

Traveller Sites Allocations Development Plan Document

Consultation Draft Sustainability Appraisal - Main Report

Incorporating Strategic Environmental Assessment and Sequential Flood Risk
Test

August 2014

Contents

1. Introduction	1
What is Sustainability Appraisal?	1
What is Sustainable Development?	2
2. Background	4
Mid Sussex Planning Policy	4
Traveller Sites Allocations DPD	4
Strategic Environmental Assessment	5
Sequential Flood Risk Test	6
Consultation	6
Sustainability Appraisal Work Undertaken So Far	9
Scoping Report	9
3. Methodology	10
Stage A	11
Stages B, C, D	11
4. Baseline	12
Social Characteristics	12
Population	12
Education	13
Health	13
Living Accommodation	14
Environmental Characteristics	15
Biodiversity, Landscape, Archaeology	15
Soil	15
Air Quality, Noise and Odour	15
Water	15
Climate Change	16
Economic Characteristics	16
Employment	16
Challenges Collecting Baseline Data	16
Future Change <i>without</i> the Traveller Sites Allocations DPD	17
5. Sustainability Framework	19
Compatibility of Sustainability Objectives	21
6. Issues and Options	23
7. Appraisal Findings	25
Existing Authorised Traveller Sites	27
Traveller Sites Allocations	28
Overall Sustainability Appraisal Conclusions	38
Cumulative and Synergistic Impacts	40
8. Monitoring	42
9. Next Steps	43
Appendix A – Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs)	44
Appendix B – Indicator Baseline	47
Appendix C – Comments received during consultation on the Scoping Report and the District Council’s response to those comments	51

1. Introduction

- 1.1. This document comprises the Sustainability Appraisal Report (incorporating a Strategic Environmental Assessment – SEA) and presents the process, findings and outcomes of the Sustainability Appraisal and SEA that has been undertaken for the Traveller Sites Allocations Development Plan Document (DPD).
- 1.2. The Traveller Sites Allocations DPD will allocate land within the district (but outside of the South Downs National Park) for sufficient sites to meet the permanent accommodation needs of Gypsies and Travellers (hereafter also referred to as “Travellers”) as required by the National Planning Policy Framework and evidenced by the Mid Sussex Gypsy and Traveller and Travelling Showpeople Accommodation Needs Assessment.
- 1.3. Upon adoption, the Traveller Sites Allocations DPD will form part of the Development Plan used to guide planning and development in Mid Sussex. Development Plans must aim to meet the objectives of sustainable development.

What is Sustainability Appraisal?

- 1.4. A Sustainability Appraisal and SEA Report is prepared to accompany DPDs in order to demonstrate that the plan being prepared is the most sustainable given all realistic alternatives.
- 1.5. A Sustainability Appraisal aims to predict and assess the **social, environmental** and **economic** effects that are likely to arise from the adoption of Plans or Programmes, to ensure these contribute to and promote sustainable development.
- 1.6. National Planning Guidance states that the role of a sustainability appraisal is “to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives”.
- 1.7. Sustainability Appraisal serves great importance in being an ‘informing tool’. It assures consideration is given to sustainability issues and assesses the options for solving such issues, or mitigating against them where possible.
- 1.8. A Scoping Report was published in October 2013 to identify the current sustainability issues within Mid Sussex and suggest a range of Sustainability Objectives. Responses received during the consultation period have informed the preparation of the Sustainability Appraisal and these revisions are reported later in this document.
- 1.9. The Sustainability Appraisal uses Sustainability Objectives to predict the social, environmental and economic effects of the Traveller Sites Allocations DPD. This will ensure it only includes policies and site options that contribute towards the aims of sustainable development.
- 1.10. The report is structured as follows:

- **Section 2** provides background to the Sustainability Appraisal and SEA process and how the requirements of SEA have been taken into account
- **Section 3** covers the appraisal methodology in terms of the approach adopted
- **Section 4** covers the baseline collection work and identification of the plans, policies and programmes that have an impact upon the Traveller Sites Allocations DPD
- **Section 5** sets out the Objectives and Indicators (collectively known as the Sustainability Framework) which will be used to appraise the various policy options
- **Section 6** provides detail on how other policy and allocation options were identified, considered and appraised, leading to the Consultation Draft stage and the Submission Stage of the DPD
- **Section 7** will identify the social, environmental and economic effects of the site allocations. Mitigation measures for any detrimental sustainability effects are also identified in this section
- **Section 8** identifies proposals for monitoring
- **Section 9** outlines the next steps

There are also a number of appendices that accompany various sections of this report.

What is Sustainable Development?

- 1.11. 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 a better quality of life for everyone, now and for generations to come. In doing so, social, environmental and economic issues and challenges should be considered in an integrated and balanced way.
- 1.12. The Government sees the Planning system as a key tool for delivering sustainable development as set out in the National Planning Policy Framework:
- **Planning for Prosperity (economic role)** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type, and in the right places, is available to allow growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
 - **Planning for People (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 supports its health, social and cultural well-being; and
 - **Planning for Places (environmental role)** – contributing to protecting and enhancing our natural, built, and historic environment, to use natural resources prudently and to mitigate and adapt to climate change, including moving to a low-carbon economy.
- 1.13. This Sustainability Appraisal report is a requirement of the Planning and Compulsory Purchase Act 2004. Undertaking this process can improve the overall sustainability of the Traveller Sites Allocations DPD and demonstrates how relevant issues and challenges have been considered and strategy or policy options have been ruled out where they are deemed unsustainable.

¹ The Report of the Brundtland Commission, 1987

1.14. The Government's strategy for Sustainable Development, "Securing The Future" (2005), set five guiding principles for achieving sustainable development:

- **Living within Environmental Limits** – Respecting the limit of the planet's environment, resources and biodiversity – to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations.
- **Ensuring a Strong, Healthy and Just Society** – Meeting the diverse needs of all people existing and future communities, promoting personal well-being, social cohesion and inclusion, and creating equal opportunity for all.
- **Building a Strong, Stable and Sustainable Economy** – Providing prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised.
- **Promoting Good Governance** – Actively promoting effective, participative systems of governance in all levels of society – engaging people's creativity, energy and diversity.
- **Using Sound Science Responsibly** – Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

2. Background

Mid Sussex Planning Policy

- 2.1. Mid Sussex District Council are progressing a 'District Plan' for Mid Sussex for the period to 2031. The District Plan will be the key document in the Development Plan for Mid Sussex. Once adopted will replace the majority of the policies contained within the Mid Sussex Local Plan (2004).
- 2.2. The District Plan will set out the vision for how Mid Sussex wants to evolve; a delivery strategy for how that will be achieved; and broad guidance on the distribution and quantity of development in the form of 'higher level' strategic policies. It is a way of implementing the Mid Sussex Sustainable Communities Strategy and provides the framework for all subsequent planning documents.
- 2.3. Upon adoption of the District Plan and the Traveller Sites Allocations DPD, the Development Plan for Mid Sussex will consist of:
 - Mid Sussex District Plan;
 - Small Scale Housing Allocations Development Plan Document (adopted 2008);
 - Traveller Sites Allocations Development Plan Document;
 - Saved Mid Sussex Local Plan Policies (as listed in Appendix A of the District Plan – when adopted);
 - Neighbourhood Plans (various, throughout the district); and
 - Supplementary Planning Documents (as required).
- 2.4. The District Plan proposes to include a criteria based policy for Traveller sites, should planning applications for such sites be submitted ahead of (or in addition to) a site allocations document being adopted.
- 2.5. In July 2013, the District Council submitted its District Plan to the Secretary of State. This document was withdrawn and is now being revised following the Inspector's conclusions on the Duty to Co-operate. These revisions and eventual re-submission of the District Plan will not affect the aims of the DPD.

Traveller Sites Allocations DPD

- 2.6. Government guidance "Planning Policy for Traveller Sites" (2012) requires local authorities to establish the needs of Travellers through a Needs Assessment and to identify a supply of deliverable sites sufficient to provide five years' worth of sites against locally set targets in order to meet them. Local authorities should also identify a further supply of sites or broad locations for growth for years 6 to 10 and where possible years 11-15, similar to the National Planning Policy Framework policy requirements for 'bricks and mortar' housing.
- 2.7. This requirement will be delivered through emerging District Plan policy and the Traveller Sites Allocations DPD which will identify and allocate suitable sites. It is considered that the approach of allocating specific sites in a DPD alongside the proposed criteria based policy approach in the District Plan will provide a degree of choice and certainty for the Council and the Gypsy and Traveller and settled communities that isn't currently possible.

Strategic Environmental Assessment

- 2.8. The National Planning Policy Framework sets out that a Sustainability Appraisal should meet the requirements of the European Directive on Strategic Environmental Assessment² (SEA). The SEA process is very similar to the Sustainability Appraisal process albeit with more prescriptive guidance and tasks that need to be followed in order to meet the SEA Directive's requirements.
- 2.9. National Planning Guidance states that “sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environmental Assessment Regulations’)” which assesses the effects of certain plans and programmes on the environment.
- 2.10. The SEA Directive sets out a legal assessment process that must be followed. In order to demonstrate compliance with the Directive, the table below indicates how the SEA Directive's requirements have been met during the Sustainability Appraisal work undertaken so far. This approach has been followed throughout this report and for simplification, is referred to as the Sustainability Appraisal, even though it incorporates the SEA.

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	Section 1, Section 2, Section 5 and Appendix A
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Section 4.30 – 4.33, Section 6, Section 7 and Appendix B
c) The environmental characteristics of areas likely to be significantly affected	Section 4, appraised in Sections 6 and 7
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	Section 4 and referred to where relevant in appraisal of site options in Section 7 (e.g. European Designations)
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	Established in Section 5 and Appendix A, taken into account in Section 6 and Section 7
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 4 outlines the baseline, appraised for significant effects in Section 6 and Section 7

² Strategic Environmental Assessment 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

³ Derived from ‘Figure 1: The SEA Directive's Requirement’ in “A Practical Guide to the Strategic Environmental Assessment Directive” (ODPM, 2005).

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 for each site option in Section 7
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	Section 3 details the methodology and options are discussed in Section 6
i) A description of measures envisaged concerning monitoring in accordance with Article 10	Section 8
j) A non-technical summary of the information provided under the above headings	This is provided in a separate document

Table 1 - **Where SEA Directive Requirements are met**

2.11. The SEA guidance outlines a number of tasks that need to be undertaken whilst preparing the Sustainability Appraisal report. These tasks are highlighted throughout (in blue, italic font) to clearly show where these requirements have been met.

Sequential Flood Risk Test

2.12. National Planning Guidance also recommends the inclusion of the Sequential Flood Risk Test as part of the sustainability appraisal. The Sequential Test (and if necessary, an Exception Test) is the recognised approach to flood risk assessment for Development Plan Documents. The sequential test draws upon information gathered and detailed within the District Council's Strategic Flood Risk Assessment and is used to steer development to area at the lowest risk of flooding.

2.13. In flood risk terms caravans, mobile homes and park homes intended for permanent residential uses are considered to be highly vulnerable types of development. Consequently it is not appropriate to locate Traveller sites in Flood Zone 3 and an Exception Test must be undertaken for any sites located in Flood Zone 2, in line with national guidance.

Consultation

2.14. The Travellers Sites Allocations DPD – Consultation Draft, along with this accompanying Sustainability Appraisal and the Habitats Regulations Assessment Screening Report, will be made available for public consultation for 6 weeks starting on 8th August until 19th September 2014.

2.15. All comments received on these documents will be taken into consideration in preparing the final Traveller Sites Allocations DPD and the Sustainability Appraisal. Any changes that are necessary as a result of this consultation will be reported in further stages of the Sustainability Appraisal. The final decision on the policies and the sites that will be proposed for allocation when the document is submitted to the Secretary of State will be made by elected Councillors.

2.16. All the documents are available on-line at www.midsussex.gov.uk/8686.htm, and along with the response form, are available to view at all Town and Parish Council offices, public libraries and help-points in Mid Sussex and at the District Council offices main reception.

