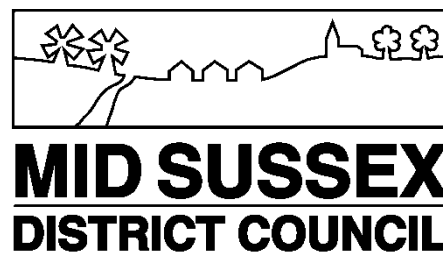


# Mid Sussex



Site Allocations DPD  
Sustainability Appraisal  
(Incorporating Strategic Environmental  
Assessment)

## Post Adoption Statement

29<sup>th</sup> June 2022

## Introduction

1. Mid Sussex District Council adopted the Site Allocations Development Plan Document (the 'Sites DPD') on 29<sup>th</sup> June 2022.
2. A Sustainability Appraisal (SA) report is a requirement of the Planning and Compulsory Purchase Act 2004 (Section 19). Section 39 of the Act requires documents such as the Sites DPD 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 plans such as the Sites DPD – promoting sites or policies that are sustainable, and ruling out those which are deemed unsustainable. Undertaking this process can improve the overall sustainability of the Sites DPD, help inform the content whilst documenting how the plan meets the legal and policy requirements.
3. Strategic Environmental Assessment (SEA) involves evaluation of the environmental impacts of a plan or programme. The requirement for SEA is set out in the European Directive 2001/42/EC adopted into UK law as the "Environmental Assessment of Plans or Programmes Regulations 2004". The SEA process is very similar to the Sustainability Appraisal process. The key difference is that it is only concerned with environmental impacts as opposed to social and economic impacts within the SA. There is also more prescriptive guidance and tasks that need to be followed in order to meet the SEA Directive's requirements.
4. Best practice suggests incorporating the SEA process into the Sustainability Appraisal due to their similarity in aim and methodology. This enables social, environmental and economic effects to be considered together in order to document the full picture of sustainability and to show a holistic outcome. National Planning Practice Guidance states that "where the [SEA] Directive applies there are some specific requirements that must be complied with and which, in the case of Local Plans, should be addressed as an integral part of the sustainability appraisal process"<sup>1</sup>.
5. This 'Post Adoption Statement' is prepared in accordance with Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations (2004) which requires Local Planning Authorities to produce an environmental report to accompany an adopted Local Plan. Part 4 of Regulation 16 states that such a report must contain the following particulars:
  - a) How environmental considerations have been integrated into the plan;
  - b) How the environmental report has been taken into account;
  - c) How opinions expressed in response to public consultation<sup>2</sup> have been taken into account;
  - d) The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and
  - e) The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan.
6. Because Mid Sussex District Council followed best practice by incorporating the SEA into the SA, this statement provides information beyond the environmental particulars listed above to include the broader sustainability appraisal process.

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<sup>1</sup> National Planning Practice Guidance, Ref: 11-003-20140306

<sup>2</sup> Regulation 13(2)(d) and 13(4).

7. This statement examines each of these points in turn.

## **A) How environmental and sustainability considerations have been integrated into the plan**

8. In order to carry out a Sustainability Appraisal of the Site Allocations DPD, key issues and challenges facing the district were identified and sustainability objectives were established against which the proposed reasonable alternatives for sites and policies could be assessed to ensure the Plan represented the most sustainable way forward for Mid Sussex.
9. A Scoping Report was published and consulted upon in May 2019. This presented the data that was collected and analysed to establish the current position with regard to Social, Environmental and Economic aspects so that predicted future impacts of sites and policies within the plan can be predicted.
10. This data was used to lay out the baseline position of Mid Sussex, describing the underlying state of the district, which then helped to identify sustainability issues and aimed to predict where they could arise in the future.
11. It was found that although Mid Sussex offers a high quality of life, the Sites DPD (in combination with District Plan policies) would need to manage a series of issues over the lifetime of the Plan if the district is to continue to be successful and the negative impacts of development are to be properly mitigated.
12. These issues and challenges include:

