existing facilities. Options **(h), (k), (l)** and **(q)** are an approximate 20 minute walk to existing health facilities which, although still in close proximity to existing services, is not as accessible as other options.

Option **(m)** proposes a health facility (hospice) on-site. Option **(n)** is remote from existing health facilities and may not be of a significant size that would allow for provision of new services on site. Options **(o)** and **(p)** are remote from existing facilities, although is likely to be of a size that could provide new facilities on site. Options **(m)** and **(o)** could also use facilities in nearby Crawley Borough however these are not within feasible walking distance due to segregation by the A23/M23.

3 – Opportunities for Education

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
++	+	+	+	+?	++	+	+?	+?	+?	+?	+?	+?	+?	+?	+?	+

Option **(a)** is within an average 15 minutes walking time from existing education facilities, and is likely to provide new facilities on site. It will therefore have a significant positive impact on this objective. Options **(b)**, **(c)** and **(d)** are within an average 15 minutes walking time from existing education facilities and could contribute towards extending/enhancing existing facilities. Option **(e)** is remote from existing facilities, although is likely to be of a size that could provide new facilities on site.

Option **(f)** is within an average 15 minutes walking time from existing education facilities although these are close to or at capacity. This option would provide new facilities on site. Option **(g)** is within an average 15 minutes walking time from existing education facilities and could contribute towards extending/enhancing existing facilities. Options **(h)** and **(k)** are an approximate 20 minute walk to existing education facilities which, although still in close proximity to existing services, is not as accessible as other options. Options **(i)** and **(j)** are within an average 15 minutes walking time from existing education facilities although these are close to or at capacity.

Option **(l)** is within an average 15 minutes walking time from existing education facilities although these are close to or at capacity. Options **(m), (n), (o)** and **(p)** are remote from existing facilities, although are likely to be of a size that could provide new facilities on site – option **(m)** in particular proposes new education facilities on-site. Options **(m)** and **(o)** could also use facilities in nearby Crawley Borough however these are not within feasible walking distance due to segregation by the A23/M23. Option **(q)** includes Imberhorne Upper School on site – development of option **(q)** would facilitate consolidation of Imberhorne School onto a single site at Imberhorne Lane.

4 – Access to Retail and Community Facilities

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
+	+	+	+	-?	+?	+	+	+	+	+	-?	+?	-?	-?	+?	+

Option **(a)** is within an average 20 minute walk from Burgess Hill town centre, however is likely to provide retail and community facilities on site. Options **(b)**, **(c)** and **(d)** are within an average 15 minutes walking time from existing retail and community facilities in the town centre and could encourage improved facilities. Option **(e)** is remote from existing facilities, although is likely to be of a size that could provide new facilities on site although not to the same standard and range of facilities that can be expected in existing town/village centres.

Option **(f)** is remote from existing retail facilities, both town centre and out of town shopping areas, however it could provide facilities on site. Options **(g)**, **(h), (i)** and **(j)** are within an average 15 minutes walking time to existing retail and community facilities within town/village centres (Haywards Heath, East Grinstead and Lindfield respectively) and could encourage improved facilities.

Options **(k)** and **(q)** are within an average 15 minutes walking time from existing retail and community facilities in Haywards Heath / East Grinstead town centres respectively and could encourage improved facilities. Options **(l), (m), (n)** and **(o)** are remote from existing retail

		and community facilities although could be of a size that encourage or provide limited facilities on site although not to the same standard and range of facilities that can be expected in town/village centres – option **(m)** is proposing community facilities (community building with meetings, café and retail) on site. Option **(p)** is within an average 20 minutes walking time from existing retail and community facilities in Cuckfield, although there are limited services compared to nearby towns such as Haywards Heath it is expected that this option would provide facilities on site. Options **(m)** and **(o)** could use facilities in nearby Crawley Borough however these are not within feasible walking distance due to segregation by the A23/M23.
	5 – Cohesive, Safe, Crime Resistant Communities	**A B C D E F G H I J K L M N O P Q** **+ + + + -? - + + -? +? + +? -? -? -? -? +** Options **(a), (b), (c)** and **(d)** would help ensure a cohesive community by providing housing close to where the need arises from. Option **(e)** is remote from existing communities and would therefore impact less positively on this objective. Option **(f)** is remote from existing communities and would therefore impact less positively on this objective. It is likely to attract more people from outside of the District due to its size, so would not provide housing in the area where need arises, limiting community cohesion. Options **(g)** and **(h)** would help ensure a cohesive community by providing housing close to where the need arises from. Option **(i)** would be of a size potentially too big for the village, limiting community cohesion. Option **(j)** may have more limited opportunities for community cohesion due to its location. Options **(k)** and **(q)** would help ensure a cohesive community by providing housing close to where the need arises from. Option **(l)** may have more limited opportunities for community cohesion due to its location. Options **(m), (n), (o)** and **(p)** are remote from existing communities and would therefore impact less positively on this objective. Option **(p)** would be promoting development at a scale that is potentially too big for the village, limiting community cohesion.
Environmental	**6 –** Flood Risk	**A B C D E F G H I J K L M N O P Q** **-? 0 0 -? -? - 0 -? - -? 0 0 0 0 0 - 0** Options **(a), (d),(e), (h) and (j)** all contain areas identified as being at risk from flooding. Whilst development would not take place in designated Flood Risk zones 2 and 3 (and appropriate buffers), further mitigation may be required. Any issues would be identified through the Flood Risk Sequential Test. Options **(f)**, **(i)** and **(p)** contain significant areas identified as being at risk from flooding. Whilst development would not take place in designated Flood Risk zones 2 and 3 (and appropriate buffers), further mitigation may be required. An area of Flood Risk zones 2 and 3 lie adjacent to option **(o)**. There are no anticipated flood risk issues arising from options **(b), (c), (g), (k), (l), (m), (n)** or **(q)**.
	7 – Efficient Land Use	**A B C D E F G H I J K L M N O P Q** **-- -- -- -- -- -- -- -- -- -- -- -- -- -- -- -- --** All options would require significant amounts of previously undeveloped (greenfield) land and would therefore have severe negative impacts on this objective.
	8 – Conserve and	**A B C D E F G H I J K L M N O P Q**

	Enhance Biodiversity	-	+?	0	-?	-	-?	0	-	-	0	-	-	-	-	-	-	-?
		Option **(a)** contains several areas of designated ancient woodland, contains part of the Bedelands SNCI and is adjacent to the Great Wood and Copyhold Hanger SNCI. Option **(b)** is adjacent to the Ditchling Common SSSI. The site proponents have worked on a scheme to improve this area, which could enhance and safeguard the SSSI and therefore could lead to positive impacts on this objective. No formal designations exist for option **(c)**. Options **(d)**,**(e)** and **(f)** contain small areas of ancient woodland. Whist these would be retained and buffered, they could suffer from degradation as a result of disturbance from increased usage. The southern part of option (e) also lies adjacent to the Oaken Wood, Stony Plats and High Lanes SNCI. No formal designations exist for option **(g)** and **(j).** Option **(h)** contains significant areas of ancient woodland – the location of this would mean it is difficult to gain access to some areas of the site without causing significant disturbance. Part of option **(i)** includes the Eastern Road Local Nature Reserve. Development here would impact negatively on the nature reserve. Option **(k)** lies adjacent to significant amounts of ancient woodland, and the Wickham Woods SNCI. Option (l) lies adjacent to the Costells, Henfield and Nashgill Woods SNCI as well as ancient woodland. Options **(m), (n)**, **(o)** and **(p)** contain significant amounts of ancient woodland. Whist these would be retained and buffered, it could suffer from degradation as a result of disturbance from increased usage. Option **(q)** contains small areas of ancient woodland. Whist this would be retained and buffered, it could suffer from degradation as a result of disturbance from increased usage.																	
	9 – Protect and Enhance Countryside	**A**	**B**	**C**	**D**	**E**	**F**	**G**	**H**	**I**	**J**	**K**	**L**	**M**	**N**	**O**	**P**	**Q**
		-	-	-?	0	-	-?	-	--	-	-?	-?	-	--	--	--	-	0
		All options have potential to have a negative impact on this objective as all sites are located within areas designated as countryside. The impact will be largely dependent on designations, landscape quality, character and capacity. The SHLAA assesses the impact each site would have on landscape using the LUC 'Capacity Study'. Sites deemed to be unsuitable in landscape terms were subject to a focused landscape review to see whether there was any potential for development. Sites (a) and (b) have low/medium potential for development in landscape terms. Site (c) has medium landscape potential, however is in proximity to the South Downs National Park – development here would have to respect its setting. Site (d) has high capacity for development in landscape terms, which may negate any potential negative impacts. Site (e) has low/medium potential for development in landscape terms, however is partly within the High Weald AONB. Site (f) has medium potential for development in landscape terms in terms of overall capacity/suitability/yield. Sites (g) and (i) have low/medium potential for development, although site (i) is within proximity of the High Weald AONB. Site (h) has low/medium landscape potential, and is wholly within the High Weald AONB. Site (j) has medium landscape potential, (k) has medium/high landscape potential however is within proximity of the High Weald AONB. Site (l) has low/medium potential for development in landscape terms. Options (m) and (n) are both wholly within the High Weald AONB, however have been assessed as having medium potential in landscape terms in terms of overall capacity/suitability/yield. Option (o) is also wholly within the AONB, but has been assessed as having low/medium landscape potential (as well as negligible landscape capacity). Site (p) has low/medium potential for development in landscape terms, however is partly within the High Weald AONB. Site (q) has medium/high capacity for development in landscape terms, which may negate any potential negative impacts.																

	10 – Protect and Enhance Historic Environment	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
		-?	-?	-?	-?	-?	-	--	-?	--	0	0	0	0	0	0	-?	-?
		Options **(a), (b), (c)**,**(d)** and **(e)** are located in proximity of listed buildings, and development here could have an impact upon their setting. Option **(f)** has a number of listed buildings within the site boundary; development here would have an impact upon their setting. Options **(g)** and **(i)** are both located adjacent to conservation areas, containing a number of listed buildings. Development here would therefore have a severe impact on both the conservation area and setting of listed buildings. Option **(h)** is located in proximity of listed buildings, and development here could have an impact upon their setting. There are no historic environment designations that will be impacted by options **(j), (k), (l), (m), (n) or (o)**.. Options **(p)** and **(q)** are located in proximity of listed buildings, and development here could have an impact upon their setting.																
	11 – Reduce Road Congestion	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
		+?	+?	-	+?	-	--	-	--	+?	+?	+?	-?	-	-	-	-	--
		Options **(a), (b), (c)** and **(d)** are within reasonable walking distance of frequent public transport (bus and/or train) which could reduce the number of journeys undertaken by private car. The Mid Sussex Transport Study has indicated option **(a)** as having potential impact on the road network but mitigation is suggested (and planned for) as part of the scheme. Option **(c)**, in combination with option **(b)** which already has outline planning permission, would cause network congestion on Folders Lane, Burgess Hill. Significant highways and transport mitigation would be required. Option **(e)** is remote from public transport facilities, and remote from essential services, so most journeys are likely to take place using private car. Option **(f)** is remote from public transport facilities, and remote from essential services, so most journeys are likely to take place using private car. It will not be possible to improve rail transport links, and (dependant on precise location) may have significant impact on A23 junctions. Option **(g)** may increase congestion on Butlers Green Road, Haywards Heath – this link has been identified in the Mid Sussex Transport Study as experiencing potential future network problems. Options **(h), (i)**, **(j)** and **(k)** are within reasonable walking distance from public transport facilities, which may reduce the number of journeys by private car. However, there are severe transport constraints within East Grinstead which is likely to limit the amount of strategic development that would be appropriate within the town unless significant mitigation is proposed. Options **(h)** and **(q)** are therefore likely to have a significant negative impact on this objective. Option **(l)** is served by irregular frequency bus transport, but is otherwise remote from public transport facilities. Options **(m), (n)** and **(o)** are remote from public transport facilities, and remote from essential services, so most journeys are likely to take place using private car. These options are likely to impact on the A/M23 junction which is close to capacity; mitigation is likely to be required. Option **(p)** is remote from public transport facilities.																
	12 – Reduce Waste Generation	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
		All options are going to impact on the amount of waste generated, both during construction stage and household waste generated once occupied. This could be mitigated by a sustainable resource use policy. All developments will benefit from the District Council's kerbside recycling facility.																

		A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
	13 – Maintain and Improve Water Quality	-?	-?	-?	-?	-	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?
		An increase in housing and business development will increase water usage, so all options are likely to impact negatively on this objective. Site specific constraints have been identified with option **(e)** – this is related to sewerage capacity at the Crawley Treatment Works and the developments already programmed for this area (both within Crawley and Horsham Districts). This situation may be resolved in the longer term.																
	14 – Increase Energy Efficiency	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
		+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?
		All options should seek to use renewable energy sources, and would be constructed using sustainable construction techniques – including compliance with Building Regulations. This could have a positive impact on this objective.																
Economic	**15 –** Encourage regeneration of Town and village Centres	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
		++	+	+	+	-	--	+?	+?	+	+	+	+	+?	+?	-	-	+?
		Option **(a)** will encourage regeneration of the town centre by increase footfall, and be a driver for new town centre retail/community/entertainment uses (a scheme has been approved). Options **(b), (c)** and **(d)** would do the same, but to a lesser extent due to their size. Option **(e)** is remote from existing town and village centres within Mid Sussex, and is therefore expected to impact negatively on this objective. Option **(f)** is remote from existing town and village centres within Mid Sussex. The size of this development would mean new retail/community/entertainment facilities are likely to be developed on-site, which would be to the detriment of existing towns and villages in the District. Options **(g)** and **(h)** are relatively remote from existing centres however could encourage regeneration of Cuckfield and East Grinstead respectively. Options **(i)** and **(j)** could increase demand for facilities in Lindfield and maintain or improve the number/quality of retail facilities in the village centre. Options **(k)** and **(l)** could increase demand for facilities in Haywards Heath/Lindfield and Scaynes Hill respectively and maintain or improve the number/quality of retail facilities in the village centres. Options **(o)** and the majority of option **(p)** are remote from existing town and village centres within Mid Sussex, and are therefore expected to impact negatively on this objective. Options **(m)** and **(n)** may encourage regeneration of Pease Pottage. Options **(q)** could increase demand for facilities in East Grinstead and maintain or improve the number/quality of retail facilities in the town centre.																	
	16 – Ensure High and Stable Employment Levels	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
		++	+	+	+	+?	+	+	+	+	+	+	+	+	+	+	+	+
		All options would have a positive impact on this objective by increasing the potential workforce and assisting people to live and work in Mid Sussex. The positive impact is likely to vary based on the size of each site. Option **(a)** in particular proposes a significant amount of business floorspace as part of the proposal. Option **(e),** whilst providing an increased workforce, may result in the loss of existing employment land on-site. The workforce generated from this site are more likely to be seeking jobs in nearby Crawley as opposed to within Mid Sussex. Whilst option **(f)** would increase the overall workforce, and provide significant employment floor space on site, this is likely to increase in-																	

		commuting in comparison to other options due to its location and size, which could limit its potential positive impact dependant on the type of employment offered on site.

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
17 – Support Economic Growth	++	+	+	+	-?	+	+	+	+	+	-?	+	+	+	+	+	+

Development of options **(a)** in particular would support economic growth, as it proposes business floor spaces as part of the scheme. Option **(e)** may result in the loss of existing business floor space on site. Options **(b), (c)**, **(d), (f), (g), (h), (i)** and **(j)** would aid the viability of existing businesses and secure new businesses in the area.

Development of Option **(k)** would result in the loss of a well-established golf course, therefore could impact jobs and the local economy. Development of options **(l), (m), (n)**, **(o)**, **(p)** and **(q)** would aid the viability of existing businesses within Mid Sussex, and help secure new businesses in the area.

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
18 – Encourage Tourism	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

It is not likely that these options will have any direct impact on this objective.

Summary of Strategic Site Appraisals

	Objectives	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q
		Land to the North of Burgess Hill (known as the 'Northern Arc')	Land to the East of Burgess Hill (East of Kings Way)	Land to the South of Burgess Hill (South of Folders Lane)	Land to the West of Burgess Hill (West of Jane Murray Way)	Land to East/ South of Crawley (Crabbet Park)	New Market Town (Sayers Common area)	Land North of Cuckfield Bypass (Cuckfield)	Land adj. Great Harwood Farm (East Grinstead)	Land north east of Lindfield (Lindfield)	Land east of Northlands Brook and south of Scamps Hill (Lindfield)	Haywards Heath Golf Course (Haywards Heath)	Eastlands, Lewes Road (Scaynes Hill)	Hardriding Farm, Brighton Road (Pease Pottage)	Land South of Pease Pottage (Pease Pottage)	Land at Lower Tilgate (Pease Pottage)	Broad location North and East of Ansty	Imberhorne Lane, East Grinstead
Social	**1 –** Decent and Affordable Home	++	+	+	+?	+?	+	+	+	+	+	+	+	+	+	+	+?	+
Social	**2 –** Access to Health	++	+	+	+	+?	+?	+	+?	+	+	+?	+?	+?	-	+?	+?	+?
Social	**3 –** Opportunities for Education	++	+	+	+	+?	++	+	+?	+?	+?	+?	+?	+?	+?	+?	+?	+
Social	**4 –** Access to Retail and Community Facilities	+	+	+	+	-?	+?	+	+	+	+	+	-?	+?	-?	-?	+?	+
Social	**5 –** Cohesive, Safe, Crime Resistant Communities	+	+	+	+	-?	-	+	+	-?	+?	+	+?	-?	-?	-?	-?	+
Environmental	**6 –** Flood Risk	-?	0	0	-?	-?	-	0	-?	-	-?	0	0	0	0	0	-	0
Environmental	**7 –** Efficient Land Use	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
Environmental	**8 –** Conserve and Enhance Biodiversity	-	+?	0	-?	-	-?	0	-	-	0	-	-	-	-	-	-	-?
Environmental	**9 –** Protect and Enhance Countryside	-	-	-?	0	-	-?	-	--	-	-?	-?	-	--	--	--	-	0
Environmental	**10 –** Protect and Enhance Historic Environment	-?	-?	-?	-?	-?	-	--	-?	--	0	0	0	0	0	0	-?	-?
Environmental	**11 –** Reduce Road Congestion	+?	+?	-	+?	-	--	-	--	+?	+?	+?	-?	-	-	-	-	--
Environmental	**12 –** Reduce Waste Generation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	13 – Maintain and Improve Water Quality	-?	-?	-?	-?	-	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?
	14 – Increase Energy Efficiency	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?	+?
Economic	**15 –** Encourage regeneration of Town and village Centres	++	+	+	+	-	--	+?	+?	+	+	+	+	+?	+?	-	-	+?
	16 – Ensure High and Stable Employment Levels	++	+	+	+	+?	+	+	+	+	+	+	+	+	+	+	+	+
	17 – Support Economic Growth	++	+	+	+	-?	+	+	+	+	+	-?	+	+	+	+	+	+
	18 – Encourage Tourism	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

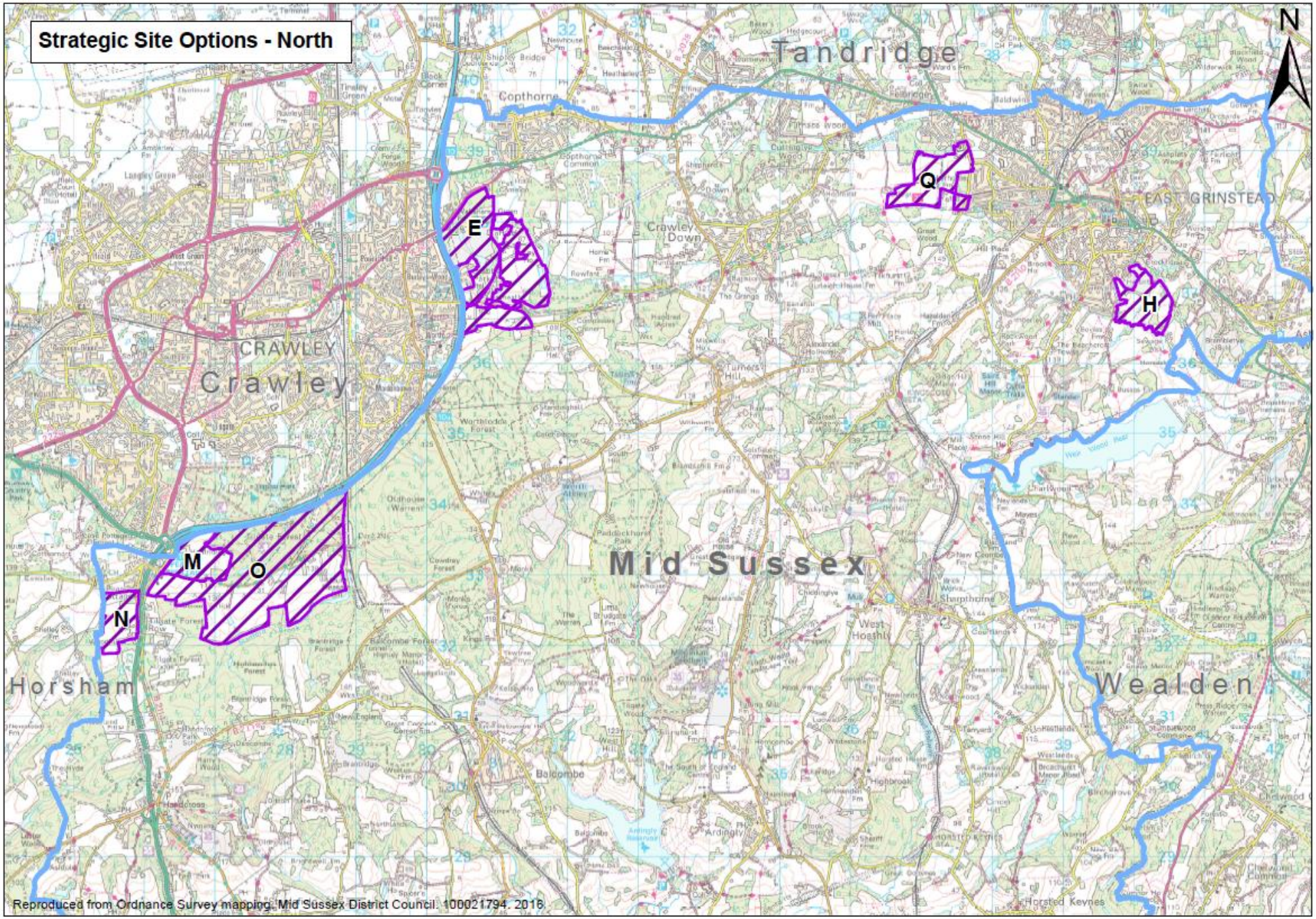
Summary of Appraisal:

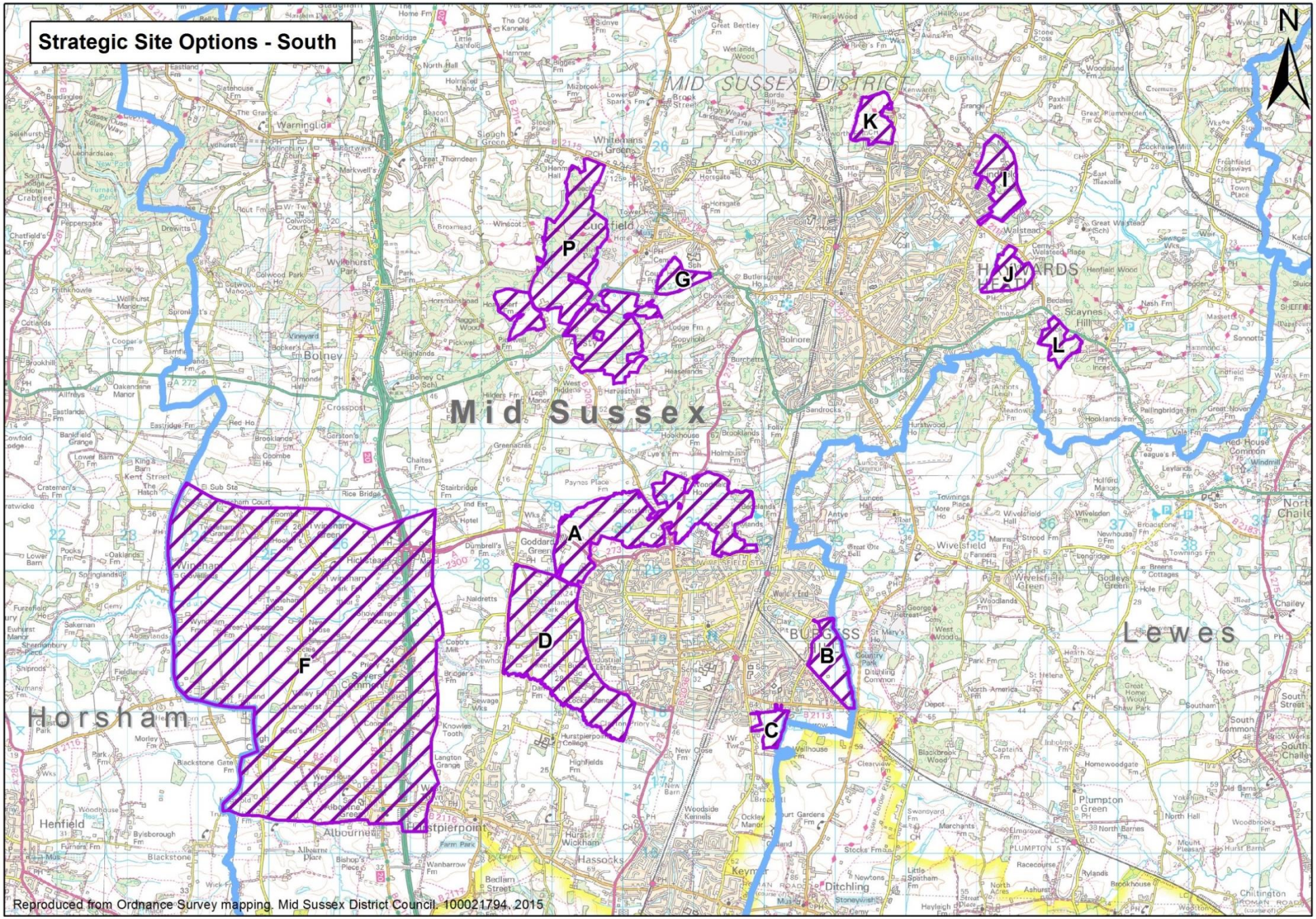
As all options are seeking to provide housing, which has secondary impacts on other community infrastructure (education, health, retail, and community facilities) it is unsurprising that the majority of the options are generally expected to have positive impacts on the social objectives. There are a few exceptions however- it is uncertain whether options **(d)**, **(e)** and **(p)** are deliverable within the plan period and therefore their effects are limited. Whilst a number of the options could potentially contribute to meeting housing need in Mid Sussex, a number are not considered to be suitable for development within the SHLAA, generally for environmental reasons. Therefore, any positive effects on social objectives are very likely to be counter-acted by negative impacts on environmental objectives.

Overall, there are generally negative impacts on the environmental objectives. This is no surprise, as the exercise carried out in section 5 highlighted that, for housing objectives, there is a conflict with environmental protection objectives due to the opposing nature of these objectives. There are, however, some potential positive impacts to be expected, particularly from site **(b).** There are some severe negative impacts expected to arise from sites **(g), (i)** and **(o)** which could not be mitigated easily.

All options aside from **(e), (f), (o)** and **(p)** are expected to have a generally positive impact on the economic objectives. This is because all other options are likely to provide a workforce (and in some cases, employment land) and ensure high and stable employment levels. There are expected to be negative impacts from **(e), (f), (o)** and **(p)** predominantly due to their location – these sites may be to the detriment of existing towns and villages of Mid Sussex by providing a workforce/employment opportunities away from these areas, where a need exists. This may, in turn, discourage regeneration of town and village centres within the District.

Overall, sites **(a)** and **(b)** are the most sustainable sites over all objectives, predominantly because of their positive impact on the social and economic objectives in comparison to other options and negative impacts on environmental impacts no worse than other options, and in some cases can be mitigated.