2.17. Where possible, responses should be made on-line at www.midsussex.gov.uk/8686.htm otherwise comments can be made on the response form, or by email to LDFconsultation@midsussex.gov.uk or by post to:

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

- 2.18. As the document seeks to allocate sites, it is also open for those who wish to promote a site for consideration, either now or in the future, to submit their site. Potential sites must be accompanied by a site map clearly showing the boundaries of the site and supported by evidence of the suitability, availability and deliverability⁴ of the site for such use. These can be submitted online at www.midsussex.gov.uk/8686.htm or by post or email using the above contact details. If any of these sites are considered to be realistic, they will be assessed through the Sustainability Appraisal process during the next stage of its production.
- 2.19. **Mid Sussex District Council will only consider comments by respondents who provide their names and address. Offensive or racist comments will not be accepted and may be reported to the appropriate authorities.**
- 2.20. To find out more about the *Traveller Sites Allocations Document* you can visit our website or call the Planning Policy Team on (01444) 477053. Please contact us if you have particular access needs or require help in completing the comments form.
- 2.21. Further detail of the consultation process is set out in the accompanying *Community Involvement Plan* available at www.midsussex.gov.uk/8686.htm and at all the consultation drop in points
- 2.22. 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.

⁴ See *Planning policy for traveller sites*(DCLG) - www.gov.uk/government/publications/planning-policy-for-traveller-sites

The SEA Directive's Requirements	Where / When this will be Undertaken
<p>Authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report</p>	<p>Undertaken through the Scoping Report, consulted upon and published in October 2013, responses are shown in Appendix C.</p>
<p>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</p>	<p>The Consultation Draft Sustainability Appraisal will be subject to a 6-week (minimum) consultation alongside the Consultation Draft DPD. The consultation will follow the adopted Statement of Community Involvement guidelines (2011).</p>
<p>Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country</p>	<p>Not applicable</p>
<p>Taking the environmental report and the results of the consultations into account in decision-making</p>	<p>All comments received during the consultation on the Sustainability Appraisal, which incorporates an Environmental Report, will be taken into account in future versions of this document and the Traveller Sites Allocations DPD. The Sustainability Appraisal will directly inform drafting of the Traveller Sites Allocations DPD.</p>
<p>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:</p> <ul style="list-style-type: none"> - 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 	<p>Not applicable yet, these requirements will need to be considered and acted upon when the Traveller Sites Allocations DPD is adopted. These requirements are recognised in Section 9 – Next Steps.</p>
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation</p>	<p>Not applicable yet, the significant effects of the Traveller Sites Allocations DPD will be monitored when adopted, as per the monitoring arrangements set out in Section 8 - Monitoring.</p>

Table 2 - Where SEA Consultation Requirements are met

Sustainability Appraisal Work Undertaken So Far

2.23. This report builds upon the work undertaken so far, and should be read in conjunction with the Scoping Report and other relevant documents. Substantial work was also undertaken in preparing the Sustainability Appraisal for the withdrawn District Plan which assessed sustainability challenges and appraised District Plan policy areas, including *Gypsies, Travellers and Travelling Showpeople*, against the Sustainability Framework. The Sustainability Appraisal will be reviewed to accompany future versions of the District Plan following post-hearing work currently being undertaken.

Scoping Report

2.24. The Scoping Report stage of the Traveller Sites Allocations DPD Sustainability Appraisal is the first stage of assessment. The Scoping Report identifies sustainability issues for the district by analysing baseline information collected to build a picture of the challenges for the district. This led to a range of sustainability objectives, and indicators to measure these, to be formulated.

2.25. The Scoping Report was subject to a five-week consultation period October-November 2013 and four responses were received including responses from the Environment Agency, High Weald AONB Unit and Natural England. The comments made and the Council's responses to these comments are set out in Appendix C.

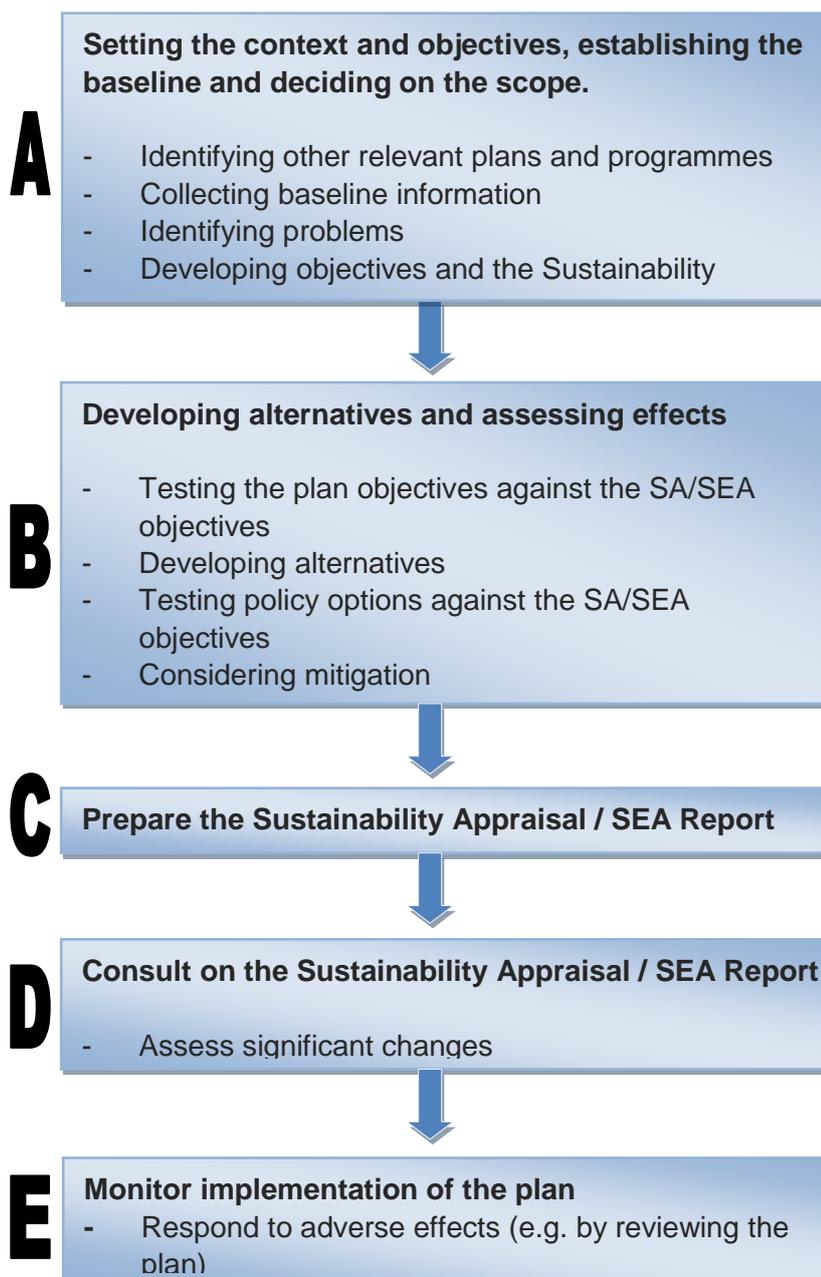
3. Methodology

3.1. This Sustainability Appraisal (incorporating Strategic Environmental Assessment) has been prepared in accordance with the following Government guidance:

- National Planning Practice Guidance
- National Planning Policy Framework
- 'Planning policy for Traveller sites – March 2012' DCLG guidance
- Sustainability Appraisal guidance within the CLG Plan Making Manual
- SEA guidance from the ODPM "A Practical Guide to the Strategic Environmental Assessment Directive" (2005)

3.2. Government guidance on preparing a Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are very similar. As the guidance for SEA is more prescriptive in its requirements, this has been followed whilst ensuring that the individual requirements of the SA guidance are also adhered to.

3.3. A five-stage approach has been undertaken in preparing this Sustainability Appraisal, based on this guidance:



Stage A

- 3.4. The Scoping Report is the first stage of the Sustainability Appraisal process (**Stage A**) and documents the tasks required to be undertaken.
- 3.5. The Council collected data about the district on social, environmental and economic issues and these were outlined in the Scoping Report as the baseline for the district. This information established the issues related to sustainability currently facing the district, and Sustainability Objectives were developed to address those issues.

Stages B, C, D

- 3.6. The Traveller Sites Allocations DPD will allocate sufficient permanent sites for Gypsies and Travellers within the district to meet the requirements identified through the *Mid Sussex Gypsy, Traveller and Travelling Showpeople's Accommodation Needs Assessment (2013)*. The Sustainability Appraisal process uses the Sustainability Objectives established in the Scoping Report to assess the sustainability of the overall strategy, policies and site options identified by the site allocation process in order to assess all reasonable alternatives.
- 3.7. The main objective of appraising site options is to highlight the different advantages and disadvantages of each option, with the aim of showing that the site option(s) selected are the most sustainable, given all reasonable alternatives. Symbols, alongside explanatory text, will be used to record the performance of each site option against each sustainability objective.
- 3.8. It is intended to use the following system in the next stage of the Sustainability Appraisal:

++	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

- 3.9. 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 effect each site option will have on each sustainability objective, and to what extent, accompanied with explanatory text. This appraisal process is undertaken in Section 7 of this report.

4. Baseline

- 4.1. Collecting baseline information enables an understanding of the current state of the district. This is important for two main reasons: to identify the current sustainability issues which could be remedied or mitigated through the policies/sites in the Traveller Sites Allocations DPD; and to assess what the situation would be like without the DPD in place. This will help justify the need for the DPD (in sustainability terms) and will ensure that it is written with sustainability in mind. This section will be expanded and updated in future stages of the Sustainability Appraisal process where necessary.

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

- 4.2. The District Plan Sustainability Appraisal Scoping Report includes a comprehensive Baseline section – including a review of relevant Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) that have influenced its development. As the Traveller Sites Allocations DPD will be written in conformity with the relevant objectives of the District Plan and in particular District Plan policy on *Gypsies, Travellers and Travelling Showpeople*, it is not intended to repeat this section within this report. Appendix A of this report does, however, build upon the PPPSGIs identified in the District Plan Sustainability Appraisal Scoping Report by including all relevant documents that will influence the development of the DPD.

A2 – Collecting Baseline Information

- 4.3. Similarly, as the District Plan Sustainability Appraisal Scoping Report includes a comprehensive look at the social, environmental and economic baseline for the district, it is not intended to repeat that information within this report. The baseline information provided is therefore specific to producing the Traveller Sites Allocations DPD and should be read in conjunction with the baseline set out in the District Plan Sustainability Appraisal Scoping Report.
- 4.4. Data is predominantly drawn from the site survey work undertaken within the *Gypsy, Traveller and Travelling Showpeople's Accommodation Needs Assessment (2013)* and when other sources have been used these have been referenced. Where possible this report has used 2011 Census data.

Social Characteristics

Population

- 4.5. The Traveller Caravan Count (CLG, January 2014) shows the total number of caravans in Mid Sussex was 33, having been 39 in the previous two counts and 41 for the five counts before then. The *Gypsy, Traveller and Travelling Showpeople's Accommodation Needs Assessment (GTAA)* could not estimate the numbers of Travellers living in 'bricks and mortar' accommodation, as it is widely recognised that Travellers living in such housing do not identify themselves as they fear discrimination and prejudice from the settled community. There is, however, anecdotal evidence of a substantial number of Travellers living in bricks and mortar accommodation, particularly in Burgess Hill.

- 4.6. According to the 2011 Census, there is a population of 142 “Gypsy or Irish Travellers” (Census ethnicity definition) within Mid Sussex – 69 male and 73 female. This is dependent on the respondent identifying themselves as a Gypsy or Irish Traveller, so whilst this may not be accurate, it provides a good indication.
- 4.7. In general, the age profile of the Traveller community is considerably younger than the overall population of Mid Sussex. There are a higher proportion of 0-29 year olds, and considerably lower proportions of older people, particularly those aged 60+. This is broadly consistent with the age profile sourced from on-site surveys undertaken as part of the background to the GTAA. This age profile is also consistent with previous studies, and the 2001 Census.

Age	Mid Sussex – Gypsy or Irish Travellers	Mid Sussex – Gypsy or Irish Travellers (%)	Mid Sussex – All Residents	Mid Sussex – All Residents (%)
0 - 9	37	26%	16,518	12%
10 - 19	33	23%	16,980	12%
20 - 29	17	12%	14,000	10%
30 - 39	19	13%	17,494	13%
40 - 49	18	13%	22,120	16%
50 - 59	10	7%	18,153	13%
60 - 69	7	5%	16,644	12%
70 - 79	1	1%	10,174	7%
80+	0	0%	7,777	6%
TOTAL	142		139,860	

Source: Census 2011

Education

- 4.8. Information on educational attainment for Gypsy or Irish Travellers from the 2011 Census is not available at the time of writing. The GTAA reports that many Travellers opt out of mainstream education and that on average literary levels are low. This is, however, a common theme nationally and not specific to Mid Sussex.