### **Social**

- an increasing population, and the need for additional infrastructure capacity or improvements in order to meet the needs of new households;
- an ageing population is likely to increase the demands on health and social care, in particular the need for residential nursing care;
- a changing and aging population, that may create potential gaps in the jobs market and the need for the District's housing stock to be fit to meet future needs;
- need for affordable housing cannot be met by existing or planned supply and therefore new affordable housing must be built to meet needs;
- house prices in Mid Sussex are high relative to average incomes, and this causes affordability issues, particularly for young people;
- primary care provision in the form of community health services will need to be improved in all the major settlements in the District;
- existing school capacity issues will need to be addressed;
- existing secondary schools in Burgess Hill will not have capacity to cater for the number of pupils generated by large-scale development envisaged in the north/northwest of Burgess Hill;
- car ownership and use is high, contributing to congestion and climate change. This may be a reflection of high average income, or limited access to public transport in the rural areas;
- high vehicle ownership and the potential for highway congestion arising from development, opportunities to promote sustainable modes of transport and interventions and schemes that mitigate the impact of developments on the transport network and environment should be encouraged;

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

## **Environmental**

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

## **Economic**

- Mid Sussex has a relatively high level of in and out commuting for work, which impacts on traffic and environmental quality. Whilst it is recognised that commuters make a significant financial contribution to the District, it is important that appropriate employment opportunities are promoted within the District to ensure people who live locally can work locally;
  - The downturn in the rural economy in recent years. Although the relatively small growth in businesses within the District shows that this may be improving, this needs to be maintained;
  - There are already infrastructure deficits in sewerage and water supply, transport, open space and sports/ play provision, and there are public concerns that further development will exacerbate these problems;
  - The District's three town centres would benefit from regeneration and renewal so that they can be attractive retail, leisure and commercial hubs each with their own distinctive character.
13. By understanding these issues, a range of sustainability objectives were developed which were used to assess the contribution that the Sites DPD could make towards achieving sustainable development in the district. These were consulted upon as part of the Scoping Report. These objectives are based on the three strands of sustainability: Social, Environmental and Economic.

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.
  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)
  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.
14. The Sustainability Appraisal of the adopted District Plan tested the proposed strategy within the District Plan against these sustainability objectives at each stage. Therefore, strategic matters were tested during that process, and no further reasonable alternatives required assessment through the Sites DPD. In addition, there are a number of strategic matters (such as the housing requirement) that are not appropriate to be included within a daughter document such as the Sites DPD, the role of which is not to re-assess strategy within a higher order plan. Therefore, the Sites DPD SA/SEA focussed on testing a range of reasonable alternatives for sites and accompanying policies, in accordance with the strategy set out in the District Plan. By doing this, all reasonable alternatives were considered and their relative sustainability recorded to determine the most sustainable policies and sites for inclusion within the Sites DPD. This ensured that the plan itself is the most sustainable given all reasonable alternatives.

## B) How the Environmental Report (Mid Sussex District Plan Sustainability Appraisal) has been taken into account

15. A Sustainability Appraisal Scoping Report (incorporating Strategic Environmental Assessment) was consulted upon in May 2019. This allowed statutory consultees and other interested parties to comment on the baseline information, the sustainability issues and challenges, and the Sustainability Framework that had been established. Comments received during the Scoping Report consultation were acted upon where possible, and helped inform future stages of the process.
16. The Sustainability Appraisal was undertaken concurrently with the Sites DPD, informing each stage of its progression. It has been reviewed, updated and published for consultation alongside each of the key stages of the Sites DPD's preparation, including continued assessment of the proposed Modifications during the examination of the DPD.
17. The following stages of the Sites DPD were accompanied by a Sustainability Appraisal:
  - Consultation Draft (Regulation 18) – September 2019
  - Proposed Submission (Regulation 19) – July 2020
  - Main Modifications – November 2021
  - Adoption – June 2022
18. Each stage was subject to a minimum 6-week consultation period in accordance with the regulations and the Council's Statement of Community Involvement.
19. The Sustainability Appraisal report was originally published for consultation in September 2019 to accompany the Regulation 18 DPD. The submission version of the Sustainability Appraisal report (July 2020) appraised further changes, taking into account responses made during the consultation period, factual updates and alternative options that had arisen.
20. During examination, the Inspector identified 22 Main Modifications that were required in order to ensure the plan was legally compliant and sound. The Main Modifications were appraised in a Main Modifications Sustainability Appraisal that should be read alongside the Submission version.
21. The expected impact of the Plan's strategy and policy options were considered against each of the sustainability objectives, documented above. This analysis was simplified by using the following coding.