Strategic Site Options - North
N
Tandridge
Copthorne
Crawley Down
EAST GRINSTEAD
CRAWLEY
Crawley
Mid Sussex
Horsham
Wealden
E
Q
H
M
O
N
Reproduced from Ordnance Survey mapping. Mid Sussex District Council. 100021794. 2016


Strategic Site Options - South
N
A
B
C
D
F
G
I
J
K
L
P
Mid Sussex
Horsham
Lewes
MID SUSSEX DISTRICT
Reproduced from Ordnance Survey mapping. Mid Sussex District Council. 100021794. 2015

Sustainability Hierarchy of Settlements

7.149. Work has been undertaken on a "Settlement Sustainability Review". The aim of this piece of work was to provide the evidence on the role of each settlement in terms of its facilities and services in order to determine a hierarchy of settlements based on their relative sustainability. This hierarchy can then be used in order to guide development to the most sustainable settlements.

7.150. The Settlement Sustainability Review identified 5 categories of settlement:

Category	Settlement characteristics and function	Settlements
Category 1 Settlement	Settlement with a comprehensive range of employment, retail, health, education leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the smaller settlements.	Burgess Hill, East Grinstead, Haywards Heath
Category 2 Settlement	Larger villages acting as Local Service Centres providing key services in the rural area of Mid Sussex. These settlements serve the wider hinterland and benefit from a good range of services and facilities, including employment opportunities and access to public transport.	Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint and Lindfield
Category 3 Settlement	Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops recreation and community facilities, often shared with neighbouring settlements.	Albourne, Ardingly, Ashurst Wood, Balcombe, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill and West Hoathly
Category 4 Settlement	Small villages with limited services often only serving the settlement itself.	Ansty, Slaugham, Staplefield, Twineham and Warninglid
Category 5	These small settlements have very limited or no services.	Birch Grove, Brook Street, Hickstead, Highbrook, Walstead

Table 33 - Settlement Categories

7.151. Each settlement has been appraised against the Sustainability Objectives in order to confirm the hierarchy, and also to account for other sustainability factors that were not subject to the Settlement Sustainability Review work.

Settlement Hierarchy

All

Settlements:

1) Burgess Hill
2) East Grinstead
3) Haywards Heath
4) Albourne
5) Ansty
6) Ardingly
7) Ashurst Wood
8) Balcombe
9) Birch Grove
10) Bolney
11) Brook Street
12) Copthorne
13) Crawley Down
14) Cuckfield
15) Handcross
16) Hassocks and Keymer
17) Hickstead
18) Highbrook
19) Horsted Keynes
20) Hurstpierpoint
21) Lindfield
22) Pease Pottage
23) Sayers Common
24) Scaynes Hill
25) Sharpthorne
26) Slaugham
27) Staplefield
28) Turners Hill
29) Twineham
30) Walstead
31) Warninglid
32) West Hoathly

Settlement	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
1 BH	++	++	++	++	+	-?	+?	-?	-?	-?	+	0	0	0	++	++	++	+
2 EG	++	++	++	++	+	-?	+?	-?	-	-?	-?	0	0	0	++	++	++	++
3 HH	++	++	++	++	+	-?	+?	-?	-?	-?	+	0	0	0	++	++	++	+
4 Al	+?	0	++	+	+	0	-	0	-?	-?	+?	0	0	0	+	+	+	+
5 An	+?	0	0	+	+	0	-	0	-?	-?	-?	0	0	0	0	+	+	+
6 Ar	+?	0	++	+	+	0	-	0	-	-?	+?	0	0	0	+	+	+	++
7 Aw	+?	0	++	+	+	0	-	-?	-	0	+?	0	0	0	+	+	+	+
8 Ba	+?	++	++	+	+	-?	-	-?	-	-?	+	0	0	0	+	+	+	+
9 BG	-	0	0	0	+?	0	-	0	--	0	0	0	0	0	0	0	0	0
10 Bo	+?	+	++	+	+	-?	-	0	-?	-?	+?	0	0	0	+	+	+	+
11 Br	-	0	0	0	+?	0	-	0	--	0	0	0	0	0	0	0	0	0
12 Co	+	++	++	++	+	-	+?	-?	-?	0	-?	0	0	0	++	+	+	+
13 CD	+	++	++	++	+	-?	+?	-?	-?	0	+?	0	0	0	++	+	+	+
14 Cu	+	++	++	++	+	-?	-	0	-?	-?	+?	0	0	0	++	+	+	+
15 Ha	+?	++	++	++	+	0	-	-?	-	-?	+?	0	0	0	++	+	+	+
16 HK	+	++	++	++	+	-	+?	-?	-?	-?	+?	0	0	0	++	+	+	+
17 Hi	-	0	+	-?	+?	-	-	0	--	0	0	0	0	0	0	0	0	0
18 Hb	-	0	0	0	+?	0	-	0	--	0	0	0	0	0	0	0	0	0
19 Ho	+?	0	++	+	+	-?	-	0	-	-?	+?	0	0	0	+	+	+	++
20Hu	+	++	++	++	+	-?	+?	0	-?	-?	+?	0	0	0	++	+	+	+
21 Li	+	++	++	++	+	-	+?	-?	-?	-?	+?	0	0	0	++	+	+	+
22 PP	+?	0	0	+	+	0	-	0	-	0	0	0	0	0	+	+	+	+
23 SC	+?	0	+?	+	+	-	-	0	-?	0	0	0	0	0	0	+	+	+
24 SH	+?	0	++	+	+	0	-	-?	-?	0	+?	0	0	0	+	+	+	+

25 Sha	+?	+?	+	+	+	-?	-	0	-	0	0	0	0	0	+	+	+	+
26 Sl	-	0	0	0	+	0	-	-?	--	0	0	0	0	0	0	+	+	+
27 St	-	0	++	0	+	-?	-	0	--	0	0	0	0	0	0	+	+	+
28 TH	+?	++	++	+	+	0	-	-?	-?	-?	+?	0	0	0	+	+	+	+
29 Tw	-?	0	++	0	+	-	-	0	--	0	+?	0	0	0	0	+	+	+
30 Wa	-	0	++	-?	+?	-	-	0	--	0	0	0	0	0	0	0	0	0
31 Wd	-?	+	0	0	+	-	-	0	-	0	+?	0	0	0	0	+	+	+
32 WH	+?	+	++	+?	+	-	-	0	-	-?	+?	0	0	0	+	+	+	+

Summary of Appraisal:

Mid Sussex contains three large towns (Burgess Hill, East Grinstead and Haywards Heath), a number of larger villages, smaller villages and hamlets. This is largely reflected in the appraisal undertaken.

There are a number of predicted positive effects under the social objectives. In general, and as noted in section 3 of this report, most areas of the District have reasonable access to health facilities, although there are some pockets of the District that rely on services provided in neighbouring towns/villages. Access to education is better, with most villages including at least one primary school within 15 minutes' walk, and most settlements have access to retail and community facilities either within their settlement or provided elsewhere – although greater choice of retail facilities only exist in the towns and larger villages in general. All settlements score generally positively for economic objectives, as all have the possibility of increasing population to sustain economic growth and provide an increased workforce.

Unsurprisingly, there are a number of potential negative effects predicted under the environmental objectives. This reflects the generally rural, constrained nature of the District as demonstrated in the Capacity Study. Impacts on the environmental objectives are generally less negative for the larger settlements. There are significant negative effects predicted for settlements that do not have a built-up area boundary, as any development will be within an area of development restraint which could have knock-on effects for the provision of facilities.

Any development will need to balance the negative environmental impacts against the predicted positive impacts for social and economic objectives. This will be particularly important for household and employment development to meet local needs.

Conclusion:

The overall appraisal accords with the overall findings within the Settlement Sustainability Review. This is unsurprising as both are using the same source data and assessing overall sustainability.

There is a distinction between the various sized settlements within the District. The towns are self-sustaining in terms of a large range of services, as are the larger villages (although the range of services is less). Smaller villages are a mix - they either have a small range of their own facilities to remain sustainable, or are reliant on facilities provided within larger villages and towns. The appraisal supports and reflects the hierarchy of settlements within the Settlement Sustainability Review.

Employment

7.152. The Economic Growth Assessment (2014) indicates a need for additional employment land in the sub-region to maintain a high quality and competitive business offer.

7.153. Coast to Capital Local Enterprise Partnership has identified Burgess Hill as a spatial priority in its Strategic Economic Plan (SEP) (2014). The spatial priorities in the SEP are defined as

those locations with the most current growth or where there are opportunities to create the most capacity for future growth. Coast to Capital have committed to making significant investment in the Burgess Hill area between 2015/16 and 2020/21 to deliver new jobs, homes and employment space.

7.154. The Burgess Hill Employment Site Study (2015) assessed the deliverability of a business park at Burgess Hill, and a proposal for a 20-30ha business park east of Cuckfield Road has been put forward.

Locations for Employment

Options:

At the current time, there are no other alternative options for this scale of employment within the District. The only reasonable option at this time is as follows:

a) To allocate 20-30ha of land as a high quality business park at Burgess Hill to the east of Cuckfield Road. Small scale employment use will be supported as long as it is in accordance with other policies in the plan.

(Note: This appraises the realistic option for a strategic size site. Sites smaller than this scale are more of relevance for allocation in Neighbourhood Plans, and will therefore be appraised through the individual Sustainability Appraisals for these plans).

Objectives		A	Summary of Appraisal
Social	**1 –** Decent and Affordable Home	+?	The provision of employment space, and job opportunities, are in response to a need for such space in the Burgess Hill area. This is linked to the provision of homes in this location (as determined by the distribution of housing strategy).
	2 – Access to Health	0	This option is not expected to have any direct impact on this objective.
	3 – Opportunities for Education	0	This option is not expected to have any direct impact on this objective.
	4 – Access to Retail and Community Facilities	+?	The provision of employment could ensure that existing retail facilities are supported by increased footfall.
	5 – Cohesive, Safe, Crime Resistant Communities	+	This option will provide employment opportunities for those currently living in the area, and will therefore enable more people to work closer to home. Reducing the need to move outside of the District for work will encourage supporting existing cohesive communities. It is likely that an employment site of this size will draw in population from further afield, but as the site is located close to the existing Mid Sussex population, it will provide an opportunity for people to work closer to home.
Environmental	**6 –** Flood Risk	0	Although the exact site boundaries are still to be determined, there are not any significant areas of flood risk in the vicinity of this location. This type of development would not be acceptable in an area of Flood Zone 2 or 3.
	7 – Efficient Land Use	--	This option would be on greenfield land, hence the major negative impact on this objective.
	8 – Conserve and Enhance Biodiversity	-?	There are small areas of ancient woodland in the vicinity of this option. Whilst these will be retained and buffered, they could suffer from degradation as a result of disturbance from increased usage. However, this is less likely than from a residential development.

	9 – Protect and Enhance Countryside	**-**	This option would have a potentially negative impact on this objective as it is located within an area designated as countryside. According to the District Council's Capacity Study, in landscape terms, this option predominantly located in areas with low/medium capacity for development.
	10 – Protect and Enhance Historic Environment	**0**	There are no historic environment designations that will be impacted by this option.
	11 – Reduce Road Congestion	**-?**	This location is currently remote from the two train stations within Burgess Hill, and is served by an irregularly timed bus service. This may be improved as a result of this development taking place (particularly in core working hours) however it is likely most journeys to this site would take place by private car. The A2300 has been identified as requiring mitigation in the Mid Sussex Transport Study.
	12 – Reduce Waste Generation	**-**	This option will impact on the amount of waste generated, from additional business use and during construction stage. This could be mitigated by a sustainable resource use policy.
	13 – Maintain and Improve Water Quality	**-?**	An increase in business development will increase water usage, so could impact negatively on this objective.
	14 – Increase Energy Efficiency	**+?**	This option should seek to use renewable energy sources, and would be constructed using sustainable construction techniques – including compliance with Building Regulations. This could have a positive impact on this objective.
Economic	**15 –** Encourage regeneration of Town and village Centres	**+**	Providing employment space of this size is likely to encourage greater footfall to Burgess Hill town centre, which will encourage its regeneration.
	16 – Ensure High and Stable Employment Levels	**++**	By providing 20-30ha of business land, this will provide a large amount of employment for both local people and further afield.
	17 – Support Economic Growth	**++**	This allocation would meet the requirement for additional employment space in the area and therefore support economic growth. This is in accordance with the Coast to Capital Local Enterprise Partnership aims for this area. A site of this size could have positive benefits for a wider area than Burgess Hill alone.
	18 – Encourage Tourism	**0**	This option is not expected to have any direct impact on this objective.

Summary of Appraisal:

The allocation of this area for a business park will have the most significant impacts on the economic objectives, which is expected given the nature of this policy. It will provide opportunities for employment close to where demand may be arising from, in particular new strategic development within Burgess Hill, as well as further afield. This could have secondary positive impacts on many of the social objectives.

Overall, there are generally negative impacts on the environmental objectives. This is no surprise, as the exercise carried out in section 5 highlighted that, for policies concerning development, there is a conflict with environmental protection objectives due to the opposing nature of these objectives

Other Options Considered and not Appraised:
(i) To not have a policy on this subject. This Would not be realistic as it is not in accordance with economic growth aspirations of the District Council or national planning policy.

There are no obvious realistic alternative site options at this stage.

Neighbourhood Plans

7.155. The District Council is keen to employ a bottom-up approach on key decisions such as housing. Communities should be able to have their say in determining the level and location of development in order to meet local needs. It has been proposed that Neighbourhood Plans allocate the level and location of development, this approach is appraised below.

7.156. Note that individual Neighbourhood Plans that propose development will be subject to Strategic Environmental Assessment (SEA) and advised to undertake SA in order to assess the sustainability implications for development in their own area.

Neighbourhood Plans

Options:

A) To use Neighbourhood Plans to allocate the level and location of new development (housing, employment, community facilities) in order to contribute towards meeting the District's overall needs (i.e. a bottom-up approach in the spirit of Localism).

B) To use the District Plan / Allocations Document to determine the level and location of new development in the Towns and Parishes (i.e. a top-down approach).

	Objectives	A	B	Summary of Appraisal
Social	**1 –** Decent and Affordable Home	+	++	Both options would ensure that the District's housing provision is met, however option **(a)** has less certainty on timing and certainty of delivery due to the number of Neighbourhood Plans being undertaken.
	2 – Access to Health	+	+?	Whilst option **(b)** wouldn't preclude the provision of new health facilities, Neighbourhood Plans could help deliver such facilities in areas that need it most. This is because Neighbourhood Plans are accepting a level of housing in their area that will be needed to support or provide new infrastructure. Neighbourhood Plans are also allocating land for open space.
	3 – Opportunities for Education	+	+?	Whilst option **(b)** wouldn't preclude the provision of new education facilities, Neighbourhood Plans could help deliver such facilities in areas that need it most. This is because Neighbourhood Plans are accepting a level of housing in their area that will be needed to support or provide new infrastructure.
	4 – Access to Retail and Community Facilities	+	+?	Whilst option **(b)** wouldn't preclude the provision of new retail and community facilities, Neighbourhood Plans could help deliver such facilities in areas that need it most. This is because Neighbourhood Plans are accepting a level of housing in their area that will be needed to support or provide new infrastructure.
	5 – Cohesive, Safe, Crime Resistant Communities	+?	0	By allowing Neighbourhood Plans to allocate appropriate levels of growth to meet local needs, this should encourage cohesive communities.
Environmental	**6 –** Flood Risk	+	+	In allocating sites, both options should ensure that development does not take place in areas at risk from flooding.
	7 – Efficient Land Use	-	-	In order to meet the District's housing and employment requirements, it is likely that greenfield sites will be required.

	8 – Conserve and Enhance Biodiversity	+	+?	Whilst both options will ensure that biodiversity is taken into account when allocating sites for development, Neighbourhood Plans may benefit from local knowledge on this subject, and take this into account when determining locations for development.
	9 – Protect and Enhance Countryside	-	-	In order to meet the District's housing and employment requirements, it is likely that greenfield sites will be required.
	10 – Protect and Enhance Historic Environment	0	0	The options are not expected to have any impact on this objective.
	11 – Reduce Road Congestion	-?	-?	Both options are concerned with the delivery of housing, employment and other development. By their nature, these are likely to generate increased levels of traffic. When assessing site options, this will need to be taken into consideration in order to determine the most sustainable location.
	12 – Reduce Waste Generation	-	-	Both options are concerned with the delivery of housing, employment and other development. By their nature, these are likely to generate waste.
	13 – Maintain and Improve Water Quality	-?	-?	Both options are concerned with the delivery of housing, employment and other development. By their nature, these are likely to generate increased levels of waste water.
	14 – Increase Energy Efficiency	0	0	The options are not expected to have any impact on this objective.
Economic	**15 –** Encourage regeneration of Town and village Centres	++	+	Neighbourhood Plans are likely to contain more detailed policies on their areas, and are likely to want to protect and enhance their area. Most will be willing to take a moderate level of development in order to sustain local facilities (such as shops, post offices, village pub) which means option **(a)** is more likely to have a positive impact.
	16 – Ensure High and Stable Employment Levels	+	+	In allocating development, both options will provide housing for potential employees.
	17 – Support Economic Growth	+	+	In allocating development, both options will seek to provide employment opportunities for residents.
	18 – Encourage Tourism	+	+?	Neighbourhood Plans may look at locally specific policies on encouraging or maintaining levels of tourism, whereas the District Plan is likely to only include a generic district-wide policy.

Summary of Appraisal:

Both options are likely to have overall positive sustainability impacts, however option **(a)** is expected to have a more positive impact than option **(b).** This is predominantly because Neighbourhood Plan areas are likely to accept development in order to focus on the infrastructure issues important to them (schools, health, education, community facilities, transport). Development is therefore more likely to be taking place in areas that need it most as the level and location will be determined by a bottom-up approach (in line with the national 'localism' agenda).

Other Options Considered and not Appraised:
None.

Preferred Option:	**A**

8. District Plan – Appraisal of Policy Options

8.1. The following section appraises all realistic alternatives for each of the policy areas proposed for the District Plan. These options should be considered in light of the wider Plan Strategy appraised in section 7.

DP1 – Sustainable Development in Mid Sussex

All

Policy Options:

A) To have a policy that reflects the NPPF presumption in favour of sustainable development, and defines sustainable development in Mid Sussex as: creating jobs in towns and villages, giving people the opportunity to access jobs and facilities closer to home, efficient land use, reducing environmental impact of development, building stronger communities, maximise potential for public transport, adapting to climate change effects, conserves and enhances biodiversity, contributes to the creation of balanced communities that meet the needs of all residents and providing infrastructure and supports the local economy.

B) To not have policy on this subject, and therefore rely on the NPPF policy.

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

Summary of Appraisal:

As both options are promoting sustainable development, both options are likely to have overall positive impacts although there are few differences.

Option (a) will ensure that housing development occurs in the areas that require it most – close to jobs, closer to where people work and to strengthen communities. Option (b) will ensure that development occurs in sustainable locations but will not necessarily factor in these locally specific requirements.

Option (a) is more specific in seeking appropriate infrastructure and public facilities to accompany development and therefore contribute to the developments overall sustainability. Option (b) doesn't preclude this, but does not mention these specifically, therefore is less likely to be as positive for objectives 2, 3 and 4. Option (a) is also more specific on reducing environmental impacts than option (b).

As option (a) is specific about creating jobs in areas that would require them most, in areas closer to home, it is more likely to have more positive impacts on the economic objectives compared to option (b).

Other options considered and not appraised:
None.

Preferred Policy Option: **A**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	+	++	++	++	+	+	++	++	+	+	+	0	+	+	++	++	++	+
Medium	+	++	++	++	+	+	++	++	+	+	+	0	+	+	++	++	++	+
Long	+	++	++	++	+	+	++	++	+	+	+	0	+	+	++	++	++	+

Recommendations and Mitigation Measures:

None suggested.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Although both options would encourage sustainable development in Mid Sussex, option (a) is more specific about defining what is important (in sustainability terms) for Mid Sussex. This is therefore likely to lead to more positive impacts against the sustainability objectives.

DP2 – Sustainable Economic Development

Promoting Economic Vitality

Policy Options:

A) To have a policy that encourages development to meet the needs of businesses, supports existing businesses, encourages inward investment and seeks the provision of appropriate infrastructure to support business growth.

B) As option (a) but also protects existing employment land, allows for appropriate intensification of employment land, encourages mixed use development on large scale housing schemes, and allows for economic development in the countryside (including tourism)

This policy will also allocate land for business development. The scale and location has been appraised as part of the plan strategy in section 7.

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

Summary of Appraisal:

Both options promote new business use in areas where it is required.

Both options seek to locate employment uses in areas where a need exists. This will discourage inappropriate use of land for employment use and could encourage redevelopment of previously developed land for business use where appropriate, which will impact positively on the efficient use of land objective. It is predicted that major positive effects could be experienced with Option (b) especially, as this option is more supportive of the re-use and adaptation of rural buildings for business use, possibly negating the need for allocating greenfield sites for business use. This will have secondary impacts on the objective concerned with protecting the countryside.

Whilst both options will have positive sustainability impacts on the three objectives concerned with employment and economic growth, option (b) is less stringent in that it allows for economic growth in the countryside, where a need may exist. This option will also ensure that the necessary amount of employment land that is required is also delivered – this will be achieved by monitoring, and allocating further sites (either within a review of the District Plan, a future Development Plan Document, or in Neighbourhood Plans) if/when an insufficient supply arises.

Other options considered and not appraised:

(i) *As option (b) but without the requirement to compensate for the loss of employment land with an equivalent alternative facility.*

Preferred Policy Option: B

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

Recommendations and Mitigation Measures:

All proposals for new development will impact negatively on the amount of waste generated and water consumed. New buildings will be expected to be built to high standards of sustainability – policies on sustainable use of resources will ensure this occurs and help to mitigate against these negative impacts.

Cross-Border Impacts:

This policy will allow for economic growth within the District. This, in turn, will provide employment opportunities for those living within reasonable travel times outside the District and go towards meeting neighbours' employment needs. Employment has been determined as a strategic cross-boundary matter.

Overall Conclusion:

This policy will be key in meeting the District Plan's economic objectives, as it sets the framework for allocating new employment land over the plan period. It will have significant positive benefits for the economic objectives, as well as indirect positive benefits for some social and environmental objectives in comparison to other options considered. This is due to the policy directing employment growth to areas where there is a need and supporting existing businesses, in urban and rural areas, as well as addressing future employment land provision if/when required.

DP3 – Town Centre Development

Promoting Economic Vitality

Policy Options:

A) To have a policy that directs retail development firstly to the existing town centres, then a hierarchy of settlements, maximising the use of previously developed land before edge of centre locations are considered (using a sequential approach to determine suitable locations) as well as ensuring the cumulative effect of recent permissions, developments under construction and completed developments are taken into account. Town centre developments should be informed by the relevant Town Centre Masterplan or updated documents. Primary and Secondary shop frontages will be determined by Neighbourhood Plans.

B) To have a policy that supports regeneration and renewal of town centres as defined on the proposals map. Development will be supported where it is appropriate in scale and function to its location and is in accordance with the Town Centre Masterplans/Neighbourhood Plans or updated documents. Primary and Secondary shop frontages will be defined on the proposals map. In Primary Frontages A1 use should be maintained. Change of use where it would enhance vitality and viability of the centre, and would not lead to a break in the continuity of shopping facilities will be permitted. Secondary frontages will focus on protecting A1-A5 uses. A retail impact assessment will be required for larger developments.

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

Summary of Appraisal:

As expected, both options are predicted to have a positive sustainability impact on the objective concerned with access to retail and community services.

Whilst option (a) gives preference to town centre sites, option (b) is stronger in this preference and defines town centre areas within which this policy will apply. This will have stronger positive impacts on the objective concerned with efficient land use, as it could make greater use of brownfield sites within town centres. The definition of primary and secondary shop frontages could have an indirect positive effect on the objective concerned with protecting the historic environment, by ensuring that only the uses defined as suitable for these shop frontage areas are permitted.

As option (b) gives great weight to developing within town centre sites, this will have a major positive effect on the objective concerned with reducing road congestion. This is because town centre sites are better connected by public transport than out of town sites. This is further enhanced by the NPPF requirement for out-of-centre sites to be justified, with the first preference to development within the town centre. It will have a direct positive impact on the objective concerned with encouraging regeneration of town and village centres.

Other options considered and not appraised:

(i) *To not have a policy directing retail development, letting the market decide.*

Preferred Policy Option: B

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	0	0	0	+	0	0	++	0	+?	+?	+	0	0	0	+	+	+	0
Medium	0	0	0	++	0	0	++	0	+?	+?	+	0	0	0	++	+	+	0
Long	0	0	0	++	0	0	++	0	+?	+?	++	0	0	0	++	+	+	0

Recommendations and Mitigation Measures:

Policies on transport should also assist in reducing road congestion. Retail developments should also accord with the policy on sustainable resources, which encourages developments to be built to high standards of energy and water efficiency. This could impact positively on objectives 13 and 14.

Cross-Border Impacts:

As this policy is concerned with the development of town and village centres within the District, there are no direct cross-border impacts. Redevelopment may encourage people living outside the District to travel to towns and villages for shopping facilities as well as jobs.

Overall Conclusion:

Encouraging the development of retail within town centre locations, where possible, will deliver economic benefits to these areas. This policy will allow for greater accessibility to retail use, particularly by public transport. This will have positive sustainability impacts, plus a number of indirect positive impacts could arise from this policy.

DP4 – Village and Neighbourhood Centre Development

Promoting Economic Vitality

Policy Options:

A) To have a policy that defines village centres which meet the needs of their own communities and also neighbouring small villages. Development in these village centres will be supported where it helps to maintain and develop the range of shops within the village, where it is appropriate in scale and function to its location, and is in accordance with Neighbourhood Plans. In smaller village centres, changes of use from Class A1 (shop) uses will be resisted unless exceptional circumstances apply.

B) To not have a policy on retail development in village centres.

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

Summary of Appraisal:
Whilst option (b) doesn't restrict development of retail uses within villages and village centres, it could lead to inappropriate development – for example, changes of use which could mean vital village shops/convenience stores being lost to other uses. This will have a negative impact on the objective concerned with access to retail and community services. Option (a) restricts changes of use from A1 unless exceptional circumstances apply, which should help retain village services – therefore a major positive effect on sustainability. This has a secondary effect on the objectives concerned with reducing road congestion and addressing the causes of climate change, as village residents will not have to travel (most likely by car) outside of the village for essential goods and services.

Possible negative sustainability impacts could arise on the objectives concerned with employment and economic growth, depending on the nature of a change in use.

Other options considered and not appraised:
None.

Preferred Policy Option: **A**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	0	0	0	++	0	0	0	0	+?	0	+	0	0	0	+	++	+	0
Medium	0	0	0	++	0	0	0	0	+?	0	+	0	0	0	++	++	+	0
Long	0	0	0	++	0	0	0	0	+?	0	+	0	0	0	++	++	+	0

Recommendations and Mitigation Measures:

Policies on transport should also assist in reducing road congestion. Retail developments should also accord with the policy on sustainable resources, which encourages developments to be built to high standards energy and water efficiency. This could impact positively on objectives 13 and 14.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Encouraging the development of retail within villages, where possible, will deliver economic benefits to these areas. Restricting unsuitable uses (including changes of use) will also protect vital village services, which will have a number of direct and indirect sustainability benefits. This policy will allow for greater accessibility to retail use, particularly by public transport. This will have positive sustainability impacts, plus a number of indirect positive impacts could arise from this policy.

DP5 – Housing

Ensuring Cohesive and Safe Communities

Policy Options:

This policy will relate to the level of housing development across the District. The options for the housing provision number have been appraised in **Section 7** as part of the overall strategy of the District Plan.

DP6 – Settlement Hierarchy

Ensuring Cohesive and Safe Communities

Policy Options:

The policy will relate to the level of housing development that is judged as sustainable for each settlement. This has been appraised in **Section 7** as part of the overall strategy of the District Plan.

DP7 – General Principles for Strategic Development at Burgess Hill

Ensuring Cohesive and Safe Communities

Policy Options:

A) To have a policy that sets out general principles that apply to all strategic development at Burgess Hill based on the contents of the Burgess Hill Town Wide Strategy. Development should integrate with the existing town, improve and make the town centre more accessible, provide employment opportunities, improve public transport and walking infrastructure, provide highway improvements, provide new community/retail/cultural/educational/health/recreation facilities, identify and respond to environmental constraints, ensure improvements at Goddards Green Wastewater Treatment Works are implemented before occupation, incorporate renewable energy installations and provide broadband infrastructre.