Health

- 4.9. The GTAA notes that 43% of respondents interviewed reported that their household contained at least one member with a long-term health problem.
- 4.10. The 2011 Census states that the majority of Travellers are of Very Good or Good general health, however there is a significant number that are of Fair, Bad or Very Bad health in comparison to Mid Sussex residents in general. There could be many reasons for this – inadequate living conditions, access to services, the general living environment and ability to register with a GP.

General Health	Mid Sussex – Gypsy or Irish Travellers	Mid Sussex – Gypsy or Irish Travellers (%)	Mid Sussex – All Residents	Mid Sussex – All Residents (%)
Very Good	47	33%	72,448	52%
Good	47	33%	47,524	34%
Fair	30	21%	14,938	11%
Bad	14	10%	3,864	3%
Very Bad	4	2%	1,086	1%

Source: Census 2011

Living Accommodation

4.11. There are currently 4 sites owned and managed by West Sussex County Council within Mid Sussex:

- Fairplace Hill, Burgess Hill (9 pitches)
- Bedelands, Burgess Hill (10 pitches)
- Horsgate, Cuckfield (3 pitches)
- Walstead, East Mascalls Lane, Lindfield (4 pitches)

4.12. In addition there are a further 5 sites with planning permission within the local planning authority area:

- 1 & 4 Highfields, Brighton Road, Warninglid (permanent, 4 pitches)
- Pitts Head, London Road, Warninglid (permanent, 5 pitches)
- Marigold Farm, Bishopstone Lane, Ansty (permanent, 1 pitch)
- Little Clonking, Luxfords Lane, Ashurst Wood (temporary, 1 pitch)
- Land at Meadow Wood, Brook Street, Cuckfield (temporary, 1 pitch)

4.13. There are two further private sites without planning permission, but are tolerated:

- Marylands Nursery, Bolney (1 pitch)
- Marigold Farm, Bishopstone Lane, Ansty (1 pitch)

4.14. There are therefore a total of **40** pitches currently within Mid Sussex. A site at Clappers Lane, Fulking is within Mid Sussex, but is located in the South Downs National Park, the Local Planning Authority for that area.

4.15. According to the GTAA. 50.1% of residents on sites state that they are fairly satisfied with their site; with 40.9% declaring that they are 'very satisfied'. The remaining 9% of residents were not satisfied. Residents were asked if they felt improvements were needed on their site – 30% felt that improvements were needed. The majority of these felt that pest control was an issue, with site management, site safety and better washing facilities all important improvements suggested. The majority of residents (83.3%) did feel that their needs could be met on their current site/pitch.

Environmental Characteristics

4.16. The majority of information in the following categories is relevant to the whole district, not specifically to the Traveller community. The District Plan Sustainability Appraisal Scoping Report contains a comprehensive review of the environmental characteristics of Mid Sussex; therefore the following headings highlight only the key characteristics relevant to the Traveller Sites Allocations DPD.

Biodiversity, Landscape, Archaeology

4.17. Mid Sussex has a high quality environment with a number of important assets – namely the South Downs National Park in the southern part of the district and the High Weald Area of Outstanding Natural Beauty in the north. Combined, these areas cover approximately 60% of the district. Mid Sussex also contains 13 Sites of Special Scientific Interest (SSSI) and 50 Sites of Nature Conservation Importance (SNCI). There are no European-designated sites within Mid Sussex although the Ashdown Forest (designated as a Special Protection Area and Special Area of Conservation under EU law) is adjacent in the neighbouring Wealden district.

4.18. It will be important when assessing the suitability of new Traveller sites that these important features are taken into account, in order to reduce any adverse impact.

Soil

4.19. Best and Most Versatile Agricultural Land is classified as Grades 1-3a as per the Agricultural Land Classification. There is no Grade 1 land (the best quality) within the district, although 1.4% is classified as Grade 2, and 63.7% as Grade 3, some of which is likely to fall into the better grade 3a category, although this data isn't readily available.

4.20. New sites for Travellers will need to be sited away from contaminated land, and will need to prevent contamination from sewerage entering the soil or watercourse.

Air Quality, Noise and Odour

4.21. There is one Air Quality Management Area (AQMA) within Mid Sussex at Stonepound Crossroads, Hassocks due to the levels of Nitrogen Dioxide (NO₂) directly caused by the level of road traffic. In order to mitigate and remedy this, an action plan has been produced and was submitted to DEFRA in September 2013. This situation will be monitored, and will need to be taken into account when planning development that could have an impact on this AQMA.

Water

4.22. Demand for water is rising, with Mid Sussex residents using approximately 181 litres of water per day.

4.23. The majority of water bodies in the district are failing to meet 'Good' status under the Water Framework Directive. It will be important for new sites to have mains sewerage connections to ensure the risk of contamination of soils and water bodies is minimised.

4.24. The Mid Sussex Strategic Flood Risk Assessment (SFRA) identifies areas within the district that are at risk from flooding. Approximately 9km² (2.7% of the total land area) are within areas at high risk of flooding (Flood Zone 2 or 3) as defined by the Environment Agency. Future sites should avoid flood risk zones (as per the National Planning Policy Framework). The vulnerability of caravans to flooding will be a key concern.

Climate Change

4.25. There is no specific data on the impacts of Traveller sites or the Traveller community on climate change. The Traveller community are expected to use the same resources (heating, electricity, car usage) as the settled population. It is expected that, due to lower levels of insulation in caravans, this may result in higher energy use requirements compared to the average. There may be potential for renewable sources of energy to be utilised on permanent Traveller sites however this is likely to be impractical for mobile homes.

Economic Characteristics

Employment

4.26. According to the 2011 Census, almost half of all Gypsy or Irish Travellers are economically inactive – in other words, they are either not of working age, or are not able/seeking work. The majority of these state that they are looking after home or family or are retired. This broadly corresponds with the information gathered from sites as part of the background work to the GTAA.

Employment Status	Mid Sussex – Gypsy or Irish Travellers	Mid Sussex – Gypsy or Irish Travellers (%)	Mid Sussex – All Residents	Mid Sussex – All Residents (%)
Economically Active - In Employment	31	38%	72,805	65%
Economically Active - Unemployed	10	12%	2,803	2%
Economically Inactive	39	49%	37,147	33%

Source: Census 2011

4.27. The GTAA notes that, of those that were economically active and employed, 38% of these were undertaking casual or temporary work. This was generally building work, landscaping, gardening and tree work. Only 3% of respondents to the GTAA stated that they were working in a full time job.

Challenges Collecting Baseline Data

4.28. The majority of statistical information within this baseline section has been sourced from the Gypsy and Traveller Accommodation Assessment (GTAA, 2013) or from the 2011 Census. As such, it represents the most up-to-date data available at the time of writing. It should be

noted that the Census should provide more accurate results than the GTAA as the survey work undertaken for the GTAA didn't speak to all households, and only concentrated on Travellers on sites (as there were difficulties contacting families in bricks and mortar housing, as previously discussed).

4.29. More general challenges in collecting the data are as follows:

- In a few instances, it has been difficult to obtain data specific to Mid Sussex. Instead County or National data is used, and where this is the case it has been referenced in this section. Where Mid Sussex data has not been possible to obtain, the next 'lowest level' data has been used (e.g. county, then regional, then national).
- As external organisations collect some data, Mid Sussex District Council has little control over how and when the data is 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 / trend analysis to be made.

Future Change *without* the Traveller Sites Allocations DPD

4.30. It is considered that the adoption of a Traveller Sites Allocations DPD should have a positive impact on the baseline. Appendix B provides the indicator baseline, showing three year trends where possible, and assesses the predicted impact on these indicators both in the absence of a DPD and if the Traveller Sites Allocations DPD is adopted. It is clear that in the majority of instances the adoption of a Traveller Sites Allocations DPD should have a positive impact on the baseline.

Social

4.31. The DPD is considered to be the most suitable option for achieving the correct level of pitch provision over the Plan period. Additional plots should be delivered to meet accommodation needs and the sustainability appraisal process undertaken should direct this new development to more sustainable locations, which would have a positive impact on access to services and facilities. Emerging District Plan policy *for Gypsies, Travellers and Travelling Showpeople* should provide a framework for suitable sites but the Council's failure to demonstrate adequate supply of specific deliverable Traveller sites would be a significant material consideration in the determination of planning applications.

Environmental

4.32. Without the Council being able to demonstrate a 5-year supply of Traveller pitches the protection of landscape and biodiversity assets may be compromised, particularly those that are not protect by national policy and legislation. It is possible that less favourable locations (in sustainability terms) could be developed in order to meet the accommodation requirement for Traveller pitches in the District, which could have a negative impact on car use and sustainable transport indicators.

Economic

4.33. It is possible that less favourable sites in sustainability terms could be developed in the absence of a DPD. This may limit access to employment or opportunities to incorporate business facilities at new Traveller sites. Indicators relating to average income and the

number of businesses setting up in the District could be affected by these impacts but not significantly and these indicators are likely to be influenced by wider factors such as the health of the national economy and provision of employment sites in the District.

A3 – Sustainability Issues and the Challenges Facing the District

4.34. The baseline information and plans, programmes, policies, strategies, guidance and initiatives (PPPSGIs) set out in the previous section and Appendix A have helped to determine the sustainability issues and challenges facing Mid Sussex District, related to Travellers. The main issues and challenges are identified as being:

- A relatively young population, with inadequate access to educational facilities either due to the location of sites or a lack of places. This in turn has a direct effect on educational achievement.
- The Traveller community have more health problems than the settled community – possibly due to the lack of health facilities accessible from sites, or due to inadequacies in living conditions.
- Ease of access to retail, community and leisure facilities is often poor due to the location of sites – particularly those that are unauthorised. There are pockets of deprivation as a whole in Mid Sussex mostly in relation to access to local community services – this can lead to social exclusion.
- Existing sites being inefficient in terms of energy use, particularly caravans. Many sites also do not have access to a mains water supply which has knock-on implications for health.
- Water usage in Mid Sussex is increasing, putting further pressure on water resources.
- Water quality will need to be maintained and enhanced. Unauthorised sites or sites with no access to mains water supply and wastewater treatment could exacerbate existing issues with water quality.
- Flood risk is an issue across the district, and it will be extremely important to ensure that development of sites for caravans are not within flood risk zones or areas with a history of flooding due to their vulnerable nature.
- The need to maintain and enhance the high quality natural, built and historic environment and biodiversity of the district.
- Relatively low employment rates in the Traveller community; therefore there is a need to encourage employment, particularly by providing enough on-site facilities for self-employment where possible.

4.35. A range of Sustainability Objectives and Indicators, collectively known as the Sustainability Framework have been developed to assess the contribution the Traveller Sites Allocations DPD will make towards sustainable development. The Framework will also be used to measure progress over time to assess whether the sustainability issues identified above are being improved where possible.

5. Sustainability Framework

Task A4 – Developing the Sustainability Appraisal / SEA Objectives

- 5.1. The Sustainability Appraisal process tests the various policy and site options against the Sustainability Framework to determine the most sustainable policy/site options given all reasonable alternatives.
- 5.2. A range of Social (**So**), Environmental (**En**) and Economic (**Ec**) sustainability objectives have been identified to assess the contribution the Traveller Sites Allocations DPD will make towards achieving sustainable development. These are based on the sustainability issues and challenges identified in the previous section.
- 5.3. A range of accompanying indicators have also been developed and consulted on as part of the Scoping Report. The indicators are used measure progress against these objectives once the DPD is adopted. This will determine how successful the DPD has been in improving the sustainability issues identified in the previous section.
- 5.4. When appraising policies/sites an assessment will be made as to their predicated impact on the Sustainability Framework. The impact of the policy/site will be scored accordingly – a prediction as to whether the baseline status of each objective will improve (**++**, **+**, **++?**), stay the same (**0**) or get worse (**--**, **-**, **-?**) as a result of the policy in question (as set out in Section 3 – Methodology).
- 5.5. The sustainability objectives and their corresponding indicators are:

So 1) To ensure that Gypsy and Traveller communities have the opportunity to live in appropriate accommodation that meets their needs

- *New additional pitches/plots delivered*

So 2) To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and increase access to educational facilities

- *Percentage of population of working age qualified to NVQ Level 3 or equivalent*
- *Percentage of adults with poor literacy and numeracy skills*
- *Percentage of new Traveller accommodation within 30 minutes public transport time of a primary and secondary school*

So 3) To improve the access to health facilities and reduce inequalities in health

- *Number of applications resulting in new, extended or improved health facilities*
- *Percentage of new Traveller accommodation within 300 metres of accessible green space*
- *Percentage of new Traveller accommodation within 30 minutes public transport time of a GP, hospital or major health centre*

So 4) To improve accessibility to retail and community services

- *Distance of Traveller sites from key retail and community services (post office, convenience store, library, place of worship, community hall, etc.)*

So 5) To improve accessibility to leisure and recreation facilities

- *Distance of Traveller sites from key leisure and recreation facilities (leisure centre, etc.)*

En 6) To protect existing biodiversity, landscape, historical and cultural heritage whilst ensuring that Gypsy and Traveller communities can continue with their own cultural practices.