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

22. The scoring system (using a range between '++' and '--') is consistent with other Sustainability Appraisals undertaken by the District Council (including the adopted District Plan SA) and is suggested as an appropriate method to take in the SEA

guidance. No mathematical models or calculations have been made in order to conclude whether the policy will perform positively or negatively against each sustainability objective. This is due to the nature of the DPD; data for every policy option and its likely effect is not always readily available, therefore making it impractical to quantify the effects and their extents in this way. A qualitative approach is therefore more appropriate and manageable and is based on professional judgement.

23. The reasonable alternative options for sites was based on the findings within the Site Selection Paper (SSP3: Housing and SSP4: Employment) which were published to support the submission of the Sites DPD. These include the methodology for filtering sites contained within the Strategic Housing and Economic Land Availability Assessment (SHELAA) which carries out an assessment of land availability and its suitability/availability/achievability at a high level. The filtering process helped arrive at the reasonable alternatives for further testing in the SA and reject sites that were not considered suitable for development.
24. At each stage, the findings of the Sustainability Appraisal (incorporating SEA) have informed development of the Sites DPD. For example:
  - Identifying sites that perform well, perform poorly or are 'marginal'
  - Assessing how the performance of sites compares against the Spatial Strategy which is established within the adopted District Plan
  - Assessing the extent to which the sites that 'perform well' help meet the housing requirement, and whether there should be an over-supply for resilience
  - Assessing the 'marginal' sites to establish whether any individual site or collection of sites could help increase housing supply without any negative sustainability impacts (i.e. positives outweigh negatives)
  - Assessing the approach to employment supply e.g. allocating sites or relying on windfall, and the broad spatial options for site allocation
  - Assessing a range of strategic policy options that accompany the site allocations
25. Each appraisal sets out the options appraised, the scoring against each objective, a summary of the appraisal and the preferred policy option. The short, medium and long term impacts are set out, and mitigation is suggested where necessary. Cross-border impacts are also set out where relevant.

## **C) How opinions expressed in response to public consultation have been taken into account**

26. Each stage of the Sustainability Appraisal (incorporating Strategic Environmental Assessment) has been subject to public consultation. Each consultation period has been aligned with consultation on the District Plan, and lasted a minimum of 6 weeks in accordance with the regulations and the Council's adopted Statement of Community Involvement (SCI). Consultation has been undertaken at the following stages:
  - Scoping Report (May 2019)
  - Consultation Draft (Regulation 18) – September 2019

