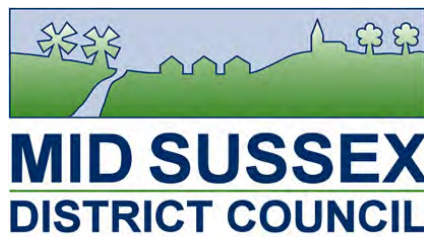


COUNCIL

2 NOVEMBER 2022



25 October 2022

Unless a majority of the Council resolve to extend the meeting before 10.00 pm it will automatically end at 10.00 pm in accordance with Council Procedure Rule 17.2.

NOTE: There will be limited public access to observe the meeting. Those wishing to do so must reserve a seat by completing a [Registration Form](#) by 4pm on the working day prior to the meeting. Access is also available via a live stream through the [Mid Sussex District Council's YouTube channel](#).

To all Members of the Council,

You are hereby summoned to attend a meeting of the **MID SUSSEX DISTRICT COUNCIL** to be held in the **COUNCIL CHAMBER** on **WEDNESDAY, 2ND NOVEMBER, 2022** at 7.00 pm to transact the following business:

Yours sincerely,

KATHRYN HALL
Chief Executive

Pages

- | | | |
|----|---|-----------------|
| 1. | Opening Prayer. | |
| 2. | To receive questions from members of the public pursuant to Council Procedure Rule 9. | |
| 3. | To confirm Minutes of the meeting of Council held on 12 October 2022. | 5 - 16 |
| 4. | To receive declarations of Interest from Members in respect of any matter on the Agenda | |
| 5. | To consider any items that the Chairman of the Council agrees to take as urgent business. | |
| 6. | Chairman's Announcements. | |
| 7. | Consultation Draft District Plan - Regulation 18. | 17 - 776 |

Working together for a better Mid Sussex



8. Mid Sussex Net Zero Targets.
9. To receive the Leader's Report.
10. Report of Cabinet Members, including questions pursuant to Council Procedure Rule 10.1.
11. Motions on Notice.

777 - 904

MOTION A: FRACKING

Proposed by: Cllr Alison Bennett
Seconded by: Cllr Benedict Dempsey

This Council notes that:

- The government has lifted the moratorium on shale gas production (“Fracking”) in England, and confirmed its support for a new oil and gas licensing round
- The government has stated that fracking will only take place where there is local support, and therefore the public position of this Council is important.
- The Weald Basin is known to hold shale gas deposits and 45% of Mid Sussex (constituency) is already licensed for oil and gas exploration
- The economic benefits of Fracking in the UK is uncertain, but that there are clear environmental concerns which have been well documented.
- Whilst exploitable reserves in the Weald Basin may not be economically viable to extract, the lifting of the moratorium poses a risk to the environment of Mid Sussex.

Accordingly, this Council resolves to oppose any oil and gas exploration, including fracking, in the District of Mid Sussex.

12. Questions from Members pursuant to Council Procedure Rule 10.2.

To: **Members of Council:** Councillors M Belsey (Chairman), P Coote (Vice-Chair), K Adams, G Allen, J Ash-Edwards, R Bates, J Belsey, A Bennett, L Bennett, A Boutrup, P Bradbury, P Brown, H Brunsdon, R Cartwright, P Chapman, R Clarke, E Coe-Gunnell White, M Cornish, R Cromie, J Dabell, R de Mierre, B Dempsey, J Edwards, S Ellis, R Eggleston, A Eves, B Forbes, L Gibbs, I Gibson, S Hatton, J Henwood, S Hicks, S Hillier, T Hussain, R Jackson, J Knight, C Laband, Andrew Lea, Anthea Lea, G Marsh, J Mockford, A Peacock, C Phillips, M Pulfer, R Salisbury, S Smith, A Sparasci, L Stockwell, D Sweatman, C Trumble, N Walker, R Webb, N Webster and R Whittaker

**Minutes of a meeting of Council
held on Wednesday, 12th October, 2022
from 7.00 pm - 9.17 pm**

Present: M Belsey (Chairman)
P Coote (Vice-Chair)

K Adams	J Dabell	Andrew Lea
G Allen	J Edwards	Anthea Lea
J Ash-Edwards	S Ellis	G Marsh
R Bates	R Eggleston	J Mockford
J Belsey	A Eves	C Phillips
A Bennett	B Forbes	R Salisbury
L Bennett	I Gibson	S Smith
P Bradbury	J Henwood	A Sparasci
P Brown	S Hicks	L Stockwell
R Cartwright	S Hillier	D Sweatman
P Chapman	T Hussain	C Trumble
R Clarke	R Jackson	N Walker
M Cornish	J Knight	R Webb
R Cromie	C Laband	R Whittaker

Absent: Councillors A Boutrup, H Brunsdon, E Coe-Gunnell White, R de Mierre, B Dempsey, L Gibbs, S Hatton, A Peacock, M Pulfer and N Webster

The Council observed a minute silence in memory of the late Monarch, Her Majesty Queen Elizabeth II.

1. OPENING PRAYER.

The opening prayer was read by the Vice-Chairman.

2. TO RECEIVE QUESTIONS FROM MEMBERS OF THE PUBLIC PURSUANT TO COUNCIL PROCEDURE RULE 9.

The following question was received from Mr Kenwood

BOP Consulting in their final report on the future of Clair Hall make reference to the fact that Haywards Heath has cultural provision typical for a town of its size. Could council please state what the cultural provisions and facilities referred to were in their comparisons and also what were the towns that Haywards Heath was compared with in order to reach that conclusion.

The following response was provided by the Leader:

Thank you. You will be aware that BOP is a nationally and internationally recognised research and consulting practice for culture and the creative economy. Their two reports are based on their extensive experience working with cities and towns across

the country. The comparison is based on their standard approach to mapping the culture and creative sector. They detailed the methodology used, including the indicators they looked at when mapping the cultural landscape in the area, in their interim report published in July. The mapping exercise outcomes are detailed in the table on page 12 in the interim report, in Section 4 The Cultural Landscape of Haywards Heath. Appendix B provides details on the mapping indicators and their definitions.

Mr Kenward's supplementary question sought to clarify the second part of his original question: what were the towns that Haywards Heath was compared with? In response, the Leader directed Mr Kenward to the sections of the report mentioned above which sets out the mapping and methodology used by BOP.

The following question was received from Ms Wilcock

The BOP report "Lead Specialist Advisor Clair Hall: Final Report" recently released by the Council, based its advice on potential sector target audiences by reference to a Council report now 6 years out of date, which does not take into account recent extensive housing developments.

Empirical evidence from the Haywards Heath Arts Festival shows in particular there is a strong demand and support for arts and cultural activities by young people, with events being sold out with standing room only.

What action is the Council taking to accurately ascertain the current demographics of Haywards Heath before taking any further action.

The following response was provided by the Leader:

Thank you for your question. It is pleasing to hear of the success of the Haywards Heath Arts Festival and that you found suitable venues for the events.

BOP based their advice on numerous information sources. This included 2021 census results which were partially released this summer. In their report they observed that new Census data suggest the demographic changes across Mid Sussex District as a whole support the trends estimated in the report you referred to. I welcome your comments, based on your recent empirical experience. BOP's work recognises the strength of our local audience and accounted for that in their final report and recommendations (which will be considered by Cabinet next week) . This is certainly something we will promote and want to build on going forward. Equally, BOP advise us that it is a very challenging economic climate to deliver culturally focused projects. Therefore, the Council is taking this robust, evidence-based approach to this project. We believe this gives us the best chance to take this work forward and be successful in securing a cultural anchor tenant for the site.

Mrs Wilcock posed a supplementary question asking, 'does that mean you are not going to have any review of the audience sectors referred to in the BOP report, which may be inaccurate?' In response the Leader noted that he had already answered the question in relation to BOP using the most up to date evidence in their report, including the 2021 census data.

3. TO CONFIRM MINUTES OF THE EXTRAORDINARY MEETING OF COUNCIL HELD ON 10 AUGUST 2022.

The minutes of the extraordinary meeting of Council held on 10 August 2022 were agreed as a correct record of the meeting and signed by the Chairman.

4. TO RECEIVE DECLARATIONS OF INTEREST FROM MEMBERS IN RESPECT OF ANY MATTER ON THE AGENDA.

The following Councillors declared an interest in relation to item 9 of the agenda due to being Members of Burgess Hill Town Council: Councillors Eggleston (Leader), Eves, Hicks, Henwood, Cornish, Hussain, Allen, Chapman and Cartwright. Councillor Bradbury declared an interest in item 9 due to being a Member of West Sussex County Council.

Councillor Jackson declared an interest relating to item 11 due to being a Member of Hurstpierpoint and Sayers Common Parish Council.

Councillors Sweatman and Dabell declared an interest relating to item 10 due to being Members of East Grinstead Town Council.

Councillors Gibson, Coote, Webb and Phillips declared an interest relating to item 12 due to being Members of Worth Parish Council.

5. TO CONSIDER ANY ITEMS THAT THE CHAIRMAN OF THE COUNCIL AGREES TO TAKE AS URGENT BUSINESS.

None.

6. CHAIRMAN'S ANNOUNCEMENTS.

The Chairman highlighted the Chairman's Charity Fundraising Concert taking place on October 20th noting that all Members are invited to help support the Kangaroos Disability Clubs charity.

The Chairman also acknowledged that Tom Clark, Corporate Solicitor will be leaving the Council after 15 years and invited comments from Group Leaders. The Leader along with the Group Leaders for the Green Party, Liberal Democrats and the Independent Group, as well as Cabinet Members and Chairmen of Committees thanked Tom for his significant contribution to the Council's work as Solicitor, Monitoring Officer and Returning Officer, noting his valuable and in-depth advice given with patience and humour which has been of immense help to both new and returning Members.

7. REPORT OF THE RETURNING OFFICER AS TO THE PERSON ELECTED AS DISTRICT COUNCILLOR FOR THE WARD OF BOLNEY ON 15 SEPTEMBER 2022.

The Chairman moved the item from the Chair, taking Members to a vote as set out in the recommendation which was approved unanimously. In announcing the result, the Chairman welcomed Councillor Adams to the Council.

RESOLVED

Council noted the election of Councillor Kristy Adams as District Councillor for Bolney.

8. APPOINTMENT OF SENIOR OFFICERS.

The Leader moved the item noting that it is a statutory requirement that Council formally approves the appointment to statutory posts. In doing so he welcomed the conclusion of the leadership restructure process. The item was seconded by the Deputy Leader.

The Chairman took Members to a vote on the recommendations as set out in the report which were approved.

RESOLVED

Council agreed the appointment of:

- (a) Rachel Jarvis as the Council's Section 151 Officer;
- (b) Geoff Wild as the Council's Interim Monitoring Officer;
- (c) Kathryn Hall as the Council's Returning Officer and Electoral Registration Officer;
- (d) Louise Duffield to the Director Resources and Organisational Development post.

9. COMMUNITY GOVERNANCE REVIEW - FINAL RECOMMENDATIONS FOR BURGESS HILL TOWN COUNCIL (BHTC) AND ANSTY AND STAPLEFIELD PARISH COUNCIL.

Councillor Anthea Lea moved the item as Chairman of the Scrutiny Committee for Community, Leisure and Parking. She noted that the review was initiated following a valid petition submitted by the requisite number of local registered electors which required that the Council review the extent of the electoral wards of the Burgess Hill Town Council considering the Local Government Boundary Commission's (LGBCE) creation of two new parish wards, Northern Arc East, and Northern Arc West and to consider the number of Councillors required. Acknowledging that the review has been through two public consultations and considered by the Scrutiny Committee, she proposed that Council agree the recommendations as set out in the report and agree the naming of the two Northern Arc Wards as outlined in paragraph 20 and 21 of the report (Northern Arc East to become Brookleigh East and Northern Arc West to become Brookleigh West). She also proposed that the Council consider a fresh Community Governance Review (CGR) in 2025. This was seconded by Councillor Dabell.

Council debated the ward naming conventions with some Members noting that there was a case for more localised naming of the wards using recognisable landmarks and no statutory reason to go with the Brookleigh name which had been decided by Homes England as part of their marketing for the area. With regards to the potential Community Governance Review (CGR) in 2025, it was noted that a significant number of residents who will live in that area have not yet had a chance to comment and therefore a further review will give them that opportunity. Clarity was sought on whether the CGR is provisional or not, with the Solicitor to the Council noting that there will be a new Council in 2023 with the intention to bring various reviews back, depending on the views at the time.

The Chairman took Members to a vote on the recommendations as set out in the report seeking agreement to name the two wards added to Burgess Hill as Brookleigh East (for the Northern Arc East Ward) and Brookleigh West (for the Northern Arc West Ward) and the proposal to hold a further CGR in 2025. This was approved with 32 in favour and 12 abstentions.

RESOLVED

Council approved the principal electoral authority's final recommendations for Burgess Hill Town Council and Ansty & Staplefield Parish Council as set out at paragraphs 19 – 27 of the report with agreement to name the two wards added to Burgess Hill as Brookleigh East (for the Northern Arc East Ward) and Brookleigh West (for the Northern Arc West Ward) and to consider a further CGR in 2025.

10. COMMUNITY GOVERNANCE REVIEW - FINAL RECOMMENDATIONS FOR EAST GRINSTEAD TOWN COUNCIL (EGTC).

Councillor Anthea Lea moved the item as Chairman of the Scrutiny Committee for Community, Leisure and Parking noting that the review was initiated following a request from East Grinstead Town Council asking the Council to consider how Town wards could be aligned to District wards, and to consider the reduction of the number of Councillor numbers from 19 to 16. This was seconded by Councillor Dabell.

The Chairman took Members to a vote on the recommendations as set out in the report. This was approved with 38 in favour, 1 against and 5 abstentions.

RESOLVED

Council approved the principal electoral authority's final recommendations for East Grinstead Town Council as set out at paragraphs 16 – 20 of the report.

11. COMMUNITY GOVERNANCE REVIEW - FINAL RECOMMENDATIONS FOR HURSTPIERPOINT AND SAYERS COMMON PARISH COUNCIL.

Councillor Anthea Lea moved the item as Chairman of the Scrutiny Committee for Community, Leisure and Parking noting that the review was initiated following a valid petition submitted by the requisite number of local registered electors. The petition called on the Council to constitute a new Parish Council for the existing Sayers Common parish ward, however following two public consultations and consideration by the Scrutiny Committee it is proposed to make no changes to the governance arrangements at this time. This was seconded by Councillor Dabell.

Discussion was held on distinct identities of both Hurstpierpoint and Sayers Common, including how residents align themselves depending on which side of the A23 they live. Members agreed that this is not the right time to redraw Parish boundaries.

The Chairman took Members to a vote on the recommendations as set out in the report. This was approved with 43 in favour and 1 abstention.

RESOLVED

Council approved the principal electoral authority's final recommendations for Hurstpierpoint & Sayers Common Parish Council as set out at paragraphs 23 – 26 of the report to make no changes to the Governance arrangements for Hurstpierpoint & Sayers Common Parish at this time.

12. COMMUNITY GOVERNANCE REVIEW - FINAL RECOMMENDATIONS FOR WORTH PARISH COUNCIL (WPC).

Councillor Anthea Lea moved the item as Chairman of the Scrutiny Committee for Community, Leisure and Parking noting that the review was initiated following a valid petition submitted by the requisite number of local registered electors. The petition called for the Council to constitute a new Parish Council for the existing Crawley Down parish ward, however following two public consultations and consideration by the Scrutiny Committee it is proposed to make no changes to the governance arrangements at this time. This was seconded by Councillor Dabell who noted that for financial reasons, it was not the right time to make a change.

The Vice Chairman clarified a point which had been raised during the Scrutiny process, confirming that he had not initiated the proposed split. Discussion was held around the potential to consider a division in the future once developments in the area are complete, noting that each area had a unique identity with unique issues. It was also mentioned that a change of name for Worth Parish Council ought to be considered in the future, to accurately reflect the area and avoid confusion with an area in Crawley, also called Worth.

The Chairman took Members to the recommendations as contained in the report which were agreed with 30 in favour, 1 against and 13 abstentions.

RESOLVED

Council approved the principal electoral authority's final recommendations for Worth Parish Council as set out at paragraphs 25 – 31 of the report to make no changes to the Governance arrangements for the Worth Parish at this time.

13. RECOMMENDATIONS FROM CABINET HELD ON 26 SEPTEMBER 2022.

The Leader moved the item, highlighting the forthcoming challenges facing the Council in relation to both rising energy costs and inflation on the Council's budget for 2022/23, something that is faced by Local Authorities nationally at this time. The Deputy Leader seconded the item acknowledging the challenging financial position but noting the number of exciting projects in the Capital Programme which despite the financial position will continue to support residents in the short to medium term.

In response to a question on what is being done to reduce energy demand on Council premises and with partner organisations, the Leader noted that the Council continues to promote ways of being energy efficient on site, (including the use of solar panels) and will continue to take those opportunities as they arise.

The Chairman took Members to a vote on the recommendations as contained in the report which was agreed unanimously.

RESOLVED

Council approved:

- (i) that £150,000 grant income from WSCC in respect of a payment for Ukraine Support be transferred to Specific Reserve as detailed in paragraph 27 of the Cabinet report;
- (ii) that £20,000 grant income relating to Neighbourhood Planning be transferred to Specific Reserve as detailed in paragraph 28 of the Cabinet report;
- (iii) that £445 grant income for new burdens relating to Council Tax Submissions be transferred to Specific Reserve as detailed in paragraph 29 of the Cabinet report;
- (iv) that £16,335 grant income relating to Housing Benefit Award Accuracy Initiative be transferred to Specific Reserves as detailed in paragraph 30 of the Cabinet report;
- (v) that £62,857 grant income from WSCC relating to Employment Projects Coordinator be transferred to Specific Reserve as detailed in paragraph 31 of the Cabinet report;
- (vi) the variations to the Capital Programme contained in paragraph 35 of the Cabinet report in accordance with the Council's Financial Procedure rule B3.