B) To not have a policy on this subject

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

Summary of Appraisal:

Setting out the general principles that apply to all strategic development at Burgess Hill (option (a)) will have a positive impact on the social objectives as it will ensure that there is access to health, education and other services as well as ensuring that there is the appropriate mix and design of housing. Option (b) will have the opposite impact as it may not ensure that all the services are provided alongside housing development.

Option (a) is also likely to have a positive impact on the economic objectives as strategic development is likely to have a positive effect on employment levels and contribute to economic growth, as well as encouraging regeneration of the town centre. Option (a) may have a positive impact on some of the environmental objectives such as biodiversity and access to the countryside as having a policy may ensure that these are enhanced through delivery of green infrastructure.

Strategic development, however, may have negative effects on the historic environment. It is considered that option (b) is unlikely to impact on the environmental and economic objectives apart from a possible negative impact on the objective concerned with reducing road congestion; this is because strategic development principles may improve sustainable transport options.

Other options considered and not appraised:

None.

Preferred Policy Option: **A**

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

Recommendations and Mitigation Measures:

For objective 10, the policies on the Historic Environment (Conservation Areas and Listed Buildings and Other Buildings of Merit) will mitigate the negative effects that may arise from this policy.

Cross-Border Impacts:
There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:
Overall, setting out the general principles that apply to all strategic development at Burgess Hill is likely to have a positive impact on the majority of objectives. This is because a policy is likely to ensure that social, environmental and economic needs are met, such as improved access to services and provision of decent and affordable homes. Whilst strategic development could have a negative impact on environmental objectives such as biodiversity and access to the countryside, a policy could ensure that provision is made for biodiversity enhancement and green infrastructure which would mitigate against any possible negative impacts. Strategic development is also likely to have a positive effect on employment levels and economic growth. There is likely, however, to be a negative effect on the historic environment as this policy could impact on the integrity of listed buildings and their setting, although the Historic Environment policies in the District Plan should help to mitigate any negative impacts.

DP8 – Strategic Allocation to the east of Burgess Hill at Kings Way
DP9 – Strategic Allocation to the north and north-west of Burgess Hill
DP9a – Strategic Allocation to the east of Pease Pottage

Ensuring Cohesive and Safe Communities

Policy Options:

The locations subject to this appraisal have been appraised as part of the overall development strategy above (Strategic Locations). The Burgess Hill options (DP8 and DP9) were considered the most sustainable options of all appraised. Whilst DP9a has negative impacts on environmental objectives, there is an overriding need for housing in this area to meet the unmet housing need arising from Crawley, and this broad location was deemed a sustainable location to help meet this need. This has been established in the appraisals looking at "Development Distribution" in section 7.

The aim of policies DP8, DP9 and DP9a is to ensure that, if these sites were to come forward for development (both residential and employment), they are done so in the most sustainable way. Hence, these policies should be looking to minimise any potential adverse impacts in the area as well as seeking to gain as many positive impacts from this development as possible. This being the case, the only feasible option is to have a policy setting out the development principles for these sites, as the principle of developing the sites themselves is appraised elsewhere. It has been decided to appraise these policies together to ensure that the development principles are to the benefit of Burgess Hill, Pease Pottage and their surrounding area.

The development principles will include: providing necessary infrastructure, open space, sustainable transport measures, complying with flood risk issues, opportunities for renewable energy.

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

Summary of Appraisal:

As there is only one feasible option (as the principle and location of these sites has been determined through the Development Strategy appraisal) this has been appraised for its short/medium/long term effects on the sustainability objectives.

Overall, positive impacts should arise from this policy. This is largely due to its broad nature in mitigating likely impacts that could arise from development at these locations.

The development principles ensure that infrastructure (community facilities, transport, water, etc) are programmed and delivered alongside the development. This will ensure that positive impacts should arise for objectives relating to infrastructure (e.g. 2, 3, 4, 6, and 14). A number of development principles are concerned with protecting the natural environment so as to ensure development does not have a negative impact upon it. In particular, DP7 includes the development principle to protect, manage and enhance the Ditchling Common Site of Special Scientific Interest (SSSI) which will have a positive impact on the sustainability objective concerned with conserving and enhancing biodiversity. Similarly, DP9a must reduce the impact on the High Weald AONB.

None of the development principles mention the protection and enhancement of the historic environment, hence the possible negative impact for this objective. This may be because there are no significant historic assets within the development locations (listed buildings, archaeology, etc). However, other policies (nationally and those within the District Plan) will ensure any possible impact on this objective is mitigated.

Recommendations and Mitigation Measures:

Policies on Flood Risk and Water Infrastructure and the Water Environment will help ensure that new development will not increase the risk of flooding, as well as ensuring objectives for biodiversity and water quality are met. The possible negative impact on the Historic Environment objective will be mitigated by the District Plan policies protecting listed buildings and conservation areas, as well as national planning policy.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

The combination of these policies will have positive impacts on the social, environmental and economic objectives. This is due to the fact the policies ensure that any strategic development is delivered in the most appropriate way so as to maximise economic, social and environmental benefits, and mitigate against any possible negative impacts that may arise for these objectives.

DP10 – Protection and Enhancement of Countryside

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that allows development outside of the built up area boundaries, providing it makes a valuable contribution to the amenity of, and where possible enhances the quality of, the rural and landscape character of the District, and where it is necessary for agriculture or some other use which has to be located in the countryside. Development proposals should be informed by the most up-to-date landscape character/capacity assessments. Best and Most Versatile Agricultural Land and mineral reserves will be protected.

B) To have a policy that does not allow any development outside of the built up area boundaries (presumption that all development will harm the quality of the rural and landscape character of the District). Best and Most Versatile Agricultural Land will be protected.

C) To not have a policy on this subject, therefore relying on national planning policy.

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

Summary of Appraisal:

The three options appraised are very different in terms of overall impact on the objectives. Option (b), as the most restrictive to development, has significant positive impacts on the environmental objectives but negative impacts on the social and economic objectives as it will restrict development in areas which may have a housing, economic or community need. Option (c) is the least restrictive to development in the countryside which may benefit the social and economic objectives, but would have negative impacts on objectives concerned with protecting the countryside, which is the main aim of this policy area. Option (a) allows some development providing it does not harm the countryside and this option is shown to have mainly positive impacts across all objectives (environmental, economic and social) with predominantly positive impacts on the environmental objectives.

Other options considered and not appraised:

None.

Preferred Policy Option: **A**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	+?	+?	+?	+?	0	0	+	+	++	+	+?	0	+?	0	+	+?	+?	+?
Medium	+?	+?	+?	+?	0	0	+	+	++	+	+?	0	+?	0	+	+?	+	+?
Long	+?	+?	+?	+?	0	0	+	++	++	+	+?	0	+?	0	+	+?	+	+?

Recommendations and Mitigation Measures:

None suggested.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

It is considered that for the majority of objectives, this policy will have positive impacts. In particular, the environmental objectives are seen to have a strong positive impact that may increase over time. This policy will allow development in the countryside providing it does not harm, and where possible, enhances the quality of the rural and landscape character. This means that there may be positive impacts on the economic and social objectives, whilst at the same time having a positive impact on the environmental objectives which is the overall aim of this policy.

DP11 - Preventing Coalescence

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that seeks to prevent the coalescence of settlements and retains all the Mid Sussex Local Plan designated Local Gaps.

B) To have a policy that seeks to prevent the coalescence of settlements but retains only those Local Gaps that meet a certain criteria (will require definition)

C) To have a policy that seeks to prevent the coalescence of settlements but does not refer to or define Local Gaps (effectively de-designating them but providing a policy hook for Neighbourhood Plans or other appropriate planning documents to define Local Gaps where there is robust evidence to support their need).

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

Summary of Appraisal:

Whilst all options are predicted to have the same impact on the two objectives that are directly related to the subject of Coalescence (objectives 9 and 10), there are minor differences on other objectives as a result of indirect consequences that could arise from these policy options.

Option (a) may have negative sustainability impacts on objective 1 as it could restrict the amount of housing that could be delivered in some locations where a need exists, due to their tightly defined built-up area boundaries, designation of gaps and proximity to other settlements. Options (b) and (b) are less restrictive, in that they either remove current gaps or look to re-designate them.

In terms of efficient land use, option (b) is less restrictive in that it could provide more opportunities to develop on greenfield land, therefore impacting negatively on this objective. Option (c) would score similarly, however it is expected that Neighbourhood Plans will designate further local gaps

in the future. It would score negatively in the short-term, until such plans are in place. In not defining as many local gaps as options (a) and potentially (c), it doesn't perform as positively on objectives 9 and 10 which are concerned with protecting the countryside and historic environment respectively.

Other options considered and not appraised:

None.

Preferred Policy Option: **C**

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

Recommendations and Mitigation Measures:

In the short term, there could be a policy vacuum in the time between de-designating some gaps, and Neighbourhood Plans re-designating or newly defining local gaps. This will have a negative effect on objectives 9 and 10 in the short term. In seeking to prevent coalescence, the policy should help mitigate against the negative impacts associated with these objectives, although this will be more stringent in the medium-long term. The policies on character and design and protection of the countryside will also mitigate against the negative impacts that could arise from this policy in the short term.

Cross-Border Impacts:

Consideration should be made to preserving the identity of towns and villages where they may coalesce with towns and villages outside of Mid Sussex (particularly in the North of the District at East Grinstead, Copthorne and Ashurst Wood.)

Overall Conclusion:

In the short term, the de-designation of existing local gaps could have negative impacts on the countryside and historic environment, although speedy preparation of Neighbourhood Plans will ensure that major positive benefits for these objectives will be obtained in the long term, as preserving land between certain settlements is shown to have positive effects both directly, and indirectly.

DP12 - Sustainable Rural Development and the Rural Economy

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that allows for sustainable rural development but limited to that which is reasonably necessary for the purposes of agriculture or forestry.

B) To have a policy that allows small scale sustainable rural development outside of the built up area boundaries where it meets the needs of local communities, supports the rural economy and requires a rural location and utilises a brownfield site where possible. The policy will allow for re-use and adaptation of rural buildings for business, tourism or residential use given certain criteria.

C) To have a policy that does not allow any development outside of the built up area boundaries (presumption that all development will harm the quality of the rural and landscape character of the District).

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

Summary of Appraisal:

Options (a) and (c) are restrictive in the amount of housing development that could be delivered in rural areas, which impacts negatively on objective 1 as housing may not be delivered in areas where a need exists. Option (b) is less restrictive, in allowing conversion of buildings to residential use as long as they meet the policy criteria. Option (b) could also allow for health and education facilities on the same basis. As one of the criteria of option (b) is that development meets the needs of local communities and utilises brownfield sites where possible, this will have more positive benefits on objectives 4 and 7 in comparison to options (a) and (c).

All options involve development of some kind in rural areas, which may increase the reliance on using the private car. This will have negative impacts on objective 11 which is concerned with reducing road congestion and addressing the causes of climate change respectively.

As both options (a) and (b) allow for development which supports the rural economy, or business use connected with the countryside, positive impacts will arise for objectives that ensure stable employment and sustain economic growth. Option (b) specifically allows for re-use of buildings for tourism, which impacts positively on objective 18. As option (c) does not allow for any development outside built-up-areas, this could have a negative impact on these objectives.

Other options considered and not appraised:

None.

Preferred Policy Option:	**B**

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

Recommendations and Mitigation Measures:

Negative impacts could arise from this policy on objectives 11 and 13. Development in the countryside may increase the reliance on the car, however the policy on transport will help to mitigate against this. Any form of development could impact negatively on water resources, regardless of location. New development should be built in accordance with the policy on sustainable resources, which seeks high standards of water efficiency.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

The proposed policy should have positive social and economic benefits. It is considered that the policy may contribute to unsustainable transport patterns and therefore the transport and climate change objectives could possibly be adversely impacted upon, however reasonable mitigation measures are in place in the form of other policies within the District Plan.

DP13 - New Homes in the Countryside

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that allows new dwellings in the countryside where special justification exists. This will be defined as: providing it is required to enable agricultural, forestry and certain other full time workers to live at, or in the immediate vicinity of their place of work depending on the needs of the enterprise concerned; and where the dwelling is of exceptional quality or is innovative in nature. New homes are defined as single dwellings, including 'granny annexes' which are independent to the dwelling. Permanent agricultural dwellings will only be permitted to support existing agricultural activities.

B) As (a), but allows for the re-use and adaptation of rural buildings, including replacements, for residential use where it would secure the future of a heritage asset, or would lead to an enhancement of the immediate setting and quality of the rural and landscape characteristics would be maintained.

C) To have a policy that does not allow new dwellings/ independent 'granny annexes' in the countryside.

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

Summary of Appraisal:

As the objectives of both policy options are almost opposite to one another, it is understandable that their impacts on the sustainability objectives are also opposite. Option (c) has no impact on a lot of the objectives as it does not allow new dwellings in the countryside, however, this is likely to have a positive impact on objective 9 which seeks to protect and enhance the countryside. This is also likely to have a positive impact on objective 7 because not allowing new dwellings in the countryside may encourage the re-use of previously developed land.

Options (a) and (b) restrict new dwellings in the countryside to those which are required for agricultural and forestry work so this policy option may benefit the economic objectives as it is linked to employment and economic growth. It may also help deliver homes in areas where there is a need, specifically for agricultural and forestry workers. Conversely, option (c) may have a negative impact on these objectives, as it does not allow new dwellings in the countryside. An exceptional quality or innovative design (option (a)) may also lead to a positive impact for objective 14.

Options (a) and (b) have a more negative impact on some of the objectives compared to option (c), particularly as development could potentially affect biodiversity and enhancement of the countryside. However, option (b) is more positive than (a) in potentially in securing heritage assets (objective 10). Travel by private car could be greater through living in the countryside away from services, thus there may be the potential to increase road congestion. Also linked to access to services is objective 13, since it may not be possible to connect the new dwelling to the mains sewerage, therefore, potentially increasing the risk of pollution incidents.

Other options considered and not appraised:

None.

Preferred Policy Option: **B**

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

Recommendations and Mitigation Measures:

For objectives 8 and 9, the policies on the Protection and Enhancement of the Countryside, High Weald AONB and Biodiversity will mitigate the negative effects that may arise from this policy. For Objective 11, the policy on Transport will mitigate the negative effects that may arise from this policy. For Objective 13, the policies on Sustainable Resources and Water Infrastructure will mitigate the negative effects that may arise from this policy.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Although this policy option has the potential to negatively impact on several of the objectives, it is considered that it is necessary to have a policy that restricts new dwellings in the countryside to those that are required by agricultural and forestry workers. This is likely to have positive impacts on employment and economic growth as well as providing the workers with a decent and affordable home.

Other policies in the District Plan are likely to help mitigate some of the negative impacts that may arise from this policy, and these are particularly related to access to services and the environmental objectives. Objective 7 is likely to have the strongest negative impact as this policy option does not encourage re-using previously developed land.

Overall, whilst this policy option is likely to have negative impacts on some of the sustainability objectives, it is considered that it is necessary to enable dwellings for agricultural and forestry workers to be allowed in certain circumstances, in particular where this contributes to agricultural and land management objectives.

DP14 - High Weald Area of Outstanding Natural Beauty

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that restricts development in the High Weald Area of Outstanding Natural Beauty unless it conserves or enhances natural beauty, wildlife and cultural heritage, respects the setting of the AONB, and has regard to the AONB management plan, in particular the identified landscape features, interaction of people with nature and appropriate land management, character and local distinctiveness, proposals that support the economy of the AONB.

B) To not have a policy on this subject and therefore rely on national planning policy.

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

Summary of Appraisal:

Option (a) performs better or equal to option (b) on each sustainability objective except Objective 1 where it may have a possible negative effect. This is because the policy direction is to protect the AONB and, therefore, may restrict some housing development in locations where a need may exist. Overall, it can be seen that option (a) will have a positive effect on the environmental objectives and may have a possible positive effect on some of the economic and social objectives. In particular, this will be due to developments being required to have regard to the criteria set out by the High Weald Management Plan.

Other options considered and not appraised:

(i) *For option (a) add 'small scale development to meet local social and economic needs of the highest environmental and design standards'.*

With regards to option ***(i)***, there will be a District Plan policy relating to small scale development in rural areas and a policy relating to character and design, and it is considered unnecessary to duplicate this in an AONB policy that is overarching.

(ii) *To have a policy that differentiates between policy applied to locations within or outside settlements within the AONB.*

With regards to option ***(ii)***, there will be a District Plan policy that differentiates between the built up area and the countryside, and it is considered unnecessary to duplicate this in an AONB policy that is overarching.

Preferred Policy Option: **A**

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

Recommendations and Mitigation Measures:

For Objective 1, the policy on Rural Exception Sites will mitigate the negative effects that may arise from this policy.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

This main objective of this policy is for development proposals within the AONB to have regard to the High Weald AONB Management Plan; hence it has significant positive impacts on the environmental and tourism objectives. Over the longer term, the policy may also have positive impacts on the social and economic objectives. The policy may, however, have a negative impact on providing for decent and affordable homes, but the Rural Exception Sites policy may help to mitigate this impact.

DP15– Ashdown Forest Special Protection Area and Special Area of Conservation

Recreational Disturbance Impacts

8.2. The District Plan HRA identifies that increased recreational activity arising from new residential development and related population growth is likely to disturb the protected near-ground and ground nesting birds on Ashdown Forest: Dartford warbler Sylvia undata and nightjar Caprimulgus europaeus.

8.3. The impacts to heathland breeding birds can be summarised as follows:

- Increased nest predation by natural predators when adults are flushed from the nest or deterred from returning to it by the presence of people or dogs;
- Chicks or eggs dying of exposure because adult birds are kept away from the nest;
- Accidental trampling of eggs by people, where nests are on the ground and may be close to paths;
- Predation of chicks or eggs by domestic dogs; and
- Increasing stress levels in adult birds in response to perceived predation risk.

8.4. Data analysis of the Ashdown Forest visitor survey[7] indicates that:

- The current level of visitor pressure is not affecting the distribution of nightjar, woodlark[8] or Dartford warbler within the Ashdown Forest SPA, although there will be a point at which levels of visitor pressure are so great that birds will abandon otherwise suitable breeding habitat and the ability of the site to support a given density of birds will be compromised.
- The current level of visitor pressure is not displacing the birds from otherwise suitable habitat, however, the level at which recreational pressure will be such that birds will begin to be displaced is not known.
- Evidence from other sites would suggest that if access levels were to increase, there may be avoidance of otherwise suitable habitat and there may be impacts on breeding success.
- Recreational disturbance may still be having an impact on the protected bird species at Ashdown Forest and 'in the absence of data on breeding success, and without understanding why bird densities are low, it currently cannot be concluded on the basis of scientific evidence that the ecological integrity of nightjar and Dartford warbler populations is not being adversely affected by a combination of existing pressure and/ or habitat management' (Clarke et al., 2010: p29).
- An increase in population from new residential development is likely to result in additional recreational pressure on Ashdown Forest.

8.5. The data analysis report[9] concludes that 'information is not available to say definitively whether the quantum of new housing proposed in the vicinity of Ashdown Forest will impact upon breeding success or cause bird displacement. Taking into account the wider body of research available, along with the principles established and mitigation and monitoring being pursued as a result of plan level Habitats Regulations Assessments at other heathland sites, it is advised that a similar approach should be taken forward for Ashdown Forest SPA' (Clarke et al., 2010: p30).

[7] Clarke, R. T., Sharp, J. and Liley, D. (2010) *Ashdown Forest Visitor Survey Data Analysis*: Natural England Commissioned Reports, Number 048.
[8] The woodlark is present in qualifying numbers on Ashdown Forest, but it is not listed as a qualifying feature of the Ashdown Forest SPA.
[9] Clarke, R. T., Sharp, J. and Liley, D. (2010) *Ashdown Forest Visitor Survey Data Analysis*: Natural England Commissioned Reports, Number 048.

8.6. In accordance with the precautionary principle and the analysis of the findings of the visitor survey, mitigation measures, therefore, are required to remove or reduce the effects of the District Plan on the Ashdown Forest SPA. It is considered that development proposals where there is a net increase in dwellings should contribute to mitigation since an increase in population may have an impact on the protected near-ground and ground nesting birds.

Appraisal of DP15 – Ashdown Forest SPA and SAC

8.7. The District Plan includes a policy addressing the Ashdown Forest SPA and SAC. Mitigation measures are proposed to avoid or reduce any potential recreational disturbance impacts to the Ashdown Forest SPA. Measures to reduce recreational pressure are likely to be most effective within a particular area around the Ashdown Forest SPA (a 'zone of influence') from where additional visits are most likely to originate as a result of new residential development.

8.8. This section outlines the different options for the zone of influence and mitigation measures.

Zone of Influence

8.9. The requirement for new residential development proposing a net increase in dwellings to provide mitigation is based on a zonal approach. This approach was established for the Thames Basin Heaths through the South East Plan Examination in Public[10]. Zones are established on the basis of visitor surveys, the data analysis of which may suggest that use of the SPA is linked to the distance people live from it and the transport links to the site. This zone is the area where mitigation measures would be most effective.

8.10. Both the data analysis of the visitor survey and the District Plan HRA recommend that residential development is not permitted within a 400m buffer zone around the Ashdown Forest SPA. This is on the basis that mitigation is unlikely to be successful since Ashdown Forest is within walking distance and people will use the site as their local recreation space. Within this distance, urban effects such as cat predation may also increase. It is considered that the use of a 400m buffer zone is included within the District Plan policy and new residential development will not be permitted in this area. This 400m zone only applies to a very small proportion of the District, which is a rural area near the hamlet of Birchgrove. It is felt there are no reasonable alternatives to the 400m buffer zone aside from a do nothing approach, which is not considered appropriate as the 400m buffer zone addresses specific issues likely to occur within this distance from the SPA.

8.11. Data analysis of the survey investigating visitor access patterns at Ashdown Forest found that the majority of regular visitors originated from a 7km distance from Ashdown Forest[11]. This is considered to be a reasonable choice for a zone of influence as it is based on evidence and was developed in consultation with Natural England. Nevertheless, an assessment has been made of other options to a 7km zone of influence.

Options for Appraisal

8.12. The options to be appraised as reasonable alternatives are as follows:

Zone of influence	Reason for selection
No zone of influence	This option represents a 'do nothing' approach to identifying in policy an area where mitigation would be most effective.

[10] Burley, P. (2007) *Report to the Panel for the Draft South East Plan Examination in Public on the Thames Basin Heaths Special Protection Area and Natural England's Draft Delivery Plan*.
[11] UE Associates (March 2015) *Habitats Regulations Assessment for the Mid Sussex District Plan* – paragraph 6.4.7, page 32 (The majority is identified as 83% of regular visitors).

	It does not mean the requirements of the Habitats Regulations would not be considered or that mitigation would not be provided, rather that each planning application would need to be assessed on a case-by-case basis. This means that a Habitats Regulations Assessment would need to be undertaken for each relevant planning application that proposes residential development in order to determine if there would be a likely significant effect on the Ashdown Forest SPA. There would be no co-ordination between the mitigation proposed and where this would be located, and it may also be difficult to individually fund mitigation measures. Small developments are unlikely to be able to fund a mitigation solution in isolation.
To have a 5km zone of influence	A 5km zone of influence is applied at the Thames Basin Heaths and the Dorset Heaths. It is considered to be a reasonable option for a zone of influence for Ashdown Forest, however, it does not reflect locally specific data. Evidence from the visitor survey and subsequent data analysis indicates that visitors to Ashdown Forest appear to travel further than visitors to the Thames Basin Heaths or Dorset Heaths[12]. This would suggest that a 5km zone of influence is not directly applicable to Ashdown Forest.
To have a 7km zone of influence	Data analysis of the visitor survey found that the majority of regular visitors to Ashdown Forest originated from within a 7km distance from Ashdown Forest[13]. This option represents the zone of influence recommended in the District Plan HRA and Natural England concurs with this distance.
To have a 15km zone of influence	Data from the visitor survey shows that 96.67% of visitors from Mid Sussex to Ashdown Forest recorded over 16 hours in September 2008 originated up to 15km from the Ashdown Forest SPA[14]. This option aims to capture nearly all of the visits to Ashdown Forest and so would require mitigation from new residential development within this area. This 15km zone of influence would also include other local authority areas not previously involved in Ashdown Forest matters, so this option may have implications for other plans.
To include all of Mid Sussex District within the zone of influence	This option represents the most precautionary approach since all planning applications in the District that propose residential development would need to provide mitigation to reduce recreational pressure. However, data analysis of the visitor survey showed that additional housing closer to Ashdown Forest is likely to lead to a higher increase in visitors to the SPA than an equivalent sized development

[12] Clarke, R.T., Sharp. J. and Liley, D. (2010) *Ashdown Forest visitor survey data analysis*: Natural England Commissioned Reports, Number 048 – Figure 15, page 32. (60% of visitors travelling by car to the Thames Basin Heaths come from within a 5km distance, whereas at Ashdown Forest, this figure is 40%).
[13] UE Associates (March 2015) *Habitats Regulations Assessment for the Mid Sussex District Plan* – paragraph 6.4.7, page 32 (The majority is identified as 83% of regular visitors).
[14] UE Associates (2009) *Visitor access patterns on Ashdown Forest* – Table 3.12, page 36.

	further away from the Ashdown Forest or with a longer travel time[15].
To have several zones of influence based on the proportionate amount of visitors to Ashdown Forest	Detailed analysis of the visitor survey data would be required to develop different zones of influence based on the proportionate number of visitors to Ashdown Forest. It would be intended that different approaches to mitigation measures would be applied in each zone of influence to specifically address the likely amount of new people from additional residential development.

Table 34- Zone of Influence Options

8.13. Figure 20 shows the different zones of influence to be appraised.

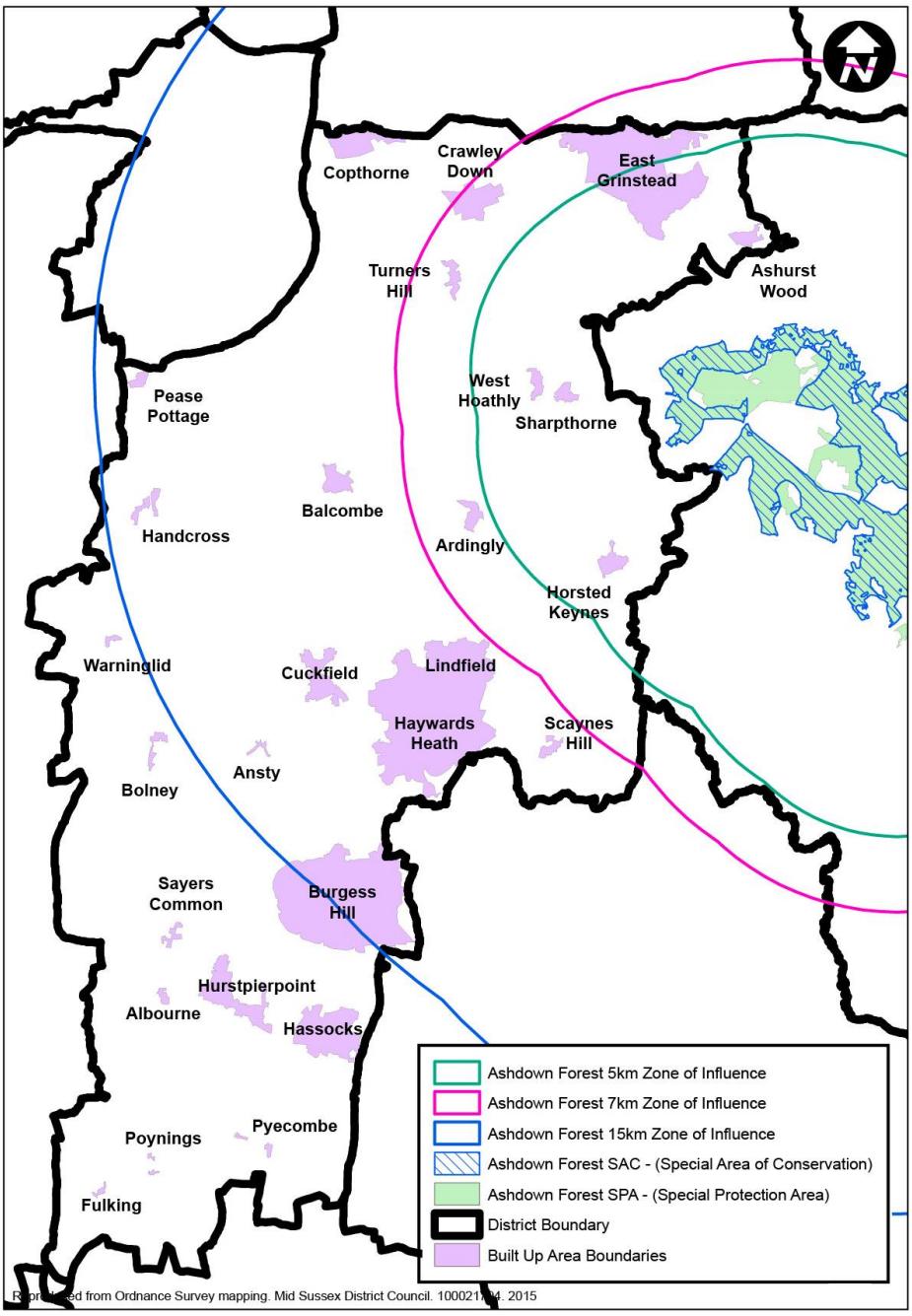


Figure 20- Possible zones of influence for the Ashdown Forest SPA

[15] Clarke, R.T., Sharp. J. and Liley, D. (2010) *Ashdown Forest visitor survey data analysis*: Natural England Commissioned Reports, Number 048 – Table 8, page 33.