- *Condition of internationally and nationally important wildlife and geological sites (SSSI, SNCI, SAC, Ramsar)*
- *Number and area of SNCIs and LNRs within the district*
- *Area of ancient woodland within the district*
- *Number of planning applications approved contrary to advice given by Natural England*

En 7) To maintain and improve the environmental quality of the district in terms of air pollution, soil (including contaminated land) and water quality

- *Number of Air Quality Management Areas within the district*
- *Number of stretches of watercourse that are rated (as a minimum) “Moderate” under the Water Framework Directive*
- *Incidents of major and significant water pollution within the district*
- *Total area of contaminated land within the district*
- *Total area of Best and Most Versatile Agricultural Land within the district.*

En 8) To protect, enhance and make accessible for enjoyment, the district’s countryside

- *Open spaces managed to Green Flag Standard*
- *Number of major developments in the South Downs National Park / High Weald AONB*
- *Net gain/loss of Rights of Way*
- *Percentage of new dwellings within 300m of accessible greenspace*

En 9) To address the causes of climate change by reducing resource consumption and reducing waste.

- *Number of developments incorporating facilities to enable recycling*

En 10) To ensure development does not take place in areas of flood risk, or does not contribute to increasing flood risk elsewhere, incorporating flood mitigation measures where appropriate

- *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/defence grounds*
- *Number of developments incorporating appropriate Sustainable Drainage Systems (SuDS)*

En 11) To reduce road congestion and pollution levels by improving travel choice and reducing the need for travel by car.

- *Car ownership*
- *Proportion of journeys to work via public transport*
- *Percentage of new residential development within 30 minutes public transport time of a GP, Primary and Secondary School, employment and major health centre*

Ec 12) To ensure that sites for Gypsy and Travellers include provision of facilities to support the businesses run by Gypsy and Travellers, so as to sustain their employment.

- *Number of new Traveller sites incorporating business facilities (e.g. storage, keeping animals, etc.)*

Ec 13) To ensure high and stable levels of employment so that everyone can benefit from the economic growth of the district.

- *Unemployment*
- *Average weekly income for those employed in the district*
- *Number of new businesses setting up in the district*

Compatibility of Sustainability Objectives

5.6. Realistically there is a difficult balance to be found that best satisfies the Social, Environmental and Economic sustainability aims all at once. Prior to appraising the strategy and site allocation options within the Traveller Sites Allocation DPD the 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 options within the DPD, the conflicts between the different sustainability objectives should be carefully considered as part of the appraisal.

2	✓											
3	✓											
4	✓											
5	✓		✓									
6	x				✓							
7	x		✓			✓						
8			✓		✓	✓						
9	x					✓						
10	✓						✓		✓			
11	x		✓			✓	✓		✓			
12	x			✓							✓	
13		✓				x		x				✓
	1	2	3	4	5	6	7	8	9	10	11	12

Key:

✓	Compatible
x	Incompatible
	No link/Neutral

Table - Compatibility of Sustainability Appraisal Objectives

5.7. Most sustainability objectives are clearly compatible with one another or have no link/neutral impact. However, in a small number of cases objectives are not compatible with one another such as where objectives that result in the need for development are compared against those concerned with conserving and enhancing the built and natural environment. In the majority of cases conservation is best achieved where development is minimised and so there are possible conflicts between these objectives. Other possible conflicts may arise within specific sites where opportunities for onsite provision of services or employment facilities might limit the potential residential yield due to the size or features of the site.

5.8. Despite these conflicts it is possible for these objectives to be achieved alongside one another (or at a minimum the negative impacts of one on another can be minimised or mitigated). The appraisal has identified where conflicts may occur and will minimise adverse impacts by promoting the most suitable policy and site options, identifying mitigation where adverse impacts cannot be completely avoided.

5.9. 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.

5.10. Issues with compatibility will also be mitigated by policies in the emerging District Plan which provides the overall strategy for achieving the vision and strategic objectives. Policies in the District Plan will provide additional criteria for suitable development, provision to meet economic and employment needs, and protect the high quality environment in Mid Sussex.

6. Issues and Options

B2 – Developing Options

- 6.1. The Council must identify how policy and allocation options were identified, considered and appraised against the Sustainability Framework detailed in Section 5. The Traveller Sites Allocations DPD aims to deliver sustainable communities that are safe, healthy and inclusive, and to provide the amount and type of accommodation that meets the needs of Gypsies and Travellers.
- 6.2. The aim of the Sustainability Appraisal is to establish the sustainability performance of all realistic options. The process is repeated as options are developed, new options come forward such as through the consultation period, or significant changes require existing options to be re-appraised.
- 6.3. Paragraph 9 of the Government's *Planning policy for Traveller sites* (March 2012) states that local planning authorities should identify a supply of specific deliverable sites sufficient to provide five years' worth of sites against locally set targets as identified by the Mid Sussex Gypsy and Traveller Accommodation Assessment (GTAA). This assessment was jointly commissioned by Mid Sussex District Council and the South Downs National Park Authority and concludes that estimated site provision for Mid Sussex (outside of the South Downs National Park) for the period up to 2031 is 34 permanent Gypsy and Traveller pitches with no requirement for Travelling Showpeople.
- 6.4. Areas of Mid Sussex district located within the South Downs National Park do not form part of the Traveller Sites Allocations DPD as Mid Sussex District Council is not the local planning authority for this area. As the Local Planning Authority, the South Downs National Park Authority will be producing their own DPD for the National Park area.
- 6.5. A Sites Study was undertaken to identify and consider as many potential options as possible to accommodate the permanent needs of Gypsies and Travellers and to develop a shortlist of potentially suitable sites for allocation, safeguarding or extension for allocation in the Traveller Sites Allocations DPD.
- 6.6. The Study provides:
 - a) A list of potential sites for allocation for use as Gypsy, Traveller and Travelling Showpeople accommodation;
 - b) An assessment of the deliverability of each identified site (i.e. in terms of its suitability, availability and achievability) to determine when and how an identified site could realistically be expected to be developed; and
 - c) The potential quantity of accommodation that could be on each identified site.
- 6.7. The framework and criteria used for site assessment work takes into account information gained from stakeholder work, the *Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment*, the Government's *Planning policy for Traveller sites*, the *National Planning Policy Framework*, *Best Practice Guidance: Designing Gypsy and Traveller Sites* and local policy set out within the emerging *Mid Sussex District Plan*.

- 6.8. To be considered deliverable (i.e. capable of delivery within five years) sites should be
- a) Available, or there should be a reasonable prospect that the site is available at the point envisaged;
 - b) Suitable; and
 - c) Achievable, including being viable.
- 6.9. For the purposes of this Sustainability Appraisal only sites that are considered to deliverable have been appraised as realistic options.
- 6.10. It is accepted that for some options it may not be possible to identify significant effects on all 13 objectives and for the purposes of the appraisal the site has been given a neutral score.
- 6.11. There are also instances where there may be the potential for positive or negative impacts on the sustainability objective depending on how an option is implemented or other factors.
- 6.12. At this stage this Sustainability Appraisal report is only an initial appraisal document and is not intended to identify and allocate sites but simply to provide an additional level of information to aid in the Council's process for selecting site options. Integrating sustainability into the site selection process at the earliest opportunity is intended to ensure that the Traveller Sites Allocations DPD promotes sustainable development and takes the most sustainable approach given all realistic alternatives.

7. Appraisal Findings

B1 – Testing the plan or programme against the SA / SEA Objectives

B5 – Considering ways of mitigating adverse effects

- 7.1. The Sustainability Appraisal for the Traveller Sites Allocations DPD – Consultation Draft mainly appraises three aspects of the DPD, the overall strategy, draft policies and site allocation options. The following section explains the options considered, their relative performance in sustainability terms and the proposed site options going forward.
- 7.2. It is likely that some of the proposed site options will present negative sustainability impacts in relation to some objectives. Often this is the case where sustainability objectives are not compatible with one another (for example, objectives on protecting the district's existing countryside or business land will not always be compatible with objectives on housing/accommodation due to finite amount of land considered to be deliverable or developable to meet needs). Where possible if negative impacts are predicted to arise measures to mitigate this impact have been suggested.

Overall Strategy

B3 – Predicting the effects of the plan or programme, including alternatives

B4 – Evaluating the effects of the plan or programme, including alternatives

- 7.3. National guidance in *Planning policy for Traveller sites* (March 2012) requires local planning authorities to identify a five-year supply of specific deliverable sites. For the Council to meet this requirement the only realistic option of the two above is to allocate specific sites in a Development Plan Document (**Option 1**).
- 7.4. Despite this both options have been appraised for the sustainability performance as shown in the table below.

Overall Plan Strategy

Policy Options:

Option 1 To produce a Traveller Sites Allocations DPD to allocate specific sites across the district.

Option 2 To rely on a criteria-based policy approach for the provision of sites for *Gypsies, Travellers and Travelling Showpeople*. Provision of Traveller accommodation could still be provided through the planning process and any development proposals for this use would be considered under relevant legislation, national planning policy and local policy.

	Sustainability Objective												
	1 - Accommodation	2 - Education	3 - Health	4 - Shops	5 - Leisure	6 - Conservation	7 - Environmental Quality	8 - Countryside	9 - Climate Change	10 - Flood Risk	11 - Transport	12 - Business Support	13 - Employment
Option 1	++	+	+	+	+	0	0	+	-	+	+	+	+
Option 2	+	+	+	+	0	-?	-?	-?	-?	+	-?	0	0

Summary of Appraisal:

Generally, **Option 1** is more sustainable or offers a better opportunity to achieve sustainable development of Traveller sites in the district. This is because sites can be appraised individually through the Sustainability Appraisal to assess their performance against sustainability objectives which will identify the most sustainable, realistic site options and inform the site selection process. The identification and allocation of sites through a Traveller Sites Allocations DPD increases the likelihood of pitch provision and so **Option 1** scores positively both in terms of accommodation and also location, being close to services and away from sensitive areas and areas of flood risk.

Option 2 has a higher risk of sites being permitted (particularly on appeal) in unsustainable locations due to the Council's failure to demonstrate an adequate five-year supply of sites against the locally set target and a higher risk of unmet need. **Option 1** is therefore the most realistic and sustainable strategy option and should be the approach taken to produce a Traveller Sites Allocations DPD should be produced.

Preferred Policy Option: 1

Draft Policies

- 7.5. This Sustainability Appraisal seeks to identify the most sustainable policy options that will deliver a Development Plan Document that meets the requirements of national policy. Two key areas that could be subject to a specific policy or policies within the DPD have been identified at this stage. These relate to both newly identified Traveller sites and existing authorised sites. The aim of identifying policy options for these two areas is to seek to meet identified current and future accommodation needs, and to prevent identified needs from being made worse by the loss of suitable existing sites to alternative uses, without an adequate replacement being made.

Existing Authorised Traveller Sites

- 7.6. The appraisal seeks to identify realistic policy options, appraise these in terms of their performance against each individual sustainability objective and then provide an overall appraisal summary through which a preferred policy option can be identified.