- Proposed Submission (Regulation 19) – July 2020
  - Main Modifications – November 2021
27. Appendix 1 shows the list of Statutory Consultees who have been informed at each stage of consultation and invited to comment. In addition to this, notifications regarding the consultation were sent to the Council's email subscriber list and to those who had commented at previous stages of the process. Therefore a range of individuals, residents, organisations and statutory providers have been invited to comment on the SA/SEA.
28. All comments made at each consultation stage have been made available for inspection on the Council's website in summary format.
29. Comments received during consultation have informed future stages of the SA/SEA. In particular:
- Comments received by statutory bodies at the Scoping Report stage led to revisions to the Sustainability Framework. In particular, revisions and additions to the objectives and indicators were made.
  - Factual inaccuracies in baseline information were corrected.
  - The assessment of impacts ('scoring') against each objective were re-appraised and amended where evidence provided by the representor meant that a change was required. As this is an area of professional judgement, it was often not appropriate to amend scoring, or amendments suggested were not consistent across all appraisals. However, on a number of occasions, representors highlighted areas of potential inconsistency or provided evidence to justify a change in score – where this was the case, the score was amended at future stages of appraisal.
  - Further reasonable alternatives suggested by representors have been included in future versions of the SA/SEA and appraised as necessary. For example, where alternative site options were presented, the Site Selection methodology was applied (SSP3 and SSP4) – if it performed well against the methodology and site concluded a reasonable alternative, this was appraised in the next iteration of the SA.
  - Where policies have been added or amended (particularly by the Inspector during examination) the effect of adding/removing the policy has been appraised and then subject to consultation (this is documented in the Main Modifications report).
30. The SA/SEA has therefore responded to comments received during the formal consultation processes. The SA/SEA has been subject to extensive public consultation at all stages of preparation, in accordance with the relevant regulations. This has provided interested parties with the opportunity to comment on the appraisal, and modifications to the appraisals have been made where relevant – this has led to a robust appraisal, scrutinising the scoring and conclusions, which ensures the most sustainable options have been chosen. This in turn has led to the Sites DPD containing the most sustainable strategy and policies, given all reasonable alternatives.



## **D) The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with**

31. Following the Scoping Report (May 2019), a consultation draft SA (accompanying the Regulation 18 Sites DPD) was produced. This was the first stage of the SA/SEA process that set out the preferred sites and policy options, alongside all reasonable alternative options considered. As the SA/SEA process is an iterative process, further options have been included at each future stage, and appraised as necessary.
32. The assessment of the Sites DPD sites and policies found there were generally positive effects for social and economic Sustainability Objectives. There are fewer positive impacts on environmental objectives, however this is due to the conflicts identified within the SA/SEA related to development and protection of the countryside. Therefore, these impacts are not expected to be as positive compared to social/economic objectives, however policies within the Plan itself will help to limit any negative impacts and mitigation is suggested where appropriate.
33. The main findings from the SA/SEA were as follows:

### **Social Conclusion**

34. There is an overall positive impact to be expected in terms of the social objectives. The Sites DPD will include housing sites enabling communities to have an opportunity to live in a home suitable for their needs (Objective 1). Infrastructure is planned alongside housing and employment sites; for example, provision of new community facilities or upgrades to existing. This is likely to have a positive impact on objectives relating to education and health for example. There are also a number of secondary benefits from policies relating to the environment – for example, provision of open space alongside development, which can have social (health) benefits.

### **Environmental Conclusion**

35. The District Plan contains policies that aim to protect and enhance the environment, and individual site allocation policies within the Sites DPD also contain necessary environmental mitigations. When read in combination, positives for social/economic objectives outweigh negatives. This is because the policies are not restrictive and allow for some development whilst ensuring that the valuable natural environment in Mid Sussex is protected.

### **Economic Conclusion**

36. Allocation of employment land will have positive economic impacts, alongside the additional policy (SA34) relating to protection of employment land which strengthens existing District Plan policy. There are also secondary benefits likely to be achieved from policies promoting housing, infrastructure and community facilities. Very few negative impacts on the economic objectives are likely to arise from the proposed policies in the District Plan.

### **Overall Conclusion**

37. The Inspector's Report (May 2022) for the Sites DPD confirms that the SA has been undertaken adequately. It notes (paragraphs 28 and 29) that there are no adverse impacts that can not be effectively mitigated, that most preferred options do not contain

any significant negative impacts and that the SA was methodical, clear and transparent and therefore robust.