8.14. The following appraisal considers the six different options for the zone of influence. Each option has been assessed against the Sustainability Objectives.

Zone of Influence

Protecting and Enhancing The Environment

Options:

A) No zone of influence.

B) To have a 5km zone of influence.

C) To have a 7km zone of influence.

D) To have a 15km zone of influence.

E) To include all of Mid Sussex District within the zone of influence.

F) To have several zones of influence based on the proportionate amount of visitors to Ashdown Forest.

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

Summary of Appraisal:

All of the options appraised for a zone of influence are considered to have either no impact or a neutral impact on the majority of the sustainability objectives. Impacts are likely to occur on some of the social and environmental objectives, with the strongest impacts on the housing, biodiversity and countryside objectives.

It is considered that defining a zone of influence creates certainty and results in a more sustainable option. It also allows a strategic approach to mitigation. For example, options (a) and (e) are likely to result in a greater negative impact for objective 1 as these options would mean that either each planning application is assessed on a case-by-case basis on the need for mitigation or that residential development across the whole of Mid Sussex would need to provide mitigation. Mitigation is likely to mean a financial contribution so the viability of developments may be affected in a wider area, particularly in areas with little potential impact on Ashdown Forest. This effect on housing (options (a) and (e)) may also result in a potentially negative impact for economic growth (objective 17).

A larger zone of influence (options (d) and (e)) may also have potential negative effects on the efficient use of land (objective 7) as more land for local mitigation may be required.

This certainty and clarity of a zone of influence is also likely to result in greater positive impacts for the objectives concerning health, education, community facilities, road congestion and supporting economic growth.

A smaller zone of influence (options (b) and (c)) is considered to have the strongest positive impact on biodiversity and countryside protection. This is because mitigation measures would be required within this zone which are necessary to avoid or reduce any potential impact on the Ashdown Forest SPA from recreational disturbance. This may also have a positive impact on reducing road congestion particularly if alternative areas of open space are provided, which are closer to new residential development.

It is considered that the positive impacts on biodiversity and countryside are likely to weaken as the zone of influence increases (option (d)) or if there is no zone of influence (option (a)) and new residential development is assessed on a case-by-case basis. A zone of influence covering all of Mid Sussex District (option (e)) is the exception as it is considered that this reflects the potential negative impact on housing with the possible consequence of positive effects on biodiversity and countryside protection as less land is used for housing.

Mitigation, such as the provision of alternative open space, may lead to positive impacts for health (objective 2) due to the benefits of greenspace on health and well-being. This effect is considered to be strongest with a smaller zone of influence (options (b) and (c)) than for larger zones of influence (options (d) and (e)) or no zone of influence (option (a)). Mitigation may also provide opportunities for education and increase access to community facilities resulting in positive effects, and this impact is strongest for options (b) and (c) with the smaller zones of influence.

The provision of mitigation in a smaller zone of influence (options (b) and (c)) may have a positive impact on reducing road congestion (objective 11). This is because people may travel less to reach mitigation than how far they would have to go if travelling to Ashdown Forest. This positive effect weakens as the zone of influence increases or if there were no zone of influence.

Option (f) is likely to have similar impacts on the sustainability objectives, however as this option (f) would require further detailed analysis of the visitor survey data, it is currently unknown what the zones of influence might be. Different mitigation requirements may be applied in each zone of influence so that the effects on the sustainability objectives may also differ with each zone of influence. This option (f) is also likely to provide less certainty and clarity for developers.

Overall, the two options considered to be the most sustainable are options (b) proposing a 5km zone of influence and option (c) proposing a 7km zone of influence. As previously explained, a 5km zone of influence is applied at the Thames Basin Heaths and Dorset Heaths, but does not reflect the data analysis of the visitor survey at Ashdown Forest. As discussed in the District Plan HRA, visitors to Ashdown Forest appear to travel further than visitors to the Thames Basin Heaths and so it would seem appropriate to extend the zone of influence to capture the majority of regular visitors to Ashdown Forest. This distance has been calculated as 7km and so it is recommended that this zone of influence should be applied to Ashdown Forest since it is based on evidence and is the area where mitigation measures would be most effective.

Other options considered and not appraised:

(i) *To have a 3km zone of influence – The visitor survey report (2009: p31) suggests that people on foot travel an average of 3.3km to Ashdown Forest, however, this zone of influence would not capture visitors arriving by car, and so this is not considered to be a reasonable alternative.*

(ii) *To have a 7.5km zone of influence – A Technical Note for the HRA of the Mid Sussex Core Strategy (2009) suggested a 7.5km zone of influence, however, this was later superseded by the*

7km zone of influence after re-analysing the visitor survey data, and so this is not considered to be a reasonable alternative.

***(iii)** To have an 11km zone of influence – The visitor survey report (2009: p31) suggests that, overall, visitors in cars travel around 11km to access points on Ashdown Forest. In terms of visitor numbers, this zone of influence would capture around 92-93% of visitors from Mid Sussex to Ashdown Forest[16]. It is not considered appropriate to appraise this option as a reasonable alternative because this percentage of visitors is very close to the 15km zone of influence option (d) that captures 96.67% of visitors. It would, therefore, not be significantly distinct from option (d).*

***(iv)** To have a 13km zone of influence – The visitor survey report (2009: p33) suggests that Ashdown Forest has a local (as opposed to tourist) catchment area of 13km. In terms of visitor numbers, this zone of influence would capture around 95% of visitors from Mid Sussex to Ashdown Forest[12]. It is not considered appropriate to appraise this option as a reasonable alternative because this percentage of visitors is very close to the 15km zone of influence option (d) that captures 96.67% of visitors. It would, therefore, not be significantly distinct from option (d).*

Preferred Policy Option: C

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

Recommendations and Mitigation Measures:

It is recommended that the policy wording is flexible enough to consider the effects of development proposed adjacent or close to the boundary of the 7km zone of influence. Such development may require mitigation and as the particular circumstances may vary for each proposal, it is recommended that such proposals for development should be dealt with on a case-by-case basis.

Future visitor surveys at Ashdown Forest undertaken as part of a mitigation strategy may reveal changes to the catchment area. If supported by evidence, amendments could be made to the zone of influence. It is recommended that future monitoring of visitors to Ashdown Forest is undertaken and the data analysed.

Cross-Border Impacts:

Ashdown Forest is within Wealden District. Joint working and collaboration has been ongoing with Wealden, Tunbridge Wells and Lewes councils on potential mitigation measures. It is likely that each of these local authorities will also be implementing a zone of influence, however, there are not expected to be any negative implications arising from this appraisal for these neighbouring areas. Whilst consistency between the local authorities may be preferable, the Habitats Regulations do not require this, and different zones of influences may reflect the local context.

Overall Conclusion:

Identifying a zone of influence is considered to provide certainty and clarity as to where measures

[16] UE Associates (2009) *Visitor access patterns on Ashdown Forest* – Table 3.12, page 36.

will be required to mitigate any potential effect on the Ashdown Forest SPA. A 7km zone of influence represents the most appropriate distance based on the evidence available as this area will capture the majority of regular visitors to Ashdown Forest. Significant positive effects are expected for biodiversity and the countryside as well as positive effects for health, education and community facilities. Future visitor surveys at Ashdown Forest will provide further evidence on visitor patterns and trends.

Mitigation Measures

8.15. Mitigation measures are necessary to counteract the effects of potential increasing recreational pressure on the Ashdown Forest SPA arising from new residential development. Mitigation measures will help to ensure that the conservation objectives for the Ashdown Forest SPA and SAC are met which will prevent the deterioration of the qualifying species for which the SPA has been classified and the SAC has been designated.

8.16. Mitigation measures seek to avoid or reduce any adverse effects on the European site, and can be taken into account when undertaking the HRA and considering if there would be a likely significant effect or an adverse effect on the integrity of the European site from the proposals. Where adverse effects on the integrity of a European site cannot be ruled out and in the absence of alternative solutions, compensatory measures may be required when the plan is assessed for imperative reasons of overriding public interest.

8.17. The visitor survey data analysis considers that a mitigation strategy for the Ashdown Forest SPA is necessary and appropriate[17]. In common with other heathland sites, the mitigation and monitoring strategy could include:

- Regular monitoring of Annex I bird populations;
- Long-term visitor monitoring, for example, through the use of automated counters, car park counts etc;
- Research to determine why the density of Annex I bird species appears to be low at Ashdown Forest;
- On-site management measures, such as enhanced wardening provision to ensure dogs are on leads, interpretation and education work, zoning, car park management etc; and
- Off-site mitigation measures such as provision of alternative sites for activities such as dog walking.

8.18. The District Plan HRA recommends a Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) approach which has been successfully used elsewhere at heathland sites. This mitigation approach has been suggested for Mid Sussex since at least 2009[18]. Including mitigation measures as part of the District Plan will mean the District Plan will not result in adverse effects on the ecological integrity of the Ashdown Forest SPA. This approach is supported by Natural England.

8.19. The District Council, as competent authority, will assess the effectiveness of any mitigation measures following the advice of Natural England. Bespoke mitigation may also be appropriate in some circumstances. The mitigation strategies will include a monitoring framework to record progress and assess the effectiveness of the mitigation which will help inform any future review of the mitigation.

[17] Clarke, R.T., Sharp. J. and Liley, D. (2010) *Ashdown Forest visitor survey data analysis*: Natural England Commissioned Reports, Number 048 – paragraphs 8.14 and 8.15, page 31.
[18] UE Associates (2009) *Technical note: HRA for the Mid Sussex Core Strategy – avoidance and mitigation strategy*.

8.20. Nevertheless, other mitigation measures have been considered. This work was initially undertaken by Wealden District Council, however, as it is for the local Ashdown Forest context, it is considered that the same principles apply to Mid Sussex District Council if any of these mitigation measures were pursued.

8.21. Mitigation measures are measures to avoid or reduce the effects of a plan on a European site and should be proposed as part of the plan, so that they can be taken into account in a Habitats Regulations Assessment. Avoidance measures are designed to avoid any effects on a European site and reduction measures are designed to minimise or reduce any adverse effects on European sites.

Mitigation: avoidance measures

8.22. Avoidance measures for the Ashdown Forest SPA that have been considered as alternatives and assessed for their suitability to form part of a mitigation strategy are as follows:

Avoidance measure	Assessment	Realistic option
Suitable Alternative Natural Greenspace (SANG)		
Provide alternative areas for people to exercise dogs, walk and other recreational purposes ensuring the visitor experience is comparable to Ashdown Forest	Data from the visitor surveys show that people do visit other areas of open space so this measure may help to reduce the number of visits to Ashdown Forest. It would be beneficial to provide alternative areas with a similar visitor experience to Ashdown Forest to ensure alternative areas attract visitors. Factors such as openness, views and natural beauty are considered important.	Yes
Provide alternative areas for people to exercise dogs, walk and other recreational purposes	Data from the visitor surveys show that people do visit other areas of open space so this measure may help to reduce the number of visits to Ashdown Forest. As people visit Ashdown Forest for specific reasons, it may be that this measure would be less effective in attracting visitors if it did not provide a similar experience to Ashdown Forest.	Yes
Provide dog gyms or other dog activity parks	Dog gyms or dog activity parks may reduce the number of visitors to Ashdown Forest by providing areas where people can exercise dogs. This will also provide a fun experience for dogs. However, whilst the majority of people visiting Ashdown Forest do so to walk their dog, a number of people also go to walk and for other recreational activity. A dog gym or dog activity park is also unlikely to provide a similar experience to Ashdown Forest such as size and openness of the site, as well as the views.	Yes, in combination with the provision of open space designed for other users
Other avoidance measures		
Prevent access onto Ashdown Forest	It is understood this is not legally possible as Ashdown Forest is open access land.	No
Prevent access onto Ashdown Forest in the areas where the protected birds are nesting	It is understood this is not legally possible as Ashdown Forest is open access land. It is also difficult to identify bird territories or nests so the specific locations to avoid would be hard to establish.	No

Avoidance measure	Assessment	Realistic option
Close access points (car parks and pedestrian accesses) where the protected birds are nesting	Ashdown Forest is owned by East Sussex County Council and managed by the Conservators of Ashdown Forest[19] so it would be difficult to require the closure of access points. It is also understood that the closure of car parks does not necessarily mean that people will go to another access point, rather that they may park on the main road near to the closed car park.	No
Implement a charge for parking in car parks	It is understood there is a duty to provide car parks and whilst the Conservators of Ashdown Forest are able to make reasonable charges for the parking of vehicles on the Forest, it may be difficult to implement a charging system. Charging for parking may also not reduce usage.	No
Introduce and enforce parking controls at the access points near to where the protected birds are nesting	It is understood that parking controls may be difficult to implement and enforce on Ashdown Forest. There are 48 car parks at Ashdown Forest and an additional 18 recognisable footpaths providing pedestrian access onto the Forest[20].	No
Introduce charging or a permit system to reduce the number of visitors	It is understood this is not legally possible as Ashdown Forest is open access land and covered by the Ashdown Forest Act 1974. This mentions that the public shall have access on foot to the Forest for quiet recreation and enjoyment.	No
Provide areas dedicated for exercising dogs	This would require fencing and the fencing allowance (100 acres) for Ashdown Forest is used up for grazing requirements.	No
Enforce dogs on leads during the bird breeding season	It is understood this would be difficult to implement as the Conservators of Ashdown Forest manage the land, however, this could be investigated further in the future.	No
Ensure new residential development has a restrictive covenant on dog ownership	This is not an effective measure as it is difficult to enforce.	No
Bespoke mitigation		
Bespoke mitigation	Bespoke mitigation is specific to the circumstances of the development. This would allow the most flexibility for applicants of proposed development to suggest mitigation solutions, however, this leads to uncertainty and potential problems with funding mitigation. It is difficult to assess precisely what such measures could involve, but potential options could be upgrading and enhancing rights of way and other forms of recreational space. Detailed evidence	Yes, although consideration would need to be given to its suitability to mitigate through a Habitats Regulations Assessment.

[19] Governance of Ashdown Forest: http://www.ashdownforest.org/governance/protection/1974act.php.
[20] UE Associates (2009) *Visitor access patterns on Ashdown Forest* – Section 2.2, page 11.

Avoidance measure	Assessment	Realistic option
	would be required to assist the competent authority in determining if the bespoke mitigation would be sufficient to avoid a recreational pressure impact on Ashdown Forest. Natural England's advice would also be taken into account.	

Table 35 - Avoidance Measures

8.23. The analysis in Table 2 shows that although there are a number of possible avoidance measures, some of them are not possible to implement or enforce. The measure most likely to avoid a likely significant effect on Ashdown Forest is the provision of alternative areas of open space. This measure is likely to attract people particularly if the open space is located close to new residential development and provides a similar visitor experience to Ashdown Forest. Dog gyms or dog activity parks may also help to attract dog owners, however, open space is also required to cater for the recreational needs of other users.

8.24. By providing an alternative option, Suitable Alternative Natural Greenspace (SANG) is the name given to greenspace that is of a quality and type suitable to be used as mitigation to offset the impact of new development on the Ashdown Forest SPA. A SANG site could either be provided on the development site itself or through a financial contribution towards a strategic SANG.

8.25. In order for SANGs to be effective mitigation for the Ashdown Forest SPA, the SANG site should be functional from the point at which any relevant development is occupied. It should also seek to provide a similar visitor experience to that of Ashdown Forest, although it is acknowledged that it is very difficult to replicate that environment. In designing the enhancement works, however, it is necessary to consider the characteristics and features that draw people to Ashdown Forest.

8.26. The assessment of the suitability of a site as SANG is made against a number of criteria developed by Natural England. A minimum standard of 8Ha of SANG per 1,000 net increase in population has been established through the mitigation work at the Thames Basin Heaths. This standard is equivalent to 0.008Ha per person.

<u>Mitigation: reduction measures</u>

8.27. It is considered that in addition to measures designed to avoid a likely significant effect on the Ashdown Forest SPA, other measures may also be required to help reduce any residual effects of visitors to Ashdown Forest, particularly as visitors are attracted by the openness and views[21]. These measures take place on Ashdown Forest itself and it is considered that a number of measures would be required together as part of a mitigation strategy.

8.28. A Strategic Access Management and Monitoring (SAMM) Strategy aims to manage visitors on-site at Ashdown Forest. It is necessary to take a strategic and co-ordinated approach to access management and monitoring in order to ensure the SPA is considered as a whole. A joint SAMM Strategy is being prepared with the other affected local authorities (Wealden District Council, Lewes District Council and Tunbridge Wells Borough Council), Natural England and the Conservators of Ashdown Forest. This joint SAMM Strategy will supersede the interim SAMM Strategy[22] that the District Council is currently applying to relevant planning applications.

[21] UE Associates (2009) *Visitor access patterns on Ashdown Forest* – page iv.
[22] Mid Sussex District Council (August 2013) *Interim SAMM mitigation strategy*.

8.29. Table 3 considers the various aspects of the proposed joint SAMM Strategy. These reduction measures could be delivered as individual projects or as part of a mitigation approach.

Reduction measure	Assessment	Realistic option
Code of Conduct for Dog Walkers and associated publicity such as leaflets and signage	A new Code of Conduct has been produced by the Conservators of Ashdown Forest. This aims to encourage responsible dog ownership and promote behavioural change.	Yes, in combination with other reduction measures.
Responsible dog ownership training	This will provide training and guidance for people as to how to control and manage their dogs.	Yes, in combination with other reduction measures.
Volunteer dog rangers	Volunteer dog rangers on Ashdown Forest will promote the Code of Conduct and encourage responsible dog ownership.	Yes, in combination with other reduction measures.
Access Management Officer(s) to oversee the volunteer dog rangers	An employed officer based at the Ashdown Forest Centre in Wych Cross will have everyday contact with visitors. This will provide opportunities for communication and education as to how visitors can visit Ashdown Forest responsibly and about the protected bird species. The Access Management Officer can also oversee and train the volunteer dog rangers.	Yes, in combination with other reduction measures.
Community activities and events	Targeted activities and events will help to communicate responsible use of Ashdown Forest and engage local people.	Yes, in combination with other reduction measures.
Signage, leaflets and interpretation boards	Additional signage, leaflets and interpretation boards will help to provide information on Ashdown Forest and its protected nature conservation status. Information can be provided on the protected species and visitors can be informed of how to visit responsibly.	Yes, in combination with other reduction measures.

Table 36 - Reduction Measures

8.30. Collectively, such mitigation measures are considered to educate visitors and encourage behavioural change on Ashdown Forest. This will help to protect the near-ground and ground nesting birds and the conservation interests of Ashdown Forest.

8.31. It is also recommended that the mitigation strategy incorporates a programme of bird and visitor monitoring on Ashdown Forest. This will provide more data and help to identify trends in visitor patterns as well as providing important information on the protected birds. Bird and visitor monitoring will also help to monitor the effectiveness of the mitigation strategy.

Appraisal of Policy DP15

8.32. Based on the conclusions of the appraisal for the zone of influence and the analysis of potential mitigation measures, a range of options have been developed to form the basis of the District Plan policy for Ashdown Forest. It is proposed to set the zone of influence to 7km and to have a combination of both avoidance and reduction measures in the form of SANG

and SAMM. There is also the ability for new residential development to provide bespoke mitigation instead of SANG contributions.

8.33. The following appraisal considers the four different options for Policy DP15. Each option has been assessed against the Sustainability Objectives.

DP15 – Ashdown Forest Special Protection Area and Special Area of Conservation

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy which outlines the intention to develop a strategic approach to protect the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) from recreational pressure and air pollution through the use of:

- A buffer zone that prevents development within a certain distance of Ashdown Forest (400m as per the visitor survey evidence), regardless of size.
- A zone of influence that allows development within a certain distance of the Ashdown Forest (7km as per the visitor survey evidence) provided mitigation methods are employed through:
  - the provision of Suitable Alternative Natural Greenspace (SANGs); or a financial contribution to SANGs elsewhere; or the provision of bespoke mitigation; and
  - A financial contribution to the Ashdown Forest Strategic Access Management and Monitoring (SAMM) Strategy that reduces the on-site impacts of visitors on special interest features of the designated site.

B) As option (a) but only requires SANG mitigation for new residential development within the 7km zone of influence.

C) As option (a) but only requires SAMM mitigation for new residential development within the 7km zone of influence.

D) As option (a) but only requires bespoke mitigation for new residential development within the 7km zone of influence.

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

Summary of Appraisal:

This policy aims to protect the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) and as such has significant positive impacts on the environmental objectives. By requiring development within a certain distance from Ashdown Forest to provide mitigation, this policy may have a negative impact on objective 1 and the ability to provide decent and affordable

homes within the zone of influence, where housing need may exist.

The provision of SANGs is likely to increase the potential for health benefits through access to community facilities and greenspace, as well as providing an opportunity for education, tourism, nature conservation and improved green infrastructure. As an alternative area of open space, SANGs should also reduce the need to travel to Ashdown Forest, thus reducing road congestion and addressing one of the causes of climate change. SANGs are, therefore, likely to have positive impacts on the social objectives and reducing road congestion.

The provision of SAMM mitigation addresses access management issues at Ashdown Forest itself and will comprise projects to manage visitor behaviour as well as monitor birds and visitors. It is not certain that the provision of SAMM mitigation by itself would be effective in addressing the impact of increased recreational pressure.

Whilst bespoke mitigation for new residential development would satisfy the requirements of the Habitats Regulations, it is likely to result in a less joined-up and co-ordinated approach. The detail of mitigation would be left to the planning application stage creating uncertainty in the type of mitigation that may come forward in the future. The mitigation proposed may vary between developments and would require applicants to provide more information to demonstrate that their development proposal would have no likely significant effect on the Ashdown Forest SPA. Not suggesting a specific mitigation strategy is also likely to lead to more uncertainty with developers, so this option (d) is expected to have a stronger negative effect on housing delivery. Since it is also unknown what measures will form the bespoke mitigation, it is considered that this would have less positive impacts on biodiversity and the countryside than if specific mitigation measures were set out. Any plans for bespoke mitigation will need to be assessed for its effectiveness and agreed by the District Council as the competent authority following advice from Natural England.

Whilst the four policy options are similar, there are likely to be greater positive impacts on the environment from requiring both SANG and SAMM mitigation. It is considered that SANG mitigation (option (b)) on its own will have stronger positive effects than SAMM mitigation (option (c)) on its own, and bespoke mitigation (option (d)) would result in less certainty and consequently would not have such strong positive effects. Requiring both SANG and SAMM mitigation (option (a)) as well as the ability for development to provide bespoke mitigation will ensure an effective approach to protecting Ashdown Forest because suitable greenspace is provided as an alternative to visiting Ashdown Forest and mitigation projects will help to manage visitor behaviour at Ashdown Forest itself.

Other options considered and not appraised:

(i) *To have a policy which outlines the intention to develop a strategic approach to protect the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA) from recreational pressure and air pollution through the use of:*

- *Buffer zones that:*
  - *Prevent development of a certain <u>size</u> within a certain <u>distance</u> of the Ashdown Forest.*
  - *Allow development within a certain distance of the Ashdown Forest provided mitigation methods are employed through the provision of Suitable Alternative Natural Greenspace (SANGs).*
- *An Access Management Strategy that reduces the impact of visitors on special interest features of the designated site.*

(ii) *To have a policy which outlines the intention to develop a strategic approach to protect the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA) from recreational pressure and air pollution through the use of:*

- *Buffer zones that:*
  - *Prevent development of a certain <u>size</u> within a certain <u>distance</u> of the Ashdown Forest.*
- *An Access Management Strategy that reduces the impact of visitors on special interest features of the designated site.*

(iii) *To not have a policy on the Ashdown Forest SPA and SAC – this is not considered to be a reasonable alternative as the evidence indicates that additional residential development may have a recreational disturbance impact on the protected birds at Ashdown Forest.*

Preferred Policy Option: A

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

Recommendations and Mitigation Measures:

Although the Habitats Regulations Assessment report concludes that likely significant effects on air pollution and the Special Area of Conservation (SAC) are unlikely, in order to promote good practice, the proposed District Plan Policy DP19 contains measures to encourage sustainable transport and proposed Policy DP27 on noise, air and light pollution sets out the requirements for avoidance and mitigation in relation to air pollution.

The Strategic Access Management and Monitoring (SAMM) strategy is likely to contain measures that monitor bird and visitor numbers on Ashdown Forest. This provides evidence and the flexibility to adapt the strategy to ensure the mitigation at Ashdown Forest is beneficial and effective.

Cross-Border Impacts:

Ashdown Forest is within Wealden District. Joint working and collaboration has been ongoing with Wealden, Tunbridge Wells and Lewes councils on the SAMM strategy. There are not expected to be any negative implications arising from this policy for these neighbouring areas.

Overall Conclusion:

This policy aims to mitigate the effects of recreational pressure arising from new residential development surrounding the Ashdown Forest SPA and SAC. It is clear that overall this policy will have positive impacts, particularly on the environmental and social objectives. There is likely to be no impact on the majority of the economic objectives. This policy requires new residential development within a certain zone of influence to provide mitigation so there may be possible negative effects on the objective concerned with providing decent and affordable homes. As a form of green open space, Suitable Alternative Natural Greenspace (SANG) is likely to have positive effects on the social and environmental objectives which are likely to increase over time. For example, there are likely to be positive benefits on access to health, education and community facilities, as well as helping to reduce road congestion and address one of the causes of climate change. The Strategic Access Management and Monitoring (SAMM) strategy will focus on access (visitor) management at Ashdown Forest itself as well as bird and visitor monitoring.

DP15 - Conclusion

8.34. The District Plan HRA identifies that increased recreational activity arising from new residential development and related population growth is likely to disturb the protected near-ground and ground nesting birds.

8.35. The District Plan HRA advises that measures are required to mitigate any potential recreational disturbance impact and District Plan Policy DP15 implements these recommendations.

8.36. A wide range of options have been considered and appraised, based on an evidence base and responses to the District Plan consultation.

8.37. The appraisals of these options show that a zone of influence should be defined within which mitigation measures would be required from new residential development. This zone of influence is set at 7km from the boundary of the Ashdown Forest SPA and the mitigation measures comprise SANG and SAMM, with the ability to provide bespoke mitigation if appropriate. This was concluded to be the most sustainable option given all reasonable alternatives.

8.38. The data analysis from the visitor survey found that the majority of regular visitors to Ashdown Forest originated from a 7km distance from Ashdown Forest. Within this 7km zone of influence, measures to reduce recreational pressure would be most effective, and residential development leading to a net increase in dwellings will need to contribute to an appropriate level of mitigation.

8.39. SANG provides an alternative option to visiting Ashdown Forest and is an avoidance measure since its purpose is to divert the majority of regular visitors away from the Ashdown Forest SPA, thereby avoiding the disturbance impact of those people. The East Court & Ashplats Wood SANG Strategy[23] has been agreed by the District Council. The site in East Grinstead is an area of existing open space with existing public access and as such, is available for use by the future residents of current planning applications. The site is operating as a SANG now and a series of enhancement works will increase the site's attractiveness to visitors.

8.40. A SAMM Strategy aims to address the residual effects of visitors to Ashdown Forest by managing visitors and promoting behavioural change, as well as monitoring birds and visitors. Work on the joint SAMM Strategy is in progress and one of the SAMM projects has begun – this is the Code of Conduct for Dog Walkers and associated publicity.