Existing Authorised Traveller Sites													
Policy Options:													
Option 1 To safeguard all existing authorised Traveller sites													
Option 2 To safeguard existing authorised Traveller sites with permanent planning permissions													
Option 3 To only safeguard some existing authorised Traveller sites and establish a set of criteria for doing so													
Option 4 To not have a policy on this subject													
	Sustainability Objective												
	1 - Accommodation	2 - Education	3 - Health	4 - Shops	5 - Leisure	6 - Conservation	7 - Environmental Quality	8 - Countryside	9 - Climate Change	10 - Flood Risk	11 - Transport	12 - Business Support	13 - Employment
Option 1	+	+	0	0	0	-	0	-	0	0	0	0	+?
Option 2	+	+	0	0	0	0	0	0	0	0	0	0	+?
Option 3	-?	-?	-?	-?	-?	0	0	0	0	0	0	0	-?
Option 4	-?	-?	-?	-?	-?	0	0	0	0	0	0	0	-?
Summary of Appraisal:													
<p>There are currently seven existing authorised Traveller sites with permanent planning permissions, totalling 36 pitches, and a further two sites that have temporary planning permission totalling two pitches. Option 1 would safeguard the two temporary sites, both of which are located on agricultural land with the High Weald Area of Outstanding Natural Beauty and are therefore considered to have an overall negative impact on conservation and countryside objectives. Option 2 would not safeguard these sites but would safeguard the seven existing authorised sites with permanent planning permission. Option 3 and Option 4 would risk some or all existing sites being lost to alternative uses without necessary safeguards in place to ensure provision of suitable, alternative replacement sites of an equivalent or improved standard and therefore these options have a possible negative impact against social objectives.</p> <p>For many objectives the safeguarding of existing sites would not have any direct impact as the policy would not result in development. Therefore against environmental impact, climate change, flood risk, transport and business support objectives all options are considered as having 'no impact' for the purposes of this appraisal.</p>													

Options that safeguard existing Traveller sites are more likely to perform positively against objectives that seek to maintain (or improve) access to services or employment as they do not risk the loss of sites. **Option 3** and **Option 4** have a potentially negative impact on social and economic sustainability objectives because existing sites already located close to services could be lost. **Option 1** and **Option 2** have potential social and economic benefits and would ensure that identified needs are not made worse by the loss of existing sites, but **Option 1** performs poorly in environmental terms due to the negative impacts of safeguarding temporary sites on agricultural land within an area of outstanding natural beauty. **Option 2** is therefore the most sustainable policy option and should be included within the DPD.

Preferred Policy Option: 2

Traveller Sites Allocations

- 7.7. The preferred overall strategy option, appraised earlier in this chapter, was to produce a Traveller Sites Allocations DPD to allocate specific sites across the district. Therefore there are only two realistic policy options for a Traveller sites allocations policy. The approach to appraising these options is the same as that taken for existing authorised Traveller sites.

Traveller Sites Allocations													
Policy Options:													
Option 1 To fulfil the identified need for Gypsy and Traveller pitches as evidenced by the <i>Mid Sussex Gypsy and Traveller Accommodation Assessment</i>													
Option 2 To allocate sites to meet some, but not all, of the identified need for Gypsy and Traveller pitches													
	Sustainability Objective												
	1 - Accommodation	2 - Education	3 - Health	4 - Shops	5 - Leisure	6 - Conservation	7 - Environmental Quality	8 - Countryside	9 - Climate Change	10 - Flood Risk	11 - Transport	12 - Business Support	13 - Employment
Option 1	++	+?	+?	+?	+	-?	-?	-?	-	0	+	+	+
Option 2	+	+	+	+	+	-?	-?	-?	-	0	+	+	+
Summary of Appraisal:													
National <i>Planning policy for Traveller sites</i> (March 2012) requires local planning authorities to identify specific deliverable sites sufficient to provide five years' worth of supply against a locally set target, and a 15 year supply of such sites where possible.													
Option 2 would therefore be required to allocate, at a minimum, sufficient sites to provide five years' supply. The appraisals of both options were similar against the majority of objectives as the sustainability performance would be dependent on the merits of specific sites. However, Option 1 clearly performs better in terms of ensuring that Gypsy and Traveller communities have the opportunity to live in appropriate accommodation that meets													

their needs, as sufficient deliverable sites would be identified to meet needs beyond the 15 year supply required under national policy. **Option 1** is therefore the most sustainable policy option and should be included within the DPD.

Preferred Policy Option: 1

Site Allocations

- 7.8. At this stage the sustainability appraisal process is intended to provide a more thorough evaluation of sites that were the output of the Sites Study.
- 7.9. A number of options for specific site locations have been appraised. The options that were appraised were as follows:
- a) Marigold Farm Caravan Site, Bishopstone Lane, Ansty
 - b) Little Clonking, Luxfords Lane, Ashurst Wood
 - c) Extension of Bedelands Caravan Site, Valebridge Way, Burgess Hill
 - d) Land to the north and northwest of Burgess Hill
 - e) Land at Meadow Wood, Brook Street, Cuckfield
 - f) Imberhorne Lane Nurseries Site, East Grinstead
- 7.10. Of these sites option (d) Land to the north and northwest of Burgess Hill is unique as the only site likely to be delivered as part of a mixed use development and covering an area of approximately 220ha. The option was identified in the Burgess Hill Town Wide Strategy as a preferred location for development and is proposed to be included as a strategic allocation in the emerging District Plan which requires the development to contribute towards the need for additional pitches. Detailed masterplanning will determine the specific uses, site location/s and potential pitch provision for Gypsies and Travellers. For the purposes of this appraisal this option has been considered on the basis of a potential yield of up to 24 pitches as part of this development (2 sites of 12 pitches).
- 7.11. Higher or lower levels of pitch provision would have a commensurate impact on sustainability performance of option (d) and also for other site allocation options. Broadly, higher levels of provision would increase performance against objectives that the site scored positively against and exacerbate the impact on objectives that the site scored negatively against. However, where the realistic capacity of the site and services is exceeded there is likely to be an overall negative impact of objectives, even where the site performs positively. Existing national policy and guidance will inform decisions on the capacity of sites outside of the sustainability appraisal process. The optimum recommended size of a Gypsy and Traveller site is 10-12 pitches.

7.12. In appraising these options it was evident that the appropriate level of detail to determine the potential impact on some of the 13 objectives would not be available until later on in the Sustainability Appraisal process. For these reasons it was considered that there would be no overall benefit in assessing site allocations against these objectives at this stage.

Objective	All Options	Comments
En 9) To address the causes of climate change by reducing resource consumption and reducing waste.	-	All options are going to result in an increase in waste and energy use from additional accommodation and any construction works necessary to deliver the sites. The negative impact could be minimised through mitigation measures that will be considered on a site by site basis as development proposals are progressed.
Ec 12) To ensure that sites for Gypsy and Travellers include provision of facilities to support the businesses run by Gypsy and Travellers, so as to sustain their employment	0	It is not possible to assess the potential of sites to accommodate additional non-residential uses and facilities until sites have been subject to a more detailed assessment of the full potential and residential capacity or have progressed to a more detailed design stage.

7.13. In addition to appraising each site’s performance against individual objectives each option has been appraised for its overall social, environmental and economic impacts. This overall score is not simply a mean score of the sites performance against the objectives that sit under those headings but a broader appraisal of the overall potential social, environmental and economic impacts of the site allocation option.

7.14. Through work on its Strategic Housing Land Availability Assessment (SHLAA), the Council has also identified ‘walking distance’ zones to services and facilities, which are as follows:

- GP surgeries – 1.6 km
- Schools – 1.6km
- Convenience stores – 1.6km
- Larger shops – 2km
- Bus stops – 0.8km
- Train stations – 1.6km
- Open spaces – 0.3km

7.15. The walking distances are based on the assumption that average walking times would be 10 minutes for 0.8km, 15 minutes for 1.2km and 20 minutes for 1.6km, and that is reasonable to assume that people might walk 10-20 minutes to access services. The open space walking distance is derived from Natural England’s Accessibility to Natural Greenspace Standards (ANGSt). The routes have been measured in terms of the most direct pedestrian access route from the site to the nearest facilities.

7.16. The impact of the site allocation options against the sustainability objectives is set out in the following table:

Objective	a) Marigold Farm, Caravan Site, Bishopstone Lane, Ansty	b) Little Clonking, Luxfords Lane, Ashurst Wood	c) Extension to Bedelands Caravan Site, Valebridge Way, Burgess Hill
So 1) To ensure that Gypsy and Traveller communities have the opportunity to live in appropriate accommodation that meets their needs	+ Existing site with one permanent authorised pitch and one unauthorised but tolerated pitch .If allocated this site would provide an additional permanent pitch. Site may also have some limited scope for expansion.	+ The site currently has temporary permission for one pitch. If allocated this site would provide an additional permanent pitch.	+ There is potential for modest expansion and improvement of this existing Traveller site (10 pitches) to provide about up to 2 additional pitches.
So 2) To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and increase access to educational facilities	- The site has no relationship with any existing settlement and is more than 20 minutes walking distance from educational facilities. The nearest education provision located at Farney Close School, Bolney (2.3km - for pupils with Special Educational Needs), St Paul Catholic College, Burgess Hill (3.2km), Bolney CofE Primary School (3.3km) and Warden Park Academy, Cuckfield (4.4km). There is no suitable pedestrian access to these schools from the site.	-? Brambletye Preparatory School is close to the site but the only access is via A22, the site is more than 20 minutes walking distance from public educational facilities. Ashurst Wood and Estcots Primary Schools are both roughly 3km away from the site as well as Sackville Secondary and Sixth Form.	+ There are two primary schools within 15 minutes walk. The site is located 700m from Manor Field Primary School and 1.2km from Sheddingdean Community Primary School. The nearest Secondary School is Oakmeeds Community College (2.4km – 30 minutes walking distance).
So 3) To improve the access to health facilities and reduce inequalities in health	- The site is considered to be distant from the nearest health facilities which are located in Burgess Hill (The Meadows Surgery, 3.7km).	- The nearest health facilities are located at Forest Row and East Grinstead (3km).	+ Park View Health partnership is located 1.3km away from the site. Horsham & Mid Sussex Clinical Commissioning Group/NHS England have indicated that new primary care provision in the form of community health services will need to be improved in all the major settlements in the district

Objective	a) Marigold Farm, Caravan Site, Bishopstone Lane, Ansty	b) Little Clonking, Luxfords Lane, Ashurst Wood	c) Extension to Bedelands Caravan Site, Valebridge Way, Burgess Hill
So 4) To improve accessibility to retail and community services	<p style="text-align: center;">-</p> <p>The site has no relationship with any existing settlement and services at nearby Ansty village are limited to a garage shop (1.8km) and Ansty Village Hall.</p>	<p style="text-align: center;">-</p> <p>The site is located outside the built up area and away from local services. The range of services available in Ashurst Wood village is limited (1.2km from the site) and so services at East Grinstead would be likely to be used by residents at this site, which is 2km away from larger retail facilities in the town.</p>	<p style="text-align: center;">++</p> <p>The site is located close to a number of shops and services, the closest being at the Valebridge Road/Janes Lane junction including a post office and public house less than 500m away. The town of Burgess offers a range of shops and facilities with easy reach of this site and there are larger shops within 1.6km of the site (20 minutes walking distance).</p>
So 5) To improve accessibility to leisure and recreation facilities	<p style="text-align: center;">-</p> <p>Ansty Recreation Ground is roughly 1.8km from the site and is the only provision of this kind in the immediate vicinity of the site. The site is considered to be remote from leisure and recreation facilities.</p>	<p style="text-align: center;">-</p> <p>The rural location of the site is also some distance away from local leisure and recreation facilities in Ashurst Wood and East Grinstead.</p>	<p style="text-align: center;">++</p> <p>The site is well located in relation to informal and formal open space with multiple playing fields less than 200m from the site and equipped areas for play at Worlds End Recreation Ground (500m), Maple Drive (700m) and Leylands Park (600m). Leisure facilities at the Triangle Leisure Centre are located 2.5km from this site.</p>
En 6) To protect existing biodiversity, landscape, historical and cultural heritage whilst ensuring that Gypsy and Traveller communities can continue with their own cultural practices	<p style="text-align: center;">0</p> <p>The site is situated in the countryside south of Ansty but lies outside of the High Weald AONB and is currently use as an existing Traveller site. Seven listed buildings are situated at nearby properties to the northwest (3) and northeast (4) but there is unlikely to be a significant impact on these buildings due to the distance (80-150m) and natural screening around the site. A triangular shaped area of ancient woodland is located in the southeast corner of the adjacent field to the existing site and there would need to be a buffer if additional pitches were proposed to protect this sensitive woodland.</p>	<p style="text-align: center;">-</p> <p>The site is located in the High Weald AONB and is currently used as an existing Traveller site in a small pocket of development in the countryside along Luxfords Lane including the nearby sewage works. There is not deemed to be any significant impact on the nearby grade II listed building, Luxfords Farmhouse. The site is also located within the Ashdown Forest Special Protection Area Zone of Influence. This is a European designated site and, in order to mitigate adverse effects on the Ashdown Forest, any development of this site for Traveller use will have to comply with Council policy. This is likely to require a contribution to the provision of Suitable Alternative Natural Green Space and the Ashdown Forest Access Management and Monitoring Strategy in accordance with emerging District Plan policy.</p>	<p style="text-align: center;">-?</p> <p>The site is located within a biodiversity opportunity area and near to the Bedelands Farm Local Nature Reserve/SNCI which covers 33 hectares to the north of the town and could be adversely impacted upon as a result of increased usage.</p>
	0	0	0

