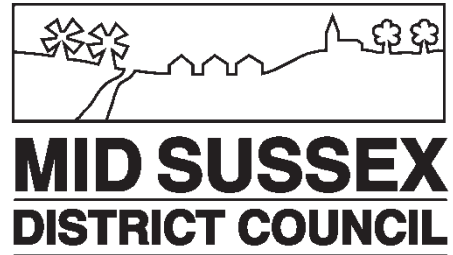


**Mid Sussex
District Council**



Site Allocations DPD

MSDC-12: Approach to Climate Change

12th July 2021

Matter 4.1: Are any additional environmental policies needed? – MSDC to consider whether a permissive policy is required, or a statement within the Plan to explain the Council’s approach to climate change and how this has influenced the allocations within the Plan

Introduction

This note has been prepared in response to queries raised in the Matter 4 hearing session on 15th June 2021, at the request of the Inspector [ID-05].

Hearing statements submitted by CPRE [689] and Sussex Wildlife Trust [748] stated that the Site Allocations DPD should contain a strategic policy setting out the Council’s climate change and mitigation strategy. Both parties confirmed this during the hearing session itself.

Context

The Council’s response during the hearing session confirmed strategic policies on matters such as climate change mitigation are not within the scope of the Sites DPD. As described within the Council’s response to Matter 1 [MSDC-02a] the scope of the Sites DPD is limited to allocating sufficient sites to meet residual housing and employment needs, allocating a specific site for a Science and Technology Park and additional policies necessary to deliver sustainable development (SA34-SA38).

The inclusion of policies SA34-38 was debated during the hearings, a separate note [MSDC-04] justifies their inclusion on the basis that these policies relate directly to the allocations within the Sites DPD. A specific policy on climate change is a strategic policy which would be relevant across the district and to development beyond that allocated within the DPD. The impacts of climate change and proposed mitigation could span a number of policies and require significant evidence base justification. The Council is of the view that the matter is considered more fully within the District Plan – a review of which has commenced, with adoption scheduled in 2023.

Climate Change – Existing Policy

National Planning Policy Framework chapter 14: *Meeting the challenge of climate change, flooding and coastal change* contains specific national policy in relation to planning for climate change. In particular, it sets out how new development should be planned to avoid increased vulnerability and reduce greenhouse gas emissions (para 150) – these have been considered during the Sites DPD process (see below). It sets out policy related to renewable and low carbon energy and heat and how plans should react (para 151) – these have been considered in the adopted District Plan (see below). It also includes policy which will be considered in the determination of planning applications (para 153 and 154).

The adopted District Plan [DPD5] contains policies specific to mitigating and adapting to climate change:

- **DP37: Trees, Woodland and Hedgerows.** This policy ensures development takes opportunities to plant new trees, woodland and hedgerows to enhance on-site green infrastructure and increase resilience to the effects of climate change

- **DP39: Sustainable Design and Construction.** This policy seeks to minimise energy use through design and layout, exploring energy efficient supply, efficient use of resources, water consumption standards and seeks demonstration that climate change has been planned for include long term resilience
- **DP40: Renewable Energy Schemes.** This policy supports proposals for new renewable and low carbon energy projects
- **DP41: Flood Risk and Drainage.** This policy should ensure development is safe across its lifetime (including an allowance for climate change) from flooding and the requirements for Sustainable Drainage Systems
- **DP42: Water Infrastructure and the Water Environment.** This policy sets water consumption standards for residential and non-residential uses.

These policies therefore already form part of the Mid Sussex development plan and there is no need to repeat them within the Sites DPD, aside from cross-references to them in policy SAGEN. As these are strategic, district-wide policies which would apply to any development (i.e. not just the Sites DPD allocations) an update to them would not fall within the scope of the Sites DPD which has a specific purpose. Any update to these policies required as a result of changing national policy, updated evidence or a revision to strategy will be considered within the review of the District Plan which has commenced, to be adopted in 2023.