8.41. The current approach to Ashdown Forest, including the mitigation proposed, is based on the best available evidence. Should new evidence be identified following analysis of bird and visitor surveys at Ashdown Forest, there is the flexibility to amend the mitigation strategy if appropriate.

8.42. A co-ordinated and strategic approach is necessary to provide the most certainty for protecting the Ashdown Forest SPA, as well as providing clarity to applicants of proposed development. A co-ordinated approach allows mitigation to be funded collectively also providing reassurance and certainty that measures can be delivered. Natural England supports the approach taken by Mid Sussex District Council to the Habitats Regulations and Ashdown Forest matters, including the District Plan HRA and District Plan Policy DP15.

[23] Mid Sussex District Council (October 2014) *East Court & Ashplats Wood Suitable Alternative Natural Greenspace Strategy*.

DP16 – Setting of the South Downs National Park

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that considers development proposals adjacent to the South Downs National Park (including rural exception sites) to ensure that they enhance and do not detract from the visual quality and essential characteristics of the area – views in particular. Development should be consistent with the National Park purposes and have regards to the South Downs Partnership Management Plan and emerging National Park planning documents and strategies.

B) To not have a policy on this subject and thereby rely on policies on character and design.

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

Summary of Appraisal:

Option (a) is more restrictive than option (b) and is likely to be more negative for the social objectives, but more positive for the environmental objectives. This conflict was likely to arise, given the compatibility of objectives exercise undertaken in section 5.

Ensuring that development proposals adjacent to the South Downs National Park enhance the area (option (a)) may result in a negative impact from the ability to provide decent and affordable homes in areas outside the park but adjacent to it, where they are required. Option (b) may provide greater flexibility.

The provision of homes in the National Park is a consideration for the South Downs National Park Authority as the strategic planning authority for the area. This approach (option (a)) may also have similar negative effects for access to services such as health and education, as well as the employment and economic growth objectives. It is considered that for these objectives, option (b) will have no impact.

Option (a) will have a positive impact on objectives 8 and 10 and significant positive impacts on objective 9 as it seeks to enhance the setting and visual quality of the South Downs National Park area. Ensuring that development proposals enhance the area may also encourage tourism leading to positive effects.

Other options considered and not appraised:

None.

Preferred Policy Option:	**A**

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

Recommendations and Mitigation Measures:

For objectives 1 and 7, the proposed policies on New Homes in the Countryside, Housing Mix, Rural Exception Sites and the Housing Strategy will mitigate any negative effects that may arise from this policy. For objectives 2, 3 and 4, the policies on Securing Infrastructure and Leisure and Cultural Activities and Facilities will mitigate the negative effects that may arise from this policy. For objectives 16 and 17, the policies on Sustainable Rural Development and Economic Development will mitigate the negative effects that may arise from this policy. The policy on Character and Design should also help to mitigate the negative effects that may arise from this policy.

Cross-Border Impacts:

The South Downs National Park is within Mid Sussex District, but the South Downs National Park Authority are the strategic Planning Authority for the area. There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Although this policy option has the potential to negatively impact on several of the objectives, it is considered that it is necessary to have a policy that considers development proposals (including rural exception sites) adjacent to the South Downs National Park to ensure that they enhance and do not detract from the visual quality and essential characteristics of the area. This is likely to have positive impacts on the environmental objectives such as biodiversity, the countryside and the historic environment. This policy will help protect and enhance the countryside through consideration of the setting of the South Downs National Park.

Other policies in the District Plan are likely to help mitigate some of the negative impacts that may arise from this policy, and these are particularly related to the provision of homes, access to services and the economic objectives.

Overall, whilst this policy option is likely to have negative impacts on some of the sustainability objectives, it is considered that it is necessary to consider the setting of the South Downs National Park ensuring that development proposals enhance the visual quality and characteristics of the area and that the significant positive impacts on environmental objectives outweigh any potential negative impacts that could arise from this policy.

DP17 - Sustainable Tourism

Promoting Economic Vitality

Policy Options:

A) To have a policy that restricts new tourism related development outside built up area boundaries to that for which a rural location is essential, is small scale and where there will be no harm to the character of the countryside.

B) To have a policy that allows new tourism related development in the countryside, including visitor accommodation and the re-use of rural buildings, where this will support the growth of the rural economy, where there will be no harm to the character of the countryside, and where it meets the criteria of other policies in the District Plan.

C) To have a policy that adds to option B above that includes reference to the safeguarding of land required to deliver extensions to the Bluebell Railway.

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

Summary of Appraisal:

For the social objectives, options (a), (b) and (c) have no impact. Option (b) will potentially have a more positive impact than option (a) on objectives 7, 9 and 10 as it encourages the re-use of rural buildings and may provide facilities for enjoying the countryside and historic environment. Option (b), however, may have a more negative impact than option (a) on objective 11 as some tourism related development may only be accessible by private car thus potentially affecting levels of emissions.

In terms of maintaining and improving water quality, there may be tourism related development in areas without mains sewerage, therefore, there is an increased pollution risk, hence a possible negative impact on this objective. Both option (a) and (b) will have a positive impact on the economic policies, but as option (b) is less restrictive in allowing tourism, the impact may be greater. Option (c) adds to option (a) or (b) the safeguarding of land required to deliver extensions to the Bluebell Railway, and it is considered that this will perform equally to option (b) as it will especially encourage tourism. It may also have a greater positive impact on enhancing the historic environment as it concerns the steam heritage of the District. As option (c) adds to either option (a) or (b), the impact on reducing road congestion is uncertain, however, the impact may be somewhere between the two.

Other options considered and not appraised:

None.

Preferred Policy Option: **C**

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

Recommendations and Mitigation Measures:

For objective 11, the proposed policy on Transport will mitigate the negative effects that may arise from this policy. For objective 13, the policies on Sustainable Resources and Water Infrastructure and Water Environment will mitigate the negative effects that could arise on water quality as a result of this policy.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

This policy is likely to have no or little impact on the majority of objectives. It is clear that this policy has strong positive impacts for the economic objectives and as can be expected, on the tourism objective. This is also likely to have positive impacts over time for the objectives on efficient land use, protecting and enhancing the countryside, and protecting and enhancing the historic environment. This policy, however, may have negative effects for the objectives on climate change, road congestion and water quality although these should be mitigated by other policies.

DP18 – Securing Infrastructure

Promoting Economic Vitality

Policy Options:

A) To have a policy that sets out the infrastructure that developers will be required to contribute towards or provide in order to support development and sustainable communities. The policy will refer to the Community Infrastructure Levy (CIL) and negotiated Section 106 agreements where appropriate (section 278 for highways). The policy will require a programme of delivery to be agreed before development begins, and that where relevant the CIL should be spent in the locality of the scheme that generated it.

B) Not to have a policy on this issue in the District Plan instead relying on national guidance and legislation (from April 2015, Section 106 agreements alone).

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

Summary of Appraisal:

As both options are focussed on delivering much needed infrastructure within the District, there are no predicted negative sustainability impacts arising from either. Option (a) does however achieve more positive benefits than option (b).

The main difference between the two options is the impact on objectives 2, 3, and 4. These objectives are concerned with improving access to health facilities, educational facilities and community services respectively. As of April 2015, changes to Reg.123 of the Community Infrastructure Levy Regulations 2010 will limit the number of pooled Section 106 contributions to 5 for any one scheme. This limit may mean contributions received from developments may not be enough to pay for new/improved community facilities such as doctor's surgeries, schools and community buildings particularly if the 5 contributions are from developments that are small in scale.

This is a similar situation with objective 11. Smaller contributions towards Total Access Demand (TAD) may mean there is not enough funding towards sustainable transport schemes.

By introducing CIL, and allowing for CIL to be spent in the locality of the scheme that generate it, it will allow for investment in town and village centres, which will have a positive impact on objective 15. This may not be the case should CIL not be introduced, as per option (b).

Other options considered and not appraised:

None.

Preferred Policy Option:	**A**

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

Recommendations and Mitigation Measures:

None suggested.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Positive social, environmental and economic benefits should accrue from this policy, particularly for those objectives that are linked to new and/or improved health, education, leisure, recreation and other community services and facilities in comparison with option (b), particularly in the long term.

DP19 – Transport

Promoting Economic Vitality

Policy Options:

A) To have a policy that sets out that development must contribute towards meeting the objectives of the Local Transport Plan[24], delivering a high quality transport network that promotes a competitive and prosperous economy; provides access to services, employment and housing; complements the built environment; and is safer and healthier to use. Development proposals should be sustainably located, facilitate and promote sustainable transport, not cause severe safety/traffic impacts and provide adequate car and cycle parking. Proposals should be accompanied by a Transport Assessment and Travel Plan.

B) To not have a policy on this subject.

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

[24] The West Sussex Transport Plan 2011-2026

Summary of Appraisal:

Option (a) performs better or equal to option (b) on every sustainability objective. In particular, a policy that promotes alternative modes of transport to the private car will have positive environmental sustainability benefits in reducing road congestion and the causes of climate change (objective 11). Improvements to public transport services will improve access to community facilities and services, especially in rural areas where there is a high dependence on the car. It should also enable people to travel more sustainably to their place of work.

Other options considered and not appraised:

(i) *To have a policy which sets out general criteria for the location of development to minimise travel and requires that the design of the development includes a safe road access, adequate car parking and the facilitation of a choice of modes of transport to the site.*

Many aspects of this policy option ***(i)*** are covered in option (a) which refers to safer road access and the facilitation of a choice of modes of transport to new developments.

Preferred Policy Option: **A**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	0	+	+?	+	0	0	0	0	+?	0	+	0	0	0	0	0	0	0
Medium	0	+	+?	+	0	0	0	0	+?	0	++	0	0	0	+?	+?	+	+?
Long	0	+	+?	+	0	0	0	0	+?	0	++	0	0	0	+?	+	+	+

Recommendations and Mitigation Measures:

None suggested.

Cross-Border Impacts:

Transport is a cross-border issue. By contributing to the Local Transport Plan, this will ensure that any negative cross-border impacts are mitigated.

Overall Conclusion:

Positive benefits should accrue from this policy. Improved travel choice and transport infrastructure is shown to have positive social, environmental and economic impacts – particularly over the long term. No negative impacts should arise from the selection of option (a) in comparison to option (b), which will not reduce road congestion, the key aim of this policy.

DP20 – Rights of Way and other Recreational Routes

Supporting Healthy Lifestyles

Policy Options:

A) To have a policy that protects rights of way, Sustrans national cycle Route and recreational routes and encourages access to the countryside by ensuring development does not result in the loss of or adversely affect a right of way, ensuring development provides links to rights of way, identifies opportunities for planning routes within and between settlements, and encourages making new or existing rights of way multi-functional.

B) To not have a policy on this subject.

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

Summary of Appraisal:

Whilst both policy options (a) and (b) have little or no impact on the majority of objectives, it is clear that this policy has the strongest impact on objective 9. This is unsurprising given the policy direction on protecting and enhancing the countryside and encouraging access to it. It is considered that option (a) will have a positive impact on objective 9 since it is concerned with encouraging access to the countryside whereas option (b) may have a negative impact as there would be less protection for rights of way and recreational routes. Option (a) would also have a positive impact on access to health (objective 2) because rights of way and recreational routes offer an opportunity for physical activity and well-being. Likewise, option (b) may reduce this opportunity resulting in a negative impact on health issues. Option (a) may also lead to a positive impact for access to services, addressing the causes of climate change, conserving biodiversity, reducing road congestion and encouraging tourism by ensuring that existing rights of way and recreational routes are not lost and encouraging new and multi-functional routes.

Other options considered and not appraised:
None.

Preferred Policy Option: **A**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	0	+	0	+?	0	0	0	+?	++	0	+	0	0	0	0	0	0	+?
Medium	0	+	0	+?	0	0	0	+?	++	0	+	0	0	0	0	0	0	+?
Long	0	++	0	+?	0	0	0	+?	++	0	+	0	0	0	0	0	0	+?

Recommendations and Mitigation Measures:

The proposed policy on Biodiversity will increase and encourage green infrastructure by creating a network of multi-functional green space. Rights of way will form a significant part of green infrastructure connecting green space, which will provide health benefits as well as ecological and environmental benefits. Rights of way and recreational routes as part of green infrastructure are important for both urban and rural areas in connecting places across the District.

Cross-Border Impacts:

The South Downs National Park Access Network and Accessible Natural Green (ANG) Space Study assessed green infrastructure and access across the West Sussex and National Park area. The study considers recreational pressure on the ANGs within Mid Sussex as neighbouring areas (Brighton, Crawley, Shoreham) lack ANG provision. Protecting ANGs within Mid Sussex is not only important for Mid Sussex, but for the wider area.

Overall Conclusion:

It is clear that this policy will have the strongest positive impact on objective 10 as rights of way and recreational routes will help to protect and enhance the countryside. This policy is also likely to have a positive impact on health as rights of way will provide opportunities for physical activity and well-being. There may also be positive impacts on access to services, addressing the causes of climate change, biodiversity, reducing road congestion and encouraging tourism. Overall, this policy is likely to have positive effects on the environmental and social objectives, and this impact may increase over time.

DP21 – Communication Infrastructure

Promoting Economic Vitality

Policy Options:

A) To have a policy that supports the expansion of electronic communication networks, including the provision of high-speed broadband (including fibre to premises) connection to the towns and rural areas of the District, preferably making use of existing sites. Where a new site is required, careful consideration should be given to the design and appearance of equipment.

B) To have a policy that supports the expansion of electronic communication networks, including the provision of high-speed broadband connection to the towns and rural areas of the District, but does not require careful consideration to its location, design and appearance of equipment.

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

Summary of Appraisal:

Both options support the expansion of electronic communication networks. Positive impacts can be predicted for the economic objectives for both options, as the installation of high-speed broadband

to town and village locations can attract new businesses and retain those that rely on high-speed communications. More importantly, it will potentially allow residents to work from home. This will impact positively on transport objectives as it will reduce the need to commute, potentially by private car.

Option (a) includes the need for proposals to be situated on existing sites where possible. This will impact positive on the efficient use of land objective. Similarly, this option requires new proposals to consider the design and appearance of equipment, which will have a positive impact on the protection of the historic environment objective in comparison to option (b).

Other options considered and not appraised:

None.

Preferred Policy Option: **A**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	0	0	+?	+	0	0	+	0	0	+?	+?	0	0	0	0	+	+?	0
Medium	0	0	+?	+	0	0	+	0	0	+?	+?	0	0	0	0	+	+?	0
Long	0	0	+?	+	0	0	+	0	0	+?	+?	0	0	0	0	+	+?	0

Recommendations and Mitigation Measures:

None.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Policy option (a) will impact positively on social and economic objectives by ensuring that up-to-date communications infrastructure can be delivered within the District, which will support economic aims and the indirect positive effects that could occur as residents are able to work from home more efficiently, reducing the need to regularly commute.

DP22 - Leisure and Cultural Facilities and Activities

Supporting Healthy Lifestyles

Policy Options:

A) To have a policy that supports development that provides new and/or enhanced existing leisure activities and facilities in accordance with the Leisure and Cultural Strategy for Mid Sussex, the standards for the provision of leisure facilities and the findings of any future assessment of the provision of leisure and cultural facilities and activities for Mid Sussex. Will set the requirement for new on-site provision of leisure and cultural facilities for all new developments (including making land available for this purpose) and sets out how these facilities could be delivered through Neighbourhood Plans.

B) As (a), but with the additional requirement to prevent the loss of open space, sports and recreational buildings and land, including playing fields. Loss of these facilities will not be supported unless deemed surplus to requirements, the loss would be replaced in a suitable location, or the development is for alternative sports and recreation provision. Provision, including standards, will be set out in an appropriate planning document.

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

Summary of Appraisal:

Both options are predicted to perform positively overall for the majority of the sustainability objectives. In particular, both policies will have positive impacts on the objectives concerned with access to health and community facilities. Option (b) is predicted to perform more positively on both of these objectives as it also requires the retention of existing facilities or re-provision of alternative facilities if such sites are lost.

A number of indirect positives may occur from either of these policy options, as provision of new leisure and cultural facilities may conserve biodiversity and protect the countryside from other forms of development. The provision of cultural facilities, in particular, is expected to have a positive impact on the objective concerned with encouraging tourism, dependant on the type of facility that is developed.

Other options considered and not appraised:

(i) *To have a policy that protects all existing open spaces or recreational and leisure facilities that have been identified as having high value.*

(ii) *To have a policy that allows open spaces or recreational and leisure facilities that have been identified as having low value to be released for alternative recreational or leisure use, housing development or employment/commercial use.*

(iii) *To have a policy that protects all existing open spaces, recreational and leisure facilities irrespective of whether they have been identified as having high or low value.*

(iv) *To not have a policy on this issue in the District Plan instead relying on national guidance.*

Preferred Policy Option: **B**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	0	+?	+?	+	+?	0	0	+?	+?	+?	+?	0	0	0	0	0	0	+?
Medium	0	+	+?	+	+?	0	0	+?	+?	+?	+?	0	0	0	0	0	0	+
Long	0	+	+?	++	+?	0	0	+?	+?	+?	+?	0	0	0	0	0	0	+

Recommendations and Mitigation Measures:

As this policy should positively contribute to the local environment, the policy on Biodiversity will help to ensure that open space also has positive effects on biodiversity and the protection of natural habitats. The policies on Housing should also ensure that new developments have sufficient open space and are well located to leisure facilities.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

The provision of new leisure and cultural activities and facilities will have positive impacts on the objectives concerned with improving access to health and education, as well as improving the local environment. Similarly, it will be important to retain existing facilities in order to continue to positively impact on these sustainability objectives, something that this policy requires. This policy should also have an economic benefit in terms of encouraging tourism.

DP23 – Community Facilities and Local Services

Ensuring Cohesive and Safe Communities

Policy Options:

A) To have a policy that supports the provision of community facilities and local services that contribute to creating sustainable communities, and where proposals involve the loss of a community facility, it should be demonstrated that its use is no longer viable or a replacement facility will be provided.

B) As (a) but also outlines the requirement for on-site provision of community facilities on larger developments where practicable, including making land available for this purpose. The provision and standards will be set out in an appropriate planning document.

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

Summary of Appraisal:

Both options are predicted to perform positively overall for the majority of the sustainability objectives. In particular, both policies will have positive impacts on the objectives concerned with access to health and community facilities. Both options should ensure that community facilities and services are retained, which is particularly important in smaller settlements where only a small range of facilities exists. Retention of such facilities is vital in ensuring sustainable communities, and therefore has a positive impact on the social and economic objectives.

Option (b) is predicted to perform more positively on both objectives as it also requires the provision of such facilities on larger developments – meaning new facilities for residents of these developments, plus reducing the possible burden on over-stretched existing facilities in the locality.

Other options considered and not appraised:

None.

Preferred Policy Option: **B**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	0	+	+	+	0	0	0	+?	+	+?	+?	+?	0	0	+?	+	+	+?
Medium	0	++	+	++	0	0	0	+?	+	+?	+?	+?	0	0	+?	+	+	+?
Long	0	++	+	++	0	0	0	+?	+	+?	+?	+?	0	0	+?	+	+	+?

Recommendations and Mitigation Measures:

None suggested.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Retention of community facilities will have positive impacts on a number of objectives, particularly the social objectives concerning access to health, education and services. This is also likely to have a positive impact on the economic objectives as it may create jobs and help economic growth. This policy may also have a positive impact on the environmental objectives such as improving access to the countryside and reducing road congestion through proximity to services. It will also have major positive effects through the provision of new facilities for larger developments.

DP24 - Character and Design

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that requires high quality in design and layout with new development contributing positively to the private and public realm (including streets and open spaces), reflects the distinctive character of towns and villages, providing adequate floor area and storage space in accordance with local standards, creates accessible environments and protects open spaces, trees and gardens that contribute to the character of the area, incorporates well integrated parking that does not dominate and addresses sustainability considerations in the layout and design.

B) To not to have a policy on this subject and therefore rely on national guidance and legislation.

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

Summary of Appraisal:

Option (b) performs relatively neutrally with regard to sustainability. Negative impacts could be experienced although these may be mitigated by other policies (such as protection of the historic environment, transport, and use of sustainable resources). However, option (a) could lead to many positive impacts – in particular, improving access to services and facilities for all by encouraging improvements to the public realm, and providing a strong basis for protecting and enhancing the character of the District.

Ensuring homes are built to a high standard, living areas are of adequate size and comply with Lifetime Homes standards will impact positively on the housing objective. It will also have possible positive impacts on improving quality of life and therefore health.

Other options considered and not appraised:

(i) *To have a policy that states that new development should respect and enhance the character of the area – and sets out general design principles.*

It was considered that this option ***(i)*** did not provide a broad strategic option when compared against option (a).

(ii) *To have a policy where new development is required to retain areas of character but at the same time having sufficient flexibility to allow innovation and encourage variety.*

It was considered that this option ***(ii)*** did not provide a broad strategic option when compared against option (a).

(iii) *To have a policy that requires development to respect and enhance the character of an area and refers to the different character areas and specifies preferred design approaches for each of these areas, with reference to design guides to be produced.*

It was considered that this option ***(iii)*** did not provide a broad strategic option when compared against option (a).

Preferred Policy Option: **A**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	+	+?	+?	+	+	0	0	+?	+	+	+	0	0	+?	+?	+?	+?	+?
Medium	+	+?	+?	+	+	0	0	+?	+	++	+	0	0	+?	+?	+?	+?	+?
Long	+	+?	+?	+	+	0	0	+?	+	++	+	0	0	+?	+?	+	+	+

Recommendations and Mitigation Measures:

None suggested.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

No negative sustainability impacts are expected to result from this policy. Good design should be seen as key in achieving social, environmental and economic aims.

DP24a - Housing Density

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that sets minimum density standards in order to make efficient use of land. Based on evidence, this will be 50dph in the built up areas of the towns, 40dph on large sites in excess of 5ha of developable land, and 30dph in all other locations.

B) To not have a policy on this subject. This would likely lead to most developments achieving, on average, around 30dph (as this has historically been a minimum density standard)

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

Summary of Appraisal:

The strongest effects of both options (a) and (b) are in relation to the sustainability objectives linked to the provision of housing and efficient use of land, and the consequent impact on biodiversity and the countryside.

By including a density policy (option (a)), it is predicted that this will have positive benefits on providing opportunities for access to housing. This is because sites will be able to yield more dwellings. A density policy will also mean that efficient use is being made of land. By expecting more dwellings in town centres or brownfield sites, this will have a positive effect on biodiversity and countryside, as should mean that fewer greenfield sites are required in order to meet housing provision targets. A density policy may also encourage the regeneration of town and village centres as more dwellings can be expected in these areas, encouraging footfall.

Option (a) may have a positive impact as an indirect consequence of specifying housing densities. For example, this may apply to access to health, education, retail and community facilities, creating cohesive communities, protecting the historic environment, and reducing road congestion, as well as creating opportunities for employment.

By including a policy on housing density (option (a)) and encouraging the efficient use of land, this may also have a positive impact on flood risk as development can be steered away from areas subject to flood risk, particularly if higher densities are specified in certain areas.

There may also be more opportunities for increasing energy efficiency if there are higher housing densities under option (a), particularly technologies such as community energy systems.

Other options considered and not appraised:

None.

Preferred Policy Option: A

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

Recommendations and Mitigation Measures:

Housing sites and density should be monitored to ensure efficient use of land (objective 7). Policies DP10 and DP37 will also help to protect the countryside and biodiversity respectively.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Overall, this policy will have most impact on the provision of housing and ensuring the efficient use of land which will take into account local housing need, with the consequent positive impact on protecting biodiversity and countryside. There may also be positive impacts on access to health, education, retail and community facilities, creating cohesive communities, protecting the historic environment, and reducing road congestion, as well as creating opportunities for employment. There are other policies in the District Plan that will also have positive impacts on these sustainability objectives.

DP25 – Dwelling Space Standards

Ensuring Cohesive and Safe Communities

Policy Options:

A) To have a policy that sets minimum standards for internal floor and storage space in all new residential development including those created through conversion and subdivision. These standards must be met unless significant clear evidence concerning the existing buildings internal form or special features suggests otherwise.

B) To not have a policy on this subject.

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

Summary of Appraisal:

Both policy options (a) and (b) will have little or no impact on the majority of the objectives, however, it is clear that this policy has the strongest impact on objective 1. This is unsurprising given the policy direction on requiring development to meet substantial internal space standards which would improve the living conditions for new homes. Option (b) may have a negative impact if internal floor and space standards are not set out in policy – this could lead to sub-standard living accommodation. As such, option (a) may also have a positive impact on the social objectives and help to reduce inequalities in health. This policy, however, may have a negative impact on the efficient use of land (objective 7) by reducing the number of dwellings that can be constructed on sites.

Other options considered and not appraised:

None.

Preferred Policy Option: **A**

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

Recommendations and Mitigation Measures:

For objective 7, the proposed policies on Character and Design and Housing Mix and Density will mitigate the negative effects that may arise from this policy.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Overall, this policy will have little or no impact on the majority of objectives. As this policy requires development to meet internal floor and storage space standards set out as part of the policy, it may have a positive impact on the social objectives concerning good quality housing. There is likely, however, to be a negative effect on the efficient use of land as this policy will impact the density of dwellings, although the Character and Design and Housing Mix and Density policies in the proposed submission District Plan should help to mitigate any negative impacts.

DP26 – Accessibility

Ensuring Cohesive and Safe Communities

Policy Options:

A) To have a policy that requires development proposals to meet and maintain high standards of accessibility so that all users can use them safely and easily, wherever possible. This will apply to all development, changes of use and extensions, the layout of development, open spaces and the public realm. With regard to listed buildings, meeting standards of accessibility should ensure that the impact on the integrity of the building is minimised. This policy will be supported by building regulations.

B) To not have a policy on this subject.

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

Summary of Appraisal:

Both policy options (a) and (b) will have little or no impact on the majority of the objectives, however, it is clear that this policy has the strongest impact on objective 1. This is unsurprising given the policy direction on requiring development to meet high standards of accessibility, meaning that housing is accessible to all members of the community. It is considered that option (a) will have a positive impact on objective 1 whereas option (b) may have a negative impact as there would be less emphasis on accessibility issues. As such, option (a) may also have a positive impact on the social objectives and help to improve accessibility to health, education and facilities. Option (a) may also have a positive impact on employment levels as it is concerned with the wider built environment. This policy, however, may have a negative impact on the historic environment (objective 10) by affecting the integrity of a listed building and its setting, although this should be minimised.

Other options considered and not appraised:

None.

Preferred Policy Option: **A**

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

Recommendations and Mitigation Measures:

For objective 10, the policies on the Historic Environment (Conservation Areas and Listed Buildings and Other Buildings of Merit) will mitigate the negative effects that may arise from this policy.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Overall, this policy will have little or no impact on the majority of objectives. As this policy requires development to meet high standards of accessibility, it may have a positive impact on the social objectives concerning housing and access to health, education and services. There may also be a positive impact on employment levels as this policy aims to improve the accessibility of the built environment. There could, however, be a negative effect on the historic environment as this policy could impact on the integrity of listed buildings and their setting, although the Historic Environment policies in the District Plan should help to mitigate any negative impacts.

DP27 – Noise, Air and Light Pollution

Protecting and Enhancing the Environment

Policy Options:

A) To have a policy that protects the environment and the quality of people's life from unacceptable levels of noise, air and light pollution. This will be done by ensuring development is designed and sited to minimise the impact of noise on the surrounding area, ensure noise attenuation measures are in place where necessary, requiring an assessment of the impact of noise where appropriate, requiring good design to restrict emissions from lighting schemes, not permitting development that would cause unacceptable levels of air pollution, assessing the impact of new development traffic levels on internationally designated sites, and ensuring proposals are consistent with Air Quality Management Plans.

B) To not have a policy on this subject.

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

Summary of Appraisal:

In protecting residents' quality of life from unacceptable levels of noise, air and light pollution, option (a) will have a positive impact on the objective concerned with providing decent standards of living accommodation. Positive impacts will also be expected on the health objective for option (a) in comparison to option (b).

In ensuring development proposals are consistent with Air Quality Management Plans, and

mitigating any potential impact from increased traffic on internationally designated sites (such as the Ashdown Forest), option (a) will have significant positive impacts on climate change objectives as well as positive impacts on the objective concerned with reduction in road congestion. A reduction in air pollution will also positively benefit biodiversity and maintain standards of water quality, which could be negatively affected by not having a policy on this subject (option (b)).

Other options considered and not appraised:

None.

