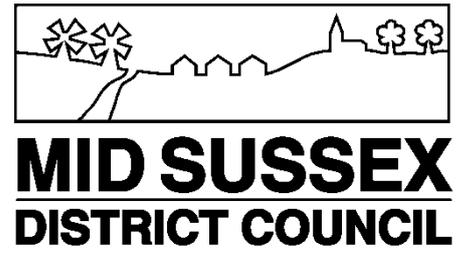


Mid Sussex



Site Allocations DPD
Sustainability Appraisal
(Incorporating Strategic Environmental
Assessment)

Main Modifications Addendum

November 2021

Contents

1. Introduction and Background	2
2. Site Allocations DPD: Sustainability Appraisal Context and Methodology	4
3. Main Modifications	10
4. Next Steps	12
Appendix 1 – Screening of Main Modifications: Sustainability Implications.....	13
Appendix 2 – Re-Appraisals / New Appraisals where Main Modifications alter previous SA findings	24

Site Allocations DPD Sustainability Appraisal – Main Modifications November 2021

1. Introduction and Background

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

- **Social**
- **Environmental**
- **Economic**

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

1.2. This Sustainability Appraisal (SA) report is a requirement of the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires Development Plan Documents (DPDs) to be prepared with a view to contributing to the achievement of sustainable development. The Sustainability Appraisal report is a tool to demonstrate how social, environmental and economic issues have been considered during production of the Site Allocations DPD (Sites DPD) – promoting sites, strategy or policy that is sustainable, and ruling out sites, strategy or policy which is deemed unsustainable. Undertaking this process can improve the overall sustainability of the Sites DPD, whilst documenting how the plan meets the legal and policy requirements. The SA report also contains the elements required by the Strategic Environmental Assessment (SEA) directive as set out in the European Directive 2001/42/EC, adopted into UK law as the “Environmental Assessment of Plans or Programmes Regulations 2004”.

The Sustainability Appraisal Report

1.3. The Sustainability Appraisal and SEA follow an iterative process, providing a view of the likely implications on sustainable development of different options for site allocations in the Sites DPD as well as any generic policies that the document may contain. The findings of this work have been taken into consideration in determining the content of the Sites DPD and are documented within this report. This process will be repeated at all formal stages of the Sites DPD.

1.4. The Sustainability Appraisal process, along with the Strategic Environmental Assessment process, has widened the range of issues and options considered in formulating the proposals for the Sites DPD, in particular by focussing attention on the need to consider a range of potential social, economic and environmental effects. In turn, this has enabled the most sustainable policy approaches to be identified for inclusion within the Sites DPD.

¹ The Report of the Brundtland Commission, 1987

- 1.5. A Sustainability Appraisal Report accompanied both the Regulation 18 and Regulation 19 versions of the Sites DPD. These were submitted to the Planning Inspectorate alongside the Sites DPD and supporting evidence in December 2020.
- 1.6. The Sites DPD was subject to public hearings in June 2021. Following the hearings, the Inspector suggested a range of Main Modifications which would be necessary for the Sites DPD to be found 'sound'. The Sustainability Appraisal process is an iterative one – this version of the SA assesses the sustainability implications of the Main Modifications.
- 1.7. The Main Modifications, and this Sustainability Appraisal are subject to consultation.

How to Comment on This Report

- 1.8. The Site Allocations DPD, along with the accompanying Sustainability Appraisal report, will be made available for public consultation. All comments received on both of these reports will be taken into consideration before adoption of the Sites DPD.
- 1.9. If you wish to comment on these documents, these should be sent to:

Email:

PolicyConsultation@midsussex.gov.uk

Online:

www.midsussex.gov.uk/SitesDPD

Post:

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

2. Site Allocations DPD: Sustainability Appraisal Context and Methodology

- 2.1. The Mid Sussex District Plan 2014-2031 was adopted in March 2018. The District Plan shapes the future of Mid Sussex by providing a framework for new development, employment growth, infrastructure, and measures to protect the countryside and other valuable assets. The District Plan was accompanied by its own Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) to ensure the Plan was the most sustainable given all reasonable alternatives.
- 2.2. The Mid Sussex District Plan identified:
 - A total housing need of 16,390 homes for the period 2014-2031; inclusive of a contribution towards meeting unmet housing need in neighbouring authorities (policies **DP4**: Housing and **DP6**: Settlement Hierarchy)
 - Strategic Housing Allocations at Burgess Hill (**DP8 – DP9**), Hassocks (**DP11**) and Pease Pottage (**DP10**)
 - A total of 25ha employment space (policy **DP1**: Sustainable Economic Development).
- 2.3. Whilst the majority of the housing need has been planned for within the District Plan (either through completions, committed sites (those with allocations of planning permission) or the strategic sites listed above), there is a residual housing need.
- 2.4. Policy **DP4: Housing** identifies this 'residual need' and commits the Council to preparing a Site Allocations DPD in order to allocate sufficient sites to meet it. The DPD is also able to identify sites for other uses, such as employment, to meet any remaining need that was not identified within the District Plan.
- 2.5. The residual housing need figure has now been updated (as at 1st April 2021), and shows that the Site Allocations DPD will be required to plan for a minimum of 797 dwellings. The employment need position has also been updated, to take account of up-to-date employment forecasts and any changes since the District Plan was adopted. This work identifies a need for an additional 10-15ha of employment land.
- 2.6. The District Plan sets out a commitment for the Council to prepare a Sites DPD, which has four main aims, which are:
 - i) to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
 - ii) to allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
 - iii) to allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
 - iv) to set out additional Strategic Policies necessary to deliver sustainable development.
- 2.7. The purpose of the Site Allocations DPD is therefore to plan for a minimum of 797 dwellings and 10-15ha of employment land by allocating sufficient sites.