14. TO RECEIVE THE LEADER'S REPORT.

The Leader began by welcoming Councillor Adams and noting apologies received from 2 Cabinet Members. He addressed the cost-of-living issues faced by residents and provided reassurance that the Council will continue to play a part in supporting local communities in the months ahead. He noted that the Council plays an important role in providing financial support to residents on lower income and those in financial difficulty. To date this year over £18m has been given in housing and council tax support schemes as well as through the exceptional hardship scheme and discretionary housing payments scheme. Food banks also offer immediate support across the district and the Council is in regular contact to offer support and grants where possible. There is also a winter support guide that has been produced by the Council to signpost people to further help. The Council community connections brochure has also been updated, providing information on services for older residents.

He drew attention to three items that the Council has been active in bidding for investment for the District. The first is the UK Shared Prosperity Fund which has an allocation for Mid Sussex of £1m over three years and requires an investment plan which the Council has submitted. Highlights of the fund include employability support to young people not in employment or education, development of community hubs and the roll out of the parks and town centre investment programmes and the outcome of the submission is expected soon.

A second submission has been made for the Levelling Up Fund for Burgess Hill Town Centre to unlock the redevelopment of the Martlets, the Church Walk public realm development and the digital hub. The Council's bid continues to score highly and an update is expected in November.

The third is in partnership with West Sussex County Council (WSCC). The Council will be making an expression of interest for investment in 2 sites (the technology park and the Martlets) to attract businesses to these two business zones. The Leader noted that recent press coverage has indicated it will have streamlined planning but

noted that both sites already are mature in planning terms and so planning powers have already influenced this. Should the expression of interest be successful, more discussions will be held with the Government to develop matters further. He concluded by thanking officers who worked at pace to deliver this on time, and thanked WSCC for their support as well.

Concern was raised by a number of Members that planning processes and environmental controls will be relaxed on these two sites to the detriment of the area. The Leader noted that although the Government has signalled a desire to streamline the processes, both sites are tightly defined sites that already have planning support by the Council. Careful consideration will happen at every stage to ensure they are going in the right direction. He reiterated that it is important to seek the opportunity to accelerate delivery of projects that people want, and it will provide tax incentives for businesses relocating and provides a competitive edge to the sites.

In response to a question on the Place and Connectivity Programme, the Leader confirmed that more projects have been identified that exceed the amount of funding available and the Church Walk programme has been one of them which is why the Council is bidding for more funding.

In response to a question on overlap between the WSCC Growth Bid and the Levelling Up Fund, the Leader confirmed that the growth deal remains in place and thanked WSCC for their constructive engagement.

Discussion was also held on warm hubs and food banks and the Leader referred Members to agenda item 16 which would provide more information.

15. REPORT OF CABINET MEMBERS, INCLUDING QUESTIONS PURSUANT TO COUNCIL PROCEDURE RULE 10.1.

Deputy Leader

The Deputy Leader thanked residents involved in the food waste trial noting there has been 80% participation with over 20 tonnes collected in the first few weeks. In response to a question regarding a local biodigester, he confirmed that the results of the pilot will need to be considered, and he has asked Officers to work on a potential for a local facility as one proposed option. In terms of garden waste, he confirmed that a business case is being compiled for an additional collection vehicle for consideration over the winter budget process for the new financial year.

He provided an update on the Centre for Outdoor Sports as meetings have been held with Officers, consultants and sports clubs and proposals are still being worked up for the facilities. He acknowledged that it is not anticipated to include an athletics track, and the athletics and running clubs are aware. Further meetings are proposed with England Athletics to address their needs. In response to Member's concerns regarding this lack of provision he noted that there are 4 tracks in about half hour of each other on the outskirts of the District and England Athletics has expressed concern about a 5th track taking valuable business from them. It would also mean that either the junior pitches or the first-class pitches could not proceed.

Discussion was held on the progression of park improvements to Finches Field and Hemsleys Meadow, and the lack of toilet facilities at King George Fields which the Deputy Leader agreed to investigate further.

Cabinet Member for Economic Growth and Net Zero

The Cabinet Member noted that the Micro Business Grant scheme totalling £71,428 was launched in April and £27,309 has been allocated so far. He also noted that the Economy team has provided support for Burgess Hill Science Week and Haywards Heath STEM Challenge as part of the Sustainable Economic Strategy action plan. In relation to that strategy, excellent Low Carbon videos were released in conjunction with WSCC and the link will be provided in the Member Information Bulletin.

He confirmed that the “Opportunity Mid Sussex” inward investment promotion materials have been completed and make a compelling case for bringing further economic activity to the district. A successful launch event was held in London on 7th September. There will be a joint local launch for Opportunity Mid Sussex and the Sustainable Economic Strategy at Edwards Vacuum in Burgess Hill on 17 November.

The Cabinet Member provided an update on the Gigabit connectivity programme which continues to go extremely well and on target, both in time and cost. In terms of commercial roll out he noted that a website is being promoted so that businesses can register interest and it is hoped to start connection to some businesses depending on size in the first quarter of 2023. The economy team has also continued business engagement via a quarterly newsletter and with the three Business Associations particularly around support for businesses through the universities’ RISE & Hothouse programmes, and about grants. Further support is also planned around digital adoption strategies and skills.

He noted that the ShopAppy app has already launched successfully in Burgess Hill (including Hassocks & Hurstpierpoint) and Haywards Heath (including Cuckfield & Lindfield) and will be launched in East Grinstead next week.

A Member posed a question regarding Scope 3 Carbon Emissions, and the Cabinet Member agreed to consider it further and provide a response.

Finally, in relation to the Burgess Hill Growth programme, he noted that an Employment & Skills Plan has been prepared with Homes England with regards to the Brookleigh development, to provide opportunities for local people through jobs training and apprenticeships.

Cabinet Member for Housing and Customer Services

The Cabinet Member noted that the Revenue and Benefits team are working hard to administer grants in unprecedented times. She acknowledged that the Head of Department Kevin Stewart is leaving the Council in October and thanked him for his expertise, energy, and enthusiasm.

She noted that the deadline for the Energy Rebate grant has passed, and the Council has now paid just under £6m to 40,000 recipients. Over £3m has been paid from the Covid Relief Fund. The Local Discretionary Scheme closes on 13 November and £571,500 has currently been paid out of £200,550.

The Council has also paid just under £15m on covid business grants and £3.4m from the Covid Additional Relief Fund.

With regards to the Comms team, she noted that they are working to promote the many initiatives that the Council is managing, and that Mid Sussex Matters will land with residents in November.

With regards to Housing, the Council is reducing the number of people in temporary accommodations by improving procedures. In August there were 83 households in temporary accommodation whereas there were 128 in December last year. As a contingency plan the Council has acquired 25 properties to use as temporary accommodation. with 6 more coming. 5 have been designed for single vulnerable people with complex needs.

We have had a successful bid for the rough sleepers accommodation funding and the Brighton Housing Trust Sussex have bought flats in Haywards Heath.

She noted that the objective of the Council is to intervene early in the process to prevent homelessness and the intervention and prevention team has been expanded to provide support. As at the end of August, 149 discretionary housing payments have been awarded, committing £82,690 to the most vulnerable residents. The Council is also working with other District Councils to utilise a £9203 award for the Domestic Abuse Act to help residents suffering abuse.

The Homelessness Prevention Grant is £432,728 and the spending will focus on preventing homelessness, contributing to ending rough sleeping and reducing temporary accommodation numbers.

An additional £90,733 this financial year to top up the Homelessness Prevention Grant and a one-off payment to support low-income households in private accommodation who have covid related arrears to avoid eviction or homelessness.

We are committed to preventing homelessness and at the end of August 7 rough sleepers were accommodated under the discretionary covid powers. Support is also needed for those still on street and in August a new mobile hub was launched, a Converted bus will allow Turning Tides to connect directly with the hidden homeless. The bus will be visiting 4 locations weekly and a flyer can be circulated for Members to promote.

The Cabinet Member noted that a joint bid to provide funding for a rough sleepers outreach service, Housing First and Turning Tides Support was successful and funds were awarded to support the off the street offer, split between Mid Sussex and Horsham.

She concluded by noting that WSCC has confirmed a local assisted network award will support Ferny Help, Haywards Heath food bank, East Grinstead food bank and children and family centres.

In response to a Member's question about the number of rough sleepers and homeless who may be from the Armed Forces, the Cabinet Member agreed to liaise with Turning Tides to see if this information is available. The Cabinet Member also agreed to share the content of this report by email.

Cabinet Member for Planning

The Cabinet Member discussed Development Management noting the positive statistics on the time taken in turning around planning applications and the increased number of applications which have been received this year. As an example, 1230 applications have been received so far this year against 1178 in 2020. Also, of major schemes determined in 13 weeks, 90% as an average have been turned around in that time. He also noted the reduction in the number of refused applications that went to appeal which is 15 in 2022 as opposed to 35 in the previous year.

He acknowledged that in terms of enforcement action, it is in the 90 percentile of enforcement that is acted on within 10 days.

The Cabinet Member provided an update on the importance of maintaining a 5-year housing land supply, citing the amount of costs awards, and agreed homes decided by two Inspectors for neighbouring Councils as they had made unreasonable decisions and failed to provide evidence on appeal. He highlighted that in comparison, the District Council was not vague, generalised or inaccurate and works on an evidence-based process.

In response to a question from a Member he confirmed that the additional housing delivered by the Council already, will count towards the 5 year housing land supply.

16. QUESTIONS FROM MEMBERS PURSUANT TO COUNCIL PROCEDURE RULE 10.2.

The following question was received from Councillor Henwood:

Community buildings which may be able to provide "warm hubs" are a way of providing warm places for those citizens in the District that will be not able to afford to pay the costs for keeping warm. "What is Mid Sussex District Council doing to coordinate and publicize warm hubs in the District?"

The Deputy Leader provided the following response:

We have already heard from the Leader in terms of the winter support being rolled out in Mid Sussex. West Sussex County Council on behalf of all the District and Boroughs in the County, is coordinating our response to 'warm hubs' and this Council is working closely with them to identify buildings that can be used. Many Parish and Towns are doing similar and the Council is looking at grants that can be offered to other groups to do same.

This Council recognises the advantages of the 'warm hubs' scheme and we will play an active role in promoting the offer and its benefits.

Councillor Henwood asked a further question on what funding may be available to support and fund any District Council community buildings that may be identified. The Deputy Leader noted that the position is developing and said he will provide a reply as the position becomes clear.

The following question was received from Councillor Marsh:

Please could the Leader of the Council clarify the cost to the taxpayer of Cllr Eggleston's letter before action challenging the Sites Allocation DPD and the extraordinary meeting of Council on 10th August, including the costs of the additional meeting, legal advice, and officer time.

The Leader provided the following response:

Officers have calculated the total costs to the taxpayer as £11,761. This includes officer time, barrister's opinion, and the costs of holding an extraordinary meeting of the Council. It is clearly regrettable.

The following question was received from Councillor Alison Bennett:

Looking at the Cabinet papers for Monday when you will consider the final consultants' reports for Clair Hall, please can you explain whether you intend to engage a single broker/agent to pursue both Model 1 (refurbishment) and Model 3 (cultural and other provision via redevelopment), or whether you intend to run two separate processes in parallel with two independent third parties as suggested in the BOP report?

And given that over 145k has been spent since your botched plan to close it.

The Leader provided the following response:

Thank you for your question. Please note the subject of your question is a matter for the Cabinet to decide at their next meeting on Monday. The proposal is to commission specialist help to pursue further the recommended models. How and when both models would be taken forward is a matter for further work experts to work on and advise us on. This would be the focus of the next phase of work, subject to the Cabinet agreeing to the recommendations.

Councillor Bennett asked the following supplementary question:

Reading the policy context on p14 of the Cabinet report it is clear that the decision to close Clair Hall was counter to the District, Neighbourhood and Town Centre plan. If Clair Hall remains closed, the facility will be lost and BOP report makes it clear that a replacement is not a certainty in the current economic climate. Why have neither the Cabinet, Steering Group nor consultants spoken to groups who have proposals to run it on a no cost basis?

The Leader responded by noting that the process being followed is set out in the report. He reminded Members that Clair Hall is currently being used by the NHS and the Council is using an evidence-based process to ensure it is fit for purpose and for the future.

The meeting finished at 9.17 pm

Chairman

CONSULTATION DRAFT DISTRICT PLAN – REGULATION 18

REPORT OF: Deputy Chief Executive
Contact Officer: Sally Blomfield, Assistant Director Planning & Sustainable Economy
Sally.Blomfield@midsussex.gov.uk
Wards Affected: All
Key Decision: Yes
Report to: Council
2nd November 2022

Purpose of Report

1. The purpose of this report is to request that the Council approve the Consultation Draft District Plan and supporting material, including Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA), for Regulation 18 consultation for a six-week period commencing 7th November 2022.

Summary

2. This report:
 - Summarises why the District Plan, adopted in 2018, needs to be reviewed and the process to update it;
 - Summarises the content of the Consultation Draft District Plan (“the draft District Plan”) including the Strategy, Policies and Housing Allocations;
 - Outlines the proposed approach to consultation.
3. The Scope, Strategy and non-housing site policies were considered by the Scrutiny Committee for Planning, Economic Growth and Net Zero on 5th October 2022. The Scrutiny Committee considered the full draft District Plan (including housing site policies) and supporting material on 18th October 2022.

Recommendations

4. **Council is recommended to:**
 - I. **Approve the following documents for Regulation 18 consultation, for a period of 6 weeks commencing 7th November 2022:**
 - (a) Consultation Draft District Plan (Appendix 1)
 - (b) Sustainability Appraisal (Appendix 2)
 - (c) Habitats Regulations Assessment (Appendix 3)
 - II. **Approve the Community Involvement Plan (CIP) (Appendix 4)**
 - III. **Authorise the Assistant Director for Planning and Sustainable Economy, in consultation with the Cabinet Member for Planning, to make any necessary minor typographical and factual changes to the above documents prior to consultation.**

Background

5. The Mid Sussex District Plan 2014 – 2031 was adopted in March 2018. The adopted District Plan contained a commitment to review the plan (policy DP4: Housing), starting in 2021 with submission to the Secretary of State in 2023. The review and update of the District Plan has commenced.
6. The District Plan review process is carried out in two stages:
 - **Stage 1: Scope of the Review:** to review the policies within the adopted District Plan and determine whether they require an update.
 - **Stage 2: Update the District Plan:** to incorporate updated policies, and new policies, within an updated District Plan.
7. The Scope of the Review and a draft District Plan were published for consideration by the Scrutiny Committee for Housing, Planning and Economic Growth at its meeting in January 2022. At this meeting the Committee resolved to defer discussion until further work had been carried out. The Committee also resolved to establish a cross-party Members Working Group to review proposed policies, the site selection methodology, the sites submitted to the Council for consideration, and the sites proposed for allocation.
8. Since January additional evidence has been commissioned to explore whether additional capacity could be delivered from brownfield land and additional detailed transport modelling has been carried out. Officers have continued to work with site promoters to determine the potential yield and delivery rates from their sites; and with our neighbouring authorities in respect of unmet need.
9. The Members Working Group met on four occasions over the summer. The additional work carried out and input from the Members Working Group has led to some revisions to the draft District Plan published in January.
10. The Scope, Strategy and non-housing site policies were considered by the Scrutiny Committee for Planning, Economic Growth and Net Zero on 5th October 2022. The Scrutiny Committee considered the full draft District Plan (including housing allocations) and all the supporting material (including the Sustainability Appraisal and Habitats Regulations Assessment) on 18th October 2022.
11. It is this version of the District Plan that Council is recommended to approve for Regulation 18 consultation. This is included at Appendix 1.

Why Update the District Plan?

12. The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review Local Plans (such as the District Plan) every five years to ensure policies remain relevant and effectively address the needs of the local community. This is reflected in the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), which set out the process that should be followed to review local plans. Reviews should be completed no later than five years from the adoption date of the Plan. The District Plan reaches its fifth anniversary in March 2023.

13. The planning system should be plan-led. An up-to-date District Plan should be in place to provide a vision for the future and address housing needs and other economic, social and environmental policies. An up-to-date plan is crucial in enabling the Council to:
- maintain control of how to address housing need;
 - control the location of the proposed sites for development including securing infrastructure to provide certainty by ensuring statutory providers know where, when and how much development is likely to be delivered;
 - place full weight on its policies when determining planning applications;
 - impose policy requirements to ensure sites deliver site-specific mitigation, infrastructure and facilities required to support housing development; and
 - secure a minimum 5-year supply. Without this, housing policies are deemed 'out of date' and the presumption in favour of sustainable development would apply resulting in speculative unplanned development.
14. In the period before the current District Plan was adopted in 2018, the Council could not demonstrate it was meeting its housing need and did not have a 5-year housing land supply. In this period, it is estimated that 3,000 unplanned, speculative dwellings on greenfield sites were developed as a direct result of the Council not having a 5-year housing land supply. It cost the Council around £720k in unsuccessfully trying to prevent these sites coming forward. The adoption of the District Plan will increase the pool of deliverable sites which the Council can include in its five-year housing land supply, thereby protecting the district from unplanned development. It is therefore vital that an up-to-date plan is in place.