Climate Change – Sites DPD Considerations

The District Plan recognises the challenge faced in relation to climate change, the potential impact of development and the need to adapt and mitigate. The District Plan contains a Strategic Objective related to climate change [DPD5, page 8]

1. To promote development that makes the best use of resources and increases the sustainability of communities within Mid Sussex, and its ability to adapt to climate change

Settlement Hierarchy – DP4 and DP6

District Plan policy **DP4: Housing** sets out the Council’s spatial strategy. It is based on a settlement hierarchy which directs the most growth to the most sustainable settlements:

Settlement Category	Plan Period Minimum Requirement
1 – Towns	10,653
2 – Larger Villages	3,005
3 – Medium Sized Villages	2,200
4 – Smaller Villages	82
5 – Hamlets	N/A
(windfall)	450
Total	16,390

The Settlement Hierarchy was based on detailed analysis within the Settlement Sustainability Review [O2]. This document formed the evidence base for the District Plan, considering service provision, accessibility and environmental constraints to determine the most sustainable settlements. The hierarchy directs development towards the most sustainable settlements – recognising the purpose of the planning system to achieve

sustainable development and mitigate and adapt to climate change. Directing development towards settlements with the best access to services and facilities will help reduce reliance on the private car and will encourage travel by sustainable modes, such as walking, cycling and public transport. These are all important considerations in the context of the impact development can have on future climate change.

Site Selection Papers

Climate change has been an important factor in the consideration of sites for inclusion within the Sites DPD. There are specific criteria related to climate change within the Site Selection Papers [SSP2, SSP3 and SSP4] and Sustainability Appraisal which have been the key tools for informing site selection.

Site Selection Paper 2 [SSP2] sets out the methodology for site selection. The results of the process are recorded in Site Selection Paper 3 (Housing) [SSP3] and Site Selection Paper 4 (Employment) [SSP4].

The following criteria for housing sites have particular links to climate change:

2) Flood Risk	Sites are assessed based on the potential risk of flooding, both existing and forecast. This has been measured using the Council's approved Strategic Flood Risk Assessment mapping, which includes an allowance for climate change (as agreed with the Environment Agency) to ensure future flood risk is assessed appropriately. Sites which are assessed as having significant flood risk are excluded from further consideration.
14) Education – Distance to Primary Schools	One of the key considerations in the formulation of the settlement hierarchy (which informed policies DP4 and DP6) is access to services and facilities. Proximity to services and facilities can reduce reliance on the private car, a contributing factor to climate change. In principle, sites in close proximity to existing services and facilities are likely to be more sustainable, increasing opportunities to walk/cycle. Where services and facilities are not within easy walking distance, public transport has a key role to play in reducing reliance on the car. These four objectives are directly related to reducing the impact of climate change. As a largely rural district, it is recognised that some settlements have fewer services and facilities and poor public transport accessibility and these are assessed accordingly. However, new development can contribute towards new facilities or improved public transport.
15) Health – Distance to GP Surgery	
16) Services – Distance to Town/Village Centre	
17) Public Transport	

The assessment against these criteria has directly informed the sites that have been assessed as suitable for allocation.

Sustainability Appraisal

Development Plan Documents such as the Sites DPD must be accompanied by Sustainability Appraisal (SA). The Sites DPD has been accompanied by SA at Regulation 18 [SUS3] and Regulation 19 stages [SUS1]. The Sustainability Appraisal considers:

- Social Objectives
- Environmental Objectives
- Economic Objectives

These are the three widely recognised sustainability objectives, as set out in the NPPF (para 8). The SA considers reasonable alternatives for site selection and policy and appraises them against a series of social, environmental and economic objectives – 16 in total.

Whilst the overarching aim of the SA is to ensure the most sustainable options are chosen – which in themselves should reduce the impact of climate change, the following SA objectives are directly related to climate change.