Methodology

- 2.8. To undertake a Sustainability Appraisal of the Site Allocations DPD, the council collected data about the district on social, environmental and economic issues. This is known as the 'baseline' and is documented in section 3 of the Regulation 18 and Regulation 19 main reports. This information enables the current (and potential future) social, environmental and economic issues facing the district to be established. The baseline consists of quantitative data as well as qualitative data – a review of all plans, programmes and policies that impact upon the Site Allocations DPD was also established to form a picture of the issues and challenges facing the district.
- 2.9. From this information, it was possible to identify sustainability objectives that the emerging policy options within the Site Allocations DPD would be assessed against. Indicators were linked to each of the objectives to enable any potential impacts from policies to be quantified and monitored in the future.
- 2.10. The report accompanied the Regulation 18 Site Allocations DPD and was subject to consultation. Comments received during the consultation have been considered in preparing this Regulation 19 report. This also builds upon an earlier 'Scoping Report' which set out the baseline and proposed objectives and indicators. In accordance with regulations, this document was subject to a 5-week consultation with statutory environmental bodies and their comments were taken into account when drafting the Regulation 18 Sustainability Appraisal.

Current Sustainability Issues

- 2.11. From the examination of the baseline data and plans, programmes and policies that could influence the Site Allocations DPD it was possible to identify the current sustainability issues faced by the district. These issues are summarised as follows:

Social

- an increasing population, and the need for additional infrastructure² capacity or improvements in order to meet the needs of new households;
- An ageing population is likely to increase the demands on health and social care, in particular the need for residential nursing care.
- a changing and aging population, that may create potential gaps in the jobs market and the need for the District's housing stock to be fit to meet future needs;
- need for affordable housing cannot be met by existing or planned supply and therefore new affordable housing must be built to meet needs;
- House prices in Mid Sussex are high relative to average incomes, and this causes affordability issues, particularly for young people.
- primary care provision in the form of community health services will need to be improved in all the major settlements in the District
- existing school capacity issues will need to be addressed
- Car ownership and use is high, contributing to congestion and climate change. This may be a reflection of high average income, or limited access to public transport in the rural areas.
- high vehicle ownership and the potential for highway congestion arising from development, opportunities to promote sustainable modes of transport and

² Includes roads and other transport facilities; flood defences; schools and other educational facilities; medical facilities; sporting and recreational facilities; and open space.

interventions and schemes that mitigate the impact of developments on the transport network and environment should be encouraged

- Ease of access to existing facilities and services is an issue for many residents in Mid Sussex, particularly those in rural areas. There are some pockets of deprivation in the District mostly in relation to access to local community services – this can create social exclusion.
- low levels of crime should be further reduced where possible through designing the built environment so that opportunities for crime are removed
- demand for leisure facilities will increase in the future so it is important that there are sufficient indoor and outdoor leisure activities and premises to cater for both resident and visitor requirements

Environmental

- There is a need to encourage sustainable, attractive and inclusive communities to ensure that the District continues to benefit from good health and an attractive natural and built environment.
- The need to maintain and enhance the high quality natural, built and historic environment and biodiversity of the District.
- Water usage is increasing, putting further pressure on water resources, which is further exacerbated by climate change.
- Water quality, both in watercourses and aquifers, needs to be maintained and enhanced.
- Flood risk is an issue for the District, in particular relating to surface water drainage from new developments.
- The amount of waste produced in Mid Sussex is increasing, while at the same time, the land available to dispose of waste (landfill) is reducing. However, this is seen as the most unsustainable option by which to manage waste. Recycling rates are increasing.
- There is a need to promote more sustainable forms of development that are energy and resource efficient, and increase the environmental as well as economic 'self-sufficiency' of communities within Mid Sussex and its ability to adapt to climate change.

Economic

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

Sustainability Framework – Objectives and Indicators

2.12. By taking the above issues it was possible to identify sustainability objectives for the district. These objectives were used to assess how the various policy options (known as 'reasonable alternatives') being explored for the Site Allocations DPD would contribute to the objectives of sustainability. The set of indicators could also be used to devise a monitoring framework for assessing how the policy proposals affect the objectives upon adoption of the Site Allocations DPD.