Updating the District Plan – Process

15. Planning Practice Guidance states that policies age at different rates. Policies do not automatically go out-of-date at the 5-year point. However, dependant on changing circumstances and evidence, policies may be considered out-of-date and carry less weight when determining planning applications if they are more than 5-years old. Accordingly, the NPPF (paragraph 33) establishes two distinct phases of the process:
- **Stage 1:** Review to assess whether elements of the plan need updating (i.e. the Scope of the review)
 - **Stage 2:** Update as necessary
16. At Stage 1, Officers reviewed all current District Plan policies. In total, of the currently adopted District Plan policies:
- 7 do not require any update;
 - 18 require minor factual/clarity updates;
 - 11 require a major update.
17. The review also noted that new policies, which aren't in the current District Plan, are required as a result of changes to national policy, updated evidence or other ambitions.
18. The findings at Stage 1 have informed the drafting of the draft District Plan (Stage 2). This includes an updated Plan Strategy to guide growth, and a range of updated and new policies to ensure the District Plan remains effective in accordance with National Policy, so that full weight can continue to be applied when determining planning applications. It also includes housing allocations to meet identified housing needs.

19. As required by national policy, Local Plans such as the District Plan must cover a minimum 15-year period from the point of adoption. The draft District Plan therefore covers the period 2021 – 2039, 8 years beyond the adopted District Plan.
20. The draft District Plan is at **Appendix 1**.

Plan Strategy

Vision and Objectives

21. The purpose of the planning system is to contribute to the achievement of sustainable development. The preparation and implementation of plans should help deliver this. Section 5 of the draft District Plan sets out the vision, which is based on the vision within the adopted District Plan:

“A thriving, attractive and resilient District, which is a highly sustainable and desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental well-being of our District and the quality of life for all, now and in the future.”

22. The vision is underpinned by three priority themes that promote the development of sustainable communities:

- **Environment:** Protecting and enhancing the natural, built, and historic environment;
- **Economy:** Promoting economic vitality; and
- **Social:** Ensuring cohesive, safe and healthy communities

23. Section 5 of the draft revised Plan sets out a range of strategic objectives for each of the themes. The themes are in full accordance with the NPPF’s objectives for delivering sustainable development through local plans.

24. In addition, in line with the revised NPPF (Paragraph 7) the draft Plan embeds the United Nations 17 “Sustainable Development Goals” (SDGs) and sets out how policies within the draft Plan will contribute to one or more of these goals. This also aligns with the approach taken in the Mid Sussex Sustainable Economy Strategy.

The draft revised District Plan Strategy

25. The adopted District Plan Strategy has been reviewed. Given the environmental and infrastructure constraints in some areas of the district, existing committed development (e.g. sites with planning permission and allocations within the adopted District Plan, Sites DPD or Neighbourhood Plans), and location of deliverable/sustainable sites with the potential for allocation, it is concluded some areas within the district have higher potential for growth than others.
26. Given the extended plan period to 2039, the extent of growth required in that period, and the aforementioned conclusions, it is clearly not possible to continue to plan in accordance with the currently adopted District Plan strategy. A revised Plan Strategy to guide locations for growth to meet local needs is therefore required.
27. The proposed revised draft Plan Strategy is based on four principles set out below.
 - **Protection of Designated landscapes (such as AONB)**
 - **Making effective use of land**

- **Growth at existing sustainable settlements where it continues to be sustainable to do so**
- **Opportunities for extensions to improve sustainability of existing settlements which are currently less sustainable**

28. Section 6 of the draft District Plan provides significant detail on each of the four themes and how they will guide locations for growth.
29. Scrutiny Committee considered the Plan Strategy at its meeting on 5th October and provided no comments.

Policies

30. Sections 7 – 16 of the draft District Plan include a revised suite of planning policies which will be used in the determination of planning applications once adopted. This includes policies that have had a major update as a result of the review, and new policy areas that were not included in the adopted District Plan. For completeness, the draft District Plan also includes policies that do not require an update i.e. remain unchanged from the current policy in the adopted District Plan. The status of each policy is clearly indicated for ease.
31. The drafting of updated and new policies is supported by a proportionate, up-to-date and robust evidence base as required by national policy. The full evidence base that has supported the policies is available online at www.midsussex.gov.uk/DistrictPlan (see Background Papers). It is important to note that the evidence base is organic and will be updated with any new additions between now and submission of the District Plan for examination.
32. The policies have been categorised under the following chapter headings:

Sustainability
Natural Environment and Green Infrastructure
Countryside
Built Environment
Transport
Economy
Sustainable Communities
Housing
Infrastructure

33. The most significant new policies relate to Sustainability. This includes DPS1 which outlines the Council’s approach to addressing the causes of climate change, for example by setting out how development should reduce carbon emissions and mitigate future impacts. The rest of the policies within the Sustainability section address these aims specifically, in particular a policy on Sustainable Design and Construction (DPS2) has been significantly updated to require developments to meet the tightest possible standards in relation to energy and water consumption.
34. In addition, there are new policies related to Health and Wellbeing (DPS6), Biodiversity Net Gain (DPN2) in response to the Environment Act becoming law in November 2021, Electric Vehicle Charging (DPT4) and Major Infrastructure Projects (DPI3).

- 35. Upon adoption, these new and updated policies will apply to all current housing allocations, including sites allocated in the adopted District Plan and the Site Allocations DPD, provided they have not already received planning consent.
- 36. The draft District Plan at Appendix 1 reflects amendments suggested by the Members Working Group and Scrutiny Committee for Planning, Economic Growth and Net Zero.

Housing Need

- 37. Paragraph 11 of the National Planning Policy Framework (NPPF) requires strategic policies to provide for objectively assessed needs for housing as a minimum, as well as any needs that cannot be met within neighbouring areas. This is unless other policies within the Framework that protect areas or assets of importance provide a strong reason for not doing so, or adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 38. The starting point for housing need is the Government’s Standard Method formula. This confirms a housing need of **20,142 (1,119 dwellings per annum)** for the plan period to 2039. The Standard Method represents the minimum number of dwellings to be planned for to meet Mid Sussex housing need. Note that this figure does not account for unmet need arising in neighbouring areas which the Council must consider under the Duty to Co-Operate.
- 39. As the adopted District Plan (2014 – 2031) and revised draft District Plan (2021 – 2039) plan periods overlap, most of the housing requirement has already been planned for because it is already allocated (in the adopted District Plan, Site Allocations DPD and ‘made’ Neighbourhood Plans) or has planning permission. In addition, dwellings completed in monitoring year 2021/22 can be included.
- 40. Therefore, to meet Mid Sussex housing needs, an additional **8,169** dwellings will need to be found to ensure the district’s housing need is met up to 2039. The position is set out in the table below:

Total Mid Sussex Need	20,142
Completions 2021/22	1,187
Commitments (existing permissions and allocations)	10,786
Total Supply	11,973
Residual “To Find” in District Plan 2021 – 2039 to meet Mid Sussex housing need	8,169

- 41. The Council has a legal Duty to Co-Operate with its neighbouring authorities. This includes a duty to consider whether unmet need arising from neighbouring authorities can be met within Mid Sussex.
- 42. Mid Sussex is primarily located within the Northern West Sussex Housing Market Area (NWSHMA). The Strategic Housing Market Assessment (SHMA) confirms that this remains the primary Housing Market Area (HMA) and includes:
 - Mid Sussex District Council
 - Crawley Borough Council
 - Horsham District Council

43. There are also some overlaps in the southern part of the district with the Coastal West Sussex HMA which comprises:
- Brighton and Hove City Council
 - Adur and Worthing Councils
 - Arun District Council
 - Chichester District Council
 - Lewes District Council
 - South Downs National Park Authority
44. The unmet need arising from these areas is circa 30,000 homes. Brighton's unmet need alone is over 15,000 homes. The West Sussex and Greater Brighton Strategic Planning Board, comprising the above authorities and Crawley and Horsham, is committed to progressing a Local Strategic Statement (LSS3) to collate evidence and identify potential strategic options for addressing this unmet need.
45. During preparation of the adopted District Plan the Inspector confirmed a priority order for meeting housing need. Based on the findings of the latest SHMA and recognising the current position in neighbouring authority areas, this priority order is still applicable:
- Priority 1:** Meeting Mid Sussex need
- Assuming there is some capacity left to meet other's needs:**
- Priority 2:** Meeting Mid Sussex need and assisting the Northern West Sussex HMA
- Priority 3:** Meeting Mid Sussex need and assisting the Northern West Sussex and Coastal West Sussex HMAs
46. The Site Selection process and the extent to which sites can deliver sustainable development will determine the extent to which Mid Sussex can meet these priorities.
47. The Duty to co-operate is an ongoing process and further engagement will occur as the draft Plan progresses. In accordance with the NPPF, Statements of Common Ground will be prepared to capture cross-boundary matters and progress made to address these, as the Draft Plan progresses towards Submission.

Housing Allocations

Strategic Housing and Employment Land Availability Assessment (SHELAA)

48. The SHELAA forms a 'pool' of 260 sites from which to assess potential for allocation. All sites in the SHELAA were subject to a Site Selection Methodology to determine the most suitable and sustainable sites for allocation.

Site Selection Methodology

49. The Site Selection Methodology, available to view in the online evidence library (see Background Papers), was based on the Site Allocations DPD methodology which was established in consultation with Town and Parish Councils, Neighbouring Authorities, and the Mid Sussex Developers' Liaison Group. It has been amended to reflect learning from the Sites DPD process. The methodology conforms to best practice and reflects expert legal advice and comments made during focussed consultation. The Members Working Group considered the Site Selection Methodology and concluded that it was fit for purpose.
50. The application of the Site Selection Methodology ensures that only those sites the Council concludes are developable (as defined by the NPPF – a suitable location for development with a reasonable prospect that they would be available) are selected for allocation. The site selection process also determines which sites should be tested as “reasonable alternatives” in the Sustainability Appraisal process, as required by legislation.
51. Following the application of the Site Selection methodology, the initial 260 sites were refined to 42 for further testing, including transport modelling, Sustainability Appraisal, Habitats Regulations Assessment and Air Quality modelling. The Members Working Group considered all the sites and the conclusions arrived at following the methodology.
52. The details of this assessment, including reasons for rejecting and selecting sites, are set out in the Site Selection Paper: Conclusions paper which is within the Evidence Library (see Background Papers).

Proposed Allocations

53. Paragraph 68 of the NPPF requires planning policies to identify a supply of specific deliverable sites for years 1-5 of the plan; specific, developable sites or broad locations for growth for years 6-10 and, where possible, 11-15 of the plan.
54. Given the extent of sites promoted to this Council and the outcome of the assessment of their suitability, availability and deliverability in accordance with the site selection methodology, this enables the Council to allocate sufficient developable sites for the full plan period. This allows the Council to provide certainty to the local community on future growth locations, but also to infrastructure providers who need to plan for growth. The allocations provide a range of larger significant sites and smaller sites.

Sustainable Communities – ‘Significant Sites’

55. The draft District Plan Strategy is based on the principle of creating sustainable communities, including the 20-minute neighbourhood principle.

56. Sites of a significant scale ('Significant Sites') are capable of accommodating on site infrastructure to support growth, such as primary and secondary education, health facilities, community centres, retail, employment and open space to meet future needs. Sites of approximately 1,000+ dwellings are more likely to support the provision of on-site infrastructure because they are more viable and provide opportunities to masterplan to incorporate facilities and services. The allocation of significant sites represents the most sustainable way of providing development with the infrastructure to support it, which can benefit not only new communities but existing communities. These sites are referred to in the plan as Sustainable Communities.
57. As well as being tested through the Site Selection process, additional due diligence and evidence base work is required to determine the most suitable significant sites for development. This has included gathering evidence from site promoters, including Vision and Masterplan documents which are available to view online in the evidence library (see Background Papers).
58. As a result of the findings within the evidence base, detailed testing and consideration by the Members Working Group, the following 'Significant Sites' are proposed for allocation.

Policy Ref	Site	Settlement	Housing Yield	On-Site Infrastructure Proposed
DPSC1	Broad location to the West of Burgess Hill	Burgess Hill	1,400	<ul style="list-style-type: none"> • Extra Care housing provision • 2 Form Entry Primary School • Playspace • Self-service Library • Leisure • Retail • Sustainable transport measures and provision
DPSC2	Land south of Reeds Lane, Sayers Common	Sayers Common	2,000 (1,850 in the plan period to 2039)	<ul style="list-style-type: none"> • Extra Care housing provision • All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form • Playspace • Self-service Library • Leisure • Retail • Sustainable transport measures and provision • Gypsy and Traveller accommodation • Commercial • Healthcare provision • Community Hall

Policy Ref	Site	Settlement	Housing Yield	On-Site Infrastructure Proposed
DPSC3	Crabbet Park, Old Hollow, Copthorne	Copthorne	2,300 (1,500 in the plan period to 2039)	<ul style="list-style-type: none"> • Extra Care housing provision • All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form • Playspace • Self-service Library • Leisure • Retail • Sustainable transport measures and provision • Healthcare provision • Community Hall • Community facilities
TOTAL			4,750	

- **Land West of Burgess Hill** is sustainably located on the edge of the town where a range of services and facilities exist and is in close proximity to employment opportunities nearby such as The Hub and planned Science and Technology Park.
- **Reeds Lane, Sayers Common** has potential to significantly improve the sustainability of Sayers Common. Currently no residents are within a 20-minute walk of a primary school or health facility. This allocation would mean that all current and new residents would be within a 20-minute walk of both facilities as these facilities are proposed to be delivered on-site. The proposal includes Secondary school provision, reducing the need to travel much further afield; this provision would also cater for demand arising in the downland villages.
- **Crabbet Park** is located to the south west of Copthorne, on Crawley's eastern border and can deliver approximately 2,300 dwellings. This site was carefully considered during the preparation of the adopted District Plan but was rejected due to land ownership uncertainties and infrastructure concerns. However, the site is now being actively promoted and work is being progressed by the site promoter to address these concerns.

Given the scale of work required to bring this site forward it is considered that 1,500 homes are likely to be brought forward in the draft Plan period. This position will be reviewed as work on the draft Plan progresses. Officers are liaising closely with Crawley Borough Council given the proximity of this site to their boundary.

59. Alternative Significant Site options were submitted for consideration and tested against the site selection methodology. Reasons for rejecting these sites are set out in the **Site Selection: Conclusions** paper in the online evidence library. In summary:

- **Ansty Farm, Ansty (1,600 dwellings):** This site has not been included within the draft District Plan due to transport capacity concerns. The latest Transport Study (Scenario 4) considers mitigation based upon the Site Promoter's proposed on and off site mitigation measures (including proposals for

sustainable transport measures to encourage modal shift). The Transport Study is available in the Council’s online Evidence Library.

The results indicate that there are 12 ‘severe’ impacts on the highways network when accounting for these mitigation measures. The main contributor to 8 of these is the significant site at Ansty Farm, Ansty, which was promoted for 1,600 dwellings. The Transport Study results also show that 4 of the junctions affected are likely to be solely impacted by the Ansty site.

Identification of severe impacts at Regulation 18 stage does not automatically rule out a site for allocation if there is some prospect that the impacts can be effectively mitigated. However, following discussions with WSCC and SYSTRA, officers conclude that seeking additional sustainable mitigation is unlikely to solve the severe issues and that there is no evidence to suggest physical mitigation is achievable given land constraints, likely costs, and limited benefit (i.e. would not sufficiently reduce traffic volumes to within capacity). Therefore, given the evidence currently presented and the advice from WSCC and SYSTRA, officers are recommending that the Ansty Farm site for 1,600 dwellings should not be proposed for allocation in the consultation draft District Plan.

- Malthouse Lane, Burgess Hill (1,800 dwellings):** This site was promoted to the Council in late-2021 and therefore was not considered as an option for the draft Plan in January 2022. The site promoters have not provided sufficient detail regarding quantum and uses for the site to enable officers to determine that the site is deliverable, promotion of this site is still at a very early stage. On the basis of the positive assessment of **DPSC1: West of Burgess Hill** the Malthouse Lane site would need to be considered in combination with it. There is no justification for choosing this site instead of DPSC1. This quantum of development is likely to exacerbate existing issues at the A23/A2300 junction, as impacts are already arising through the allocation of DPSC1 and at this stage the Council does not have sufficient evidence to have confidence this site is deliverable in combination with DPSC1.
- West of A23 “Mayfield Market Town” (2,000 dwellings):** This site has been proposed for 10,000 home mixed-use development with the majority (8,000 dwellings) within Horsham district. This would be a standalone settlement rather than providing extensions to existing settlements, so would not comply with the draft District Plan strategy. In addition, there is considerable uncertainty regarding delivery – the site has historically not been supported by Horsham District Council and did not feature in their adopted Local Plan or draft Regulation 19 Local Plan review. In addition the site would currently be subject to Water Neutrality considerations.