## **E) The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan**

38. The effects of the Sites DPD need to be monitored to identify any unforeseen, adverse effects and to allow for remediation action to take place. It also highlights where policies are working well. Questions that should be addressed through the monitoring process include:
  - Whether the Sustainability Appraisal assumptions about the impact of the sites and policies are accurate
  - Whether the Sites DPD is contributing towards meeting the sustainability objectives
  - Are there any other effects from the implementation of the Sites DPD that need to be considered?
39. A monitoring schedule has been produced which sets out a range of indicators including output indicators, that assess the impact of individual policies and contextual indicators that facilitate understanding of the wider context that may be influencing output indicators or identify where future intervention may be necessary. These are based on those used for the Sustainability Appraisal to maintain close links between the two documents. Identifying trends within the data associated with these objectives will help measure how well the plan contributes to sustainable development throughout the plan period, and to highlight any unforeseen adverse effects to enable appropriate remedial action to be taken where possible.
40. Appendix 2 of the Sustainability Appraisal shows the current baseline data. This appendix forms the monitoring framework, which will be updated annually through the District Council's Authority Monitoring Report (AMR).
41. If it appears that policies are not effective or are no longer appropriate in the light of more recent national policies or local circumstances, then action will be taken to review the policy or policies concerned.

## Appendix 1 – List of Statutory Consultees

Ref#	Organisation	Behalf Of
331	Adur and Worthing Councils	
330	Albourne Parish Council	
547	Albourne Parish Council	
342	Ansty and Staplefield Parish Council	
351	Ardingly Parish Council	
369	Arun District Council	
368	Ashurst Wood Village Council	
527	Avison Young	National Grid
364	Balcombe Parish Council	
341	Bolney Parish Council	
305	Brighton and Hove City Council	
315	British Telecom	
316	BT Plc	c/o RPS Planning
360	Burgess Hill Town Council	
329	Burstow Parish Council	
323	Chailey Parish Council	Chailey Parish Council
317	Colgate Parish Council	Colgate Parish Council
319	Cowfold Parish Council	Cowfold Parish Council
346	Crawley Borough Council	
367	Cuckfield Parish Council	
374	Danehill Parish Council	Danehill Parish Council
324	Ditchling Parish Council	
327	Dormansland Parish Council	Dormansland Parish Council
353	East Grinstead Town Council	
355	East Sussex County Council	
371	EE	
370	EMF Enquiries - Vodafone and O2	
365	Environment Agency	
328	Felbridge Parish Council	
326	Fletching Parish Council	Fletching Parish Council
366	Forest Row Parish Council	
343	Fulking Parish Council	
358	Hassocks Parish Council	
354	Haywards Heath Town Council	
308	Highways England	
347	Historic England	
333	Homes and Communities Agency	
335	Horsham District Council	
348	Horsted Keynes Parish Council	
340	Hurstpierpoint & Sayers Common Parish Council	

502	Hurstpierpoint & Sayers Common Parish Council	
309	Lewes District Council	
344	Lindfield Parish Council	
363	Lindfield Rural Parish Council	
318	Lower Beeding Parish Council	Lower Beeding Parish Council
338	Mobile Operators Association	
350	National Grid	
307	Natural England	
349	Natural England	
310	Network Rail (Kent, Sussex, Wessex)	
345	Newtimber Parish Council	
352	NHS West Sussex Clinical Commissioning Group	
301	Poynings Parish Council	
302	Pyecombe Parish Council	
320	Shermanbury Parish Council	Shermanbury Parish Council
303	Slaugham Parish Council	
332	South Downs National Park Authority	
336	South East Water	
306	Southern Gas Network	
311	Southern Water	
313	Surrey County Council	Surrey County Council
314	Sussex NHS Commissioners	
334	Sussex Police	
375	Sussex Police	
373	Sutton and East Surrey Water	
362	Tandridge District Council	
339	Thames Water Utilities Ltd (Thames Water)	
372	Three	
357	Turners Hill Parish Council	
359	Twineham Parish Council	
337	UK Power Networks	
322	Upper Beeding Parish Council	Upper Beeding Parish Council
356	Wealden District Council	
361	West Hoathly Parish Council	
312	West Sussex County Council	
325	Wivelsfield Parish Council	Wivelsfield Parish Council
321	Woodmancote Parish Council	Woodmancote Parish Council
298	Worth Parish Council	