2.13. A total of 16 Sustainability Objectives were devised:

SOCIAL

- | | |
|----------|--|
| 1 | To ensure that everyone has the opportunity to live in a home suitable for their needs and which they can afford |
| 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. |
| 5 | To create safe and crime resistant communities, and encourage social cohesion, reduce inequality. Promote integration with existing town/village, and retain separate identities. |

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 well-being, the economy and the environment from flood events. (SEA) |
| 7 | To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance. |
| 8 | To conserve and enhance the District's biodiversity. (SEA) |
| 9 | To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes. (SEA) |
| 10 | To protect, enhance and make accessible for enjoyment, the District's historic environment. (SEA) |

11	To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car, thereby reducing the level of greenhouse gases from private cars and their impact on climate change. (SEA)
-----------	---

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. (SEA)
-----------	--

ECONOMIC

14	To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.
-----------	--

15	To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District.
-----------	---

16	To sustain economic growth and competitiveness across the District, protect existing employment space, and to provide opportunities for people to live and work within their communities therefore reducing the need for out-commuting.
-----------	--

Developing and Appraising Options – “Reasonable Alternatives”

2.14. In preparing the Site Allocations DPD, a number of options were considered, and a range of options for each policy area were identified – these are referred to in the guidance as ‘reasonable alternatives’. As the aim of the DPD is to allocate sufficient housing and employment sites in order to meet the identified need, the majority of the Sustainability Appraisal report focuses on the strategy options and site options for allocation. There are also a number of other policies, which have been identified as needed to support the allocation of sites. Reasonable alternatives for these have also been tested through the appraisal process.

2.15. Whilst it is a requirement of Strategic Environmental Assessment to appraise all reasonable alternatives, there is no need to devise alternatives just to comply with this directive – hence only realistic alternatives have been identified.

2.16. The preferred policy option from all of the options appraised has been based on the overall impact against the sustainability objectives, with the option with the most positive predicted impact determined as the ‘preferred option’. In order to record the sustainability of the varying options, a range of colours and symbols has been used:

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

Table 1: Appraisal Impact scoring method

- 2.17. All of the reasonable alternatives were appraised using these symbols, against the methodology outlined in section 2 of the main report. Once appraised, mitigation for any predicted negative impacts has been identified.
- 2.18. The majority of the Site Allocations DPD sites and policies were generally found to impact positively on the social, environmental and economic objectives. In almost all instances, where a negative sustainability impact had been identified it was mitigated by one of the policies within the adopted District Plan or could be mitigated by including policy requirements on individual sites.

3. Main Modifications

- 3.1. The Sustainability Appraisal is an iterative process. It is not intended to repeat previous Sustainability Appraisal work and findings within this report as that information is available within the Regulation 18 and regulation 19 (submission) versions of the SA which are within the examination library.
- 3.2. The purpose of this report is to assesses the sustainability implications of the Main Modifications suggested by the Inspector to ensure soundness of the Sites DPD. It is assumed that previous findings are still valid, unless demonstrated otherwise by the exercise undertaken within this report.
- 3.3. The Inspector will take account of the SA and comments received from consultation in producing his final report to the Council.

Main Modifications: Sustainability Appraisal Approach

- 3.4. Many of the proposed changes/modifications to the Sites DPD are minor with regard to significance for the SA process; they are generally concerned with correcting errors, addressing omissions, providing more clarity to policy wording, and updating of information. Therefore, it might be that the Main Modifications have no implications on the findings of the previous (Regulation 19) SA.
- 3.5. The proposed Main Modifications have therefore been screened for their significance with regard to SA – in other words, do the changes, deletions and additions significantly affect the findings of the Submission SA Report and/or do they give rise to significant environmental/sustainability effects?
- 3.6. A pragmatic and proportionate approach was taken, as relevant to this stage of plan-making and assessment. A professional judgment was made for SA significance taking into account the proposed change within the Main Modification and using the same method and SA Framework as the previous SA work, thus providing continuity and consistency of process.

Main Modifications: Conclusion

- 3.7. The results of the screening exercise are set out in **Appendix 1**.
- 3.8. The screening for SA significance identified that most Main Modifications (MMs) do not significantly affect the findings of the previous SA Report (Regulation 19 – Submission: July 2020), nor do they give rise to significant environmental effects.
- 3.9. The requirement for refreshed or new sustainability appraisal of some MMs was identified and the findings are summarised as follows:
 - **Main Modification 1: SA25: Land west of Selsfield Road, Ardingly**
This proposed modification reduces the yield from the site from 70 dwellings to 35. This respects the conclusion reached by the Inspector that 70 dwellings in this location would be considered ‘major development’ in the AONB whereas 35 would not.

As the change in yield represents a reasonable alternative option not yet appraised, a new appraisal has been carried out within Appendix 2.

The findings of the revised appraisal find the new option (yield of 35) is likely to have a reduced negative impact on the objective concerned with AONB – Objective 8: Countryside.

- **Main Modification 3: New Policy: Older Persons Accommodation (C2)**

Following the hearing sessions, the Inspector concluded that an additional policy was required on this subject. The new policy would provide support for such uses as long as certain requirements are met.