Proposed Housing Allocations

60. In addition to the Significant Sites, the following housing sites are proposed for allocation:

Policy Ref	Site	Settlement	Yield
DPH5	Batchelors Farm, Keymer Road, Burgess Hill	Burgess Hill	33
DPH6	Land at Hillbrow, Janes Lane, Burgess Hill		25
DPH7	Burgess Hill Station		300

DPH8	Land off West Hoathly Road, East Grinstead	East Grinstead	45
DPH9	Land at Hurstwood Lane, Haywards Heath	Haywards Heath	45
DPH10	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath		30
DPH11	Land east of Borde Hill Lane, Haywards Heath		60
DPH12	Orchards Shopping Centre, Haywards Heath		100
DPH13	Land to west of Turners Hill Road, Crawley Down	Crawley Down	350
DPH14	Hurst Farm, Turners Hill Road, Crawley Down		37
DPH15	Land rear of 2 Hurst Road, Hassocks	Hassocks	25
DPH16	Land west of Kemps, Hurstpierpoint	Hurstpierpoint	90
DPH17	The Paddocks Lewes Road Ashurst Wood	Ashurst Wood	8-12
DPH18	Land at Foxhole Farm, Bolney	Bolney	200
DPH19	Land at Chesapeake and Meadow View Reeds Lane Sayers Common	Sayers Common	33
DPH20	Land at Coombe Farm London Road Sayers Common		210
DPH21	Land to west of Kings Business Centre Reeds Lane Sayers Common		100
DPH22	Land south of LVS Hassocks London Road Sayers Common		200
DPH23	Ham Lane Farm House Ham Lane Scaynes Hill	Scaynes Hill	30
DPH24	Challoners Cuckfield Road Ansty	Ansty	37
DPH25	Land to the west of Marwick Close Bolney Road Ansty		45
TOTAL			2,007

Brownfield Sites

61. In response to the Scrutiny Committee's requirement to maximise development on Brownfield sites, two additional allocations are proposed since the January draft District Plan.
- **Burgess Hill Station Car Park** is currently allocated in the Burgess Hill Neighbourhood Plan. It had previously been assumed that 150 dwellings were possible on this site as part of a mixed-use development that would deliver a relocated station entrance and transport hub, creating a new gateway development to Burgess Hill. Further work has since identified that the site could accommodate 300 dwellings, therefore 150 more dwellings than already planned for.
 - **The Orchards Shopping Centre, Haywards Heath.** The adopted Haywards Heath Town Centre Masterplan identifies the site as an 'Opportunity Site' for mixed-use regeneration, including retail, leisure and residential. National Planning Policy recognises the role that residential development can play in maintaining vibrant town centres.

Policy Ref	Site	Settlement	Additional Yield
DPH7	Burgess Hill Station Car Park	Burgess Hill	150 (300 total)
DPH12	The Orchards	Haywards Heath	100
TOTAL			250

62. In addition, the yield of **DPH22: Land south of LVS Hassocks London Road Sayers Common** has been increased from 120, recognising the site promoter's intention to improve and relocate the special educational needs (SEN) facility on-site, releasing up to 80 additional dwellings on brownfield land.

Meeting Mid Sussex Housing Need

63. In conclusion the following is proposed in the updated draft District Plan (set out in policy DPH1: Housing) to address housing need for the purposes of Regulation 18 consultation.

Housing Requirement (Mid Sussex Housing Need)	20,142
Commitments (Existing allocations and Permissions)	10,786
Completions 2021/22	1,187
Significant Sites	4,750
DPSC1: Land to West of Burgess Hill	1,400
DPSC2: Land to South of Reeds, Sayers Common	1,500
DPSC3: Crabbet Park	1,850
Housing Sites DPH5 – DPH25	2,007
Windfall / Brownfield Allowance	1,714
Total Housing supply from 2021 – 2039	20,444
Total under/over supply for resilience and wider HMA	+ 302

64. This approach meets the housing need arising within Mid Sussex and a contribution towards unmet need within the priority Housing Market Area and/or resilience and robustness as the District Plan proceeds through examination. Without a contingency for resilience, there is a risk that the District Plan would be found unsound should site yields be reduced or sites removed during the examination process. This would lead to considerable delay, and it is highly likely that the Inspector would require the Council to find additional sites, update the evidence base (such as transport and air quality modelling) and re-consult. By this time the adopted District Plan would be out-of-date. This would significantly increase the risk of speculative, unplanned and unwanted development.
65. Tables 1a (page 35) and 1b (page 36) of the draft District Plan set out the distribution of all planned housing growth within the district to 2039, inclusive of development already planned for in the adopted District Plan, Sites DPD, Neighbourhood Plans and planning permissions.

Changes to the draft District Plan following Scrutiny Committee (18th October)

66. Scrutiny Committee for Planning, Economic Growth and Net Zero considered the draft District Plan (Regulation 18) at its meeting on 18th October 2022. As a result of these discussions, three amendments have been made to the draft District Plan. These are:

- **DPSC1– DPSC3:** text added to each of the Significant Sites in relation to provision of wastewater infrastructure
- **DPH4: General Development Principles for Housing Allocations** - amended the requirement for Arboricultural Impact Assessment and Arboricultural Method Statements to reflect best practice
- **DPH5: Batchelors Farm, Burgess Hill** - text added to refer to the adjacent Batchelors Farm Nature Reserve

67. The Committee resolved to recommend to Council that the Consultation Draft District Plan, along with supporting documentation, should be approved for Regulation 18 consultation.

Sustainability Appraisal and Habitats Regulations Assessment

68. In accordance with legal requirements, the draft District Plan is accompanied by a Sustainability Appraisal (incorporating Strategic Environmental Assessment) (Appendix 2) and Habitats Regulations Assessment (Appendix 3). Subject to Council approval, both documents will be published for consultation alongside the Plan.

69. The purpose of Sustainability Appraisal (SA) is to appraise the social, environmental and economic effects of a Plan. It assesses all reasonable alternative options against a Sustainability Framework to guide decision making, with the aim of ensuring the content of the Plan achieves sustainable development.

70. The Sustainability Appraisal generally finds that the preferred options for strategy and sites perform well against Social and Economic objectives. As expected, there are negative impacts expected against Environmental objectives, however the SA concludes these could be mitigated through policy requirements e.g. other policies within the draft District Plan, or within site policies themselves.

71. The purpose of Habitats Regulations Assessment is to test whether a plan such as the District Plan will significantly harm the designated features of an internationally important designated site. For Mid Sussex, this relates to Ashdown Forest which is in neighbouring Wealden district, which is a designated Special Area of Conservation (SAC) and Special Protection Area (SPA)

72. The Habitats Regulations Assessment confirms that the proposals within the draft District Plan will not have adverse effects on the integrity of the Ashdown Forest SPA/SAC in relation to atmospheric pollution. In relation to recreational pressure, the HRA confirms that there will be no adverse impacts provided the current SANG/SAMM measures continue.

Consultation and Community Involvement Plan

73. Subject to Council's approval, the Consultation Draft (Regulation 18) District Plan 2021 – 2039 and all associated documentation (including the Sustainability Appraisal, the Habitats Regulation Assessment, the Infrastructure Delivery Plan and all the evidence in the library) will be subject to public consultation for six-weeks, proposed for 7th November – 19th December 2022.

74. This represents the first opportunity for the community, statutory bodies, organisations and other stakeholders to comment on the proposals. The Council would like to hear views which will help shape future iterations of the District Plan.

75. Consultation will be carried out in accordance with the prescribed regulations, the Council's adopted Statement of Community Involvement, and the Community Involvement Plan included in Appendix 4.
76. To ensure as many stakeholders as possible can be involved and engaged in the process, the following consultation methods will be used:
- Press release, email alert and utilise social media to advertise;
 - Documentation available on Council website including an on-line response form, consultation portal and interactive map;
 - Letters or emails to specific consultation bodies (statutory consultees) and to other organisations listed in the Community Involvement Plan;
 - Emails to those subscribed to the Planning Policy email alert service
 - Briefings for Town and Parish Councils
 - Hold public exhibitions/drop sessions in areas of significant change, as required
77. This approach goes beyond the minimum requirements set out in the regulations. The full approach is set out in the Community Involvement Plan (Appendix 4) for Council's approval.
78. There will be further opportunities to comment on the District Plan prior to its adoption. A further iteration of the District Plan (known as Regulation 19), which reflects the results of consultation and further updated evidence, will be considered by Scrutiny Committee and Council in mid-2023 which will be followed by a second round of consultation. Upon submission to the Secretary of State, stakeholders will have the opportunity to submit further statements and evidence at the Examination in Public. The Inspector will review all evidence and provide a report on conclusions.

Policy Context

79. The review (and subsequent update) of the District Plan is a corporate priority identified in the Corporate Plan and Budget 2022/23 (March 2022) and Service Plan for Planning and Economy. It aligns with the Council's priorities for Sustainable Economic Growth and Strong and Resilient Communities.

Other Options Considered

80. There is a legal and national policy requirement to review the Plan and update where necessary. There is also a Council commitment within its currently adopted District Plan to do so. The Council could decide not to review or update the Plan, however this would have significant impacts on its ability to apply full weight to its existing policies when determining planning applications.

Financial Implications

81. Preparation of the District Plan review and update is funded by a specific reserve, as agreed in the Corporate Plan and Budget 2022/23 (March 2022). This reserve has funded evidence base studies to support the work and will continue to be required to fund future evidence, legal advice and examination costs. The work carried out so far is within the identified budget.

Risk Management Implications

82. There is a legal and national policy requirement to review and update local plans to ensure that they continue to be effective and carry full weight when making planning decisions. Without an updated plan, there is a risk that some policies would be deemed out-of-date and the weight afforded to them when determining planning applications reduced. Both this and the two Scrutiny reports set out the implications on the 5-year housing land supply, including the threat of speculative development and associated costs in defending unwanted developments.
83. The Government introduced a Levelling Up and Regeneration Bill to Parliament in May 2022. This proposes changes to the planning system, however as the Bill has not yet received Royal Assent it is difficult to predict the impacts that any future changes and/or transition periods will have on the progress of the District Plan. The Government has urged local authorities to continue plan-making, and at this moment in time Local Planning Authorities must continue to comply with current legislation, which requires Local Plans to be updated where required every 5 years. The same sanctions for not complying, including the consequences of not meeting housing need or maintaining a 5-year housing land supply are still in force. This position will be kept under review as the work on the preparation of the District Plan progresses.

Equality and Customer Service Implications

84. An Equality Impact Assessment has been prepared to ensure opportunities to promote equality and/or barriers to service are considered and addressed. A copy is at Appendix 5.

Other Material Implications

85. There are no other material implications.

Sustainability Implications

86. The updated District Plan includes a range of sustainability policies as described above. The National Planning Policy Framework recognises the role that planning can have in addressing and mitigating future impacts of climate change – the draft policies within the updated District Plan reflect national policy and ambitions.
87. It is a legal requirement for the District Plan to be accompanied by a Sustainability Appraisal (incorporating Strategic Environmental Assessment) at each formal stage of the plan-making process which documents the impacts of proposed policies, strategy and sites against the sustainability criteria and informs the plan-making process by ensuring the plan is the most sustainable given all reasonable alternatives. A copy of the Sustainability Appraisal is at Appendix 2.

Appendices

Appendix 1: Consultation Draft District Plan (Regulation 18)

Appendix 2: Sustainability Appraisal (SA)

Appendix 3: Habitats Regulations Assessment (HRA)

Appendix 4: Community Involvement Plan (CIP)

Appendix 5: Equalities Impact Assessment (EqIA)

Background Papers

The full evidence base to support the revised draft District Plan, including documents referred to in this report, is available online at www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-2021-2039-evidence-base/

Scrutiny Committee for Planning, Economic Growth and Net Zero – Reports and Minutes

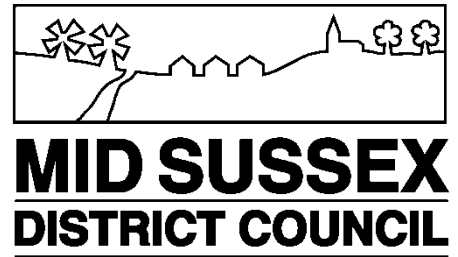
5th October 2022 “Strategy and Non-Housing Site Policies”

<https://midsussex.moderngov.co.uk/ieListDocuments.aspx?CId=284&MId=3037&Ver=4>

18th October 2022 “Consultation Draft (Regulation 18)”

<https://midsussex.moderngov.co.uk/ieListDocuments.aspx?CId=284&MId=3112&Ver=4>

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Mid Sussex

District Plan 2021 - 2039

Consultation Draft (Regulation 18)

Council

2nd November 2022

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1. District Plan – Introduction

Mid Sussex District Plan - Overview

Mid Sussex District Council adopted the Mid Sussex District Plan 2014-2031 in March 2018. The adopted District Plan set the vision and strategy, with accompanying site allocations and policies to achieve the vision and strategy.

District Plan policy **DP4: Housing** committed the Council to reviewing the plan, starting in 2021, with submission to the Secretary of State in 2023. This accords with the 5-year review requirement set out in national policy.

This is the consultation draft (Regulation 18) Mid Sussex District Plan 2021 – 2039. It reflects the outcome of the review process described below. It contains an updated vision, strategy, site allocations and policies and will supersede the adopted District Plan upon its adoption which is anticipated in 2024.

District Plan Review and Update – Process

The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) requires local planning authorities to review local plans at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community.

The National Planning Policy Framework (NPPF July 2021) mirrors the legislation by requiring Local Planning Authorities to review Local Plans at least once every five years and update them as necessary (paragraph 33).

Upon the 5th anniversary of adoption (2023), the District Plan will not be out-of-date automatically, as policies age at different rates. The review process is a method to ensure that a plan and the policies within it remain effective. It is important to note that, whilst this District Plan contains updated policies – no decision has been made as to whether any policy is currently considered “out-of-date”.

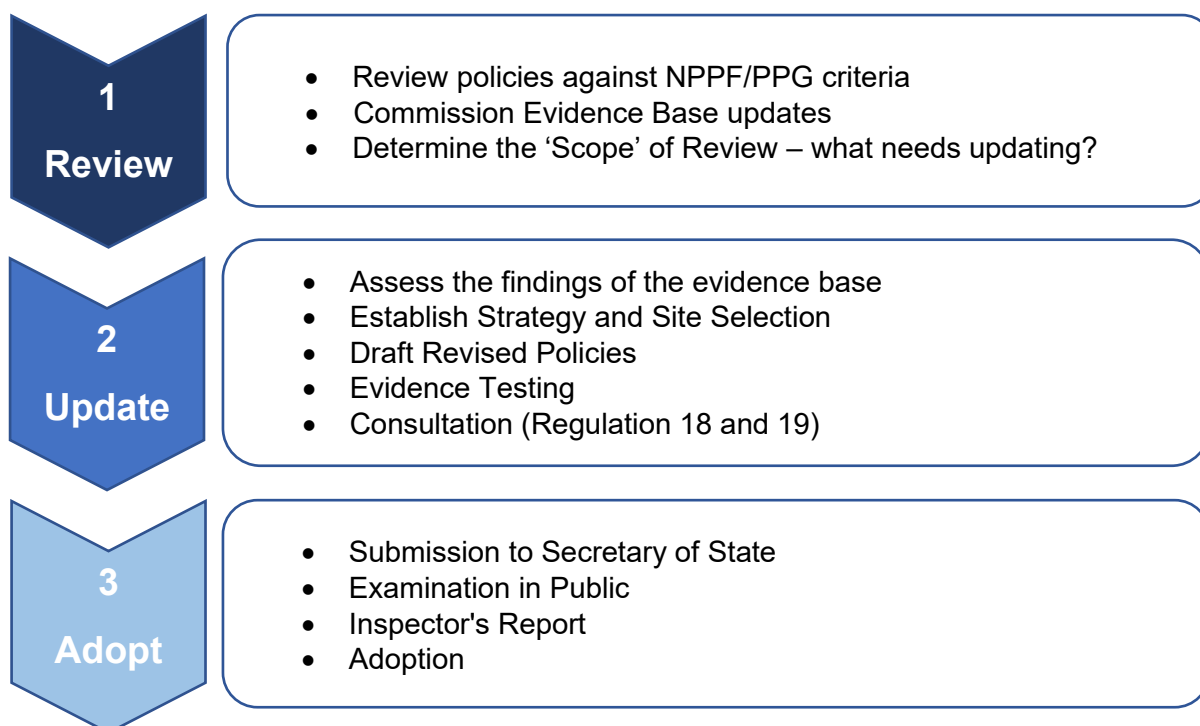
In reviewing plans, the NPPF states that the following needs to be considered:

- Any changing circumstances affecting the area
- Any relevant changes in national policy

It is a requirement to monitor the impact of policies to measure progress against need-based requirements and to assess the effectiveness of adopted policies. The review process also provides an opportunity to make amendments to policies as a result of this monitoring information.

It is also an opportunity to address other matters, such as issues that have arisen during the current plan period, the impact of other plans (such as within neighbouring authorities or regionally) and significant economic changes (such as impacts of Brexit and the Covid-19 pandemic).

There are three distinct phases in the preparation of this District Plan:



1. Review the existing District Plan

All current District Plan 2014-2031 policies have been reviewed for their conformity with the NPPF, changing local circumstances and other factors.

The process identifies that current policies fall within three categories, with conclusions subject to the findings of Regulation 18 consultation:

- **No Update Required:** Policy as written in the District Plan does not require any amendment
- **Minor Factual/Clarity:** Policy as written in the District Plan is still in date however factual corrections, updates (e.g., cross-references or references to changes in updated policy/SPDs/guidance) or points of clarification are required. Does not change the overall meaning or requirements of the existing policy.
- **Full Update:** Existing policy requires an update as a result of changing targets, strategy, updated evidence base, local circumstances or national policy.

In order to support this work, the District Plan evidence base was updated. This included commissioning of specialist studies to assess whether an update was required, and if so, to establish new requirements, described in Section 4.

2. Update – a new District Plan

This document reflects the outcome of the review process. It includes draft policies that, upon adoption, will supersede the existing adopted strategy and policies – thus updating them to ensure they continue to remain effective.

National Planning Policy requires plans to look ahead for a minimum of 15 years from adoption (anticipated 2024). The plan period therefore extends to 2039, 8 years beyond the existing District Plan.

For completeness, this District Plan also contains policies that were reviewed and found to be in-date (i.e. no updates, or only minor amendments were required) so that upon adoption the Council's Strategic policies can be read as a whole.

This document is the Consultation Draft (Regulation 18) District Plan and will be subject to stakeholder consultation in accordance with the regulations and the Council's adopted Statement of Community Involvement. This process will enable communities, statutory bodies, those working in the area and those with land interests to comment and inform the next version of the plan.