Objective	a) Marigold Farm, Caravan Site, Bishopstone Lane, Ansty	b) Little Clonking, Luxfords Lane, Ashurst Wood	c) Extension to Bedelands Caravan Site, Valebridge Way, Burgess Hill
En 7) To maintain and improve the environmental quality of the district in terms of air pollution, soil (including contaminated land) and water quality	The site is unaffected by land contamination issues. Results from monitoring for nitrogen dioxide across the district show, except at Hassocks, levels recorded are below the objective at all relevant locations.	The site is unaffected by land contamination issues. Results from monitoring for nitrogen dioxide across the district show, except at Hassocks, levels recorded are below the objective at all relevant locations.	The site is unaffected by land contamination issues. Results from monitoring for nitrogen dioxide across the district show, except at Hassocks, levels recorded are below the objective at all relevant locations.
En 8) To protect, enhance and make accessible for enjoyment, the district's countryside	-?	-	0
En 10) To ensure development does not take place in areas of flood risk, or does not contribute to increasing flood risk elsewhere, incorporating flood mitigation measures where appropriate	0	-?	0
En 11) To reduce road congestion and pollution levels by improving travel choice and reducing the need for travel by car.	-	-	++
	+?	0	+

Objective	a) Marigold Farm, Caravan Site, Bishopstone Lane, Ansty	b) Little Clonking, Luxfords Lane, Ashurst Wood	c) Extension to Bedelands Caravan Site, Valebridge Way, Burgess Hill
Ec 13) To ensure high and stable levels of employment so that everyone can benefit from the economic growth of the district	Within reasonable distance of proposed urban extension and business park at Burgess Hill and Greater Brighton Growth Hub (City Deal) which provides the potential for new local employment opportunities.	The location of the site is relatively isolated in a rural location but close enough to employment opportunities in East Grinstead and, to a limited extent, Ashurst Wood and is not considered to have a significant impact on this objective.	The site's location in the town of Burgess Hill would give residents access to employment opportunities in the town (a Growth Location in the Coast to Capital LEP Strategic Economic Plan).
Overall Social	-	-	+
Ovr. Environmental	-	-	-?
Overall Economic	0	0	+
Overall Conclusions	The site is considered to be in an unsustainable location and residents would not integrate with existing communities due to the remote nature and distance from key services.	The site's location away from the built up area of Ashurst Wood and key local services mean that this option performs poorly in sustainability terms and the visual harm to this area of natural beauty is considered to be a major constraint to pitch provision at this location.	This option performs well in sustainability terms due to the local services and facilities available in the Worlds End area of the town of Burgess Hill that the site has relatively good access to. As an extension to an existing site further consideration would need to be given to the number of pitches that could be accommodated on this site without significant negative impact on sustainability objectives, in particular the potential adverse effect on the natural environment and biodiversity of the surrounding area.

Objective	d) Land to the north and northwest of Burgess Hill	e) Land at Meadow Wood, Brook Street, Cuckfield	f) Imberhorne Lane Nurseries Site, Imberhorne Lane East Grinstead
So 1) To ensure that Gypsy and Traveller communities have the opportunity to live in appropriate accommodation that meets their needs	++	+	++
	Significant work has already been undertaken to deliver mixed-use development at this location as a key strategic allocation in the emerging District Plan. It will be an emerging policy requirement that the site provides appropriate pitch provision for gypsies and Travellers to contribute towards need in the district and it is considered that 24 pitches could be provided as part of this development.	The site has temporary permission for one pitch. The site could potentially provide a permanent pitch provision of 2 pitches if considered appropriate (based on representations received).	The site has the potential to provide about 10 to 15 new pitches.
	++	+	-?

Objective	d) Land to the north and northwest of Burgess Hill	e) Land at Meadow Wood, Brook Street, Cuckfield	f) Imberhorne Lane Nurseries Site, Imberhorne Lane East Grinstead
<p>So 2) To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and increase access to educational facilities</p>	<p>The wider development will include the development of new primary schools and a new secondary school campus. St Paul's Catholic College borders the development area to the south west.</p>	<p>Meadow Wood is located on the outskirts of Cuckfield and just over 15 minutes walking distance (1.4km) to Holy Trinity Primary School. The settlement also benefits from secondary school provision at Warden Park Academy which is located 1.8km from the site and further education provision is located in the nearby settlement of Haywards Heath.</p>	<p>The site is 2km from St Peter's Catholic Primary School (25 minutes walking distance) and 2.2km from Imberhorne School (Secondary). East Grinstead has a range of education provision but the sites location outside the built up area boundary means that car use would likely be essential for access to these facilities. It is noted that potential improvements to local Public Rights of Way network could significantly improve accessibility to local services and facilities.</p>
<p>So 3) To improve the access to health facilities and reduce inequalities in health</p>	<p style="text-align: center;">++</p> <p>The development will include a new neighbourhood centre which will ensure new, local health provision. The town of Burgess Hill already has existing health provision and Princess Royal Hospital is less than 3km away.</p>	<p style="text-align: center;">+</p> <p>The site is 1.4km from Cuckfield Medical Practice. There is additional capacity at the Vale surgery in Haywards Heath and the village also contains three dental practices and a pharmacist.</p>	<p style="text-align: center;">-</p> <p>The site is considered to be beyond reasonable walking distance from health facilities located in East Grinstead, with the nearest facility at Ship Street (2.6km from the site). . It is noted that potential improvements to local Public Rights of Way network could significantly improve accessibility to local services and facilities.</p>
<p>So 4) To improve accessibility to retail and community services</p>	<p style="text-align: center;">++</p> <p>The new neighbourhood centre delivered as part of this development will include retail, employment and community uses in accordance with emerging policy. The town of Burgess Hill already offers a wide range of shops and community facilities that would be accessible from this site. The entire development is intended to be within 10 minutes' walk of a new neighbourhood centre or 5 minutes' walk of a new local centre and most of the site is within 20 minutes walking distances of existing convenience stores and less than 2km away from larger shops.</p>	<p style="text-align: center;">+</p> <p>The site is only a short distance from the neighbourhood centre at Whitemans Green (as defined in policy CNP12 of the emerging Neighbourhood Plan) and 15 minutes walking distance of Cuckfield High Street which offers a number of shops and services.</p> <p>In addition a wider range of retail choice at Haywards Heath is accessible by bus.</p>	<p style="text-align: center;">+?</p> <p>Although outside of the built up area with no shops especially close, the site is located within 1.6km (20 minutes walking distance) of convenience stores and larger shops in East Grinstead, including Sainsbury's Supermarket. The town has a range of retail choice and the High Street is located 2.5km from the site. It is noted that potential improvements to local Public Rights of Way network could significantly improve accessibility to local services and facilities.</p>
<p>So 5) To improve accessibility to leisure</p>	<p style="text-align: center;">++</p> <p>The site is in close proximity to the Triangle Leisure Centre and other</p>	<p style="text-align: center;">+</p> <p>The site is within close walking distance of Whitemans Green playing</p>	<p style="text-align: center;">+</p> <p>The site is located 700m from East Grinstead Sports Club which offers</p>

Objective	d) Land to the north and northwest of Burgess Hill	e) Land at Meadow Wood, Brook Street, Cuckfield	f) Imberhorne Lane Nurseries Site, Imberhorne Lane East Grinstead
and recreation facilities	existing leisure and recreation facilities in the town and the development will also include a Centre for Community Sport and other leisure provision to further improve access to these facilities.	fields which includes a running track and skate bowl (800m) and 1.4km from the Worsley Memorial Recreation Ground and equipped area of play.	a range of recreation and sports facilities as well as a café/bar. The nearest equipped areas for play are located with East Grinstead, 1.7km from the site but there could be potential to provide an onsite open space. . It is noted that potential improvements to local Public Rights of Way network could significantly improve accessibility to local services and facilities.
En 6) To protect existing biodiversity, landscape, historical and cultural heritage whilst ensuring that Gypsy and Traveller communities can continue with their own cultural practices	+?	-	-?
En 7) To maintain and improve the environmental quality of the district in terms of air pollution, soil (including contaminated land) and water quality	+?	0	-?

Objective	d) Land to the north and northwest of Burgess Hill	e) Land at Meadow Wood, Brook Street, Cuckfield	f) Imberhorne Lane Nurseries Site, Imberhorne Lane East Grinstead
			except at Hassocks, levels recorded are below the objective at all relevant locations.
En 8) To protect, enhance and make accessible for enjoyment, the district's countryside	<p style="text-align: center;">+?</p> <p>The proposals seek to protect and enhance the green link around the town and improve access to the wider rural area. Emerging District Plan policy that will require development to deliver a multi-functional route between Burgess Hill and Haywards Heath and provide a multi-functional 'Green Circle' around the town.</p>	<p style="text-align: center;">-</p> <p>Although temporary consent has been granted for use of this site since February 2003 (largely related to the personal circumstances of the applicant at the time which are irrelevant to this appraisal), allocation would constitute permanent development outside the built up boundary of Cuckfield and the encroachment of agricultural land.</p>	<p style="text-align: center;">0</p> <p>This option is a brownfield site and is well screened on all boundaries by trees and hedges and not visible from Imberhorne Lane. It is noted that potential improvements to the Public Rights of Way network would improve accessibility to this network and the countryside for the local area.</p>
En 10) To ensure development does not take place in areas of flood risk, or does not contribute to increasing flood risk elsewhere, incorporating flood mitigation measures where appropriate	<p style="text-align: center;">0</p> <p>This land is subject to allocation through emerging District Plan policy which requires the strategic development to provide appropriate pitch provision and take account of on-site flood plains. The majority of this strategic site is in Flood Zone 1.</p>	<p style="text-align: center;">0</p> <p>The site is wholly located in Flood Zone 1 and is considered to be at low risk of fluvial flooding (1 in 1,000 annual probability). The location is therefore considered to be appropriate for Traveller site use in flood risk terms – in accordance with the National Planning Policy Framework.</p>	<p style="text-align: center;">0</p> <p>The site is wholly located in Flood Zone 1 and is considered to be at low risk of fluvial flooding (1 in 1,000 annual probability). The location is therefore considered to be appropriate for Traveller site use in flood risk terms – in accordance with the National Planning Policy Framework.</p>
En 11) To reduce road congestion and pollution levels by improving travel choice and reducing the need for travel by car.	<p style="text-align: center;">+</p> <p>The development will be required to deliver sustainable transport measures through emerging policy and improve public transport, walking and cycling infrastructure, including access to Burgess Hill and Wivelsfield railway stations. However the site is expected to be delivered alongside 3,385 new homes which will have a negative impact on road congestion and pollution levels although this is not necessarily directly attributable to pitch provision at this location.</p>	<p style="text-align: center;">+?</p> <p>The nearest bus stops are located on London Road, 500m from the site and offer services to Haywards Heath, Burgess Hill and Brighton. The settlement of Cuckfield has no railway station but a short bus journey to Haywards Heath railway station is possible.</p>	<p style="text-align: center;">+?</p> <p>The nearest bus services are 450m from the site although are fairly disconnected with the site. East Grinstead train station is 2.1km away and offers services to East Croydon with connections to London, Gatwick Airport and Brighton. It is likely that the majority of services and facilities would require car use for access and this would have an overall negative impact on this objective. It is noted that potential improvements to local Public Rights of Way network could significantly improve accessibility to local services and facilities by means of transport other than the car.</p>
	++	+?	+?