As this option had not been appraised previously, a new appraisal has been carried out within Appendix 2. The appraisal finds that there are more likely to be positive effects by having such a policy, particularly against the social objectives.

- 3.10. Overall, the results of the screening exercise and additional policy appraisals demonstrate that none of the modifications are likely to alter the original SA findings at Regulation 19/Submission stage (apart from where stated), and where SA findings are altered, they do not give rise to any significant negative environmental impacts. In general, the Main Modifications are more likely to have positive impacts against the SA objectives as a whole by comparison to the results at Regulation 19/Submission stage.

4. Next Steps

- 4.1. Proposed Main Modifications (MMs) have been made to the Site Allocations DPD following examination hearings. These MMs are required to make the Sites DPD sound and capable of adoption. Most changes to the Sites DPD are concerned with correcting errors, addressing omissions, updating, and providing clarity.
- 4.2. As part of the iterative and ongoing SA process, the proposed Main Modifications were screened for their significance with regard to the SA process and any likely significant effects.
- 4.3. The Main Modifications and accompanying evidence, including this SA Report, will be subject to public consultation. Any representations received will be taken into account by the Inspector in his final considerations of the soundness of the Sites DPD. When the Sites DPD is found sound, it will be adopted, and a SA/SEA Adoption Statement will be prepared in accordance with statutory requirements.

Appendix 1 – Screening of Main Modifications: Sustainability Implications

MM Ref	DPD Section	Proposed Change	Does this Main Modification significantly affect the findings of the Submission Sites DPD SA (July 2020) or do they give rise to significant environmental effects?
MM1	Policy SA25, page 73	<p><i>Modify policy SA25: Land West of Selsfield Road, Ardingly, for 70 dwellings, as follows:</i></p> <p>Number of Units: 70 35 dwellings.</p> <p><i>Under Urban Design Principles:</i> <i>New first bullet point:</i></p> <ul style="list-style-type: none"> Locate the development at the eastern end of the open land between the South of England Showground and the Recreation Ground, fronting onto Selsfield Road. The proposed development should include strategic landscaping at its western end. <p><i>Amend Policies Map and SA10/SA11 (with figures as at 1st April 2021) to reflect this modification.</i></p>	<p>This site option was appraised at Regulation 18 stage with a yield of 100 dwellings – this gave rise to potential very negative (--) impacts on Objective 9 – “Countryside” due to the sites location within the High Weald AONB and impact on it as the Council concluded that the site was ‘major’ development at this scale.</p> <p>At Regulation 19 stage, the yield reduced to 70 dwellings. The Council concluded that this was not ‘major development’ therefore the impact against Objective 9 was likely to be lower (concluded as negative (-)).</p> <p>The Inspector’s justification for this Main Modification is that a yield of 70 would likely be ‘major’ development. This would therefore re-instate the impact against Objective 9 to very negative (--). The Inspector suggests that a modification that reduces the yield to 35 and amends the site boundary is not likely to be ‘major’.</p> <p>Conclusion: As this is likely to affect the findings of the SA since the Submission version, this policy has been re-appraised in Appendix 2.</p>

MM2	Policy SA20, page 59	<p><i>Modify policy SA20: Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, for 550 dwellings, as follows:</i></p> <p><i>Under Social and Community:</i> Provision of a minimum of 142 dwellings (Use Class C2) in a dedicated site within the allocation, fronting onto Imberhorne Lane.</p> <p><i>The area for the older persons' dwellings needs to be defined on the Policies Map.</i></p>	<p>Submitted policy SA20 includes the requirement to provide accommodation for older persons (use class C2). The appraisal scored Very Positive (++) against Objective 1 – Housing.</p> <p>This modification simply specifies the amount and location of C2 accommodation within the site boundary.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM3	New policy to address the need for specialist accommodation for older people and care homes	<p><i>Include new criteria based policy to provide for specialist accommodation for Older People and Care Homes within Mid Sussex, as follows:</i></p> <p>There is an identified need for specialist accommodation for older people comprising at least 665 additional extra care units (Use Class C2) by 2030, of which at least 570 should be leasehold. The Housing and Economic Needs Assessment Addendum (August 2016) identified forecast demand for care homes (Use Class C2) at 2031 as 2,442 bedspaces. The Council will support proposals that will contribute to meeting these types of specialist accommodation.</p> <p>Proposals for specialist accommodation for older people and care homes will be supported where:</p>	<p>Further to debate at the hearings in relation to an additional policy for older persons accommodation (Use Class C2), the Inspector has concluded that an additional policy is required in order to address this issue.</p> <p>Conclusion: This is a new policy proposed for inclusion within the SA since the Submission version, reasonable alternatives for this policy have been appraised in Appendix 2.</p>