3. Adoption

Following the statutory consultation periods the District Plan will be submitted to the Secretary of State. An independent Planning Inspector will be appointed to examine the plan to ensure it meets all legal and soundness requirements (in accordance with national policy). Upon receipt of an Inspector's Report concluding the plan is sound, the Council can adopt the plan. Once adopted it will be part of the Council's Development Plan and will carry full weight when determining planning applications.

Mid Sussex Development Plan

Upon adoption of the District Plan 2021 – 2039, the Development Plan for Mid Sussex will contain the following:

- Mid Sussex District Plan 2021 – 2039
- Site Allocations Development Plan Document (2022) (note that three policies are replaced by policies in this plan)
- Saved policies in the Small Scale Site Allocations Development Plan Document (2008)
- Saved policies in the Mid Sussex District Plan 2014 – 2031 and Local Plan 2004¹
- Supplementary Planning Documents – full list available at www.midsussex.gov.uk/SPDS
- Made Neighbourhood Plans – full list available at www.midsussex.gov.uk/NeighbourhoodPlans

¹ Saved policies are listed in Chapter 18

2. Background

Mid Sussex Context

Mid Sussex is a rural district in the south east of England, situated within the county of West Sussex.

The district contains three towns – Burgess Hill, East Grinstead and Haywards Heath which accounts for around two thirds of the population. It also contains a number of large villages, small villages and hamlets each with their own heritage, characteristics and aspirations for the future.

Mid Sussex is characterised by beautiful countryside. Nearly 50% of the district is within the High Weald Area of Outstanding Natural Beauty, and over 10% is within the South Downs National Park. The Mid Sussex District Plan covers the area outside the National Park; the South Downs National Park Authority are the local planning authority for that area and have adopted their own Local Plan (2019).

The Census 2021 estimated a population of around 152,000 people, 60% of which are aged 16-64. Following current demographic trends, this is projected to increase by over 7% by the end of the plan period. Mid Sussex has an ageing population, with numbers of those aged 65+ predicted to increase by 34% over the plan period. These reflect County-wide and regional trends.

Mid Sussex accommodates just over 68,000 workforce jobs, with 79% of 16 to 64 year olds economically active and low levels of unemployment (3% compared to 5% national).

Wider Context

Mid Sussex is bordered by the following authority areas:

- Crawley Borough
- Horsham District
- Adur District
- Brighton and Hove
- Lewes District
- Wealden District
- Tandridge District
- South Downs National Park

Mid Sussex is situated primarily within the Northern West Sussex Housing Market Area and Functional Economic Market Area. This is a long-established position which was tested at each of the authorities respective Local Plan examinations, supported by evidence. There are also overlaps with a secondary Housing Market Area (Coastal West Sussex) in the southern part of the district.



Northern West Sussex

The Northern West Sussex Housing Market Area (HMA) and Functional Economic Market Area (FEMA) consists of the following authority areas:

- **Mid Sussex**
- **Crawley**
- **Horsham**

This was confirmed by a jointly commissioned Strategic Housing Market Assessment (SHMA) in 2009, which was updated to support each of the authorities adopted Local Plans. Crawley and Horsham commissioned an update in November 2019, with a Mid Sussex update prepared to support this District Plan in 2021. The updated SHMA confirmed that the evidence continues to support the definition of the Northern West Sussex HMA.

Sussex Coast

The south of the district (south of Burgess Hill) has overlaps with the Sussex Coast HMA and FEMA which consists of the following authority areas:

- **Mid Sussex**
- **Adur and Worthing**
- **Brighton and Hove**
- **Crawley**
- **Horsham**
- **Lewes**
- **South Downs National Park**

The majority of the district which overlaps with this HMA and FEMA is within the South Downs National Park and therefore not within the plan area covered by this District Plan – the South Downs National Park Authority are the planning authority for this area and have produced their own Local Plan.

West Sussex and Greater Brighton Strategic Planning Board

The West Sussex and Greater Brighton Strategic Planning Board authorities are:

- **Mid Sussex**
- **Adur**
- **Arun**
- **Brighton and Hove**
- **Chichester**
- **Crawley**
- **Horsham**
- **Lewes**
- **Worthing**
- **South Downs National Park**

The West Sussex & Greater Brighton (WS&GB) Strategic Planning Board was formed to identify and manage strategic planning issues within that area and to support better integration and alignment of strategic spatial and investment priorities. It was initially made up of the coastal West Sussex local planning authorities together with Brighton & Hove City Council and Lewes District Council but was expanded to include the authorities within the Northern West Sussex HMA (Mid Sussex, Crawley and Horsham).

The Board, which comprises lead Councillors from each of the LPAs works in an advisory capacity with all decision-making through the individual member authorities.

Its remit is to:

- identify and manage spatial planning issues that impact on more than one local planning area within WS&GB; and
- support better integration and alignment of strategic spatial and investment priorities in WS&GB, ensuring that there is a clear and defined route through the statutory local planning process, where necessary.

A Local Strategic Statement (LSS), which set out long term Strategic Objectives and Spatial Priorities for delivering these, was endorsed by each of the then constituent authorities in 2013. In 2015 the LSS was updated through a focused 'refresh'

At its meeting in September 2017, the Board agreed to explore options for meeting the unmet housing needs across the Board area, to commit to preparation of an updated strategy and to commission work to provide an evidence base to support the development of a longer-term strategy to address spatial options for meeting housing, employment and infrastructure needs over the period to 2050 - known as LSS3. Mid Sussex plays an active role in the ongoing work to progress LSS3.

3. Achieving Sustainable Development

The National Planning Policy Framework (NPPF, July 2021) is clear that the purpose of the planning system is to contribute to the achievement of sustainable development, which is broadly defined as:

“Meeting the needs of the present without compromising the ability of future generations to meet their own needs”

The NPPF sets three over-arching objectives to be delivered through the preparation of plans and policies, such as the District Plan:

- **Environmental:** to protect and enhance our natural, built and historic environment
- **Economic:** to build a strong, responsive and competitive economy
- **Social:** to support strong, vibrant and healthy communities

Members of the United Nations – including the United Kingdom – have also agreed 17 inter-connected goals to achieve a better and more sustainable future for all, which align with the three over-arching objectives. These “Sustainable Development Goals”, identified below, form part of the UN 2030 Agenda for Sustainable Development.



The NPPF encourages Local Plans to reflect the 17 Sustainable Development Goals. The District Plan therefore embeds these goals and sets out policies within the plan to contribute to one or more of them.

Environmental Characteristics and Challenges

The Sustainability Appraisal identifies the following Environmental Characteristics and Challenges for Mid Sussex:

- Potential for development to have an impact on Air Quality within the district (Air Quality Management Area) and outside (Ashdown Forest SAC).
- The need to conserve and enhance the numerous sites protected for their biodiversity value across the district.

- The fragmentation and erosion of habitats and the wider ecological network which is a threat to biodiversity.
- There is a high pressure to deliver growth in the district and biodiversity net gain will need to be sought.
- Large areas of the district are protected for species and habitat value which come under pressure from development and activity.
- The impact of Climate change on increasing the risk of flooding.
- The impact of carbon emissions from numerous sources.
- The importance of protected landscapes such as the High Weald AONB within the plan area, and South Downs National Park on the southern boundary, and the impact of development upon them.
- The impact of development and other growth on waste generated, including wastewater.
- Managing water resources and water quality is key to serve existing and future residents.

The Sustainable Development goals related to the environmental challenges are as follows:



Policies within this District Plan to address environmental challenges are as follows:

Sustainability	DPS1: Climate Change DPS2: Sustainable Design and Construction DPS3: Renewable and Low Carbon Energy Schemes DPS4: Flood Risk and Drainage DPS5: Water Infrastructure and the Water Environment DPS6: Health and Wellbeing
Natural Environment and Green Infrastructure	DPN1: Biodiversity, Geodiversity and Nature Recovery DPN2: Biodiversity Net Gain DPN3: Green Infrastructure DPN4: Trees, Woodland and Hedgerows DPN5: Historic Parks and Gardens DPN6: Pollution DPN7: Noise Impacts DPN8: Light Impacts and Dark Skies DPN9: Air Quality DPN10: Land Stability and Contaminated Land
Countryside	DPC1: Protection and Enhancement of the Countryside DPC2: Preventing Coalescence DPC3: New Homes in the Countryside DPC4: High Weald Area of Outstanding Natural Beauty DPC5: Setting of the South Downs National Park DPC6: Ashdown Forest SPA and SAC
Built Environment	DPB1: Character and Design DPB2: Listed Buildings and Other Heritage Assets DPB3: Conservation Areas

Economic Characteristics and Challenges

The Sustainability Appraisal identifies the following Economic Characteristics and Challenges for Mid Sussex:

- There is a high level of out commuting for work in Mid Sussex which puts pressure on the transport network.
- There is a variety of employment need across the district which can be challenging to accommodate locally.
- There is a significant difference in average wages between those working in the district and those working outside (potentially leading to out-commuting).
- There has been a change in shopping consumer patterns which has been exacerbated by the covid-19 pandemic.
- Whilst there is good public transport coverage generally, outside urban areas this can be infrequent and many residents are reliant on the private car.
- Impacts of future development on the highways network, which is already constrained and in need of further investment to increase capacity.

The Sustainable Development goals related to the economic challenges are as follows:



Policies within this District Plan to address economic challenges are as follows:

Transport	<p>DPT1: Placemaking and Connectivity</p> <p>DPT2: Rights of Way and Other Recreational Routes</p> <p>DPT3: Cycling</p> <p>DPT4: Parking and Electric Vehicle Charging Infrastructure</p> <p>DPT5: Off-Airport Parking</p>
Economy	<p>DPE1: Sustainable Economic Development</p> <p>DPE2: Existing Employment Sites</p> <p>DPE3: Employment Allocations</p> <p>DPE4: Town and Village Centre Development</p> <p>DPE5: Within Town and Village Centre Boundaries</p> <p>DPE6: Development Within Primary Shopping Areas</p> <p>DPE7: Sustainable Rural Development and the Rural Economy</p> <p>DPE8: Sustainable Tourism and the Visitor Economy</p>

Social Characteristics and Challenges

The Sustainability Appraisal identifies the following Social Characteristics and Challenges for Mid Sussex:

- Mid Sussex has an increasing, ageing and changing population.
- Mid Sussex has an ageing population, which has the potential to result in pressure on the capacity of local services and facilities, such as GP surgeries, hospitals and social care.
- The delivery of new homes to address housing need in Mid Sussex will result in pressure on the capacity of local services and facilities including health facilities.
- Whilst residents in Mid Sussex are generally in good health, it is key for the Council to continue to ensure that future development make a positive contribution to residents' health and well-being.
- Ease of access to health facilities is unequal across the district, with limited provision within the rural areas of the district.
- The delivery of new homes to address housing need in Mid Sussex will result in pressure on the education facilities capacity.
- Ease of access to education facilities is unequal across the district, with reduced provision within the rural areas of the district.
- Although crime levels are low within the district, opportunities for crime need to be further reduced.
- The attractiveness of the area directly impacts on house prices which are high in Mid Sussex, leading to affordability issues.
- The housing stock in Mid Sussex is largely dominated by larger detached or semi-detached properties which are owner occupied.
- Mid Sussex has an ageing population which requires a mixture of housing that will meet the needs for older people, whilst also freeing up houses for younger residents.
- An increasing number of households.
- Although affordable homes are consistently being delivered in the District, the need for affordable homes is not met by existing or planned supply.
- There is a need for affordable housing in Mid Sussex where house prices are high compared to incomes.

The Sustainable Development goals related to the social challenges are as follows



Policies within this District Plan to address social challenges are as follows:

Sustainable Communities	DPSC:1 Land west of Burgess Hill DPSC:2 Land to the south of Reeds Lane, Sayers Common DPSC:3 Land at Crabbet Park, Cophorne
Housing	DPH1: Housing DPH2: Sustainable Development - Outside BUA

	<p>DPH3: Sustainable Development - Inside BUA</p> <p>DPH4: General Development Principles for Housing Allocations</p> <p>DPH5 – DPH25: Housing Site Allocations</p> <p>DPH26: Older Persons Housing and Specialist Accommodation</p> <p>DPH27 – DPH28: Older Persons Housing and Specialist Accommodation - Allocations</p> <p>DPH29: Gypsies, Travellers and Travelling Showpeople</p> <p>DPH30: Self and Custom Build Housing</p> <p>DPH31: Housing Mix</p> <p>DPH32: Affordable Housing</p> <p>DPH33: First Homes</p> <p>DPH34: Rural Exception Sites</p> <p>DPH35: Dwelling Space Standards</p> <p>DPH36: Accessibility</p>
<p>Infrastructure</p>	<p>DPI1: Securing Infrastructure</p> <p>DPI2: Planning Obligations</p> <p>DPI3: Major Infrastructure Projects</p> <p>DPI4: Communications Infrastructure</p> <p>DPI5: Open Space, Sport and Recreational Facilities</p> <p>DPI6: Community and Cultural Facilities and Local Services</p> <p>DPI7: Viability</p>

20 Minute Neighbourhoods

In order to achieve sustainable development and promote sustainable communities in accordance with the NPPF and Sustainable Development Goals, this Plan aligns with the concept of 20-minute Neighbourhoods.

What is a 20-minute neighbourhood?

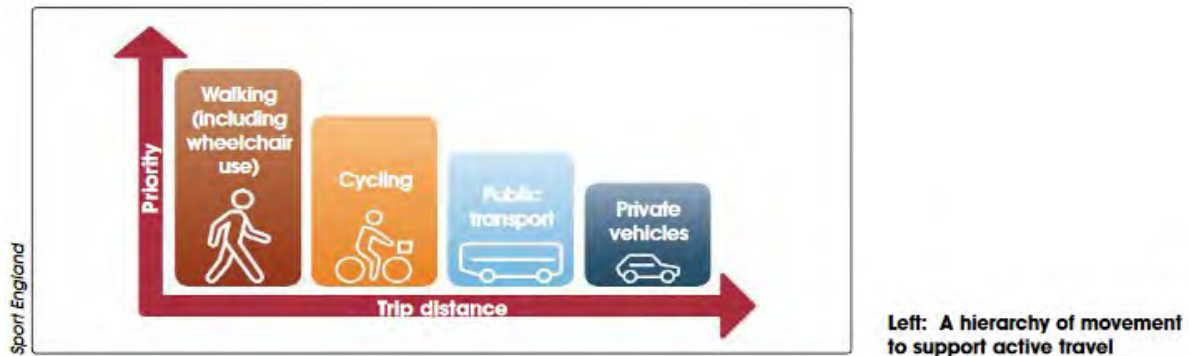
The Town and County Planning Association (TCPA) has produced a 'Guide to 20-minute Neighbourhoods' (March 2021) which provides guidance and information on the features which make up a 20-minute neighbourhood and how to successfully implement in existing places and when planning new large-scale developments.



Figure 1 - Diagram produced in The Town and County Planning Association 'Guide to 20-minute Neighbourhoods - Creating Healthier, Active, Prosperous Communities' (March 2021).

The concept is not new and has been implemented in diverse places across the world and provides the framework to support a holistic and transformational approach to place-making, with significant potential to improve people's health and wellbeing. Research has shown that 20 minutes is the maximum time that people are willing to walk to meet their daily needs.

The 20-minute neighbourhood is about creating attractive, interesting, safe, inclusive, walkable environments in which people of all ages and levels of fitness are happy to travel actively for short distances from home to services and destinations they need to support their day to day lives; these include shopping, school, green spaces and more. One of the core principles is to ensure places are accessible by everyone on foot, wheeling, by cycle, by public transport and without having to use a car.



What are the benefits?

The environments in which we live, work and play have profound impacts on our health and wellbeing. How well we plan, design and create new places and regenerate existing ones will help or hinder work to tackle a wide range of issues, including health inequalities, climate change, and the decline in local high streets and economies. In order to help people and places to thrive and to tackle these issues we need to transform the way that we live. We need to create environments that make it easier for everyone to be more physically active, and our District Plan has a key role to play in achievement of this aspiration.

As identified above there are a number of challenges facing the district with the need to

- reduce carbon emissions and reduced air pollution
- help people become more active, improve physical and mental health and reduce loneliness
- improve prosperity of local high streets
- improve access to affordable healthy food
- improve our towns and villages to make them great places to live.

The 20-minute neighbourhood concept is one mechanism we can use to start to address these interconnected issues simultaneously. The District Plan will seek to ensure we plan, design, regenerate and create inclusive communities that meet people's everyday needs, help to tackle health inequalities, and enable everyone to thrive through the creation of complete, compact and connected neighbourhoods in which people can meet the majority of their daily needs within a short walk or cycle ride, and in which local economies are strengthened and opportunities to reduce food miles are taken.

The benefits that this way of configuring places brings are multiple and include healthier communities, cleaner air, stronger local economies, and better resilience against climate change.

How could it work in rural areas?

In rural areas, the implementation of 20-minute neighbourhoods will pose a different set of challenges from those typical in urban areas. One of the key aims is to support the increased trend for living locally seen during the Covid-19 pandemic and to improve digital connectivity, particularly where existing infrastructure is poor quality with slow speeds, and wherever possible building on the Local Full Fibre Network (LFFN), which is already being rolled out in the district.

The TCPA 20-minute neighbourhood guide sets out the potential of two approaches to rural settlements, the application of which will depend on the location and, in some cases, a combination of the two approaches may be appropriate.

The first, is to ensure that each of the three main towns of Burgess Hill, Haywards Heath and East Grinstead become complete and compact 20-minute neighbourhoods. Although people from nearby villages would need to travel to the town to use its services, once there they would be able to walk within the town and find most of what they need for their everyday lives, rather than having to travel to several different places.

The second approach, more suited to more rural areas of the district which are characterised by smaller villages and more remote from the three towns, is to encourage creation of a network of villages that collectively provide what most people need for their daily lives, joined by active travel and public transport arrangements. There is also the opportunity to promote growth at such settlements that would provide new facilities, such as education and health, for both new and existing residents to benefit from.