Objective	d) Land to the north and northwest of Burgess Hill	e) Land at Meadow Wood, Brook Street, Cuckfield	f) Imberhorne Lane Nurseries Site, Imberhorne Lane East Grinstead
Ec 13) To ensure high and stable levels of employment so that everyone can benefit from the economic growth of the district	The emerging District Plan proposes to deliver a high quality business park at this location and the area has been included as a Growth Hub in the submission for the Greater Brighton City Deal which should help deliver local employment development that will provide local jobs.	The site is considered to be reasonably located in relation to local sources of employment and within reasonable commuting distance of Haywards Heath and other settlements. Additional pitch provision at this site is likely to aid viability of existing shops and businesses in Cuckfield.	The site is located outside the built up area of East Grinstead but is still considered to be within reasonable commuting distance of the town.
Overall Social	++	+	+?
Ovr. Environmental	0	-	0
Overall Economic	+	+?	+?
Overall Conclusions	This option performs well in a number of areas due to the potential of large-scale development to deliver a range of required infrastructure within walking distance of the site/s. However, the provision of pitches at this location is somewhat reliant on the timely delivery of this infrastructure and the detailed design stages of the development may require a reappraisal.	The site scores fairly well in sustainability terms, particularly in relation to access to local services and facilities. Cuckfield is considered to be a sustainable settlement however the major constraint for this site is its location in the High Weald AONB. The site's temporary use for Traveller pitch provision is deemed to have a negative impact on the natural beauty of the area despite being well screened and development would constitute an encroachment of agricultural land and extension of the built up area boundary of Cuckfield. The site's positive overall sustainability needs to be balanced against the impact on this important landscape designation.	The site has a number of potential constraints and would likely require car use for access to the majority of services and facilities. However, although these services are not within 15 minutes walking distance the site would have reasonable access to a range of facilities and retail choice in East Grinstead. Land contamination issues will need to be investigated further. It is noted that potential improvements to local Public Rights of Way network could significantly improve accessibility to local services and facilities by means of transport other than the car.

Overall Sustainability Appraisal Conclusions

- 7.17. The Sustainability Appraisal process highlights that the majority of realistic, deliverable sites for Traveller use have a number of constraints that impact on their performance in sustainability terms. Generally those sites located in or near to major settlements perform well and where pitch provision can be met alongside new residential, employment and infrastructure development there are clear benefits.
- 7.18. It is worth noting that all site allocation options have negative impacts on one or more of the objectives so a balance must be made between these objectives and the need to provide sufficient sites to meet the needs of Gypsies and Travellers. The compatibility of objectives considered in section 5 needs to be taken into account in this regard. For example, as all options score positively against Objective So1 it is expected that there is likely to be some

negative impacts against Objectives En6, En7, En9 and En10 and generally options have a neutral or negative impact on these environmental objectives.

7.19. The performance of each site allocation option in sustainability terms is summarised in the table below:

		Sustainability Objective															
		1	2	3	4	5	6	7	8	9	10	11	12	13	So	En	Ec
Site Allocation Options	a) Marigold Farm Caravan Site	+	-	-	-	-	0	0	-?	-	0	-	0	+	-	-	0
	b) Little Clonking	+	-?	-	-	-	-	0	-	-	-?	-	0	0	-	-	0
	c) Extension of Bedelands Caravan Site	+	+	+	++	++	-?	0	0	-	0	++	0	+	+	-?	+
	d) Land to north + northwest BH	++	++	++	++	++	+	+	+	-	0	+	0	++	++	0	+
	e) Land at Meadow Wood	+	+	+	+	+	-	0	-	-	0	+	0	+	+	-	+
	f) Imberhorne Lane Depot Site	++	-?	-	+	+	-?	-?	0	-	0	-	0	+	+	0	+

Cumulative and Synergistic Impacts

- 7.20. It is important that each option is not considered in isolation and the potential sustainability impacts (either positive or negative) of the site allocation options in combination are also appraised. The main issue when considering the effects of site allocations in combination is that it is unlikely that all site allocation options will be taken forward and there is a broad range of possible combinations that may be taken forward in later stages of the DPD. Therefore at this stage in the process the cumulative and synergistic impacts have generally been appraised in the context of all sites being allocated for Traveller use. It is accepted that this outcome may be unlikely and further work will appraise realistic combinations in future stages of the Sustainability Appraisal process. There are a number of uncertainties in the assessment of cumulative and synergistic effects and it has therefore been necessary to use professional judgement when determining the likely impacts.
- 7.21. The first part of this process was to look at site allocation options in geographical clusters and consider the cumulative and synergistic impacts on the settlement each site is located in, adjacent to or most closely associated with. It is not considered that allocation options, given the realistic size and scale of the sites, would place an unsustainable level of pressure on local services in any settlement across the district when considered in combination. In many cases development would provide a minor benefit in aiding the viability of existing business premises.
- 7.22. In particular the number of site allocation options located within or near to the town of Burgess Hill was considered in terms of cumulative and synergistic impacts should multiple sites be allocated at Burgess Hill. However, the combined development potential of these sites is not considered to be of a scale large enough to have significant adverse cumulative impacts on the town and services in sustainability terms, particularly if further infrastructure provision at land to the north and northwest of Burgess Hill is delivered. Evidence from stakeholders in forming the Mid Sussex Gypsy and Traveller Accommodation Assessment highlight a concentration of Traveller families in and around Burgess Hill due to employment and familial ties to the area.
- 7.23. Whilst some of the site allocation options appraised may individually have a minor impact on certain objectives, collectively the impact may be more significant. For instance, the negative impact identified for all sites on objective En9 will be commensurate according to the scale of provision, which will primarily be determined by the identified need. The impacts can be mitigated as far as possible through on-site measures, design and local plan policies.

8. Monitoring

B6 – Proposing Measures to Monitor the Effects of the Plan or Programme

- 8.1. The effects of implementing the Traveller Site Allocations DPD will need to be monitored to identify any 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 site allocations are accurate?
 - Whether the Traveller Site Allocations DPD is contributing towards meeting the sustainability objectives?
 - Are there any other effects from the implementation of the Traveller Site Allocations DPD that need to be considered?
- 8.2. 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 13 Sustainability Appraisal objectives identified in Section 5. Identifying trends within the data associated with these objectives will help measure how well the DPD contributes to sustainable development and highlight any unforeseen adverse effects to enable appropriate remedial action to be taken where possible.
- 8.3. Appendix B shows the current (2012/13) baseline data. This will be updated with 2013/14 data where possible for the next stage of the Sustainability Appraisal process. This appendix forms the monitoring framework, which will be updated annually through the District Council's Monitoring Report and through all future publications of this Sustainability Appraisal report.

9. Next Steps

D1 – Consulting on the Draft Plan or Programme and Environmental Report

- 9.1. This Sustainability Appraisal report will be consulted on alongside the Consultation Draft Traveller Sites Allocations DPD in April 2014. Consultation on the Sustainability Appraisal will follow the same guidelines and requirements for consultation as the DPD, as per the District Council's Statement of Community Involvement (SCI). This will involve a formal consultation period where District, Town and Parish Councillors, statutory consultees and the general public are able to comment on the Traveller Sites Allocations DPD and the content and findings of its accompanying Sustainability Appraisal.

D2 – Assessment of Significant Changes

- 9.2. The Sustainability Appraisal process is iterative. The results of the consultation will inform drafting of the DPD and accompanying Sustainability Appraisal to be submitted to the Secretary of State.
- 9.3. 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 site options may arise that will require appraisal for the first time.

D3 – Decision Making and Providing Information

- 9.4. The information within this report has been taken into account when preparing the Consultation Draft Traveller Sites Allocations DPD for consultation, and will continue to do so for all future formal stages prior to its adoption.
- 9.5. 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) considerations have been taken into account in preparation of the Traveller Sites Allocations DPD.

Appendix A – Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGs)

The Sustainability Appraisal that accompanies the draft District Plan contains a comprehensive review of Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGs) that have influenced the development of the District Plan. As it is intended that the Traveller Site DPD is based upon the strategic objectives of the District Plan, the majority of the PPPSGs listed in the draft District Plan SA are relevant and have informed the content of the Traveller Sites Allocations DPD. Rather than repeat those here, the key PPPSGs relevant to the production of the Traveller Sites Allocations DPD and Sustainability Appraisal are listed below.

Document	Broad Aims / Relevant Policies	Requirements of the Document in Relation to the Traveller Sites Allocations DPD
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 Traveller Sites Allocations DPD.
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 Traveller Sites Allocations DPD must be in conformity with the NPPF.
Planning Policy for Traveller Sites	Requires Local Authorities to establish needs and identify a supply of specific deliverable sites against locally set targets.	The Traveller Sites Allocations DPD has been prepared due to and in line with the requirements of the Planning Policy for Traveller Sites.
National Planning Practice Guidance (NPPG)	Provides guidance on the need for sustainability appraisal and strategic environmental assessment in relation to Plan development	The Traveller Sites Allocations DPD Sustainability Appraisal (incorporating Strategic Environmental Assessment) has been prepared in line with the requirements of the National Planning Practice Guidance.
Localism Act 2011	Act that decentralises power as far as possible from central Government to individuals, communities and councils. Introduces neighbourhood planning,	The Traveller Sites Allocations DPD will be prepared with the requirements of the Localism Act in mind.

	amongst other key measures.	
Sustainability Appraisal Guidance within the CLG Plan Making Manual	Sets out guidance on how to prepare sustainability appraisals, incorporating the SEA Directive requirements, for Development Plan Documents	The Sustainability Appraisal must be fully integrated with the Traveller Sites Allocations DPD and the emerging document must demonstrate that the findings of the sustainability work have been taken into account at each stage.
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.
The Town and Country Planning (Local Planning) (England) Regulations 2012	Sets out the regulations for preparing Local Development Documents.	The Traveller Sites Allocations DPD will be prepared in accordance with the Regulations.
Planning and Compulsory Purchase Act 2004	Clause 39 places a duty on Local authorities to contribute to sustainable development.	Mid Sussex District Council is required to produce a Sustainability Appraisal to accompany certain planning documents, including the Traveller Sites Allocations DPD.
Town and Country Planning Act 1990	Sets out the procedures for 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 Traveller Sites Allocations DPD.
Equality Act 2010	The Equality Act makes it illegal to discriminate on the grounds of race, colour, nationality or national or ethnic origins.	The Traveller Sites Allocations DPD will be prepared in accordance with the Act.
Regional / County		
High Weald Area of Outstanding Natural Beauty Management Plan (2004)	Sets out the objectives for the AONB that the impacts of proposed development must be considered against.	The landscape impacts of proposed development will be fully considered in the preparation of the Traveller Sites Allocations DPD with regard to the High Weald AONB and the objectives within the Management Plan.
Local		
Mid Sussex Gypsy and Traveller and Travelling Showpeople	Provides up-to-date evidence about the accommodation needs of Gypsies and Travellers and Travelling Showpeople	The Traveller Sites Allocations DPD will be prepared in order to provide the policy framework that will include allocating new sites to meet identified needs.

Accommodation Assessment (2013 and 2014)	for the period until 2031.	
Housing Strategy for Mid Sussex 2009-2014	The key aim is to set out how a supply of good quality housing will be provided across the district. This provision also includes affordable housing.	One of the Document's objectives is to "promote independence and inclusion" which underlines the Council's intentions to take a plan-led approach to providing suitable accommodation for Gypsies and Travellers.
Gypsy and Traveller Strategy 2009-2012	Sets out the Council's strategy for Gypsies and Travellers. It aims to address the inequalities faced by Gypsies and Travellers in Mid Sussex, whilst recognising the needs of the settled community.	One of the Document's objectives is to "Meet the accommodation needs of Gypsies and Travellers", which underlines the Council's intentions to take a plan-led approach to providing suitable accommodation for Gypsies and Travellers.
Mid Sussex Sustainable Communities Strategy (2008)	Sets out key objectives to enable sustainable development of the communities of Mid Sussex: <ul style="list-style-type: none"> • 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. Many of these objectives are relevant to the Traveller Sites Allocations DPD.
Mid Sussex District Council – Statement of Community Involvement (SCI)	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 DPDs, different techniques are being used for each document to ensure that the appropriate engagement occurs.	The production of the Traveller Sites Allocations DPD has and will need to have regard to the community engagement methods for DPDs, set out in the SCI.

Appendix B – Indicator 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.

The baseline year has been determined as 2012 – 2013 unless indicated otherwise.