		<p>a) It is allocated for such use within the District Plan, Site Allocations DPD or Neighbourhood Plan; or</p> <p>b) It forms part of a strategic allocation; or</p> <p>c) It is located within the Built-Up Area Boundary as defined on the Policies Map; or</p> <p>d) Where the site is outside the Built-Up Area, it is contiguous with the Built-Up Area Boundary as defined on the Policies Map and the development is demonstrated to be sustainable, including by reference to the settlement hierarchy (policy DP4).</p> <p>In all circumstances, the site must be accessible by foot or public transport to local shops, services, community facilities and the wider public transport network. Proposals must demonstrate how reliance on the private car will be reduced and be accompanied by a Travel Plan which sets out how the proposal would seek to limit the need to travel and how it offers a genuine choice of transport modes, recognising that opportunities to maximise sustainable transport solutions will vary between urban and rural areas.</p>	
MM4	Policy SA13, page 43	<p><i>Modify policy SA13: Land East of Keymer Road and South of Folders Lane, Burgess Hill, for 300 dwellings, as follows:</i></p> <p><i>Under Objectives:</i></p> <ul style="list-style-type: none"> To deliver a sympathetic and well integrated extension to Burgess Hill, informed by a landscape led masterplan, which respects responds to the setting of the South Downs National Park in its design, creating <p><i>Under Landscape Considerations:</i></p> <ul style="list-style-type: none"> Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to minimise impacts 	<p>Submitted policy SA13 already includes requirements related to the setting of the South Downs National Park, the Main Modification proposed gives more clarity to this requirement.</p> <p>The submitted policy also contains the requirement for a Landscape and Visual Impact Assessment to be prepared to support an application inform site layout, capacity and mitigation. During the hearings, an additional piece of work related to Opportunities and Constraints was prepared. The policy wording</p>

		<p>on the most visible parts of the site on the wider countryside and the setting of and any potential views from the South Downs National park to the south. Any external lighting scheme shall be designed to minimise light spillage to protect the dark night skies.</p> <ul style="list-style-type: none"> • The LVIA will incorporate the findings of the Opportunities and Constraints Plan, paying particular attention to the increasing sensitivity moving through the site towards the south, and acknowledge its position as an edge of settlement development to Burgess hill that reflects the characteristics of its immediate area. The design will take account of and respond to the findings of the LVIA. 	<p>has been amended to refer to this, and to strengthen the role that the LVIA plays.</p> <p>Both amendments provide clarity and strengthening to the existing policy but do not materially change the policy in a way that would give alter the findings of the original SA. Similarly, it is not anticipated that any adverse environmental impacts would arise from the change – if anything, more positive impacts could be expected compared to the conclusion reached at Regulation 19 stage.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM5	Policy SA7, page 27	<p><i>Modify policy SA7: Cedars (Former Crawley Forest School), Brighton Road, Pease Pottage, for employment use, as follows:</i></p> <p><i>Under Site Specific Requirements, Second bullet point:</i></p> <p>Undertake a Landscape and Visual Impact Appraisal (LVIA) to inform the site layout, capacity and mitigation requirements, including a comprehensive landscape scheme in order to conserve and enhance the landscape and scenic beauty of minimise impact on the AONB.</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM6	Policy SA8, page 28	<p><i>Modify policy SA8: Pease Pottage Nurseries, Brighton Road, Pease Pottage, for employment use, as follows:</i></p> <p><i>Under Site Specific Requirements, Second Bullet Point:</i></p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within</p>

		Undertake a Landscape and Visual Impact Appraisal (LVIA) to inform the site layout, capacity and mitigation requirements, including a comprehensive landscape scheme in order to conserve and enhance the landscape and scenic beauty of minimise impact on the AONB.	the High Weald AONB which is reflected in the score against Objective 9 – Countryside. The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects. Conclusion: No re-appraisal required, appraisal at Submission stage still holds.
MM7	Policy SA23, page 67	<i>Modify policy SA23: Land at Hanlye Lane to the East of Ardingly Road, Cuckfield, for 55 dwellings, as follows:</i> <i>Under Objectives:</i> To deliver a high quality, landscape led, sustainable extension to Cuckfield, which provides enhanced and accessible open space; respects the character of the village and conserves and enhances the setting of the High Weald AONB;	This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the setting of the High Weald AONB which is reflected in the score against Objective 9 – Countryside. The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects. Conclusion: No re-appraisal required, appraisal at Submission stage still holds.
MM8	Policy SA26, page 76	<i>Modify policy SA26: Land South of Hammerwood Road, Ashurst Wood, for 12 dwellings, as follows:</i> <i>Under Objectives:</i> <ul style="list-style-type: none"> To deliver a sensitive extension to Ashurst Wood which reflects local distinctiveness and sits well within conserves and enhances the landscape and scenic beauty of the High Weald AONB <i>Under AONB:</i>	This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside. The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.