There is clear synergy with this approach and the 20-minute neighbourhood principles more generally embedded in the Vision and Objectives of West Sussex County Council's Local Transport Plan (LTP) 2022-2036 which seeks to support a 'healthy West Sussex' and enable rural communities to 'live locally by accessing local services or nearby towns'. The LTP sets out a number of measures designed to support this objective including reducing the need to travel by car referred to as 'local living', delivering an active travel strategy and development of a coherent network of active travel facilities which is inclusive for all users, supporting delivery of Local Cycling Walking and Infrastructure Plan (LCWIP) and making active travel modes and shared transport services more attractive options.

4. District Plan – Supporting Evidence

Evidence Base

Plans must be underpinned by relevant and up to date evidence, which is proportionate, focused tightly on supporting and justifying the policies concerned. To support the updated District Plan, the following evidence base studies were commissioned.

- **Strategic Housing Market Assessment (SHMA)** – to establish the district’s housing need, including affordable housing and older persons’ accommodation and inform the need for potential site allocations
- **Gypsy and Traveller Accommodation Assessment (GTAA)** – to establish the district’s need for Gypsy and Traveller pitches and inform the need for potential site allocations
- **Economic Growth Assessment (EGA)** – to establish needs for office, industrial and storage and distribution uses and inform the need for potential site allocations
- **Retail and Town Centre Study** – to establish requirements for retail, leisure and town centre uses and to inform the need for potential site allocations
- **Urban Capacity Study** – to assess the potential supply of housing from brownfield sites within the district’s main urban areas
- **Transport Study** – to assess potential site allocations for their impact on the transport network
- **Air Quality** – to assess the impacts of additional traffic movements on Ashdown Forest SAC/SPA and Stonepound Crossroads AQMA
- **Water Cycle Study** – to assess the potential issues relating to future development and the impacts on water supply, wastewater collection and treatment and water quality.
- **Viability Assessment** – to assess the implications of the Plan on viability of development, to confirm the Plan is deliverable in viability terms.
- **Infrastructure Delivery Plan (IDP)** – an Infrastructure Delivery Plan is required to support the plan and set out the infrastructure requirements required to mitigate development impacts.
- **Sustainability Appraisal (SA)** – a legal requirement, to appraise options for strategy, policies and sites against sustainability criteria and assess impacts on social, environmental and economic objectives
- **Habitats Regulations Assessment (HRA)** – a legal requirement to test whether a plan could significantly harm the designated features of a European site; for the District Plan this relates to Ashdown Forest SAC/SPA.

These additions to the evidence base complement the existing substantial evidence base that supported the adopted District Plan. The Evidence Base is available to view on the District Plan web page (www.midsussex.gov.uk/DistrictPlan) and will be kept up-to-date as the District Plan proceeds to adoption.

Site Selection

The selection of sites within this District Plan has been informed by a detailed and robust site selection process. The starting point is the Council’s Strategic Housing and Employment Land Availability Assessment (SHELAA). This forms a pool of sites to assess for their development potential.

A Site Selection methodology was established which was applied to the sites within the SHELAA. The purpose of this process was to reject sites that were not suitable for

development and to identify the most deliverable and developable for allocation within this plan. The process involved assessing sites against 14 assessment criteria which encompassed environmental, delivery and sustainability factors.

The full methodology is set out in District Plan 2021-2039 Site Selection Methodology.

The site assessments and justification for rejecting sites is contained within the Site Selection: Conclusion's paper – available at www.midsussex.gov.uk/DistrictPlan

Sustainability Appraisal (SA)

The District Plan is accompanied by a Sustainability Appraisal (SA), which incorporates Strategic Environmental Assessment (SEA). It is a legal requirement for SA/SEA to be carried out when producing Local Plans. This District Plan is accompanied by Sustainability Appraisal which has been prepared in accordance with relevant legislation, national policy and guidance, and best practice.

The role of the SA is to promote sustainable development, by assessing the extent to which the plan will help achieve environmental, economic and social objectives given all reasonable alternatives. The SA documents appraisals of policy, strategy and site options against a range of sustainability criteria and identifies mitigation where any negative impacts can be expected. This ensures that the plan overall contributes towards sustainable development.

The Sustainability Appraisal is an iterative process, prepared and updated at each stage of the plan making process as additional options or mitigation are identified.

Habitats Regulations Assessment (HRA)

The District Plan is accompanied by a Habitats Regulations Assessment (HRA) which has been prepared in accordance with relevant legislation, guidance and best practice. The objective of the HRA is to identify if any aspects of the District Plan will have a likely significant effect, or where relevant, an adverse effect on the integrity of the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).

The main potential impacts arising from the District Plan are recreational pressure and air quality. These are considered in detail in the HRA and Policy DPC6 sets out the strategic solution to recreational pressure and the approach to mitigation.

The HRA is an iterative process, prepared and updated at each stage of the plan making process.

Duty to Co-Operate

In accordance with legislation and national policy, the Council has a duty to co-operate with neighbouring authorities and other prescribed bodies on strategic matters that cross administrative boundaries.

Cross-boundary strategic issues are well established; these were identified during production of the adopted District Plan and during ongoing dialogue between authorities during production of respected Local Plans and Local Plan Reviews. The Council is aware of the respective housing and employment need positions of its neighbours through ongoing

work, joint evidence base commissions and cross-boundary strategic working (such as ongoing progress with the Local Strategic Statement ‘LSS3’ with the West Sussex and Greater Brighton authorities as described in Section 2).

Officers held a virtual briefing with neighbouring and nearby authorities on the purposes and review of the District Plan in September 2021. This session also contained a briefing on the district’s housing requirement and site selection process. The Site Selection Methodology was shared with all parties for comments; these have been reflected in the final version for publication.

Duty to co-operate meetings have been held with Crawley and Horsham at officer level to discuss the unmet need position within the Northern West Sussex Housing Market Area and to seek solutions. In addition, meetings have been ongoing with neighbouring authorities where there are likely to be cross-boundary impacts.

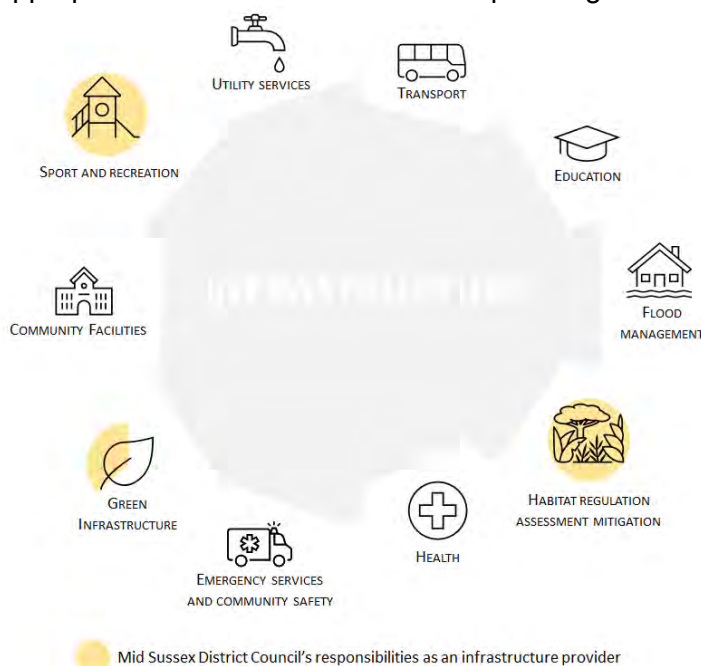
The duty to co-operate is an ongoing process and further co-operation will occur as the draft Plan progresses. In accordance with the NPPF, Statements of Common Ground will be prepared to capture cross-boundary matters and document progress in co-operating to address these, as the Draft Plan progresses towards Submission.

Infrastructure

As part of the local plan making process, the Council, as the local planning authority, has worked closely with key infrastructure providers and organisations to identify the level of infrastructure required to support planned development and to help ensure it will be accompanied by the necessary infrastructure, in the right place at the right time, to support sustainable communities and meet the plan’s Strategic Objectives. The Infrastructure Delivery Plan, Viability Study and liaison with site promoters form vital pieces of the Plan’s evidence base.

How is the level of required infrastructure determined?

It is vital the development which we are planning for in the District Plan is supported by the appropriate level of infrastructure and planning for the delivery of necessary infrastructure is key to achieving the Council’s updated Strategy and delivery of sustainable development.



The ultimate delivery of the full range of required infrastructure is not however fully within the council’s control and is instead dependent on partnership working between a variety of public, private and voluntary sector agencies. The Council has limited responsibilities in the delivery of most infrastructure, and as such is heavily reliant on external providers and organisations expertise and advice to determine what is needed to support

development in the plan and to ultimately deliver the required infrastructure.

The Council publishes an annual Infrastructure Funding Statement (IFS) online at <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/>. The IFS provides an overview of the development contributions (section 106 planning obligations) secured, received, allocated and spent during the report year.

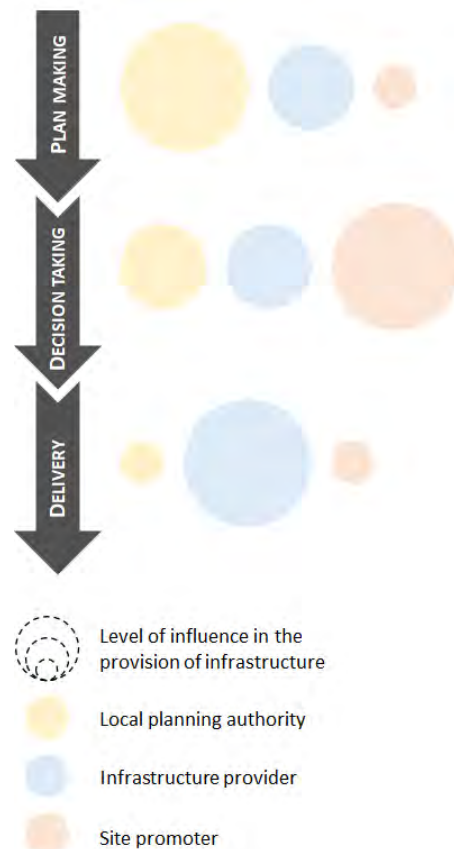
In 2020/21 the Council collected over £2.7m from planning obligations to be spent on infrastructure. The total amount of money spent in 2020/21 was £2.6m. The IFS sets out details of where this money is allocated and spent. Over the last three years, over 60% of funds secured through new development was directly collected and managed by other providers.

It is accepted that there is a wide range of infrastructure needs across the district, not all of these are required to support development through the District Plan 2021-2039. The preparation of the District Plan is intended to focus on the provision of new infrastructure to serve proposed future development and its role is not to remedy pre-existing deficiencies in infrastructure unless those deficiencies will be made more severe by new development (this is in accordance with legal and national policy requirements).

From an early stage of the plan-making process, the Council has engaged with infrastructure providers and site promoters. It has acted as a link to ensure that there is a joint understanding of the level of infrastructure required to be delivered for each new development, in particular for significant sites, as well as sufficient capacity and funding for timely delivery.

The Infrastructure Delivery Plan displays the outcomes of this collaborative approach and details the expected infrastructure to support development identified in the District Plan.

The Council is committed to securing and overseeing the delivery of the appropriate level of infrastructure to support future development across the district, but is aware of its changing role as development proposals progress through the planning system. At the application and delivery stage, the Council will be bounded by the provider's advice and will work proactively to secure and deliver the infrastructure.



5. Vision and Objectives

District Plan Vision

The Plan is based on the vision for the District set out in the adopted District Plan.

“A thriving, attractive and resilient District, which is a highly sustainable and desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental well-being of our District and the quality of life for all, now and in the future.”

The vision is underpinned by three priority themes that promote the development of sustainable communities:

- **Environment:** Protecting and enhancing the natural, built, and historic environment;
- **Economy:** Promoting economic vitality; and
- **Social:** Ensuring cohesive, safe and healthy communities

Strategic Objectives

The three priority themes are supported by 15 strategic objectives which help guide the strategy and policies within this Plan. These strategic objectives remain unchanged from the adopted District Plan; they are still reflective of the Environmental, Economic and Social challenges facing the district and there have been no changing local circumstances or updated evidence to suggest that they need revising.

Environment

Protecting and enhancing the natural, built, and historic environment

1. To promote development that makes the best use of resources and increases the sustainability of communities within Mid Sussex, and its ability to adapt to climate change
2. To promote well located and designed development that reflects the District’s distinctive towns and villages, retains their separate identity and character and prevents coalescence
3. To protect valued landscapes for their visual, historical and biodiversity qualities
4. To protect valued characteristics of the built environment for their historical and visual qualities
5. To create and maintain easily accessible green infrastructure, green corridors and spaces around and within the towns and

villages to act as wildlife corridors, sustainable transport links and leisure and recreational routes

6. To ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This includes as a priority the provision of efficient and sustainable transport networks

Economy
Protecting economic vitality

7. To promote a place which is attractive to a full range of businesses, and where local enterprise thrives
8. To provide opportunities for people to live and work within their communities, reducing the need for commuting
9. To create and maintain town and village centres that are vibrant, attractive and successful and that meet the needs of the community
10. To support a strong and diverse rural economy in the villages and the countryside
11. To support and enhance the attractiveness of Mid Sussex as a visitor destination

Social
Ensuring cohesive, safe and healthy communities

12. To support sustainable communities which are safe, healthy and inclusive
13. To provide the amount and type of housing that meets the needs of all sectors of the community
14. To create environments that are accessible to all members of the community
15. To create places that encourage a healthy and enjoyable lifestyle by the provision of first class cultural and sporting facilities, informal leisure space and the opportunity to walk, cycle or ride to common destinations

6. District Plan Strategy

Current District Plan Strategy

The adopted District Plan Spatial Strategy focuses development towards the three towns (Burgess Hill, East Grinstead and Haywards Heath) and encourages proportionate growth at other settlements to meet local needs and support the provision of local services. This spatial strategy informed the location of allocations within the adopted District Plan and subsequent Site Allocations DPD.

The plan periods for the adopted District Plan and this updated District Plan overlap. Development already planned for ('commitments' i.e. sites with planning permission or allocations with the Sites DPD or Neighbourhood Plans) is consistent with the existing District Plan strategy.

This updated District Plan extends the plan period to 2039, an additional eight years. It must account for changing evidence and circumstances, including an increased housing requirement. As part of the review process, it has been necessary to revisit the adopted spatial strategy to assess whether it can still be applied when assessing options for increased growth to meet needs over a longer period.

The District Plan review process has therefore sought to determine a) whether the existing strategy is still relevant given any changes to evidence or local circumstances; and b) whether the current strategy can be maintained given the extended plan period; future predicted needs; and availability of sites.

Areas with Potential for Further Growth

Given the environmental and infrastructure constraints within some areas of the district, existing committed development, and location of deliverable/sustainable sites with potential for allocation within the Strategic Housing and Employment Land Availability Assessment (SHELAA), some areas within the district have higher potential for further growth than others.

The findings of the evidence base has indicated that, beyond existing commitments:

- There is limited further growth potential at East Grinstead and Haywards Heath and AONB settlements
- There is the potential for growth at some settlements not within the AONB and the extent of growth is dependent upon the characteristics of the settlements and the availability/size of sites which can make the settlements more sustainable (i.e. by providing much needed infrastructure such as primary schools and enhancing/creating village centres which offer much needed access to shops and services)

Potential for Growth at Settlements

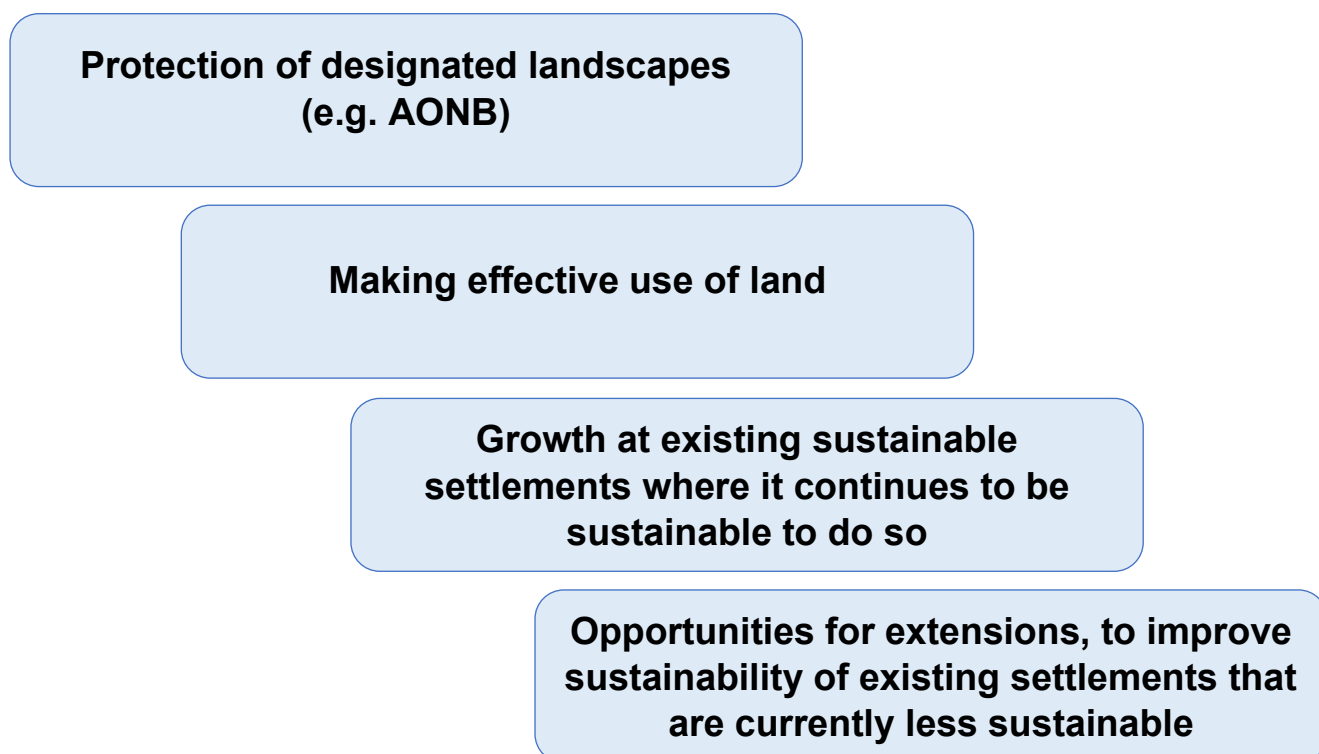
Limited Further Growth Potential	Potential for Proportionate Growth	High Growth Potential
Ansty	Burgess Hill	Copthorne (Crabbet Park)
East Grinstead	Cuckfield	Sayers Common
Haywards Heath	Crawley Down	
Hassocks	Ashurst Wood	
Hurstpierpoint	Albourne	
Lindfield	Bolney	
Ardingly	Pease Pottage	
Balcombe	Scaynes Hill	
Handcross		
Horsted Keynes		
Turners Hill		
West Hoathly		
Sharpthorne		
Twineham		

	Settlement within the High Weald AONB
	Settlement contains a "Significant Site" with potential

It is therefore necessary to revise the District Plan strategy insofar as it relates to additional growth beyond that already planned for.