Key:

	Baseline situation is predicted to get better by 2031
	Baseline situation is predicted to stay the same by 2031
	Baseline situation is predicted to get worse by 2031
	It is difficult to predict or assess the impact the DPD will have

Objective	Indicator	Trend	Predicted Status <u>WITHOUT</u> the DPD	Predicted Status <u>WITH</u> the DPD
So1	New additional pitches/plots delivered	2012/13: No data 2011/12: No data 2010/11: No data	?	
So2	Percentage of population of working age qualified to NVQ Level 3 or equivalent	2012: 60.8% 2011: 64.0% 2010: 56.2%	?	?
	Percentage of adults with poor literacy and numeracy skills	2012: 6.1% 2011: Sample size too small for reliable estimate 2010: Sample size too small for reliable estimate	?	?
	Percentage of new Traveller accommodation within 30 minutes public transport time of a primary and secondary school	2012/13: No data 2011/12: No data 2010/11: No data		
So3	Number of applications resulting in new, extended or improved health facilities	2012/13: 2 2011/12: 0 2010/11: 0	?	?
	Percentage of new Traveller accommodation within 300 metres of accessible green space	2012/13: No data 2011/12: No data 2010/11: No data		
	Percentage of new Traveller accommodation within 30 minutes public transport time of a GP,	2012/13: No data 2011/12: No data 2010/11: No data		

	hospital or major health centre			
So4	Distance of Traveller sites from key retail and community services (post office, convenience store, library, place of worship, community hall, etc.)	2012/13: No data 2011/12: No data 2010/11: No data	↓	↑
So5	Distance of Traveller sites from key leisure and recreation facilities (leisure centre, etc.)	2012/13: No data 2011/12: No data 2010/11: No data	↓	↑
En6	Condition of internationally and nationally important wildlife and geological sites (SSSI, SNCI, SAC, Ramsar)	<u>Sites in favourable/unfavourable but recovering condition:</u> 2012/13: 97.6% 2011/12: 95.2% 2010/11: 92.9%	↓	~
	Number and area of SNCIs and LNRs within the district	2010/11 to 2012/13 SNCIs: 50 (1,094.2Ha) LNRs: 6 (164Ha)	~	~
	Area of ancient woodland within the district	2012/13: 5,302Ha 2011/12: 5,300Ha 2010/11: 5,300Ha	~	~
	Number of planning applications approved contrary to advice given by Natural England	2012/13: 0 2011/12: 0 2010/11: 0	↓	~
En7	Number of Air Quality Management Areas within the district	2012/13: 1 2011/12: 1 2010/11: 0	?	?
	Number of stretches of watercourse that are rated (as a minimum) "Moderate" under the Water Framework Directive	2012/13: No data 2011/12: No data 2010/11: No data	?	?
	Incidents of major and significant water pollution within the district	2012/13: 0 2011/12: 1 2010/11: 0	?	~
	Total area of contaminated land within the district ⁵	2012/13: 0Ha 2011/12: No data 2010/11: No data	?	~
	Total area of Best and Most Versatile Agricultural Land within the district	2012/13: No data 2011/12: No data 2010/11: No data	?	~

⁵ No land determined to be contaminated under Part 2a of the Environmental Protection Act 1990

En8	Open spaces managed to Green Flag Standard	2012/13: 1 2011/12: 1 2010/11: 1		?	?	
	Number of major developments in the South Downs National Park / High Weald AONB	2012/13: 3 major applications approved in AONB, 1 major application approved in National Park 2011/12: 2 major applications approved 2010/11: No data		?	?	
	Net gain/loss of Rights of Way	2012/13: No data 2011/12: No data 2010/11: No data		↓	↑	
	Percentage of new dwellings within 300m of accessible greenspace	2012/13: No data 2011/12: No data 2010/11: No data		↓	↑	
En9	Number of developments incorporating facilities to enable recycling	2012/13: No data 2011/12: No data 2010/11: No data		↓	↑	
En10	Number of properties at risk from flooding, as defined by the Environment Agency	2012/13: 1,441 2011/12: 1,441 2010/11: 1,441		?	↑	
	Number of planning applications approved contrary to advice given by the EA on flood risk/defence grounds	2012/13: 0 2011/12: 0 2010/11: 0		↓	~	
	Number of developments incorporating appropriate Sustainable Drainage Systems (SuDS)	2012/13: No data 2011/12: No data 2010/11: No data		~	↑	
En11	Car ownership	Cars/vans per household	2001	2011	↓	?
		None	14.2%	13.6%		
		One	42.5%	42.2%		
		Two	33.4%	33.2%		
	Three or more	9.8%	11.0%			
Proportion of journeys to work via public transport	2011: 10.4% 2001: 12.0%		↓	↑		
Percentage of new residential development within 30 minutes public transport time of a GP, Primary and Secondary School, employment and major health centre	2012/13: No data 2011/12: No data 2010/11: No data		↓	↑		

Ec12	Number of new Traveller sites incorporating business facilities (e.g. storage, keeping animals, etc.)	2012/13: No data 2011/12: No data 2010/11: No data		
Ec13	Unemployment	2012/13: 3.4% 2011/12: 3.8% 2010/11: 4.2%		
	Average weekly income for those employed in the district	2012: £574.70 2011: £594.30 2010: £574.60	?	?
	Number of new businesses setting up in the district	2012: 695 2011: 710 2010: 665	?	?

Appendix C – Comments received during consultation on the Scoping Report and the District Council's response to those comments⁶

Respondent	Date Received	Comment	MSDC response
Alison Heine	01/11/2013	I support the preparation of a site allocation DPD.	None required.
Alison Heine	01/11/2013	You will need to ensure that consideration is given to not only the number of pitches but the quality of new and existing provision.	The Traveller Sites Allocations DPD Sustainability Appraisal assesses the sustainability performance of policy and site options. The purpose of the DPD is to allocate sufficient suitable deliverable Traveller sites to meet accommodation needs according to best available evidence. Design of specific sites will be assessed during the planning application process although the general capability of sites to accommodate good design is considered through the allocation process. Applications will be considered in line with the Traveller Sites Allocations DPD and policy <i>DP31 – Gypsies, Travellers and Travelling Showpeople</i> of the emerging District Plan.
Alison Heine	01/11/2013	Many existing pitches do not comply with	The quality of existing sites is outside the

⁶ Note references to District Plan policies refer to those contained within the Submission District Plan (July 2013) since withdrawn from public examination. They are included to provide steer towards the Council's intended approach to the matters raised during this consultation but are subject to changes as the District Plan is currently being reviewed.

		<p><i>Designing Gypsy and Traveller Sites – Good Practice Guide</i> (DCLG 2008) (i.e. insufficient space for a static/ mobile home as plots are too small and cramped and poor utility block designs as judged against national guidance).</p>	<p>remit of the Traveller Sites Allocations DPD and therefore will not be under consideration in the sustainability appraisal process.</p> <p>Emerging District Plan policy <i>DP31 – Gypsies, Travellers and Travelling Showpeople</i> requires sites to be designed to recognised best practice standards that include those set out in DCLG guidance. This policy will apply to all new Gypsy and Traveller sites and extensions to existing sites.</p>
Alison Heine	01/11/2013	<p>You will need to provide a variety of pitches (i.e. some pitches for large families which may have need to live in several caravans or one big twin unit mobile home, others for small single households).</p>	<p><i>Designing Gypsy and Traveller Sites – Good Practice Guide</i> (DCLG 2008) provides guidance on best practice on site design, recommended pitch sizes and enabling a variety of accommodation to be catered for. Design of specific sites will be assessed during the planning application process although the general capability of sites to accommodate good design is considered through the allocation process. Applications will be considered in line with the Traveller Sites Allocations DPD and policy <i>DP31 – Gypsies, Travellers and Travelling Showpeople</i> of the emerging District Plan.</p>

Environment Agency	04/11/2013	Overall the sustainability objectives identified within Section 6 cover the key issues within our remit. Given the flood risk vulnerability of caravans and mobile homes we are particularly supportive of the inclusion of objective En 10. Overall we consider that the indicators are relevant measures for how planning decisions impact on the sustainability objectives.	None required.
Environment Agency	04/11/2013	Within Appendix 1, we are pleased to see reference to the relevance of Plans, Programmes, Policies, Strategies, Guidance and Initiatives (PPPSGIs) that have influenced the development of the District Plan.	None required.
High Weald AONB Unit	11/10/2013	The reference to the AONB and consideration of landscape impacts of proposed development is noted and welcomed.	None required.
High Weald AONB Unit	11/10/2013	We suggest including reference to the High Weald AONB Management Plan (adopted policy of the Council) either in the text relating to landscape and/or in the list of policies at the appendix.	The document has been added to Appendix A accordingly.

Natural England	19/11/2013	<p>We note that although Policy DP31 (Gypsies, Travellers and Travelling Showpeople) recognises the need for sites to be “compatible with neighbouring land uses, and minimise impact on adjacent uses and landscape character”, there appears to be no policy requirement to consider designated or BAP habitats, the local habitat network or the use of possible sites by protected species.</p>	<p>Biodiversity and habitats issues are addressed elsewhere in the emerging District Plan, for example policies DP36 and DP37. The purpose of this document is to appraise the sustainability performance of sites options in the preparation of the Traveller Sites Allocations DPD, the sustainability performance of policy options in the emerging District Plan are appraised in a separate report.</p>
Natural England	19/11/2013	<p>Whilst the Government’s strategy for sustainable development, “Securing The Future” (2005), set five guiding principles for achieving sustainable development (your para 1.9), the development of sustainability objectives should be informed by more recent publications, not least NPPF. I append preliminary thoughts drawing on NPPF, relating to the environment, which may help your consideration of objectives.</p>	<p>The importance of the NPPF is not ignored in either the Scoping Report or this Sustainability Appraisal report and is the subject of the next paragraph (1.10) of the Scoping Report. The paragraphs of the National Planning Policy Framework appended to the response are already addressed through Sustainability Objectives, emerging District Plan policies, or a combination of both as demonstrated below:</p> <p>So5 – Paras 61, 73 En6 – Paras 17, 81, 109, 117, 118 En7 – Paras 109, 12, 124 En8 – Paras 17, 75, 115, 116 En9 – Paras 94, 99 En10 – Paras 94, 99 En11 – Para 124</p>

			<p>DP1 – all Paragraphs DP9 – Paras 17, 75, 112, 115, 116 DP13 – Paras 17, 109, 115, 116 DP14 – Paras 61, 81, 109, 117, 118 DP15 – Paras 115, 116 DP16 – Paras 17, 115, 116 DP19 – Para 124 DP20 – Para 75 DP27 – Para 124 DP33 – Para 61 DP36 – Paras 17, 81, 109, 117, 118 DP37 – Annex DP39 – Para 97 DP40 – Para 97 DP41 – Paras 94, 99 DP42 – Paras 94, 99</p> <p>Paragraph 114 is not relevant to Mid Sussex as it is not a coastal district. Paragraph 144 is not relevant to Mid Sussex District Council as it is not the relevant Minerals Planning Authority</p>
Natural England	19/11/2013	We agree that consideration needs to be given to impact on: the South Downs National Park, the High Weald Area of Outstanding Natural Beauty, their settings, local landscape character (where appropriate outside these areas), Ashdown Forest Special Protection Area and Special Area of Conservation, Sites of Special Scientific Interest (SSSI), Sites of Nature Conservation Importance (SNCI). In addition, consideration should be given	The consideration of landscape and biodiversity issues has not been limited to those listed. Site appraisals have included appraising the sustainability performance of each site option on objective En 6 (To protect existing biodiversity, landscape, historical and cultural heritage whilst ensuring that Gypsy and Traveller communities can continue with their own

		to designated or BAP habitats, the local habitat network or the use by protected species of possible allocations.	cultural practices). This has included the consideration of biodiversity opportunity areas, local nature reserves, wildlife habitats and, where possible, more detailed environmental assessments undertaken in the preparation of local development plan documents such as Neighbourhood Plans. More detailed assessment including the potential impacts of development on protected species will be assessed during the planning application process.
Natural England	19/11/2013	We support the consideration of the Best and Most Versatile Agricultural Land, although (on the basis of the information you have to hand) this may be a limited exercise.	Paragraph 112 of the National Planning Policy Framework requires local planning authorities to take the benefits of the best and most versatile agricultural land into account and seek to use areas of poorer quality land where development is demonstrated to be necessary. The Council intends to utilise best available evidence to protect land of higher agricultural quality in line with emerging District Plan policy DP9.
Natural England	19/11/2013	The indicators listed under para 6.5 seem too general. Whilst they helpful for considering change in general terms, if the DPD allocates sustainable sites (in line with the explicit and implicit objective discussed here) the indicators may prove to be an ineffective means of assessing and measuring impact.	The indicators chosen include output indicators that provide a means of assessing the impact of the DPD, but also contextual indicators that facilitate understanding of the wider context that may influence output indicators or identify future considerations.

			<p>It is important that indicators chosen can be monitored in a robust and consistent way throughout the Plan period.</p> <p>National guidance on the monitoring of local development frameworks was deleted in 2011. The National Planning Policy Framework does not set out any advice regarding the monitoring of local plans. The Traveller Sites Allocations DPD links closely with the emerging District Plan and the Council has established a number of mutual indicators for both documents in order to undertake its work efficiently and ensure key issues and objectives are considered by both.</p>
--	--	--	--