		<ul style="list-style-type: none"> Undertake a Landscape and Visual Impact Assessment (LVIA) to inform the site layout, capacity and mitigation requirements, in order to protect conserve and enhance the landscape and scenic beauty of the High Weald AONB. 	<p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM9	Policy SA27, page 78	<p><i>Modify policy SA27: Land at St Martin Close, Handcross, for 35 dwellings, as follows:</i></p> <p><i>Under Objectives, insert new first bullet point:</i></p> <p>To deliver a high quality, landscape led, sustainable extension to Handcross, which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM10	Policy SA28, page 80	<p><i>Modify policy SA28: Land South of The Old Police House, Birchgrove Road, Horsted Keynes, for 25 dwellings, as follows:</i></p> <p><i>Under Objectives:</i></p> <p>To deliver a high quality, landscape led, sustainable extension to Horsted Keynes, which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.</p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM11	Policy SA29, page 82	<p><i>Modify policy SA29: Land South of St Stephens Church, Hamsland, Horsted Keynes, for 30 dwellings, as follows:</i></p>	<p>This modification makes minor wording changes to policy wording. The previous appraisal for this</p>

		<p><i>Under Objectives:</i> To deliver a high quality, landscape led, sustainable extension to Horsted Keynes, which respects the character of the village and conserves and enhances the landscape and scenic beauty of the High Weald AONB, and which is comprehensively integrated with the settlement so residents can access existing facilities.</p>	<p>site accounted for the fact that it is located within the High Weald AONB which is reflected in the score against Objective 9 – Countryside.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM12	Policy SA34, page 93	<p><i>Modify policy SA34: Existing Employment Sites</i></p> <p><i>After first paragraph, insert the following text:</i></p> <p>Development proposals outside the traditional employment use classes for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of the site, or its development for employment or employment uses, is not viable, through the provision of:</p> <p>(i) Details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing marketing conditions; and</p> <p>(ii) A financial appraisal that demonstrates that the development of any employment generating use is unviable.</p> <p>Development proposals outside the traditional employment use classes for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of the site, or its development for employment or employment uses causes, or would lead to site-specific, environmental</p>	<p>The Main Modification adds additional requirements in relation to demonstrating continued viable use of the site. If this can not be demonstrated, non-employment generating uses will be supported. This provides some added flexibility.</p> <p>The Submission appraisal concluded that very positive (++) impacts would be expected for the employment objectives 15 – Employment and 16 – Economic Growth.</p> <p>Whilst the main modification could reduce the strength of the policy in protecting existing employment uses, it is not likely to significantly alter the conclusions reached in the original SA.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>

		problems, such as noise, pollution or disturbance through traffic generation, recognising the environmental benefits to be gained by redeveloping these sites for non-employment generating uses.	
MM13	Policy SA35, page 96	<p><i>Modify policy SA35: Safeguarding of Land for and Delivery of Strategic Highway Improvements, as follows:</i></p> <p><i>Amend fifth paragraph as follows:</i> New development in these areas should be carefully designed, having regard to matters such as building layout, noise insulation, landscaping, the historic environment, and means of access and meeting the requirement for biodiversity net gain.</p>	<p>The Main Modification adds an additional requirement in relation to biodiversity net gain.</p> <p>The original appraisal concluded that no impact (0) was anticipated against Objective 8 – Biodiversity.</p> <p>The additional wording will strengthen the requirement for biodiversity net gain, which should have a positive (+) impact on Objective 8 by comparison to the previous appraisal. Therefore, only positive impacts are anticipated to result from this Main Modification.</p> <p>Conclusion: No re-appraisal required, whilst this modification may result in a change in affect compared to the submission SA, they are only likely to be positive.</p>
MM14	Policy SA37, page 103	<p><i>Modify policy SA37: Burgess Hill/Haywards Heath Multifunctional Network, as follows:</i></p> <p><i>Under third paragraph as follows:</i> The area shown on the Policies Map illustrates where policy SA37 will apply; the precise alignment for the scheme will be informed by detailed design work and it should be carefully designed having a clear consideration of matters such as biodiversity and landscape in order to avoid harmful impacts on those features.</p>	<p>The Main Modification adds an additional requirement in relation to biodiversity net gain.</p> <p>The original appraisal concluded that no impact (0) was anticipated against Objective 8 – Biodiversity.</p> <p>The additional wording will strengthen the requirement for biodiversity net gain, which should have a positive (+) impact on Objective 8 by comparison to the previous appraisal.</p>

			<p>Therefore, only positive impacts are anticipated to result from this Main Modification.</p> <p>Conclusion: No re-appraisal required, whilst this modification may result in a change in affect compared to the submission SA, they are only likely to be positive.</p>
MM15	Appendix B, page 141	<p><i>Modify Appendix B by inserting additional table, as set out below in Appendix 1, after the following text:</i></p> <p>The Council has identified some of the additional information it intends to record if it is available.</p>	<p>This modification adds additional factual information, it therefore does not alter the conclusions of any policy or site appraisal.</p> <p>Conclusion: No material impact on any appraisal conclusion, no significant environmental effects likely to result.</p>
MM16	Housing Trajectory	<p><i>Include the Council's updated housing trajectory within the Plan.</i></p>	<p>This modification adds additional factual information, it therefore does not alter the conclusions of any policy or site appraisal.</p> <p>Conclusion: No material impact on any appraisal conclusion, no significant environmental effects likely to result.</p>
MM17	Policy SA16, page 50	<p><i>Modify policy SA16: St Wilfrid's Catholic Primary School, School Close, Burgess Hill, for 200 dwellings, as follows:</i></p> <p><i>Under Urban Design Principles, at the end of the first bullet point, for 200 dwellings, insert:</i></p> <p>The anticipated yield of the comprehensive redevelopment scheme includes the 200 dwellings proposed in policy SA16, plus an additional 100 dwellings proposed in the Neighbourhood Plan for the Brow Quarter.</p>	<p>This modification makes minor wording changes to policy wording for clarity.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM18	Policy SA31, page 50	<p><i>Modify policy SA31: Land to the rear of Firlands, Church Road, Scaynes Hill, for 20 dwellings, as follows:</i></p> <p><i>Under Highways and Access, additional bullet point:</i></p>	<p>Submitted policy SA31 included a requirement to provide safe and convenient routes for pedestrians and cyclists. The modification</p>