Social	2. To improve the access to health, leisure and open space facilities and reduce inequalities in health.
	3. To maintain and improve the opportunities for everyone to acquire the skills needed to find and remain in work and improve access to educational facilities.
	4. To improve access to retail and community facilities.
Environmental	6. To ensure development does not take place in areas of flood risk, or where it may cause flooding elsewhere (taking into account and aiming to reduce the potential impact of climate change), thereby minimising the detrimental impact to public wellbeing, the economy and the environment from flood events.
	8. To conserve and enhance the District's biodiversity.
	11. To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.
	12. To increase energy efficiency and the proportion of energy generated from renewable sources in the District, utilise sustainably produced and local products in new developments where possible, and reduce waste generation and disposal
	13. To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.

Each reasonable alternative site and policy option has been appraised against each of the 16 sustainability objectives. The aim is to ensure that the most sustainable options are chosen – the process directly informs the content of the Sites DPD. The SA suggests mitigation for those options that are likely to have a negative impact on any of the objectives. This can include specific policy requirements/mitigation within the Sites DPD itself, or application of existing policies (both National and within the District Plan) to reduce or remove any potential negative impacts.

Policy Requirements

Each site allocation within the Sites DPD is accompanied by a series of policy requirements which will need to be taken into account when determining future planning applications. These are site-specific to address any particular mitigation required for each site. In relation to climate change, there are specific references in relation to:

- **Urban design** – including optimising development potential and layout
- **Social and community** – including provision of new services and facilities on site
- **Biodiversity and Green Infrastructure** – including requiring improvements to biodiversity and water quality
- **Highways and Access** – including provision of facilities to enable sustainable transport such as pedestrian and cycle routes and requirements for a Sustainable transport Strategy to be submitted at application stage.
- **Flood Risk and Drainage** – including incorporation of Sustainable Drainage Systems, mitigation for surface water and fluvial flooding including any allowance made for climate change (as per the approved Strategic Flood Risk Assessment) and requirements for Flood Risk Assessments to be provided at application stage

These specific requirements are in addition to current District Plan policies. The Sites DPD contains **SAGEN**, which sets out general principles for all site allocations. This provides an overview of District Plan requirements along with requirements set out in the Council's adopted Supplementary Planning Documents. There are specific references to the District Plan policies DP37, DP39-DP42 as well as other aspects related to climate change:

- **Biodiversity and Green Infrastructure:** Recognising the importance of green infrastructure to climate change
- **Flood risk and drainage:** requiring a sequential approach to site layout to avoid developing areas at risk of flooding including climate change allowances
- **Access and Highways:** prioritise sustainable transport measures ahead of physical mitigation measures; provide safe and convenient routes for walking and cycling
- **Sustainability:** Designing development to be resilient to climate change, minimise energy and water consumption and mitigate flood risk; exploit the benefits of passive design and orientation and include on-site low or zero carbon technologies to reduce energy consumption

Conclusion

The impact of climate change is recognised and has played a key role in the consideration of sites to be allocated within the Sites DPD. In addition, there is a suite of existing policies both at a national level and within the adopted District Plan that address climate change adaptation and mitigation. These policies would be applicable to all development, including implementation of the sites within the Sites DPD. These are supplemented by site specific requirements set out for each site.

The main aim of the Sites DPD is to allocate sufficient housing and employment sites to address residual requirements. The Sites DPD also include strategic policies directly related to site allocations. It is not the role of the Sites DPD to include over-arching strategic policies, which would be better addressed within the District Plan Review (which has commenced) where a revised evidence base can be commissioned, and climate change considered more fully. The Council is confident that there is a strong existing policy framework in relation to climate change, a process for updating such policies if required through the District Plan Review which follows in the short-term, and therefore no further over-arching policy is required within the Sites DPD.

This statement clearly demonstrates the various considerations the Council has made in relation to climate change and how it has influenced the formulation of the Sites DPD. Whilst the Council does not believe it would be required to make the Plan 'sound', a short summary of climate change considerations (as set out in this statement) could be included as a modification to the introductory chapters of the Sites DPD if it was felt necessary.