Updated District Plan Strategy

Further growth identified within this draft District Plan will be in accordance with the draft revised District Plan Strategy, which is based on the following four key principles:



Protection of designated landscapes (e.g. AONB)

Strategic Objectives met	3 - To protect valued landscapes
District Plan Policies	11 - Support Mid Sussex as a Visitor Destination DPC4: High Weald Area of Outstanding Natural Beauty

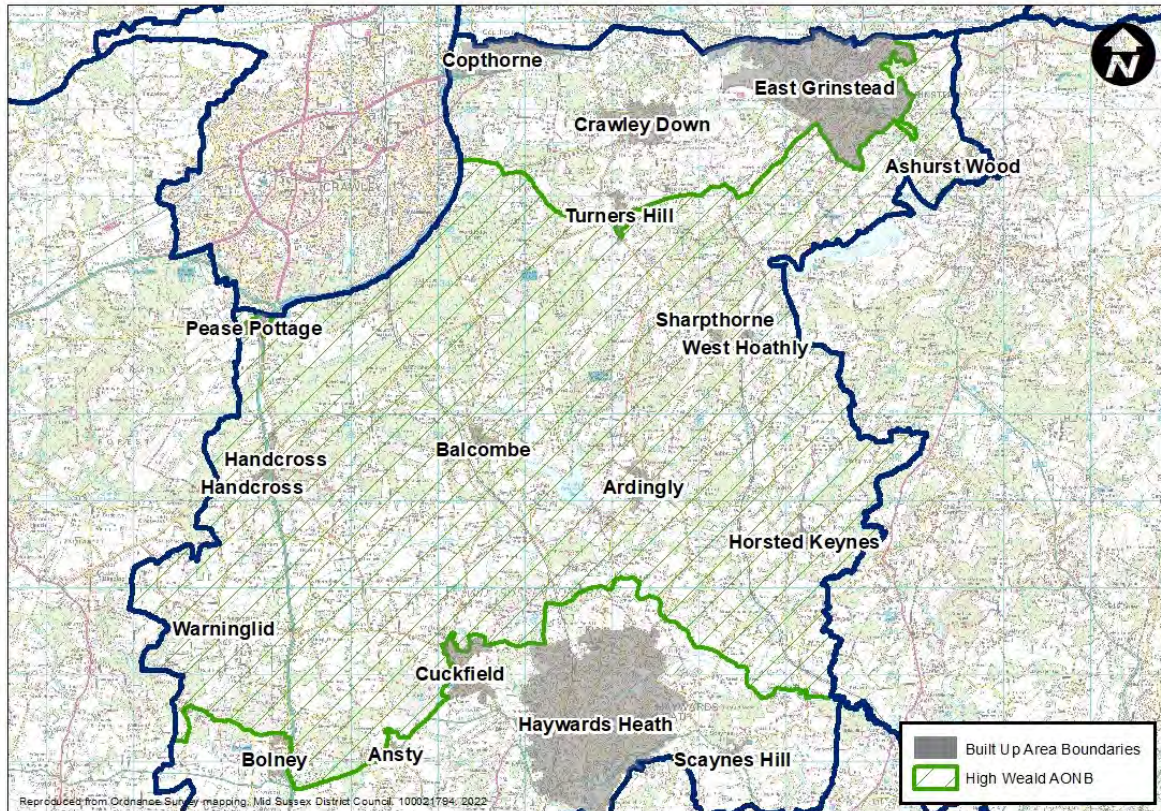
How?

A key principle for the District Plan Strategy and Strategic Objective of the Plan is the protection of designated landscapes and in Mid Sussex District this is the High Weald Area of Outstanding Natural Beauty. (Approximately 11% of Mid Sussex District is within the South Downs National Park, however, the District Plan does not include this area as the South Downs National Park Authority is the local planning authority for this area). Whilst protection of designated landscapes is important for the landscape itself, it also has benefits by being an attractive destination for visitors.

Why?

An Area of Outstanding Natural Beauty (AONB) is an area of land protected by the Countryside and Rights of Way Act 2000 for its outstanding natural beauty. The purpose of the landscape designation is to conserve and enhance the natural beauty of the area.

There are 34 AONBs in England covering 15% of the land. The High Weald AONB was designated in 1983. It has an area of 1,461 sq km and covers four counties and 11 districts. Nearly 50% of Mid Sussex District is within the High Weald AONB; there are 163.6 sq km of AONB land within Mid Sussex District which is approximately 11% of the High Weald AONB.



The High Weald AONB is a historic landscape characterised by a deeply incised, ridged and faulted landform of clays and sandstone, with numerous gill streams and woodlands. Small irregularly-shaped and productive fields typically used for livestock grazing are often bounded by hedgerows and woodland. Dispersed historic settlements of farmsteads and late Mediaeval villages are characteristics as are historic routeways.

The High Weald AONB Management Plan is the strategy for looking after the High Weald AONB in order to achieve the statutory purpose of conserving and enhancing the High Weald AONB. The Management Plan can be used to guide environmental land management and assess the impact of development or other changes on the High Weald AONB.

National planning policy and guidance is clear that great weight should be given to conserving and enhancing the landscape and scenic beauty of AONBs and its wildlife and cultural heritage. These areas along with National Parks and the Broads have the highest status of protection (NPPF, July 2021: paragraph 176).

As such, this District Plan places great importance on protecting the High Weald AONB such as through Policy DPC4. This approach is also in line with national policy which makes clear that the scale and extent of development in protected landscapes should be limited (NPPF, July 2021: paragraph 176). In assessing potential housing sites and identifying proposed site allocations, protection of the High Weald AONB was central to the site selection process.

As part of the evidence base for this District Plan, two topic papers have been prepared that assess the impact of potential housing sites on the High Weald AONB and also assess if the proposed site allocations could be considered as major development in line with paragraph 177 of the NPPF (July 2021). The national policy position is that major development should not be permitted other than in exceptional circumstances and where they are in the public interest.

Making Effective Use of Land

Strategic Objectives met

- 1 - Sustainable Development and Adaptation to Climate Change
- 2 - Maintaining Settlement Identity and Character
- 3 - To protect valued landscapes
- 9 - Create and Maintain Town and Village Centres
- 12 - Support Safe, Healthy and Inclusive Communities

District Plan Policies

- DPB1:** Character and Design
- DPC1:** Protection and Enhancement of the Countryside

How?

Making effective use of land means maximising opportunities for reusing brownfield sites and ensuring that the full potential of a site is considered when proposals are put forward. It also means that, where greenfield sites are required, development is planned at an appropriate density to make efficient and effective use of the site.

Development that makes effective use of land meets the Plan’s Strategic Objectives in supporting sustainable communities by delivering development in, typically, existing urban areas close to existing services and facilities. An increased customer base can help support these services and spark investment. Bringing vacant sites back into use can improve the street scene making places safer and more attractive to live and work. The reuse of buildings can avoid the release of energy embedded in existing materials and incorporate improvements such as biodiversity net gain, thereby helping to reduce the district’s carbon footprint and adapt to the impacts of climate change.

Why?

As a predominately rural district opportunities for brownfield development are largely limited to the three main towns and larger villages. Unlike some neighbouring authorities, the opportunity for the large-scale redevelopment of brownfield sites, such as ports or traditional industries, is minimal. Ensuring that land within the district is used effectively is an important consideration in the preparation of this District Plan and in achieving its strategic objectives, particularly around creating sustainable communities and reducing pressures on the countryside.

National planning policy (NPPF chapter 11) and guidance:

- promotes the use of previously developed land (PDL) or ‘brownfield’ land wherever possible;
- encourages the consideration of various and innovative approaches to accommodating growth; and

- supports a proactive approach in identifying opportunities to bring forward suitable brownfield land to help meet development needs.

To support the above, an Urban Capacity Study (UCS) was commissioned to assess the potential quantum of new housing that could be delivered from brownfield sites, thereby contributing towards the district's housing need.

The UCS considers the potential from brownfield sites in detail, recognising that there are often feasibility issues, neighbouring uses to consider, and that development of brownfield sites are often challenging in viability terms due to existing land values and clear-up costs.

Growth at existing sustainable settlements where it continues to be sustainable to do so

Strategic Objectives met

- 1 - Sustainable Development and Adaptation to Climate Change
- 2 - Maintaining Settlement Identity and Character
- 3 - To protect valued landscapes
- 5 - Create and Maintain Green Infrastructure
- 6 - Infrastructure to Support Sustainable Communities
- 7 - Encourage Business and Thriving Local Enterprise
- 8 - Opportunities to Live and Work within Communities
- 9 - Create and Maintain Town and Village Centres
- 12 - Support Safe, Healthy and Inclusive Communities
- 13 - Provide Housing to Meet Community Needs
- 14 - Create Accessible Environments
- 15 - Provide Cultural, Leisure and Sporting Facilities

District Plan Policies

- DPS6:** Health and Wellbeing
- DPC2:** Preventing Coalescence
- DPB1:** Character and Design
- DPT1:** Placemaking and Connectivity
- DPT4:** Active Travel
- DPH1:** Housing
- DPI1:** Securing Infrastructure
- DPI4:** Communications Infrastructure

How?

Promoting growth at existing sustainable settlements meets the Plan's Strategic Objectives by ensuring development can be directed away from protected landscapes within the district towards locations which benefit from existing infrastructure and services. Growth at these locations can contribute towards improved and/or new facilities to the benefit of all the community.

Increased population can also provide additional support for local businesses and town/village centres through increased patronage and staffing. Sustainable expansion of an existing settlement will help provide the critical mass to support viable sustainable travel solutions and improved active travel connectivity for all the community, reducing the need to travel by car and reducing the district's carbon footprint.

Why?

It is necessary to manage the location and scale of housing and employment space across the district and this Plan provides the opportunity to protect what we know is special while taking responsibility to shape future development positively, for all our residents and visitors.

The District Plan, in providing a land use framework for Mid Sussex, seeks to manage change in the most sustainable way possible. We have a responsibility to ensure that change and the new places we create meet our current and future needs and can be designed in a way that is equally as rich, maintains local distinctiveness and is fully inclusive to all members in our community.

The Plan aims to support sustainable development. This element of the proposed strategy is a continuation of the 2018 District Plan Strategy and subsequent Site Allocations DPD; focusing development towards the three main towns primarily and supporting proportionate growth at other settlements to meet local needs and support the provision or retention of local services.

In order to maintain and enhance existing sustainable settlements in the Plan, careful account has been given to the characteristics of each settlement, their role and function and not simply their size, along with the infrastructure and services they support in order to determine the extent of new growth they can accommodate sustainably. It is recognised that sustainability is based on many factors and, a wide range of development will be welcomed where it that helps existing centres to provide a mix of uses and continue to be hubs for communities, by providing employment, services, retail and social facilities.

The approach to expand existing settlements can also help support delivery of 20-minute neighbourhood principles by increasing housing density and creating compact and well-connected places, investing in and expanding existing sustainable and active travel links within the more sustainable settlements in Mid Sussex, enabling residents to easily access a range of services that meet their day to day needs either by active travel modes or public transport. Supporting the 20-minute neighbourhood principles, the Plan also aims to support better opportunities for villages to work collectively with other settlements to provide safe and sustainable access to a better range of services for their shared community as a connected network.

When is it no longer sustainable?

The quality of the environment in Mid Sussex is not limited to those areas recognised by National designations, the district is formed of a wealth of landscape, cultural and heritage assets which contribute to the rich character, making it a desirable place to live and work.

Whilst development already planned for (for example, District Plan, Sites DPD and Neighbourhood Plan allocations) is consistent with the adopted strategy, it is becoming more challenging to deliver future growth in accordance with this strategy. This limits capacity for further sustainable at some settlements.

There are a number of significant constraints which need to be taken into account when assessing whether future growth is compliant with this element of the strategy. The availability of sites which continue to be capable of accommodating sustainable growth has become much more limited, particularly at East Grinstead and Haywards Heath and larger villages. The Plan can therefore only accommodate a proportion of housing need sustainably through expansion of existing settlements and the Strategy has had to evolve in order to meet the needs of the district sustainably.

The Site Selection process will assist in determining the extent development can be delivered in accordance with this element of the strategy.

Opportunities for extensions, to improve sustainability of existing settlements that are currently less sustainable

Strategic Objectives met

- 1 - Sustainable Development and Adaptation to Climate Change
- 3 - To protect valued landscapes
- 5 - Create and Maintain Green Infrastructure
- 6 - Infrastructure to Support Sustainable Communities
- 7 - Encourage Business and Thriving Local Enterprise
- 8 - Opportunities to Live and Work within Communities
- 9 - Create and Maintain Town and Village Centres
- 10 - Support Strong and Diverse Rural Economy
- 12 - Support Safe, Healthy and Inclusive Communities
- 13 - Provide Housing to Meet Community Needs
- 14 - Create Accessible Environments
- 15 - Provide Cultural, Leisure and Sporting Facilities

District Plan Policies

- DPS6:** Health and Wellbeing
- DPB1:** Character and Design
- DPT1:** Placemaking and Connectivity
- DPT4:** Active Travel
- DPH1:** Housing
- DPI1:** Securing Infrastructure
- DPI4:** Communications Infrastructure

How?

This element of the District Plan strategy recognises that there are some settlements that are less sustainable, but there are opportunities for growth. By planning for a quantum of development which would support provision of new facilities – such as education, health, retail, employment, community and open space this would not only meet the needs of new residents but would also provide much needed facilities for existing communities which would allow these settlements to be more sustainable, reducing reliance on the private car, and embracing the principle of 20-minute neighbourhoods.

Significant scale development can also better support more diverse needs in housing with affordable and specialist extra care and older persons accommodation making the settlement more inclusive and overall, more sustainable.

Why?

The existing District Plan Strategy and planning policy more generally has historically sought to resist all but small-scale growth at smaller rural settlements on the basis they are currently unsustainable. The result of which has reinforced a strong reliance on use of the private car to access all but the most basic of services and needs in neighbouring larger settlements. Such small scale, sometimes piecemeal development, has increased population size but not reached a critical mass to support new facilities and services.

Many villages have seen the closure of the local public house(s) and convenience shops and the impact of tidal movements of cars and residents leaving to access school, work and leisure during the day has resulted in lack of patronage for existing village services and impacted on the sense of community in some places. Many rural villages are also often characterised by higher priced properties and ageing population, where affordability is limiting the opportunities for many younger people to remain in the village. Equally, a lack of suitable and specialist accommodation for older people often leads to people being forced to move away from the village to get the support they need.

The proposed strategy is therefore seeking to extend existing less sustainable communities, which currently have the benefit of only limited services, with development of a scale which can provide the infrastructure and services which will not only meet the needs of the new community but of those in the existing community as well.

This can be achieved by developing a single large site providing facilities and services on site; or a combination of smaller sites, that on their own would not deliver sustainable development, but collectively would support new schools, neighbourhood centres and employment opportunities. This strategy will help to reduce the tidal flow of people out of the settlement each day by providing new neighbourhood centres with potential for appropriate scale commercial development and new schools, along with affordable and specialist extra care housing and accommodation for older people in the community.

Based around the 20-minute neighbourhood principles, the Plan seeks to deliver complete, compact and well-connected communities which provide the facilities and services to support the day to day needs of the community as a whole, accessed by walking, wheeling and cycling. The Plan will also seek to support the continued trend of home working and the many associated benefits it can bring to our communities in terms of wellbeing and life/ work balance, supporting local businesses and services, reducing the need to travel by car.

Poor digital connectivity can however be a significant barrier in our more rural communities. Delivery of growth at these settlements can also support delivery of advanced digital infrastructure with fast reliable broadband speeds, where currently network providers deem it unviable to do so, which is key to supporting successful home working. The increased quantum of development will also enable viable support for improved bus services along with active travel links to nearby settlements to access train services, facilities and goods in our main towns and will be to the benefit of the whole community.

Spatial Strategy - Distribution

Future growth within Mid Sussex is planned for as follows:

- **Commitments:** sites with planning permission, allocations in the adopted Site Allocations DPD and 'made' Neighbourhood Plans
- **District Plan 2021 – 2039 Allocations:** sites allocated for development within this plan

For the plan period 2021 – 2039, the distribution of future growth from all sources is set out in Tables 1a (by Settlement) and 1b (by Parish).