		<p>Contribute towards provision of a footpath connecting the site to the existing footpath to the south. This could be done either as an extension to the Scaynes Hill Common footpath or exploring options for a formal footway alongside the carriageway.</p>	<p>strengthens this requirement and details potential options.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM19	SA14, page 46	<p><i>Modify policy SA14: Land to the South of Selby Close, Hammonds Ridge, Burgess Hill, for 12 flats, as follows:</i></p> <p><i>Under Highways and Access, first bullet point:</i> Provide access from Hammonds Ridge. or through CALA Homes development at Edwin Street to the west, the details of which need to be investigated further.</p>	<p>This modification makes minor wording changes to policy wording for clarity.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM20	SA29, page 82	<p><i>Modify policy SA29: Land South of St Stephens Church, Hamsland, Horsted Keynes, for 30 dwellings, as follows:</i></p> <p><i>Under Highways and Access: Delete first bullet point and insert:</i></p> <ul style="list-style-type: none"> • Safe and convenient pedestrian and vehicular access needs to be secured, in accordance with Manual for Streets (MfS) to enable (a) satisfactory access by waste collection vehicles and emergency services vehicles; and (b) safe and convenient pedestrian access, both along Hamsland and into the proposed development. <p><i>Under Biodiversity and Green Infrastructure:</i> <i>Add new bullet point:</i> Ensure adequate protection of the existing trees along the site boundary.</p>	<p>Submitted policy SA29 included a requirement to investigate potential access. The modification strengthens this requirement and provides further details.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>

MM21	SA22, page 65	<p><i>Modify policy SA22: Land North of Burleigh Lane, Crawley Down, for 50 dwellings, as follows:</i></p> <p><i>Under Highways and Access:</i> Provide access from Sycamore Lane or Woodlands Close. Detailed access arrangements will need to be investigated further.</p>	<p>This modification makes minor wording changes to policy wording for clarity.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>
MM22	SA20, page 61	<p><i>Modify policy SA20: Land South and West of Imberhorne Upper School, Imberhorne Lane, East Grinstead, for 550 dwellings, as follows:</i></p> <p><i>Under Biodiversity and Green Infrastructure:</i> Additional text at end of bullet point 6: The management of the SANG should include regular monitoring of visitor numbers, where visitors travel from to visit the SANG, activities at the SANG, and any suggestions for future management.</p>	<p>This modification adds an additional requirement for monitoring of the SANG, including suggestions for how this could be achieved.</p> <p>The Main Modification provides clarity to the policy that does not significantly alter the previous SA findings and is not likely to give rise to significant environmental effects.</p> <p>Conclusion: No re-appraisal required, appraisal at Submission stage still holds.</p>

Appendix 2 – Re-Appraisals / New Appraisals where Main Modifications alter previous SA findings

SA25: Land west of Selsfield Road, Ardingly			
Reasonable Alternatives for Assessment			
<p>A: Land west of Selsfield Road. SHELAA#832. Regulation 19 / Submission stage Units: 70.</p> <p>B: Land west of Selsfield Road. SHELAA#832. Main Modifications stage Units: 35.</p>			
Objective	A – Reg. 19 / Submission	B – Main Modifications	Assessment
1 - Housing	++	++	This site option makes a significant contribution towards the residual housing need and has demonstrated a reasonable prospect of deliverability.
2 - Health	-	-	This site option is located more than a 20 minute walk from the nearest GP surgery.
3 - Education	++	++	This site option is located less than a 10 minute walk from the nearest primary school.
4 - Retail	++	++	This site option is located less than a 10 minute walk from the nearest convenience store.
5 - Communities	+	+	This site option would encourage the growth of communities.
6 - Flood Risk	0	0	This site option has no areas at risk from flooding, and has not suffered from flooding in the past.
7 - Land Use	-	-	This site option is on green field land.
8 - Biodiversity	0	0	There are no formal biodiversity designations (Ancient Woodland, SSSI, Local Nature Reserve, etc) on or adjacent to this site.
9 - Countryside	--	-	This site is wholly within the High Weald AONB and has been assessed as having a moderate impact upon the landscape due to the scale of development. A previous scheme for 100 units was appraised at Regulation 18 stage as “- -” as it was concluded as ‘major development’ in accordance with NPPF paragraph 177 (and footnote 60). The Regulation 19 SA appraised the impact as negative (‘-’) as the yield had reduced to 70 dwellings and concluded as not major. However, the Sites DPD Inspector has assessed the site as being ‘major’ at this yield, therefore the appraisal now concludes a very negative impact (‘- -’). Option (b), at 35 dwellings, is not concluded as major and therefore a negative impact is expected.
10 - Historic	-	-	This site option has no constraints in terms of listed buildings, but has a less than substantial harm (low) on Ardingly Conservation Area.
11 - Transport	?	?	This site option on its own is unlikely to contribute to negative impacts on the highways network. In-combination modelling of the package of preferred option sites will be tested as part of the evidence supporting the Site Allocations DPD.