Preferred Policy Option: **A**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	+	+	0	0	0	0	0	+	+	0	+	+?	+	0	0	0	0	+
Medium	+	+	0	0	0	0	0	+	+	0	+	+?	+	0	0	0	0	+
Long	+	+	0	0	0	0	0	+	+	0	+	+?	+	0	0	0	0	+

Recommendations and Mitigation Measures:

The proposed policy on Transport will also ensure that positive impacts on reducing road congestion will be met.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:
This policy will have positive impacts on the environmental objectives, particularly in relation to minimising the levels of air pollution within the District which will impact positively on climate change objectives. Noise and light pollution restrictions will impact positively on the social objectives.

DP28 – Housing Mix

Ensuring Cohesive and Safe Communities

Policy Options:

A) To have a policy that provides a mix of dwelling types and sizes from all new development taking into account local housing needs based on the best available evidence, including provision (in appropriate developments) for the needs of older people and vulnerable groups which could include bungalows and other forms of suitable accommodation. The retention of small dwellings in the countryside will also be supported.

B) As option (a), but also requires strategic sites to provide permanent pitches for Gypsies and Travellers and Travelling Showpeople and self-build plots where a need for such accommodation is identified.

C) To not have a policy on this subject and thereby rely on the market to dictate the appropriate mix, whilst having regard to policies on character and design.

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

Summary of Appraisal:

Options (a) and (b) will have more positive impacts particularly relating to the social and environmental objectives. There is likely to be a positive impact on objective 1 as it will ensure that there is a dwelling mix appropriate to local needs, whereas option (c) would do less to provide a mix of dwellings.

Option (b) will ensure that the needs of Travellers will be met. By providing a mix of dwellings, option (a) is likely to provide housing that is needed to support the local workforce which may not be provided by option (c). This will impact positively on the objective concerned with ensuring stable levels of employment.

A number of possible positive impacts could arise from this policy in relation to improving health and ensuring developments minimise the risk of crime. This is due to the policy ensuring that suitable housing is made available for people of all ages (therefore improving quality of life) and vulnerable groups.

Other options considered and not appraised:

None

Preferred Policy Option: **B**

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	+	+?	0	0	+?	0	0	0	+?	+?	0	0	0	0	0	+	0	0
Medium	+	+?	0	0	+?	0	0	0	+?	+?	0	0	0	0	0	+	0	0
Long	+	+?	0	0	+?	0	0	0	+?	+?	0	0	0	0	0	+	0	0

Recommendations and Mitigation Measures:

None suggested.

Cross-Border Impacts:

The Objectively Assessed Need for the District will determine the number of households to be delivered through the District Plan. This accounts for in-migration from other authorities. However, there are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

It is considered that this policy will ensure that the appropriate mix of dwellings is delivered taking into account the local housing needs. It is likely to have a positive impact on several of the objectives, particularly objectives 1 and 16. This policy is also likely to positively impact on those objectives relating to access to health, creating crime resistant communities and the natural and built environment.

DP29 – Affordable Housing

Ensuring Cohesive and Safe Communities

Policy Options:

In line with DCLG Starter Homes Regulations –Technical Consultation (March 2016), all options will provide 20% starter homes, aside from sites less than 0.5ha and delivering between 1 and 9 dwellings to which separate standards apply. Provision of affordable homes will be determined within the three options for appraisal:

A)
Outside the High Weald AONB
Sites of 1-9 units (net), less than 0.5ha and less than 1,000m^2 of combined gross floorspace will provide no affordable housing or starter homes. Sites of 1-9 units (net), less than 0.5ha and greater than 1,000m^2 of combined gross floorspace will provide **30%** affordable housing (no starter homes). Sites of 10 units (net) and greater than 1000m^2 or sites of 11+ units will provide **10%** affordable housing in addition to 20% starter homes.

Inside the High Weald AONB
Sites of 1-5 units (net), less than 0.5ha will make no provision for affordable homes or starter homes. Sites between 6-9 units (net) and less than 0.5ha will make provision for **30%** affordable housing through a commuted payment (no starter homes). Sites between 6-9 units (net) and greater than 0.5ha will make provision for 20% starter homes and **10%** affordable homes through a commuted payment. Sites of 11+ units will make provision of 20% starter homes and **10%** affordable homes.

B)
Outside the High Weald AONB
Sites of 1-9 units (net), less than 0.5ha and less than 1,000m^2 of combined gross floorspace will provide no affordable housing or starter homes. Sites of 1-9 units (net), less than 0.5ha and greater than 1,000m^2 of combined gross floorspace will provide **40%** affordable housing (no starter homes). Sites of 10 units (net) and greater than 1000m^2 or sites of 11+ units will provide **20%** affordable housing in addition to 20% starter homes.

Inside the High Weald AONB
Sites of 1-5 units (net), less than 0.5ha will make no provision for affordable homes or starter homes. Sites between 6-9 units (net) and less than 0.5ha will make provision for **40%** affordable housing through a commuted payment (no starter homes). Sites between 6-9 units (net) and greater than 0.5ha will make provision for 20% starter homes and **20%** affordable homes through a commuted payment. Sites of 11+ units will make provision of 20% starter homes and **20%** affordable homes.

C)
Outside the High Weald AONB
Sites of 1-9 units (net), less than 0.5ha and less than 1,000m^2 of combined gross floorspace will provide no affordable housing or starter homes. Sites of 1-9 units (net), less than 0.5ha and greater

than 1,000m^2 of combined gross floorspace will provide **50%** affordable housing (no starter homes). Sites of 10 units (net) and greater than 1000m2 or sites of 11+ units will provide **30%** affordable housing in addition to 20% starter homes.

Inside the High Weald AONB

Sites of 1-5 units (net), less than 0.5ha will make no provision for affordable homes or starter homes. Sites between 6-9 units (net) and less than 0.5ha will make provision for **50%** affordable housing through a commuted payment (no starter homes). Sites between 6-9 units (net) and greater than 0.5ha will make provision for 20% starter homes and **30%** affordable homes through a commuted payment. Sites of 11+ units will make provision of 20% starter homes and **30%** affordable homes.

A mix of tenure (usually 75% social or affordable rented homes / 25% intermediate homes) will be required for the affordable housing provision (i.e. not starter homes). These requirements will be met unless evidence is provided to show the site cannot support the required affordable housing from a viability perspective. Neighbourhood Plans can set local policies for affordable housing that exceed these targets provided they do not affect viability.

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

Summary of Appraisal:

All options would deliver a proportion of affordable housing which would go towards meeting the affordable housing needs of the District, therefore scoring positively on Objective 1. As option (c) proposes the highest level, it is uncertain whether this could be delivered as it would impact on the deliverability of sites from a viability perspective. This is set out in the Community Infrastructure Levy and District Plan Viability Study. This could in effect restrict the actual proportion of affordable homes delivered on the ground, therefore the positive impact is uncertain.

The provision of affordable housing should assist in the retention of a resident workforce, which will impact positively on the economic objectives.

Options requiring higher levels of affordable housing will have a knock-on effect on the amount of Community Infrastructure Levy (CIL) contributions that could be expected from development in order for sites to remain financially viable and therefore deliverable. It is a fine balance between delivering higher proportions of affordable housing (such as option (c)) with the consequence of receiving lower levels of CIL, or delivering lower proportions of affordable housing (such as option (a)) and receiving the expected level of CIL as determined by the Viability Assessment.

Option (c) could see negative impacts arising for objectives that are concerned with delivery of community facilities – health, education, retail, community services and transport. As this option requires a higher proportion of affordable homes to be delivered, contributions towards these facilities would be lower as a reduced level of CIL would need to be collected in order for the developments to remain viable.

Other options considered and not appraised:

None.

Preferred Policy Option: B

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	++	0	0	0	+?	0	0	0	0	0	0	0	0	+?	0	+	+	0
Medium	++	0	0	0	+?	0	0	0	0	0	0	0	0	+?	0	+	+	0
Long	++	0	0	0	+?	0	0	0	0	0	0	0	0	+?	0	+	+	0

Recommendations and Mitigation Measures:

None suggested.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:
The provision of affordable housing is a much needed social requirement for Mid Sussex and therefore a number of positive social impacts should arise from this policy. This should also lead to a number of indirect economic benefits (i.e. increased provision of affordable housing assisting in the retention of key workers). Option (b) should ensure that the level of affordable housing required from new developments will not be financially restrictive, and ensure that social objectives relating to provision of facilities will not be affected.

DP30 – Rural Exception Sites

Ensuring Cohesive and Safe Communities

Policy Options:

A) To have a policy which sets out criteria for exception sites (where a local need is proven, the occupancy of the homes is restricted in perpetuity to those with a genuine local need for affordable housing, and that the location, scale and design is sympathetic to the rural settlement and landscape) and includes the requirement that locations have direct access to essential services and public transport.

B) To have a policy that sets out criteria for exception sites (as option (a)), but does not include the requirement that locations have access to essential services and public transport. This is on the basis that the provision of affordable housing would provide other sustainability benefits, such as supporting local services and social and family structures, and helping to balance the community.

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

Summary of Appraisal:

There are a number of differing impacts between the two policy options. Option (a) performs better than (b) on those objectives concerned with access to facilities, due to its requirement for rural exception sites to be located in proximity to services and public transport. However, this requirement will be restrictive in that it will rule out some locations for rural exception sites – hence why option (b) performs better on its ability to help deliver affordable homes and sustain local economies where needs exist, regardless of proximity to services and public transport. There could also be a knock-on effect in that new development could help encourage new services/ increased public transport in such areas.

Other options considered and not appraised:

None.

Preferred Policy Option: **B**

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

Recommendations and Mitigation Measures:

Policies on infrastructure provision should ensure that new housing contributes to the provision of new/ extended health and education facilities. Policies on housing mix and density, and character and design should ensure efficient use of what will predominantly be greenfield sites in rural areas. As some sites may be developed that are not well served by public transport, and will require the use of the private car in order to access facilities, policies on the use of Sustainable Resources and Renewable Energy will help mitigate against the negative effects this policy may have on climate change objectives. The proposed policy on Transport will mitigate against possible increases in road congestion and pollution.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

The main objective of this policy is to deliver 100% affordable housing schemes where a need exists; hence option (b) has a very positive impact on the housing objective. This policy is considered to possibly impact negatively on objectives that concern accessibility to community services and facilities, including public transport, schools and retail. This has a knock-on negative effect on climate change objectives.

The level of housing that will be delivered through this policy is unlikely to be significant, therefore the negative impacts will be relatively minor. Other mitigation measures, as mentioned above, will help to reduce the negative sustainability impacts on such objectives.

DP31– Gypsies, Travellers and Travelling Showpeople

Ensuring Cohesive and Safe Communities

Policy Options:

A) To have a policy that sets criteria for meeting the District's need for new or extended sites (based on best available evidence) that ensure that the impact on the area and adjacent uses is minimised; that occupiers have reasonable access to services and facilities such as schools, health facilities and a choice of modes of transport; and that the site is designed to recognise best practice standards. (note: as separate Development Plan Document is being prepared that allocates sites). Existing sites will be safeguarded.

B) To have a policy that is less restrictive than option (a) about access to services and different modes of transport, but concentrates on minimising impact on the area and adjacent uses.

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

Summary of Appraisal:

Option (a) is predicted to have a more positive impact on the social objectives. This is because the policy will seek to ensure traveller accommodation will be located close to health, education and community facilities. Option (b) is less restrictive, so may lead to traveller sites being permitted in areas that are less accessible.

Both options are predicted to have potential negative impacts on the environmental objectives, in particular those concerned with protecting the countryside and historic environment. This is because the policy does not preclude sites being permitted outside built-up areas – however it is a criteria of the policy that the impact on the area and adjacent uses is minimised.

By locating potential sites near facilities that are most likely to be used, this is likely to have a more positive impact on the objective concerned with reducing road congestion.

Other options considered and not appraised:
None.

Preferred Policy Option: **A**

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

Recommendations and Mitigation Measures: For objective 6, the policies on Flood Risk and Water Infrastructure and the Water Environment will mitigate the negative effects that may arise from this policy. For objectives 7, 9 and 10, the proposed policy on Character and Design will mitigate the negative effects that may arise from this policy.
Cross-Border Impacts: There are no direct cross-border impacts expected to arise from this policy.
Overall Conclusion: It is clear that this policy has a positive impact on the social objectives, although it will be necessary to ensure that gypsy and traveller sites are not located in areas of flood risk. This policy has a neutral impact on the economic objectives, however, there may be a negative impact on some of the environmental objectives, but this should be mitigated by other policies.

DP32 - Listed Buildings and Other Buildings of Merit

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that provides the policy framework to conserve and enhance the character and setting of listed buildings. This will ensure protection of listed buildings – development proposals must understand the significance of the building, respect form, scale, setting and fabric, ensure satellite antennae, solar panel (etc) are not sited in a prominent location.

B) As option (a), but also protects 'Other Buildings of Merit'. These are buildings that are not listed but are of architectural merit or make a significant contribution to the street scene.

C) To not have a policy on this issue in the District Plan but rely on national guidance and legislation.

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

Summary of Appraisal:
For the majority of objectives, option (a), (b) or (c) will have no impact. Option (a) and (b) are more restrictive than option (c) and this may mean that in conserving and enhancing the character and setting of buildings, there could be a potential negative impact on objectives 1, 4, and 7. By protecting and enhancing such buildings, however, there may be a positive impact on objectives 9 and 18 as it could enhance the countryside and encourage tourism. The most significant impact of these policy options is on objective 10 which is unsurprising given that this objective is concerned with protecting and enhancing the historic environment.

As option (b) goes further that option (a) by offering protection to other buildings of merit, it is considered that this will have the strongest positive impact on protecting and enhancing the historic environment.

Other options considered and not appraised:
None.

Preferred Policy Option: B

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

Recommendations and Mitigation Measures:

For objectives 1, 4, and 7 the policies on Renewable Energy/Sustainable Resources, and Character and Design will mitigate the negative effects that may arise from this policy.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

It is clear that this policy will have the strongest (positive) impact on objective 10 as it is intended to conserve and enhance the character and setting of listed buildings and other buildings of merit. This policy may also have a positive impact on the countryside and tourism objectives. By protecting the setting of listed buildings, there may be a negative impact on the objectives relating to homes, access to services, efficient land use and climate change, although these should be mitigated by other District Plan policies to some extent.

DP33 – Conservation Areas

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that provides the policy framework to conserve and enhance the character of Conservation Areas. Development will be required to preserve and enhance its special character and appearance – new building and extensions should be sensitively designed, open space, gardens, landscaping and boundary features should be designed to reflect local character, traditional shop fronts should be protected, existing buildings should be protected, and new pavement and road surfaces should reflect existing materials. The setting of the conservation area will be protected.

B) To not have a policy on this issue in the District Plan but rely on national guidance and legislation.

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

Summary of Appraisal:

Whilst neither policy option (a) or (b) have an impact on the majority of objectives, it is clear that this policy has the most positive impact on objective 10. This is unsurprising given the policy direction on protecting and enhancing the historic environment, and it is considered that option (a) will provide the best means of doing this. Conserving and enhancing conservation areas may also have a positive impact on tourism as the historic environment is being protected. Option (a) may, however, have negative impacts on objectives 1, 4 and 7 as it would need to consider the impact of any new development on a conservation area, which could restrict development of new housing or community facilities where a need exists. In conserving and enhancing conservation areas, option

(a) may restrict proposals for energy efficiency in buildings and so may have a negative impact on this objective.

Other options considered and not appraised:

None.

Preferred Policy Option: **A**

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

Recommendations and Mitigation Measures:

For objectives 1, 4, 7, and 15, the proposed policies on Renewable Energy, Sustainable Resources, and Character and Design will mitigate the negative effects that may arise from this policy.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

The proposed policy should have positive social and economic benefits. It is considered that the policy may contribute to unsustainable transport patterns and therefore the transport and climate change objectives could possibly be adversely impacted upon, however reasonable mitigation measures are in place in the form of other policies within the District Plan.

DP34 – Historic Parks and Gardens

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy which seeks to protect registered parks and parks or gardens of special local interest by restricting development within, adjacent to or within the vicinity of registered parks or gardens.

B) To not have a policy on this subject and rely on national planning guidance to provide protection to registered parks and parks or gardens of special local interest.

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

Summary of Appraisal:

As existing national planning guidance is in place to protect registered parks or gardens of special local interest, both options are similar in their appraisal. By having a local policy (option (a)), which defines such areas on the proposals map and sets a criteria about what development is appropriate within, adjacent to or within the vicinity of these sites, a more stringent policy framework is in place to protect these important assets. This explains the major positive score for option (a) in comparison to option (b) on the protection of the historic environment and biodiversity objectives.

Restricting development in the vicinity of registered parks or gardens of special local interest may mean development does not arise in areas where there is a local need. This could have a negative impact on objective 1.

Ensuring that these important sites are protected and enhanced should encourage tourism, as well as retaining important outdoor leisure facilities. Option (a) therefore has a positive impact on the two objectives concerned with tourism and health (objectives 18 and 3 respectively).

Other options considered and not appraised:
None.

Preferred Policy Option: **A**

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

Recommendations and Mitigation Measures:

Restricting development in the vicinity of registered parks and gardens may restrict development in areas where a need exists. This could lead to negative impacts on objective 1. The housing and economic strategy for the District should ensure that such developments are allocated in suitable locations, which should mitigate against any negative impacts that may arise from this policy.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Overall positive benefits should arise from this policy. In ensuring that these valued historic sites are retained and protected, a number of very positive environmental sustainability benefits should be seen, as well as encouraging tourism which will benefit economic objectives. A small number of indirect social benefits could also be gained.

DP35 – Archaeological Sites

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that protects and enhances sites of archaeological interest (such as scheduled Ancient Monuments) where possible and sets out how proposals for development that may impact upon sites of archaeological sites should be considered. This will require applicants to carry out an archaeological assessment where a proposed development may impact upon an archaeological site.

B) To not have a policy on this subject and rely on national planning guidance to provide protection to archaeological sites.

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

Summary of Appraisal:

As existing national planning guidance is in place to protect sites of archaeological interest, both options are similar in their appraisal. By having a local policy (option (a)), which defines such areas on the proposals map and makes a requirement for applicants to carry out archaeological assessment where necessary, a more stringent policy framework is in place to protect these important assets. This explains the major positive score for option (a) in comparison to option (b) on the protection of the historic environment objective.

Restricting development in the vicinity of sites of archaeological interest may mean development does not arise in areas where there is a local need. This could have a negative impact on objective

1, however in the majority of cases mitigation of development impact on archaeology can be achieved.

Ensuring that these important sites are protected and enhanced could encourage tourism, site dependent. Option (a) therefore has a positive impact on the tourism objective.

Other options considered and not appraised:

None.

Preferred Policy Option: **A**

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

Recommendations and Mitigation Measures:

Restricting development in the vicinity of sites of archaeological interest may restrict development in areas where a need exists. This could lead to negative impacts on objective 1. The housing and economic strategy for the District should ensure that such developments are allocated in suitable locations, which should mitigate against any negative impacts that may arise from this policy.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Overall positive benefits should arise from this policy. In ensuring that these valued historic sites are retained and protected, a number of very positive environmental sustainability benefits should be seen, as well as encouraging tourism which will benefit economic objectives. A small number of indirect social benefits could also be gained.

DP36 – Trees, Woodland and Hedgerows

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that supports the protection of trees, woodland (including ancient woodland) and hedgerows and encourages new planting, and restricts against new development that will damage or lead to loss of trees, woodland or hedgerows that contribute to the visual amenity value or character of an area and/or have landscape, historic or wildlife importance.

B) To not have a policy on this subject and rely on national planning guidance to provide protection to trees, woodland and hedgerows.

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

Summary of Appraisal:

Whilst national planning policy and guidance gives a level of protection to ancient woodland and aged/veteran trees, it is predicted that a locally specific policy will give more protection to these important features.

Both options could have a negative impact on the objective concerned with providing housing, as restricting development on areas currently occupied by woodland may reduce the number of potential sites/yield of sites in the District for housing – this is relevant as the District is heavily covered in woodland (most of which is classed as ancient). However, both options (option (a) in particular) has significant positive impacts on the objectives concerned with biodiversity, protecting the countryside and historic environment.

By preserving woodland more stringently, option (a) is also predicted to have a more positive impact on health, as these woodland areas could be heavily used for leisure activities such as walking, cycling, horse riding, etc.

Other options considered and not appraised:

None.

Preferred Policy Option: **A**

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

Recommendations and Mitigation Measures:

Sites put forward for the District Plan/Neighbourhood Plan process should aim to avoid woodland (including ancient woodland) and would be excluded from the SHLAA assessment for this reason. This should mitigate against potential negative impacts on Objective 1.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Whilst both appraisals are very similar, and would both score positively on the most relevant objectives (8 and 9), Option A is more stringent in its requirement of protecting all forms of woodland, as well as those which are important to amenity, landscape and historic character.

DP37 – Biodiversity

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that prevents damage to sites/ areas identified as being of nature conservation or geological interest including designated sites, wildlife corridors, aged or veteran trees and Nature Improvement Areas. The policy will seek on-site natural green space enhancements for all new developments where practicable, including making land available for this purpose; require contributions from developments towards the provision of a green multi-functional network which includes the restoration, management and expansion of priority habitat areas in the District; and enables improved access to and understanding of natural green space and nature conservation features.

B) To have a policy that prevents damage to sites/ areas identified as being of nature conservation or geological interest including designated sites, wildlife corridors, aged or veteran trees and Nature Improvement Areas. The policy will protect and enhance biodiversity so that there is a net gain in biodiversity, protect existing biodiversity, pursue opportunities to incorporate biodiversity features within developments and require biodiversity offsets from unavoidable damage, minimise habitat and species fragmentation, and maximise opportunities to enhance ecological corridors and increase resilience.

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

Summary of Appraisal:

Both options have positive sustainability impacts overall, but specifically on the environmental objectives concerning biodiversity, climate change, and protecting and enhancing the countryside. This will help to achieve a net biodiversity gain by protecting existing biodiversity, creating new designated sites and incorporating biodiversity features within developments.

Option (b), however, goes further than option (a) as the policy has been strengthened to include a possible positive impact on flood risk prevention and mitigation, through maximising opportunities to connect natural habitats. Option (b) addresses the causes of climate change by creating ecological corridors to increase resilience. There will also be a possible positive impact on some of the social objectives as improved biodiversity can be beneficial for health and recreation, whilst incorporating biodiversity features within developments may have a positive impact on the provision of decent and affordable homes.

Other options considered and not appraised:

(i) *To have a policy that seeks to prevent all forms of development within and close to all areas of importance in terms of biodiversity and nature conservation.*

(ii) *To have a policy that allows development within or close to areas of importance in terms of biodiversity and nature conservation on the proviso that alternative site options have been explored and been established as being less appropriate. In such instances there will be a requirement to relocate, replace or compensate for any assets lost as part of the development.*

(iii) *Seek biodiversity/nature conservation enhancements for all new developments where appropriate and preventing all forms of development that would or could, either directly or indirectly, harm the nature conservation interest of areas of importance, unless the need for the development in the public interest clearly outweighs the nature conservation interest and there are adequate mitigation and compensation measures.*

(iv) *To have option (a) only seeking enhancements where they are related to the development site.*

(v) *To have a policy that seeks on-site biodiversity/nature conservation enhancements for all new developments where practicable, and requires contributions from all developments where practicable, and requires contributions from all developments towards the restoration, management and expansion of priority habitat areas in the District, and establishing a 'green multi-functional network' for recreational use and to aid the movement of wildlife between habitats.*

Preferred Policy Option: B

Preferred Option: Predicted Impact	Social					Environmental									Economic			
	1 – Decent and Affordable Home	**2 –** Access to Health	**3 –** Opportunities for Education	**4 –** Access to Retail and Community Facilities	**5 –** Cohesive, Safe, Crime Resistant Communities	**6 –** Flood Risk	**7 –** Efficient Land Use	**8 –** Conserve and Enhance Biodiversity	**9 –** Protect and Enhance Countryside	**10 –** Protect and Enhance Historic Environment	**11 –** Reduce Road Congestion	**12 –** Reduce Waste Generation	**13 –** Maintain and Improve Water Quality	**14 –** Increase Energy Efficiency	**15 –** Encourage regeneration of Town and village Centres	**16 –** Ensure High and Stable Employment Levels	**17 –** Support Economic Growth	**18 –** Encourage Tourism
Short	0	+?	0	+?	0	0	0	+	+?	0	0	0	+	0	0	0	0	+?
Medium	+?	+	0	+	0	+?	0	++	+	+?	0	0	+	0	0	0	0	+
Long	+?	+	0	+	0	+?	0	++	+	+	0	0	+	0	0	0	0	+

Recommendations and Mitigation Measures:

No mitigation required.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

This policy should result in positive benefits, particularly for the environmental objectives. It can be seen that over the longer term, positive benefits will increase and there will be a positive impact on some of the social objectives. Overall, this policy should achieve the biodiversity objective and contribute to enhancing the natural and built environment, as well as addressing the causes of climate change.

DP38 – Green Infrastructure

Protecting and Enhancing The Environment

Policy Options:

A) To have a policy that contributes to the establishment of green infrastructure and supports the development of a connected network of multi-functional green space. The policy will provide on-site natural green space enhancements for all new developments where practicable, including making land available for this purpose; promote the expansion of priority habitats in the District; and improve access to and understanding of natural green space and nature conservation features.

B) As option (a) but also safeguards land around Burgess Hill for the delivery of a multi-functional 'Green Circle', by allocating land for informal open space.

C) To not have a policy on this subject and therefore rely on national policy and guidance.

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

Summary of Appraisal:

There are a number of differences between options (a)/(b) and (c) - options (a) and (b) have more positive impacts than option (c). This is unsurprising given that options (a) and (b) are more demanding than option (c) which relies on national policy and guidance.

Option (a) will have a significant positive impact on addressing the causes of climate change, conserving and enhancing biodiversity, and protecting and enhancing the countryside objectives. This is because these are some of the functions of green infrastructure, and a policy that promotes the establishment of green infrastructure and protects it will result in a positive impact for these environmental objectives. The other positive sustainability impacts of option (a) are also due to the functions of green infrastructure. These include flood risk management, the benefits of greenspace for health, access to recreation facilities, improvements in water quality, and the associated benefits for tourism. Option (b) will have the same benefits, but will have more positive impacts on the objective concerned with access to health as it will safeguard/allocate land for informal open space.

It is considered that option (c) may not perform as positively on these sustainability objectives as simply relying on national policy and guidance may not go as far in protecting, improving, enhancing, managing and restoring a connected network of multi-functional greenspace and associated green infrastructure.

Other options considered and not appraised:

None.

Preferred Policy Option: **B**

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

Recommendations and Mitigation Measures:

No mitigation required.

Cross-Border Impacts:
There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Overall, this policy should result in positive impacts on the sustainability objectives, particularly for the environmental objectives. It can be seen that over the longer term, positive benefits will increase and there may also be positive impacts for some of the other sustainability objectives. In particular, it is clear that the strongest impacts will be on the sustainability objectives that relate to functions of green infrastructure, especially addressing the causes of climate change, conserving and enhancing biodiversity, and protecting and enhancing the countryside.

DP39 - Sustainable Design and Construction

Protecting and Enhancing The Environment

Policy Options:

A) To have no policy on sustainable design and construction.

B) To have a policy that requires all major development proposals to demonstrate how they address energy efficiency.

C) To have a policy that requires all major development proposals to demonstrate how they address a number of aspects of sustainable design and construction - energy efficiency, waste and resources, water use and resilience to climate change.

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

Summary of Appraisal:

All policy options have a little or no impact on the majority of objectives, however the inclusion of a policy (options (b) and (c)) is necessary for the Plan to have the strongest positive impact on objective 14.

It is considered that option (b) could have a positive impact on objective 1 by improving the sustainability and performance of development. However a core planning principle of the NPPF (paragraph 17) is to 'support the transition to a low carbon future in a changing climate', the Sustainability Statement proposed in option (b) provides an opportunity for proposals to demonstrate how other aspects of this principle, such as reuse of resources and resilience to climate change, have been addressed. Option (c) incorporates these other aspects and will have positive impacts on reducing waste generations (objective 12), improving water quality (objective 13) and, where waste and materials are reused onsite, may have a positive impact on reducing road congestion (objective 11).