12 - Energy/Waste	?	?	This site option is going to impact on the amount of waste generated, due to additional population generated from housing as well as during construction. This option should seek to recycle materials and make best use of resources, including using sustainable construction techniques and renewable energy in accordance with District Plan policies.
13 - Water	?	?	This site option is going to impact on the amount of water used and wastewater generated, due to additional population generated from housing as well as during construction. This site option should seek to minimise water use, including using sustainable construction techniques in accordance with District Plan policies.
14 - Regeneration	++	++	This site option performs positively against this objective as the sites are in close proximity to the village centre.
15 - Employment	+	+	This site option would provide housing to meet the identified housing need, and therefore aligns with job projections.
16 - Ec. Growth	+	+	This site option would encourage investment by businesses within Mid Sussex, as an increasing workforce means a larger jobs pool for potential employers to call upon.
Conclusion	✓		
<p>This site performs relatively well against the SA framework. There is a 'Negative' impact against objective (9) due to its location within the High Weald AONB, however the AONB unit have concluded that there is Moderate Impact as opposed to High Impact and may be reduced as a result of its reduced scale since originally assessed (Regulation 18 stage: 100 units and Regulation 19 stage: 70 units). As the District Plan strategy anticipates growth at Ardingly, and there are a number of positive impacts against social and economic criteria, the positive impacts from progressing this site for allocation outweigh the negative impacts.</p>			

Older Persons Accommodation

Reasonable Alternatives for Assessment

Option (a):

To have a policy that supports proposals that will contribute to meeting needs for older people and care homes. This will be supported where allocated, or within the built-up area boundary, or contiguous with the built-up area boundary. The site must be accessible by sustainable modes to local facilities and services, and a travel plan will need to be provided.

Option (b):

To not have a policy, and therefore rely on District Plan Policy **DP30: Housing Mix**.

Objective	A	B	Assessment
1 - Housing	++	+	Both options (a) and (b) are likely to have a positive impact on this objective, as both provide the flexibility to allow for these uses. However, option (a) provides greater clarity by providing explicit support as long as certain requirements are met.
2 - Health	+	0	Option (a) provides support for older persons, particularly those requiring care. This is therefore likely to have a positive impact on health. Option (b) does not preclude this, and provides policy support, however as option (a) provides explicit support it is more likely positive impacts could arise.
3 - Education	0	0	Neither option has an identified impact upon the sustainability objective for education.
4 - Retail	0	0	Neither option has an identified impact upon the sustainability objective for retail.
5 - Communities	0	0	Neither option has an identified impact upon the sustainability objective for communities.
6 - Flood Risk	0	0	Neither option has an identified impact upon the sustainability objective for flood risk.
7 - Land Use	0	0	Neither option has an identified impact upon the sustainability objective for land use.
8 - Biodiversity	0	0	Neither option has an identified impact upon the sustainability objective for biodiversity.
9 - Countryside	0	0	Neither option has an identified impact upon the sustainability objective for countryside.
10 - Historic	0	0	Neither option has an identified impact upon the sustainability objective for historic environment.
11 - Transport	+	0	Option (a) is stronger in its requirement for the site to be sustainably and accessibly located, and provides certain requirements in relation to travel plans and sustainable transport modes.
12 - Energy/Waste	0	0	Neither option has an identified impact upon the sustainability objective for energy/waste.
13 - Water	?	?	There may indirect benefits to watercourses by improving air quality in the District.
14 - Regeneration	0	0	Neither option has an identified impact upon the sustainability objective for regeneration.
15 - Employment	0	0	Neither option has an identified impact upon the sustainability objective for employment.

16 - Ec. Growth	0	0	Neither option has an identified impact upon the sustainability objective for economic growth.
Summary of Appraisal:			
Both options (a) and (b) provide support (with caveats) for older persons accommodation. However, as option (a) is more explicit in its support and recognises a need for such accommodation, it is likely that more positive impacts could arise. In particular, social objectives (1) and (2) are likely to receive more positive outcomes with option (a) in place. In addition, option (a) provides certain requirements related to sustainable travel which is not present in DP30: Housing Mix (option (b)) and therefore more positive impacts are expected against this objective.			
Cross-Border Impacts:			
There are no cross-border impacts likely to arise from this policy.			
Recommendations and Mitigation Measures:			
None suggested			
Preferred Option:	A		