Other options considered and not appraised:

(i) *As option (b) but applicable to all types of development*
(ii) *As option (b) but with an additional requirement to maximise energy efficiency and renewable energy within the existing built environment – the Mid Sussex Sustainable Energy Study (2014) recommended that the ability for planning policy to affect change on the existing built environment in terms of energy efficiency and renewable energy was limited and the main mechanisms are likely to be through national energy legislation and allowable solutions.*
(iii) *To have a policy that sets specific requirements for achieving levels of the Code for Sustainable Homes/BREEAM – the government has identified that Code requirements are to be scaled back and incorporated within national building regulations. As part of a review of housing standards the government has suggested that Local Plans no longer refer to the Code.*

Preferred Policy Option: **C**

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

Recommendations and Mitigation Measures:

Residential developments will need to meet zero carbon homes requirements once adopted by government, including allowable solutions. The details of these requirements are being developed; it is likely that the Council will have some role. The policy will need to be flexible to take account of the government's timetable for zero carbon homes.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Overall, this policy will have little or no impact on the majority of objectives. As a policy would require proposals to demonstrate how they address sustainable design and construction it should have a positive impact on environmental objectives concerning energy efficiency, reduced waste generation and road congestion, and improved water quality. There may also be a positive impact on housing as the policy will improve the energy performance of new dwellings.

DP40 – Renewable Energy Schemes

Protecting and Enhancing The Environment

Policy Options:

A) To have no policy on renewable energy schemes.

B) To have a policy that is supportive of renewable and low carbon energy development where adverse impacts are addressed satisfactorily and in accordance with other policies within the plan.

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

Summary of Appraisal:

Both policy options (a) and (b) have a little or no impact on the majority of objectives. However, in the absence of a policy on renewable energy schemes (option (a)) there may be negative impacts, including visual and cumulative impacts, on the natural and built environment from inappropriate or poorly designed development.

Including a policy that is supportive of renewable and low carbon energy development (option (b)) is likely to have a positive impact on proportion of energy generated from renewable sources in the district (objective 14)

Other options considered and not appraised:
(i) *To have a policy that sets a specific target for installed renewable energy capacity – the Mid Sussex Sustainable Energy Study identifies limited potential for renewable energy schemes in the district and recommends that it would be hard to justify such a policy given available evidence.*

(ii) *To have a policy that allocates specific sites for renewable energy development – given the limited potential for major renewable energy schemes identified in the Mid Sussex Sustainable Energy Study, there are no apparent deliverable strategic sites. Neighbourhood Plans provide a more suitable mechanism for allocating sites for small-scale, community-led schemes, if desired.*

Preferred Policy Option:	**B**

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

Recommendations and Mitigation Measures:

The limited potential for renewable energy schemes in the district will place a greater emphasis on small-scale, possibly community-led, schemes to achieve the most positive impact on objective 14. The policy will need to support community-led schemes, including those supported through the neighbourhood planning process, in accordance with paragraph 97 of the NPPF.

Cross-Border Impacts:

The Mid Sussex Sustainable Energy Study (2014) does not identify significant projects that would have cross boundary implications. There are therefore no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Overall, this policy will have little or no impact on the majority of objectives. A policy would provide a positive strategy for promoting renewable and low carbon energy development while ensuring that impacts are addressed satisfactorily.

DP41 – Flood Risk and Drainage

Protecting and Enhancing the Environment

Policy Options:

A) To have a policy that requires development proposals to be in accordance with the findings of the District Council's Strategic Flood Risk Assessment (SFRA) and implement sustainable drainage systems (SuDS) in accordance with local guidance, as well as complying with national policy on flood risk and drainage.

B) As option (a) but also safeguards land required for current and future flood management from development.

C) To not have a policy on flood risk and drainage and therefore rely on national policy.

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

Summary of Appraisal:

All options would lead to positive sustainability outcomes and would ensure more vulnerable development such as housing (objective 1) is directed away from areas at risk of flooding. A locally specific policy (options (a) and (b)) provides greater likelihood of positive outcomes against objectives in relation to the provision of biodiversity benefits (objective 8), water quality (objective 13), provision of quality amenity and open space (objective 2) through the implementation of well-designed sustainable drainage systems, in accordance with local guidance.

The incorporation of using the Council's Strategic Flood Risk Assessment proposed in options (a) and (b) may lead to more positive outcomes on objective 6 as this document identifies areas of present and future flood risk from a range of sources, including allowances for climate change and identification of areas of the district that have experienced flooding in the past. However, option (b) offers the strongest positive impacts on objective 6 as it ensures land necessary for future flood management is not lost to development, particularly given the increased risk of flooding anticipated long term and the potential for this to increase flood risk elsewhere.

Other options considered and not appraised:

None.

Preferred Policy Option: **B**

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

Recommendations and Mitigation Measures:

Sequential flood risk tests (and, if necessary, the exception test) will be applied for the District Plan, Neighbourhood Plans and other documents that allocate sites for development to ensure that new development is directed towards areas with the lowest probability of flooding.

Cross-Border Impacts:

Flood risk issues have the potential to impact on areas outside the district. In particular fluvial flood risk issues could impact across boundaries as the four main river catchments that affect Mid Sussex (the River Ouse, the River Adur, the River Medway and the River Mole) also affect areas outside of the district. The Strategic Flood Risk Assessment has regard to Catchment Flood Management Plans and the Environment Agency provided data for the whole of the Agency's Southern Region to inform the SFRA.

Overall Conclusion:

This policy would mainly have positive impacts on the flood risk (objective 6), housing (objective 1) and water (objective 13) objectives but could achieve other sustainability benefits through the implementation of SuDS. Anticipated additional benefits associated with well-design SuDS (and identified in local guidance) would likely be realised over the longer term as development proposals incorporate these systems into site designs and those developments are completed.

DP42 – Water Infrastructure and the Water Environment

Protecting and Enhancing the Environment

Policy Options:

A) To have no policy on water infrastructure or the water environment.

B) To have a policy that requires all proposals to demonstrate that capacity and infrastructure exists for adequate water supply, foul and surface water provision to serve the development.

C) To have a policy that requires all new residential developments of more than 10 dwellings to demonstrate that capacity and infrastructure exists for adequate water supply, foul and surface water provision to serve the development.

D) As option (b) but also requires development to meet water consumption standards as recommended in the Gatwick Sub Region Water Cycle Study by applying the optional Building Regulations – Part G requirement and BREEAM 'Good' standard water consumption targets.

E) As option (c) but also requires development to meet water consumption standards as recommended in the Gatwick Sub Region Water Cycle Study by applying the optional Building Regulations – Part G requirement and BREEAM 'Good' standard water consumption targets.

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

Summary of Appraisal:

To not have a policy that ensures necessary water infrastructure is in place for new development (option (a)) is likely to have negative impacts on flood risk and other environmental objectives (objectives 6 and 8) and a significant negative impact on the water quality objective (objective 13). Potential impacts where essential infrastructure is not provided alongside development include sewage flooding and pollution of land and watercourses. Not including a policy could also lead to water shortages and low pressure water supply problems which may have a negative impact on housing (objective 1).

For a policy on infrastructure supply to only apply to residential developments of more than 10 dwellings (options (c) and (e)), as recommended in the Gatwick Sub Region Water Cycle Study, would not address the potential impacts of small-scale residential development and water-intensive industry developments not ensuring that important water infrastructure was provided in a timely manner and so the positive impact of these options on objectives 6, 8 and 13 is limited.

The Gatwick Sub Region Water Cycle Study recommends that the District Plan contains a policy

on water use in both residential and non-residential developments. The Code for Sustainable Homes standard recommended in the Study is the equivalent of the Building Regulations – Part G optional requirement proposed in the draft housing standards produced by Government and water efficiency measures are supported by the local Water Resources Management Plan (2014). To apply this requirement through a policy (options (d) and (e)) would increase the positive impacts of including a policy on Water Infrastructure and the Water Environment.

Other options considered and not appraised:

None.

Preferred Policy Option: **D**

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

Recommendations and Mitigation Measures:

Off-site water infrastructure will largely need to be delivered by statutory undertakers and so it is important that the District Council and developers work with these organisations and the Environment Agency to ensure their infrastructure planning meets the development needs of the district and the expected levels of development over the Plan period.

The application of optional requirements in the Building Regulations and BREEAM water consumption targets will likely have a cost implication for developers and this will need to be considered through a viability assessment.

Cross-Border Impacts:

There are no direct cross-border impacts expected to arise from this policy.

Overall Conclusion:

Overall, this policy will have little or no impact on the majority of objectives. The policy will have a positive impact on a number of environmental policies particularly in regard to water quality and will have a positive impact on existing and future housing by ensuring water services are provided in a timely and effective manner.

9. Overall Sustainability Conclusions

Cumulative and Synergistic Impacts

9.1. Whilst some of the policy options appraised above may individually have a minor impact (either positive or negative) on the current social, environmental and economic baseline of the District, when considering all the policies together, collectively they may have a much more significant impact. As part of this appraisal, the cumulative and synergistic impacts of the policy proposals have been determined. There are a number of uncertainties involved in the assessment of cumulative and synergistic effects especially when considering the effects over the time scale of the plan. It has therefore been necessary to use professional judgement when determining the likely impacts.

9.2. In most instances, combining the policy proposals result in almost all of the negative sustainability impacts identified for the individual policies being cancelled out. For instance, in appraising the development strategy a number of potential negative impacts on the environmental objectives were identified. However, when appraising the cumulative impacts of all the policies within the District Plan, these negative impacts have been addressed by other policies on subjects such as protection of the countryside, renewable energy, biodiversity, sustainable resources, transport and character and design.

9.3. Policies regarding housing development is one area where cumulative and synergistic impacts are apparent. For instance, due to likely increases in population from the new housing provided, there will be potential for increased traffic generation and road congestion – impacting on the road congestion and climate change objectives. This cumulative, district-wide impact has been mitigated as far as possible by ensuring that the locations for new housing are located in a way so as to encourage more sustainable forms of transport, as well as the inclusion of a specific policy on this topic. Other likely adverse cumulative impacts include increased levels of waste generation and increased use of water. Many of these cumulative and synergistic impacts are likely to occur at both the construction and operation stages of development and therefore constitute both short and long-term impacts.

9.4. Despite these adverse impacts, the housing policies combined do have a very positive cumulative impact on many of the social and economic objectives. This is also the case when policies concerning new employment, new business development and retail are combined.

9.5. The following table shows the overall impact of all the ‘preferred options’ (as determined by the appraisals in section 8)

Policies - Preferred Option	Sustainability Objectives																	
	Social					Environmental									Economic			
	1 – Decent and Affordable Home	2 – Access to Health	3 – Opportunities for Education	4 – Access to Retail and Community Facilities	5 – Cohesive, Safe, Crime Resistant Communities	6 – Flood Risk	7 – Efficient Land Use	8 – Conserve and Enhance Biodiversity	9 – Protect and Enhance Countryside	10 – Protect and Enhance Historic Environment	11 – Reduce Road Congestion	12 – Reduce Waste Generation	13 – Maintain and Improve Water Quality	14 – Increase Energy Efficiency	15 – Encourage regeneration of Town and village Centres	16 – Ensure High and Stable Employment Levels	17 – Support Economic Growth	18 – Encourage Tourism
DP1	+	++	++	++	+	+	++	++	+	+	+	0	+	+	++	++	++	+
DP2	+?	+?	+?	+	0	0	++	-?	+	-?	+?	-	-	0	++	++	++	++
DP3	0	0	0	++	0	0	++	0	+?	+?	++	0	0	0	++	+	+	0
DP4	0	0	0	++	0	0	0	0	+?	0	+	0	0	0	++	++	+	0
DP5	++	+	+	+	+?	0	-	-?	-	0	-?	-	-?	+?	+	+	+	0
DP6	(each settlement is appraised individually)																	
DP7	+	++	++	++	+?	+?	+?	+?	+?	-?	+	0	+?	0	++	+	+	+?
DP8 DP9 DP9a	+	+	+	+	0	+?	0	+	+?	-?	+	0	+?	+?	+	+	+	0
DP10	+?	+?	+?	+?	0	0	+	+	++	+	+?	0	+?	0	+	+?	+	+?
DP11	+?	+?	0	0	0	0	0	0	++	++	0	0	0	0	+?	+?	+?	0
DP12	+	+?	+?	+	0	0	+	0	0	0	-	0	-?	0	+?	+	+	+
DP13	+	0	0	+?	0	0	+?	-?	+?	+	-?	0	-?	+?	+?	+?	+	0
DP14	-?	+?	+?	+?	0	0	0	+	+	+	0	0	0	+?	+?	+	+	+
DP15	-?	+	+?	+	0	0	0	++	++	0	+	0	0	0	0	0	0	+?
DP16	-?	-?	-?	-?	0	0	-?	+	++	+	0	0	0	0	0	-?	-?	+
DP17	0	0	0	0	0	0	+	0	+?	+	-?	0	-?	0	-?	++	++	++
DP18	+	+	+	+	+?	0	0	+?	0	0	+	+?	0	0	++	0	0	0
DP19	0	+	+?	+	0	0	0	0	+?	0	++	0	0	0	+?	+?	+	+?
DP20	0	+	0	+?	0	0	0	+?	++	0	+	0	0	0	0	0	0	+?
DP21	0	0	+?	+	0	0	+	0	0	+?	+?	0	0	0	0	+	+?	0
DP22	0	+	+?	++	+?	0	0	+?	+?	+?	+?	0	0	0	0	0	0	+
DP23	0	++	+	++	0	0	0	+?	+	+?	+?	+?	0	0	+?	+	+	+?
DP24	+	+?	+?	+	+	0	0	+?	+	++	+	0	0	+?	+?	+?	+?	+?
DP24a	++	+?	+?	+?	+?	+?	++	+	+	+?	+?	0	0	+?	+	+?	0	0
DP25	+	+?	0	0	0	0	-?	0	0	0	0	0	0	0	0	0	0	0
DP26	+	+?	+?	+?	0	0	0	0	0	-?	0	0	0	0	0	+?	0	0
DP27	+	+	0	0	0	0	0	+	+	0	+	+?	+	0	0	0	0	+
DP28	++	+?	0	0	+?	0	0	0	+?	+?	0	0	0	0	0	+	0	0
DP29	++	0	0	0	+?	0	0	0	0	0	0	0	0	+?	0	+	+	0
DP30	++	-?	-?	+?	0	0	-	0	0	0	-	0	0	+	+	++	++	0
DP31	+	+	+	+	+	+?	-?	0	-?	-?	+	+?	0	0	0	0	0	0
DP32	-?	0	0	-?	0	0	-?	0	+?	++	0	0	0	0	0	0	0	+?
DP33	-?	0	0	-?	0	0	-?	0	0	++	0	0	0	-?	+?	0	0	+?
DP34	-?	+	0	+?	0	0	0	++	+	++	0	0	0	0	0	+?	+?	+
DP35	-?	+?	0	+?	0	0	0	0	+	++	0	0	0	0	0	0	+?	+
DP36	-	++	0	0	0	0	-?	++	++	+	0	0	+?	0	0	0	0	+?
DP37	+?	+	0	+	0	+?	0	++	+	+	0	0	+	0	0	0	0	+
DP38	+?	++	0	+	0	+	0	++	++	+?	+?	0	+	0	0	0	0	+
DP39	+	0	0	0	0	0	0	0	0	0	+?	++	+	++	0	0	0	0
DP40	0	0	0	0	0	0	0	+?	+?	+?	0	0	0	++	0	0	0	0
DP41	+	+?	0	0	0	++	0	+	0	0	0	0	+	0	0	0	0	0
DP42	+	0	0	0	0	+	0	+	0	0	0	0	++	0	0	0	0	0

Table 37 – Overall Sustainability Conclusions of Preferred Options

9.6. Table 12 above shows that the majority of the policy options chosen as the preferred option impact positively on the environmental, economic and social objectives. In almost all instances, where a negative sustainability impact had been identified it was mitigated against by one of the other policies within the District Plan.

9.7. In all cases, the justification for including each policy area was backed up in sustainability terms. For example, in all instances 'having a policy' on the subject performed more sustainably than 'not having a policy' on the subject, where these options were appraised.

Social Conclusion

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

Environmental Conclusion

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

Economic Conclusion

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

Further Options

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

10. Monitoring

B6 – Proposing Measures to Monitor the Effects of the Plan or Programme

10.1. The effects of implementing the District Plan will need to be monitored to identify and unforeseen, adverse effects and to allow for remediation action to take place. Questions that should be addressed through the monitoring process include:

- Whether the Sustainability Appraisal assumptions about the impact of the District Plan policies are accurate?
- Whether the District Plan is contributing towards meeting the sustainability objectives?
- Are there any other effects from the implementation of the District Plan that need to be considered?

10.2. It is therefore essential that a comprehensive monitoring framework is developed. For practical reasons, and in order to remain consistent, this will be based on the indicators linked to the 18 Sustainability Appraisal objectives identified in Section 5. Identifying trends within the data associated with these objectives will help measure how well the plan contributes to sustainable development over the course of the plan, and to highlight any unforeseen adverse effects to enable appropriate remedial action to be taken where possible.

10.3. Appendix 2 shows the current baseline data. This will be updated with any new data that is published ahead of the next stage of the Sustainability Appraisal process. This appendix forms the monitoring framework, which will be updated annually through the District Council's Annual Monitoring Report (AMR) and through all future publications of this Sustainability Appraisal report.

11. Next Stages

D1 – Consulting on the Draft Plan or Programme and Environmental Report

11.1. The Sustainability Appraisal has been consulted upon at Pre-Submission and Focused Amendments stages. This version of the document represents changes made following the Focused Amendments stage (known as 'further modifications'). This version will be submitted to the Planning Inspectorate alongside the District Plan.

D2 – Assessment of Significant Changes

11.2. Undertaking Sustainability Appraisal is an iterative process. The results of the consultation will inform drafting of the District Plan and accompanying Sustainability Appraisal to be submitted to the Secretary of State.

11.3. Any significant changes that result from this consultation will be reported at the next stage of publication of this report. These changes may result in the need to re-appraise some of the policy areas in this report, similarly new options or policy areas may arise that will require appraisal for the first time.

D3 – Decision Making and Providing Information

11.4. The information within this report has been taken into account when preparing the District Plan for publication, and will continue to do so for all future formal stages prior to its adoption.

11.5. The District Council will prepare an adoption statement, in compliance with the Environmental Assessment of Plans or Programmes Regulations 2004, to detail how the environmental (as well as social and economic elements) considerations have been taken into account in preparation of the District Plan.

Appendix 1 – Review of Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) that have influenced the development of the District Plan.

Introduction

As required by Article 5(1) Annex 1 (a) and (e) of the Strategic Environmental Assessment Directive this Appendix sets out the plans, programmes, policies, strategies, guidance and initiatives, which have informed the content of the District Plan.

The Appendix is set out in six tables, one detailing plans, programmes, policies, strategies, guidance and initiatives that cover General Sustainable Development principles, and then one table for each of the five guiding sustainable development principles:

- Ensuring a Strong, Healthy and Just Society
- Living Within Environmental Limits
- Achieving a Sustainable Economy
- Promoting Good Governance
- Using Sound Science Responsibly

There are a number of PPPSGIs that cover one or more of the five headings; these have been placed in the general category where it is clear that they can impact on all of the five areas. For those that could impact on one or two areas a decision has been made to include them in only one category.

Any conflicts, constraints and challenges, which may arise through the interpretation of the different policy documents, have been identified at the bottom of each table with an indication of how the District Plan will take them into account.

General Sustainable Development

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
International		
The Johannesburg Declaration on Sustainable Development	Commitment to sustainability principles and the sustainable development agenda agreed at Rio de Janeiro Earth Summit in 1992.	Interpreted into national sustainable development strategies, which will inform the District Plan.
European Spatial Development	Sustainable development of the European Union,	Interpreted into national guidance, which will

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
Perspective	balancing competitiveness with economic and social cohesion, conservation and management of natural resources and the cultural heritage.	inform the District Plan.
National		
A Practical Guide to the Strategic Environmental Assessment Directive	Provides information and guidance on how to comply with the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment".	The Sustainability Appraisal must fully integrate the SEA requirements.
Planning and Compulsory Purchase Act 2004	Clause 38 places a duty on Local Authorities to contribute to the achievement of sustainable development.	Mid Sussex District Council is required to produce a Sustainability Appraisal to accompany certain planning documents including the District Plan.
Town and Country Planning Act 1990	Sets out the procedures for the preparation, approval and adoption of Development Plans and for the control of development.	Certain parts of the Act need to be adhered to in preparing the District Plan.
National Planning Policy Framework (NPPF) - 2012	Sets out the Government's priorities for planning in England, and contains a general assumption in favour of sustainable development.	The District Plan must be in conformity with the NPPF.
National Planning Practice Guidance (NPPG) - 2014	Provides further guidance to support the NPPF	The District Plan must be in conformity with the NPPF and therefore must heed the guidance set out in the NPPG.
Localism Act 2011	Act that decentralises power as far as possible from central government to individuals, communities and councils. Introduces neighbourhood planning, amongst other key measures. The Localism Act 2011 was given Royal Assent on 15th November 2011.	
Securing the Future: delivering UK sustainable development strategy (2005)	The Strategy highlights the renewed international push for sustainable development from the World Summit on Sustainable Development in 2002 and details the Government's new approach towards sustainable development, in particular to the issue of climate change. In order to ensure the separate aims of sustainable development are integrated the following guiding principles have been created:	The Strategy will impact upon all Government guidance that will be produced over the coming years, which will inform the Local Development Framework.

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
	• Living Within Environmental Limits • Ensuring a Strong, Healthy and Just Society • Achieving a Sustainable Economy • Promoting Good Governance • Using Sound Science Responsibly	
Regional/ County		
Sustainable Communities in the South East: Building for the Future	Sets out a programme of action on how the Government intends to achieve sustainable communities for all. It lists housing supply, affordability of housing and transport as the key strategic challenges for the South East.	The issues raised and actions proposed will inform the District Plan.
Local		
Mid Sussex Sustainable Communities Strategy (2008)	Sets out key objectives to enable sustainable development of the communities of Mid Sussex: • Protecting and enhancing the environment • Ensuring cohesive and safe communities • Promoting economic vitality • Supporting healthy lifestyles.	The issues and objectives in this strategy will need to be addressed in the District Plan as far as possible.
Mid Sussex District Council Corporate Plan	The main purpose of the Corporate Plan is to work in partnership for the wellbeing of all in the community, with the areas of improvement under three themes: • Better Environment • Better Lives • Better Services.	The District Plan will reflect the issues highlighted by the Corporate Plan, and also contribute to achieving improvement within the three themes.

Constraints, conflicts and challenges

Sustainable development has been placed at the centre of the new planning system. Legislation and guidance for planning and many other elements of sustainable development has been emerging for many years. It is essential that this is reflected in all Local Development Documents. The challenge is to ensure that it is easily understandable and that it is clear that economic, environmental and social considerations have been taken into account.

From the plans, programmes, policies, strategies, guidance and initiatives identified in the above table it is obvious that there is a significant amount

of documentation advocating general sustainable development principles. The documents that should be given priority are the ones that are a material consideration in producing the District Plan, as well as being the most recently published.

Ensuring a Strong, Healthy and Just Society

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
National		
National Planning Policy Framework (NPPF)	Sets out the Government's priorities for planning in England, and contains a general assumption in favour of sustainable development.	The District Plan must be in conformation with the NPPF.
National Planning Practice Guidance (NPPG) - 2014	Provides further guidance to support the NPPF	The District Plan must be in conformity with the NPPF and therefore must heed the guidance set out in the NPPG.
Localism Act 2011	Act that decentralises power as far as possible from central government to individuals, communities and councils. Introduces neighbourhood planning, amongst other key measures. The Localism Act 2011 was given Royal Assent on 15th November 2011.	
Local		
Town Health Checks and Parish Action Plans (only applicable to those towns and parishes who have produced a plan)	These documents generally set out the aspirations for each town/ parish by setting out several aims for the town/ parish and it is proposed to achieve those aims.	Some of the Action Plans identify action areas that can be delivered by the planning system, including the need for affordable housing and where it should be located – the District Plan needs to have regard to these aspirations.
Feasibility Studies for Development Options at Burgess Hill and Haywards Heath (known as the Atkins studies)	These documents looked at the potential for additional strategic development on land around the 2 towns that were examined.	The findings from these 2 studies form an important part of the evidence base for the assessment of options for broad locations for new development as well as other policy areas.
Mid Sussex District Council Development and Infrastructure SPD (2006)	Sets out various infrastructure requirements that development will be expected to contribute towards. Includes a contributions calculator for different sizes of new private and affordable dwellings.	The District Plan should contain a broad policy on the infrastructure requirements of the new developments.

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
Burgess Hill Town Wide Strategy (2011)	This strategy sets out the general principles, visions and objectives for Burgess Hill over the plan period and provides a foundation on which policies addressing strategic development at Burgess Hill are based.	Policies relating to strategic development at Burgess Hill will be informed by the Burgess Hill Town Wide Strategy.
Burgess Hill: Visioning the Future (2007)	This document describes a possible future for Burgess Hill that could happen over the next thirty years or so. It was produced following an extensive stakeholder involvement exercise.	This document has provided a key piece of evidence in the assessment of options for broad locations for new development in the district.
Mid Sussex Rural Affordable Housing Strategy (2007)	The document sets out the Council's strategy for ensuring we are able to meet the housing needs of local residents in rural areas, in particular those who cannot afford to rent or buy a property on the open market.	The District Plan can play a key role in helping to meet the aims and objectives of this strategy.
Mid Sussex Community Safety Plan (2008)	To protect and improve the quality of the local environment and to achieve long-term reductions in crime, disorder and the fear of crime.	The District Plan should include reference to guidance produced by others, e.g. 'Safer Places' and 'By Design'.
Refreshed Housing Strategy for Mid Sussex (2012)	The key aim is to set out how a supply of good quality homes will be provided across the District. This provision also includes affordable housing.	The District Plan will need to assist in meeting the aims of the strategy by providing affordable and open market housing.
At Crawley Study (2009)	This document explores the potential for new strategic development to be accommodated at Crawley during the period to 2026, to meet the development requirements of the Gatwick sub-region.	The findings from this study form an important part of the evidence base for the assessment of options for broad locations for new development as well as other policy areas.
Leisure & Cultural Strategy for Mid Sussex 2009-2020	The Strategy aims to guide all those involved in leisure and cultural provision as to how they can best work together to maximise the opportunities that can result from leisure and cultural development in Mid Sussex.	The District Plan will need to take account of this strategy.

Constraints, conflicts and challenges

There is a general consensus in these documents that housing development has to occur within Mid Sussex and that new housing can enable some social problems to be alleviated. The challenge is to ensure that the District Plan balances the requirement for new development with its impact on the

environment. It is also essential that the provision of new housing is linked with the provision of community facilities and services both within the new development and the existing town and village centres. Failure to do this would be likely to result in social exclusion.

Much of the policy and guidance that is laid out in the nationally produced documents has been translated into regional and district level policy and guidance, therefore resulting in few conflicts between the range of documents that cover social issues.

Living within Environmental Limits

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
International		
Kyoto Protocol 1997	The protocol commits 38 industrialised countries to cut their emissions of greenhouse gases between 2008 and 2012 to levels that are 5.2% below 1990 levels.	Interpreted into national guidance.
European Union Sixth Environmental Action Plan	High level of protection of the environment and human health and a general improvement in the environment and quality of life.	Interpreted into national guidance.
European Directive 2001/42/EC (SEA Directive) on the assessment of the effects of certain plans and programmes on the environment	Sets out detailed requirements of environmental assessment required for plans such as Development Plan Documents.	The sustainability appraisal accompanying the District Plan must comply with the requirements of this legislation.
European Directive 92/43/EEC (and amended by 97/62/EC) on the conservation of natural habitats and of wild flora and fauna (known as the Habitats Directive)	To conserve natural habitats and threatened species. To protect natural heritage.	The sustainability appraisal accompanying the District Plan must comply with the requirements of this legislation.
European Directive 79/409/EEC (and amended by 2009/147/EC) on the conservation of wild birds (known as the Birds Directive)	Preservation, maintenance or restoration of sufficient diversity and area of habitats in order to conserve all species of birds.	This Directive has been interpreted into national guidance
National		
Wildlife and Countryside Act 1981 (as amended)	Serves to protect the most important examples of habitats and species in Britain.	This Act has been interpreted into national guidance.
Countryside and Rights of Way Act 2000 (the CROW Act)	Tightens the provisions of the above mentioned Act by making it an offence to recklessly damage protected	This Act has been interpreted into national guidance. Regard needs to be given to this

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
	habitats and fauna.	guidance in the District Plan.
Ancient Monuments and Archaeological Areas Act 1979	Relevant act of parliament with reference to the historic environment.	To be taken into account when devising policies on the historic environment.
Conservation of Habitats and Species Regulations 2010	Implements the Habitats Directive and protects biodiversity through the conservation of natural habitats and species of wild fauna and flora.	The District Plan must comply with the requirements of this legislation.
Waste Strategy for England (Defra, 2007)	The strategy describes the Government's vision for sustainable waste management. This includes seeking to increase the percentages of waste that is either recycled or composted over a given period of time.	The District Plan should reflect the vision of this document.
Catchment Abstraction Management Strategies	These strategies set out the Environment Agency policies for the licensing of water abstraction.	The Management Strategies that are applicable to Mid Sussex District will need to be taken into consideration when deciding how new housing development will be served with water.
The Future of Transport – White Paper (2004)	The document looks at the factors that will shape travel and transport over the next thirty years and sets out how the Government will respond to the increasing demand for travel, maximising the benefits of transport while minimising the negative impact on people and the environment.	The District Plan should have regard to the governments transport plans for the coming years.
The Natural Environment White Paper (2011)	This document outlines the government's vision for the natural environment over the next 50 years.	The District Plan should reflect the vision of this document.
The Water Framework Directive and the production of River Basin Management Plans.	The Directive seeks to promote the sustainable use of water, protecting and restoring aquatic ecosystems and to contribute towards the mitigation of the effects of flood and droughts.	The District Plan should promote sustainable water management and improvements in water quality of 'water bodies'.
BREEAM / Code for Sustainable Homes	These two programmes set standards for development schemes to attain, so minimising their environmental impact, in particular through the implementation of energy and water efficiency techniques.	Standards can be applied to the design stage or at the construction stage. The two programmes could be incorporated into policy.
Energy White Paper: Our Energy Future: Creating a Low Carbon Economy (DTI, 2003)	This strategy defines a long-term strategic vision for energy policy combining the governments environmental, security of supply, competitiveness and	To assist in implementing the government's goals for the energy policy (i.e. cut carbon dioxide emissions and maintain the reliability

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
	social goals.	of energy supplies).
Building a Greener Future: policy statement (2007)	This statement confirms the government's intention to achieve zero carbon homes by 2016.	The District Plan will need to ensure that the appropriate policy framework is in place to enable its implementation.
National Planning Policy Framework (NPPF)	Sets out the Government's priorities for planning in England, and contains a general assumption in favour of sustainable development.	The District Plan must be in conformity with the NPPF.
Regional/ County		
Biodiversity Action Plan for Sussex	Purpose to focus resources to conserve and enhance biodiversity in Sussex by means of local partnerships, taking account of national and local priorities.	The District Plan will need to take account of nature conservation and biodiversity issues.
West Sussex Transport Plan 2011-2026	Key objectives of the plan include providing a high quality and resilient transport network, and improve accessibility to services, quality of life, safety, public transport and sustainability.	Proposed schemes and measures are put forward for Mid Sussex and the District Plan will need to take these into account.
The High Weald AONB Management Plan 2014-2019 (2014)	Identifies the important features of the AONB and sets out guidance and objectives on the ways in which these features can be protected, restored and enhanced.	The land and countryside management issues in the document should be considered in the District Plan.
A Strategy for the West Sussex Landscape, West Sussex County Council (2005)	The document identifies the important features of the character of the West Sussex landscape and sets out a number of key management issues and guidelines. It does not contain land use policies but deals with good management practice of the area in relation to landscape character.	The land and countryside management issues in the document will need to be considered for the District Plan.
High Weald Natural Area profile, published by English Nature	The Natural Area profile contains an analysis of the local wildlife resource and provides a context within which the Biodiversity Action Plan for Sussex can operate. It sets strategic objectives for conservation of those features characteristic of the Natural Area.	The District Plan will need to take account of nature conservation and biodiversity issues. The District Plan should draw on strategic objectives described in the Natural Area profile.
Seeing the Wood for the Trees: A Forestry and Woodlands Framework for South East England (2004)	Sets out a framework for the future development of woodlands and forestry in the South East with the vision of wanting woods to make an increasing contribution to the sustainable development of the South East region in both rural and urban areas.	The District Plan will need to take into account areas of woodland.

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
Countryside Character Volume 7: South East and London, CA 13 (1999)	Identifies the important features of the character of England, including the High Weald Character Area 122 and sets out a number of key management issues and guidelines. It does not contain land use policies but deals with good management practice of the area in relation to landscape character.	The land and countryside management issues in the document should be considered in relation to the proposed development options.
Mid Sussex Landscape Character Assessment (2005)	This document looks in more detail at the character of the District and contains detailed management guidelines.	The management guidelines in particular have been taken into consideration when looking at the locations for new development.
Mid Sussex Ancient Woodland Survey (2007)	The survey sought to identify the areas of ancient woodland within Mid Sussex.	Ancient Woodland is a key biodiversity asset for the district and needs to be recognised in the District Plan.
Water for Life and Livelihoods: River Basin Management Plan, South East River Basin District (Environment Agency)	River basin management plans (RBMP) set out measures to improve water in rivers, lakes, estuaries, coasts and in groundwater.	To be taken into account when devising policies on flood risk, sustainable drainage, water treatment.
Catchment Abstraction Management Strategies (Environment Agency)	Strategy for water abstraction to meet demand for supply.	To be taken into account when devising policies on water supply.
Groundwater protection: Principles and Practice (GP3) (Environment Agency)	This document describes the approach to the management and protection of groundwater in England and Wales. It provides a framework within which the EA can work with others to manage and protect groundwater.	To be taken into account when devising policies on flood risk, sustainable drainage, water treatment.
Local		
Mid Sussex Historic Landscape Characterisation (2006)	This work looks in more detail at the history of the landscape of the District.	The management guidelines have been taken into consideration when looking at the locations for new development.
Mid Sussex Extensive Urban Surveys (2005 and 2006)	These surveys are a joint venture between West and East Sussex County Councils, Brighton & Hove City Council and English Heritage and cover 41 historic	The reports aid in the assessment of the options for the strategic locations of housing as well as identifying key historical features of

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
	towns/ villages, 5 of which are within Mid Sussex. The output is a Historic Character Assessment Report, which aid in the understanding of the historic qualities of the towns and villages in Mid Sussex.	value that have been considered in the formulation of many of the policy areas within the District Plan.
Mid Sussex Strategic Flood Risk Assessment (2008)	Produced in accordance with PPS25, this work identifies all areas of flood risk within the district as well as what the level of risk is. Guidelines for new development, with regards to avoiding areas of flood risk, requirements of a flood risk assessment and advice on the use of SuDS have subsequently been prepared.	The District Plan needs to ensure that new development avoids areas identified at risk of flooding and that the existing level of flood risk within and outside Mid Sussex is not exacerbated and, where possible, reduced. The Strategic Flood Risk Assessment is a key tool for achieving these requirements.
Conservation Area Appraisals and Management Guidelines	The Appraisal and Management Guidelines are produced in order to clearly identify what qualities make the specific conservation areas special and how these qualities can be preserved and enhanced.	These documents provide further information on the areas of townscape that are important to Mid Sussex, which the District Plan could use in setting the policy approach for such areas.
Catchment Flood Management Plans for the Adur, Ouse, Medway and Thames	These documents are strategic planning tools through which the Environment Agency will seek to work with other key decision-makers within a river catchment to identify and agree policies for sustainable flood risk management.	The District Plan will need to complement these CFMPs and ensure that it does not compromise the ability of the CFMP to deliver its policies.
Mid Sussex Landscape Capacity Study (2007)	The study identifies the capacity of the Mid Sussex landscape to accommodate strategic development.	This study has been a key piece of evidence in the identification and appraisal of options for the strategic locations of housing as well as the formulation of policies concerning the District's landscape.
Our Green Heritage: A Landscape and Biodiversity Strategy for Mid Sussex (2001)	The document recognises the value of biodiversity and landscape within the District and sets out how these assets can be protected and enhanced.	The Landscape and Biodiversity SPG sets planning policy guidance that builds on the content within this strategy.
Mid Sussex District Council Sustainable Construction SPD (2006)	Seeks to promote sustainable building methods based on national advice and good practice on sustainable construction. Acknowledges that each site should be considered on its individual merits in terms of which sustainable construction techniques are appropriate.	The District Plan should take into account sustainable construction techniques.

Constraints, conflicts and challenges

Concerning conflicts between the environmental plans and policies, there does not seem to be any obvious cases. This is generally due to International and European environmental legislation being incorporated into national and regional planning guidance.

There is a general consensus that the built and natural environment is an important resource that should be safeguarded. However, the need for new housing in West Sussex that cannot be accommodated on brownfield sites means that some loss is inevitable.

A balance needs to be struck between the acknowledged need for new development and the importance attached to natural areas. Therefore, the District Plan will need to incorporate measures to minimise and mitigate the impact of the proposed development on the environment.

Achieving a Sustainable Economy

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
National		
Good Practice Guide on Planning for Tourism (2006)	This document sets out guidance on the importance of tourism and to facilitate, promote and deliver new tourism development in a sustainable way.	The District Plan needs to consider the guidelines in this document.
National Planning Policy Framework (NPPF)	Sets out the Government's priorities for planning in England, and contains a general assumption in favour of sustainable development.	The District Plan must be in conformity with the NPPF.
National Planning Practice Guidance (NPPG) - 2014	Provides further guidance to support the NPPF	The District Plan must be in conformity with the NPPF and therefore must heed the guidance set out in the NPPG.
Localism Act 2011	Act that decentralises power as far as possible from central government to individuals, communities and councils. Introduces neighbourhood planning, amongst other key measures. The Localism Act 2011 was given Royal Assent on 15th November 2011.	
Local		
Mid Sussex District Council – Master Plans for East Grinstead, Burgess Hill and Haywards Heath town centres (all	Seeks to guide the revitalisation and redevelopment of the three town centres over the next 20 years. Several objectives are set out for each town centre, which are	The District Plan and master plans need to be considered together so that they complement one another.

three documents have been adopted as SPDs)	intended to deliver a vision.	
Mid Sussex Economic Development Strategy and Action Plan (2013)	The document lists 4 specific objectives for economic development in the District and states how the Council will assist in meeting these aims. The document highlights how the Council will assist in achieving the aims of the plan, including through the planning system.	The document highlights how the Council will assist in achieving the aims of the plan, including through the planning system.
Mid Sussex Employment Land Review (2009 and 2010)	This document provides an up to date assessment of the supply of and demand for employment land and floorspace in Mid Sussex.	This is an important part of the evidence base for the setting of the vision, objectives and policy on economic development.
Mid Sussex Retail Study (2006) plus Updated (2008)	The key objectives of this study are: • To establish the vitality and viability of the retail centres in the District; and • To provide a robust assessment of current and projected retail needs for the period to 2026.	This is an important part of the evidence base for the setting of the vision, objectives and policy on retail development.

Constraints, conflicts and challenges

There are no obvious constraints or conflicts between the economic and employment related plans or policies. However, at a national level there is a strong desire to utilise previously developed land first for new employment facilities. This is also the case for new housing development and therefore there could be a conflict between developing previously developed sites for housing or employment, especially given that there is only a limited amount of previously developed land within the District.

Similar to the need for new housing, the need the new employment facilities will have to balance the need to protect the environment of the District.

Promoting Good Governance

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
National		
Planning and Compulsory Purchase Act 2004	Requires all local planning authorities to prepare a Statement of Community Involvement (SCI). This sets out how the local community and stakeholders can get involved in the planning process with particular attention given to community involvement in the preparation of Local Development Documents (LDD).	The Local Planning Authority is required to produce a Statement of Community Involvement to accompany certain planning documents.

National Planning Policy Framework (NPPF)	Sets out the Government's priorities for planning in England, and contains a general assumption in favour of sustainable development.	The District Plan must be in conformation with the NPPF.
Localism Act 2011	Act that decentralises power as far as possible from central government to individuals, communities and councils. Introduces neighbourhood planning, amongst other key measures. The Localism Act 2011 was given Royal Assent on 15th November 2011.	
Local		
Mid Sussex District Council – Statement of Community Involvement	Sets out how the Council will engage with the public in the preparation and adoption of Development Plan Documents. To reflect the varying nature of the Development Plan Documents, different techniques are being used for each document to ensure that the appropriate engagement occurs.	The production of the District Plan has and will need to have regard to the community engagement methods for Development Plan Documents contained within this document.

Constraints, conflicts and challenges

There are no constraints or conflicts between the good governance plans or policies.

Using Sound Science Responsibly

Name of document	Broad aims/ relevant policies	Requirements of the document in relation to the District Plan
International		
Rio Declaration on Environment and Development – Principle 15: Precautionary Principle (1992)	In order to protect the environment, the precautionary approach shall be widely applied by States according to their capabilities. Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.	The District Plan will have regard to the precautionary principle to ensure irreversible environmental damage is avoided in the district and surrounding area.

Constraints, conflicts and challenges

There are no constraints or conflicts between the using sound science responsibly plans or policies.

Appendix 2 – Sustainability Framework Baseline

The following table presents the baseline figures for the indicators that make up the Sustainability Framework, where such data has been possible to collect. Where this has not been possible to collect, the District Council will investigate ways of collecting this data in future, and will update the baseline section of the Sustainability Appraisal in future versions of the document. Difficulties in collecting data have been described in Section 3.

The baseline year has been determined as 2013-2014 unless indicated otherwise, as this is the latest year where all datasets are readily available at the time of writing.

Key:

↑	Baseline situation is predicted to get better by the end of the plan period
~	Baseline situation is predicted to stay the same by the end of the plan period
↓	Baseline situation is predicted to get worse by the end of the plan period
?	It is difficult to predict or assess the impact the District Plan will have

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
SOCIAL						
1. To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford	Housing completions per annum (net)	536	**12-13:** 749 **11-12:** 522 **10-11:** 179	MSDC AMR-A1	?	↑
	Number of affordable homes completed annually (gross)	122	**12-13:** 108 **11-12:** 202 **10-11:** 85	MSDC AMR-A2	?	↑
	Financial contributions towards affordable housing provision	192 Units (£38,663)	**12-13:** 173 Units (£0) **11-12:** 64 Units (£0) **10-11:** 164 Units (£258,663)	MSDC AMR-A5	↓	↑

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
	Number of low cost home ownership households delivered annually (note these include FirstBuy completions which would appear as open market units on planning applications but have been since sold through the FirstBuy shared equity scheme)	12	**12-13:** 33 **11-12:** 71 **10-11:** 18	MSDC AMR-A3	↓	↑
	Number of households accepted as full homeless	45	**12-13:** 49 **11-12:** 38 **10-11:** 46	MSDC AMR-A6	?	?
2. To improve the access to health, leisure and open space facilities and reduce inequalities in health.	Number of applications resulting in new, extended or improved health facilities	0	**12-13:** 2 (£308,631)	MSDC AMR – C7	?	?
	Number of households within a 15 minute walk (approx. 1.2km) from GP surgery/health centre/hospital	49,480 (82.2%)	No trend: Newly monitored this year.	MSDC AMR-C8	~	↑
	Number of households within 300m of leisure and open space facilities (as defined in the Mid Sussex Assessment of Open Space, Sport and Recreation – PPG17 Study)	48,418 (80.4%) (note this represents Multi-Functional Green Space only, other facilities will be monitored in the future)	No trend: Newly monitored this year.	MSDC AMR-C9	↓	↑
	Amount of leisure floorspace (Use Class D2) completed per annum (gross)	0m²	**12-13:** 1,200m² **11-12:** 0m² **10-11:** 992m²	MSDC AMR-C3	↓	↑

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
	Financial contributions towards leisure facilities	£886,821 (24 agreements)	**12-13:** £466,798 (12 agreements) **11-12:** £469,204 (13 agreements) **10-11:** £993,976 (24 agreements)	MSDC AMR-C4	↓	↑
3. To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities.	Percentage of population of working age qualified to NVQ level 3 or equivalent	64.5%	**12-13:** 60.8% **11-12:** 64.0% **10-11:** 56.2%	MSDC AMR-C1	?	?
	Percentage of adults with poor literacy and numeracy skills	6.0%	**12-13:** 6.1% **11-12:** 3.1%[25]	MSDC AMR-C2	?	?
	Number of households within a 15 minute walk (approx. 1.2km) from a Primary School	54,062 (89.8%)	No trend: Newly monitored this year.	MSDC AMR-C10	↓	↑
	Number of households within a 20 minute walk (approx. 1.6km) from a Secondary School	39,051 (64.9%)	No trend: Newly monitored this year.	MSDC AMR-C11	↓	↑
4. To improve access to retail and community facilities.	Number of households within a 15 minute walk (approx. 1.2km) from a superstore/town centre/high street shopping facilities);	38,771 (64.4%)	No trend: Newly monitored this year.	MSDC AMR-C12	↓	↑

[25] Estimate and confidence interval unreliable since the group sample size is small

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
	Number of households within a 15 minute walk (approx. 1.2km) from a convenience store	55,129 (91.6%)	No trend: Newly monitored this year.	MSDC AMR-C13	↓	↑
	Number of households within a 15 minute walk (approx. 1.2km) from community facilities (e.g. community hall, place of worship, library)	**Not Currently Monitored –** This data will be monitored in the future				
5. To create cohesive, safe and crime resistant communities	All crime – number of crimes per 1000 residents per annum	34.41 per 1000 residents[26]	**12-13:** 36.98 **11-12:** 38.33 per 1000 residents[27]	Sussex Police	~	?
	Number of domestic burglaries per 1000 households	4.23 per 1000 households	**12-13:** 5.24 **11-12:** 5.07 per 1000 households[28]	Sussex Police	~	?
ENVIRONMENTAL						
6. To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere (taking into account and aiming to	Percentage of the District that is within Flood Zone 2/Flood Zone 3	**Flood Zone 2:** 3.2% **Flood Zone 3:** 2.7%	No trend: Newly monitored this year.	MSDC – Strategic Flood Risk Assessment	~	↑
	Number of properties at risk from flooding, as defined by the Environment Agency;	1,411	No trend: Newly monitored this year.	MSDC AMR – E1	~	↑

[26] Figures for 1st January 2012 to 31st December 2012
[27] Figures for 1st January 2012 to 31st December 2012
[28] Figures for 1st January 2012 to 31st December 2012

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
reduce the potential impact of climate change), and seek to reduce the risk of flooding. (SEA)	Number of planning applications approved contrary to advice given by the EA on flood risk/flood defence grounds.	0	**12-13:** 0 **11-12:** 0 **10-11:** 0	MSDC MR – E2	~	~
7. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance.	Percentage of new and converted dwellings on previously developed (brownfield) land	45.1% (297 units)	**12-13:** 55.2% (317 units) **11-12:** 58% (465 units) **10-11:** 64.4% (204 units)	MSDC MR- A7	?	?
	Percentage of new employment floorspace on previously developed land	100% (2,553m^2)	**12-13:** 90% (2,852m^2) **11-12:** 60% (1,123m^2) **10-11:** 91% (8,187m^2)	MSDC MR- B2	↓	↑
	Density of new housing developments (dwellings per hectare)	**08-11:** 37 dwellings per hectare	**04-07:** 37 dwellings per hectare **00-03:** 33 dwellings per hectare	MSDC MR- A8	~	?
	Amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development.	**Not Currently Monitored –** This data will be monitored in the future				
8. To conserve and enhance the District's biodiversity. (SEA)	Condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC, Ramsar)	95.3% of SSSIs in favourable / unfavourable but recovering condition (n.b there are no SPA/SAC/Ramsar sites in Mid Sussex)	**12-13:** 97.6% **11-12:** 95.2% **10-11:** 92.9%	MSDC MR- E5	↓	↑

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
	Number and area of SNCIs and LNRs within the District	SNCI: 50 (1,094ha) LNR: 6 (168ha)	**12-13:** SNCI 50 (1,094ha) LNR: 6 (164ha) **11-12:** SNCI: 50 (1,094ha) LNR: 6 (158ha)	MSDC MR- E6	~	~
	Area of Ancient Woodland within the District	5,304ha (15.9%)	**12-13:** 5,302ha **11-12:** 5,300ha **10-11:** 5,300ha	MSDC MR- E7	~	?
	Number of planning applications approved contrary to advice given by Natural England on biodiversity issues	0	**12-13:** 0 **11-12:** 0 **10-11:** 0	MSDC MR- E8	?	↑
	Number of dwellings permitted within the 7km Zone of Influence (SPA)	**Not Currently Monitored –** This data will be monitored in the future				
9. To protect, enhance and make accessible for enjoyment, the District's countryside. (SEA)	Open spaces managed to green flag standard	1	**12-13:** 1 **11-12:** 1 **10-11:** 1	MSDC MR- E9	?	?
	Number of major developments in National Park / AONB	High Weald AONB: 3 South Downs NP: 1	**12-13:** AONB: 3 SDNP: 1 **11-12:** 2	MSDC Monitoring	↓	↑
	Number of households within 300m of multi-functional green space (as defined in the Mid Sussex Assessment of Open Space, Sport and Recreation – PPG17 Study)	48,418 (80.4%)	No trend: Newly monitored this year.	MSDC MR- C9	↓	↑
10. To protect, enhance and make	Number of listed buildings within the District	1,054	**12-13:** 1,040 **11-12:** 1,040 **10-11:** 1,040	MSDC MR- F3	~	~

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
accessible for enjoyment, the District's historic environment. (SEA)	Buildings of Grade I and II* and scheduled monuments at risk	2	**12-13:** 2 **11-12:** 1 **10-11:** 0	MSDC MR- F1	~	~
	Number of Conservation Areas in the District;	36	**11-12:** 36 **10-11:** 36	MSDC MR- F2	?	?
	Number of Conservation Areas with appraisals and management proposals	4	**12-13:** 4 **11-12:** 4 **10-11:** 4	MSDC MR- F2	~	~
11. To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)	Number of households within a 5 minute walk (approximately 400m) of a bus stop with frequent service (3+ an hour)	54,850 (91.1%) (note that this is all bus stops – frequency information will be monitored in the future)	No trend: Newly monitored this year.	MSDC MR- D3	↓	↑
	Number of households within a 10 minute walk (approximately 800m) of a bus stop with less frequent service (less than 3 an hour)	58,564 (97.3%) (note that this is all bus stops – frequency information will be monitored in the future)	No trend: Newly monitored this year.	MSDC MR- D4	↓	↑
	Number of households within a 15 minute walk (approx. 1.2km) of a train station	25,309 (42.1%)	No trend: Newly monitored this year.	MSDC MR- D5	~	↑
	Proportions of journeys to work by public transport	14.3% (train, tube, tram, bus, minibus, coach) 25.4% (as above, plus walk and bicycle)	**11-12:** 16.1% **10-11:** 12% **09-10:** No data	Census 2011	?	↑
	Percentage of residents living and working within Mid Sussex	55.55%	**2001:** 54.18%	Census 2011	~	↑

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
	Monetary investment in sustainable transport schemes (value of S106 agreements)	£534,259 (20 agreements)	**12-13:** £797,309 (19 agreements) **11-12:** £915,441 (18 agreements) **10-11:** £646,854 (19 agreements)	MSDC MR- D1	↓	↑
	Number of Air Quality Management Areas (AQMAs) within the District.	1	**12-13:** 1 **11-12:** 1 **10-11:** 1	MSDC MR- E11	~	↑
12. To reduce waste generation and disposal, and achieve the sustainable management of waste, including the amount of waste that is either re-used or recycled.	Percentage of domestic waste that has been recycled	30.99%	**12-13:** 30.0% **11-12:** 31.26% **10-11:** 32.97%	MSDC MR- G3	?	↑
	Percentage of domestic waste that has been composted	12.16%	**12-13:** 11.0% **11-12:** 11.70% **10-11:** 10.84%	MSDC MR- G4	?	?
13. To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable	Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate"	**Good:** 1 **Moderate:** 14 **Poor:** 8 **Bad:** 1	No data	Environment Agency	↓	↑
	Incidents of major and significant water pollution within the district	3	**12-13:** 1 **11-12:** 1 **10-11:** 0	Environment Agency	?	↑

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
water resources management. (SEA)	Number of planning applications approved contrary to advice given by the Environment Agency on water quality issues	0	**12-13:** 0 **11-12:** 0 **10-11:** 0	MSDC MR- E4	?	↑
	Number and area of developments where appropriate remediation of contaminants has taken place	8 sites (18.75ha)	**12-13:** 2 sites (0.55ha) **11-12:** 5 sites (1.95ha) **10-11:** 7 sites (3.66ha)	MSDC MR- E10	?	?
	Number of developments built to BREEAM / Code for Sustainable Homes standards	Design certificates: 202 Post Construction certificates: 230	**12-13:** Design: 80 Post Construction: 203	MSDC MR- G1	~	↑
14. To increase energy efficiency and the proportion of energy generated from renewable sources in the District and to utilise sustainably produced and local products in new developments where possible.	Number of developments built to recognised renewable energy standards	Code for Sustainable Homes – Design certificates: 202 Post Construction certificates: 230	**12-13:** Design: 80 Post Construction: 203	MSDC MR- G1	~	↑
		Number of BREEAM Standard Homes Not currently monitored.				
	Domestic energy consumption per household	**2012:** 1,018GWh	**2010:** 1,101GWh	MSDC MR- G2	↓	↑
	Number of renewable energy installations within Mid Sussex	**March 2014:** 1,354	No trend: Newly monitored this year.	DECC	~	↑

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
	Installed capacity of renewable energy installations within Mid Sussex	**March 2014:** 5,694 (kW)	No trend: Newly monitored this year.	DECC	~	↑
ECONOMIC						
15. To encourage the regeneration of the District's existing Town Centres and support the viability and vitality of village centres.	Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2)	A1: 9,278 m^2 B1a: 2,173 m^2	No trend: Newly monitored this year.	MSDC MR – B4	↓	↑
	Number of households within a 15 minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities)	38,771 (64.4%)	No trend: Newly monitored this year.	MSDC MR – C12	↓	↑
16. To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.	Percentage of Mid Sussex residents who are unemployed	3.2%	**12-13:** 3.4% **11-12:** 3.7% **10-11:** 4.2%	Annual Population Survey (Nomis)	?	↑
	Percentage of Mid Sussex residents who are economically active	87.3%	No trend: Newly monitored this year.	Annual Population Survey (Nomis)	~	↑
	Average weekly income for those who are employed in the district	**2013:** £587.80	**2012:** £574.70 **2011:** £594.30 **2010:** £574.70	MSDC MR- B7	?	?
	Percentage of residents living and working within Mid Sussex	55.55%	**2001:** 54.18%	Census 2011	~	↑
	Job density (ratio of jobs to working age population).	0.77	No trend: Newly monitored this year.	ONS Job Density	~	↑

Objective	Indicator	Latest Data (2013-14 unless otherwise stated)	Trend	Source	Predicted Status WITHOUT the District Plan	Predicted Status WITH the District Plan
17. To support economic growth and competitiveness across the District.	Net increase / decrease in commercial (Use Classes B1 (b,c), B2, B8) and office (B1(a) and A2) floorspace	1,857m² (6 completions)	**12-13:** 2,611m^2 (3 completions) **11-12:** 1,388m^2 (7 completions) **10-11:** 13 completions (5,687m^2)	MSDC MR- B1	?	↑
	Number of businesses within the District	**2013:** 7,065	**2013:** 6,990 **2011:** 6,910 **2010:** 6,725	MSDC MR – B5	~	↑
	Number of new businesses setting up in the District	Births of Enterprises: 830 Deaths of Enterprises: 660 Net: +170	**12-13:** Births: 695 Deaths: 740 Net: -45 **11-12:** Births: 710 Deaths: 635 Net: +75 **10-11:** Births: 665 Deaths: 625 Net: +40	MSDC MR- B5	↓	↑
18. To encourage the development of a buoyant, sustainable tourism sector.	Percentage of jobs in the tourism sector	**2013:** 8.2%	**2012:** 7% **2011:** 9.1%	Tourism South East	?	↑
	Total trips to Mid Sussex for tourism purposes	**2013:** 4,160,000 (day visits)	**2012:** 4,110,000 day visits	Tourism South East	~	↑
	Total spend by those visiting Mid Sussex for tourism purposes	**2013:** £221m	**2012:** £218m	Tourism South East	~	↑
	Number of visitors staying overnight (serviced accommodation)	**2013:** 508,624	**2012:** 497,360 **2010-12:** 495,000pa	Tourism South East	~	~