Settlement	Commitments (at 1 st April 2022)	District Plan 2021 – 2039 Allocations	Total Housing Supply 2021 - 2039
Albourne	51	0	51
Ansty	17	82	99
Ardingly	41	0	41
Ashurst Wood	105	12	117
Balcombe	35	0	35
Bolney	63	200	263
Burgess Hill	5,279	1,758	7,037
Copthorne	374	1,500	1,874
Crawley Down	150	387	537
Cuckfield	74	0	74
East Grinstead	1,769	45	1,814
Handcross	69	0	69
Hassocks	794	25	819
Haywards Heath	1042	235	1,277
Hickstead	3	0	3
Horsted Keynes	57	0	57
Hurstpierpoint	17	90	107
Lindfield	249	0	249
Pease Pottage	259	0	259
Sayers Common	170	2,393	2,563
Scaynes Hill	23	30	53
Sharpthorne	51	0	51
Slaugham	10	0	10
Staplefield	3	0	3
Turners Hill	65	0	65
Twineham	9	0	9
Warninglid	3	0	3
West Hoathly	4	18	4
TOTAL	10,786	6,757	17,543

Table 1a – Commitments by Settlement

Parish	Commitments (at 1 st April 2022)	District Plan 2021 – 2039 Allocations	Total Housing Supply 2021 - 2039
Albourne	51	1,850	1901
Ansty and Staplefield	86	142	228
Ardingly	41	0	41
Ashurst Wood	105	12	117
Balcombe	35	0	35
Bolney	63	200	263
Burgess Hill	5,215	358	5,573
Cuckfield	74	0	74
East Grinstead	1,769	45	1,814
Hassocks	794	25	819
Haywards Heath	1,042	175	1,217
Horsted Keynes	57	0	57
Hurstpierpoint and Sayers Common	187	2,033	2,220
Lindfield	2	0	2
Lindfield Rural	270	30	300
Slaugham	339	0	339
Turners Hill	65	0	65
Twineham	12	0	12
West Hoathly	55	0	55
Worth	524	1,887	2411
TOTAL	10,786	6,757	17,543

Table 1b – Commitments by Parish

Settlement Hierarchy

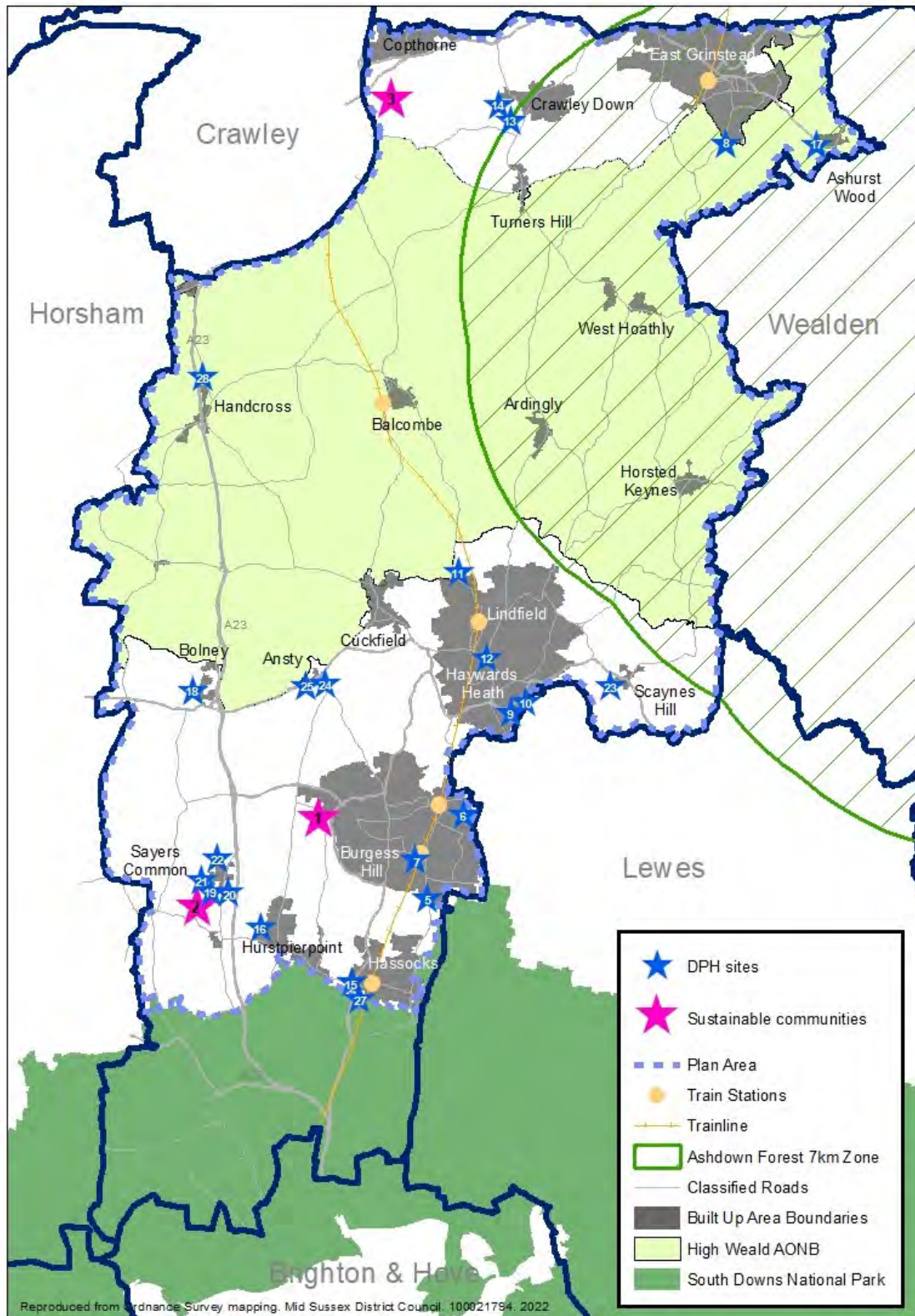
Mid Sussex has a distinctive settlement pattern, containing three main towns and a large number of and wide variety of villages. A settlement hierarchy has been developed which identifies five categories of settlement within Mid Sussex. This is based on an assessment of their facilities, characteristics and functional relationships with their surrounding areas. The position of settlements within the hierarchy will be kept under review, particularly as development proposed within this plan is delivered alongside accompanying services, facilities and infrastructure.

Category	Settlement characteristics and function	Settlements
Category 1 - Town	Settlement with a comprehensive range of employment, retail, health, education leisure services and facilities. These settlements will also benefit from good public transport provision and will act as a main service centre for the smaller settlements.	Burgess Hill East Grinstead Haywards Heath
Category 2 - Larger Village	Larger villages acting as Local Service Centres providing key services in the rural area of Mid Sussex. These settlements serve the wider hinterland and benefit from a good range of services and facilities, including employment opportunities and access to public transport.	Copthorne Crawley Down Cuckfield Hassocks Hurstpierpoint Lindfield

Category 3 - Medium Village	Medium sized villages providing essential services for the needs of their own residents and immediate surrounding communities. Whilst more limited, these can include key services such as primary schools, shops, recreation and community facilities, often shared with neighbouring settlements.	Albourne Ardingly Ashurst Wood Balcombe Bolney Handcross Horsted Keynes Pease Pottage Sayers Common Scaynes Hill Sharpthorne Turners Hill West Hoathly
Category 4 - Small Village	Small villages with limited services often only serving the settlement itself.	Ansty Staplefield Slaugham Twineham Warninglid
Category 5 - Hamlets	These small settlements have very limited or no services.	Hamlets such as: Birch Grove Brook Street Hickstead Highbrook Walstead

Table 2

Key Diagram



7. Policies

The following sections contain planning policies which will be used by the District Council when determining planning applications.

The policies are supported by the conclusions reached within the evidence base and in compliance with national policy requirements. The background to each policy/section and the supporting evidence used to justify such a policy is set out.

Strategic and Non-Strategic Policies

The NPPF (paragraph 21) requires Local Plans to clearly indicate which policies are “Strategic” and “Non-Strategic”. This is indicated next to each policy. The definition is as follows:

- **Strategic Policies:** should set the overall strategy for the pattern, scale and design quality of places and make provision to meet needs (e.g. housing, employment and retail), infrastructure, community facilities and the conservation and enhancement of natural and built environment. Strategic policies should look ahead over a minimum 15-year period from adoption – it is anticipated this Local Plan will be adopted in 2024, therefore strategic policies look forward to 2039.
- **Non-Strategic Policies:** these policies set out more detail for specific areas, neighbourhoods or types of development and can include allocating sites, provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and set other development management policies.

Policies within this District Plan should be read in conjunction with national policy and other policies within the Development Plan. This includes Neighbourhood Plans. Whilst Neighbourhood Plans cannot set Strategic Policies, they can include Non-Strategic Policies. Non-Strategic policies within the latest plan to be adopted/made take precedence where there is a conflict.

Policy Review Status

The District Plan Review indicated which of the current adopted policies required an update, which were still up-to-date and therefore do not need updating and highlighted additional areas where a new policy is required. For completeness, all District Plan policies that will form part of the development plan upon adoption are completed within this updated District Plan.

The review status is indicated next to each policy. Appendix 1 sets this out in summary form and also indicates which current policy it will supersede upon adoption. The review status is one of the following:

- **No Update:** The policy continues to comply with national policy and the evidence base has determined it is still effective as it stands.
- **Minor Update:** The Policy only requires minor amendments (such as factual updates) that do not change the overall meaning or direction of the policy.

- **Major Update or New Policy:** Changes in national policy or updated evidence suggests that the policy may require updating in full or that new Policies are required.

Policy Themes

The District Plan policies are contained within the following themed sections:

Sustainability
Natural Environment and Green Infrastructure
Countryside
Built Environment
Transport
Economy
Sustainable Communities
Housing
Infrastructure

8. Sustainability



Sustainability	DPS1: Climate Change H4: Sustainable Design and Construction DPS3: Renewable and Low Carbon Energy Schemes DPS4: Flood Risk and Drainage DPS5: Water Infrastructure and the Water Environment DPS6: Health and Wellbeing
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DPS1: Climate Change

Policy: Review Status: Strategic Objectives:	Strategic New Policy 1 – Sustainable Development and Adaptation to Climate Change 5 – Create and Maintain Green Infrastructure
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The impacts of climate change are seen in both the built and natural environment. The planning system is a tool that provides an opportunity to minimise vulnerability to the effects of climate change. Policy DPS1 is an overarching policy that sets out principles and signposts to other more detailed policies. It sets out that the Council will take an integrated and holistic approach to address the causes of climate change and to increase resilience to the effects of climate change.

All development can play its part in taking action on climate change, however, the opportunities and measures available may vary depending on the type of development. Applicants will need to consider climate change at an early stage and incorporate measures to:

- Reduce carbon emissions
- Maximise carbon sequestration
- Adapt to and mitigate for climate change

DPS1: Climate Change

The Council will take an integrated and holistic approach to address the causes of climate change and to increase resilience to the effects of climate change. This will be achieved by:

Reducing carbon emissions

- a. Development will be expected to demonstrate that measures have been taken to reduce carbon emissions, including improvements in energy efficiency and in the design and construction of buildings. This includes new buildings and the conversions of existing buildings. Detailed requirements are set out in Policies DPS2: Sustainable Design and Construction, DPS3: Renewable and Low Carbon Energy Schemes, and the Mid Sussex Design Guide SPD.
- b. The Council will support renewable and low carbon energy schemes in line with the requirements set out in Policy DPS3: Renewable and Low Carbon Energy Schemes.
- c. Development should adopt the principles of the 20-minute neighbourhood and prioritise active travel such as walking and cycling and sustainable transport such as public transport to reduce reliance on private modes of transport and to facilitate healthy lifestyles. Detailed requirements are set out in Policies DPT1: Placemaking and Connectivity; DPT3: Active Travel; and DPB1: Character and Design.
- d. Development likely to be sources of other greenhouse gas emissions (methane, nitrous oxide and fluorinated gases) will be expected to demonstrate that opportunities have been taken to reduce these emissions. This includes proposals that may use these other greenhouse gases in their design and operation, for example, refrigerants and air conditioning systems.

Maximising carbon sequestration

- e. Development should protect existing trees, woodland and hedgerows and seek opportunities to plant appropriate species of trees in appropriate places. Detailed policy requirements are set out in Policy DPN4: Trees, Woodland and Hedgerows.
- f. Development will be expected to protect existing carbon sinks and take opportunities to provide nature-based solutions for carbon capture.
- g. Development will be expected to take opportunities to improve soil health and minimise disturbance to soils in order to protect soil biodiversity and carbon storage. Detailed policy requirements are set out in Policies DPN1: Biodiversity, Geodiversity and Nature Recovery, and DPS2: Sustainable Design and Construction.

Climate change adaptation and mitigation

- h. Development must be designed to minimise vulnerability from the effects of climate change particularly in terms of overheating, flood risk and water supply. Detailed policy requirements are set out in Policies DPS2: Sustainable Design and Construction; DPS4: Flood Risk and Drainage; and DPS5: Water Infrastructure and the Water Environment.
- i. Development will be expected to incorporate green infrastructure and nature-based solutions to moderate surface and air temperatures, increase biodiversity and as part of sustainable drainage systems. Detailed requirements are set out in Policies DPB1: Character and Design; DPS4: Flood Risk and Drainage; and DPN3: Green Infrastructure.
- j. Development will be expected to achieve a net gain in biodiversity and contribute to ecological networks. Detailed policy requirements are set out in Policies DPN1: Biodiversity, Geodiversity and Nature Recovery, and DPN2: Biodiversity Net Gain.

- k. The Council will seek adaptation and mitigation measures that improve resilience to climate change and allow communities, businesses, buildings, infrastructure and ecology to adapt to the impacts of climate change.

DPS2: Sustainable Design and Construction

Policy: Strategic
Review Status: Major Update
Strategic Objectives: 1 – Sustainable Development and Adaptation to Climate Change

All development in its design, construction, operation and use will be expected to contribute to the reduction of carbon emissions, increase resilience to the impacts of climate change and improve sustainability. Applicants will need to consider:

- Measures that move towards zero carbon development;
- Energy use;
- Preventing overheating;
- Water resources and water efficiency;
- Soil protection; and
- Minimising waste.

To help ensure development design and construction contributes to the reduction of carbon emissions and delivers a sustainable development, the BREEAM sustainability assessment method will be utilised and applied.

BREEAM is an industry recognised sustainability assessment and rating methodology. Assessment and rating certification is delivered through accredited third-party assessors. BREEAM assessments consider a wide range of sustainability factors and are completed throughout the lifecycle of the development. The assessments include an analysis of energy use, health and wellbeing, innovation, land use, materials, management, pollution, transport, waste and water.

Where applicable, consideration of how the appropriate design standard will be achieved must start at the inception stage of the design process in order to maximise the developments potential to achieve the highest scores. Details should be set out in the accompanying Design and Access Statement, including evidence of registration of the project with BREEAM. Unless otherwise agreed, compliance with BREEAM and Home Quality Mark (HQM) standards shall be demonstrated via formal certification. Equivalent standards for buildings by nationally recognised certification bodies may also be accepted, such as Passivhaus or AECB standards.

According to the Department for Environment Food & Rural Affairs (UK Statistics on Waste July 2021) the development industry made up over half (62%) of the UK's total waste production in 2018 from construction, demolition and excavation. In addition, a notable proportion of materials delivered to building sites are never used and go straight to waste.

In order to help move away from a linear economy where products are made to be used and sent to waste, and towards a circular economy which looks to minimise waste production all

developments will be expected to demonstrate how they will follow the waste hierarchy and avoid any avoidable waste production and disposal. This can be achieved by:

- prioritising the use of previously developed land and buildings,
- reusing and recycling of appropriate materials that arise through demolition and refurbishment, including the reuse of non-contaminated excavation soil and hardcore within the site,
- prioritising the use of locally sourced and/ or sustainable materials and construction techniques, and
- using resilient, low maintenance materials

DPS2: Sustainable Design and Construction

All developments are required to submit a Sustainability Statement to demonstrate how through its design, construction, operation and use it will contribute to the reduction of carbon emissions, increase resilience to the impacts of climate change and improve sustainability.

Prioritise retention and retrofit of existing buildings or structures to capture the embodied energy associated with the building's original construction unless it can be demonstrated to be unviable to do so.

Development, as defined below, will be required to meet the relevant minimum defined standards until they are superseded by higher national standards.² Sustainable Settlement Allocations DPSC1 – DPSC3 will need to meet higher standards where specified in DPH4.

Towards zero carbon development

Unless it can be demonstrated that doing so is not technically feasible or unviable, development will be required to achieve the minimum standards below:

Development Type	Scale of Development	Minimum Standard
Residential new build	Up to 150 dwellings	HQM 3 Star*
Residential new build	> 150 dwellings	HQM 3.5 Star*
Residential Refurbishment	Major	HQM 3 Star*
Non-residential new build ³	All	BREEAM Excellent**
Non-residential Refurbishment	Over 500m ²	BREEAM Excellent - Refurbishment and Fit-Out Technical Standards**
Sustainable Settlement allocations – Residential	1000+	Refer to DPH4

² References to major development are as defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015 or as amended.

³ Defined as development falling outside of Use Class C3 as defined by The Town and Country Planning (Use Classes) Order 1987 (as amended).

new build - DPSC1 – DPSC3		
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* Developments must achieve a minimum score of 50 credits in the energy category and 12 credits in the water category.

**Developments must achieve an 'Outstanding' rating in energy and water categories and demonstrate reasonable endeavours to achieve an 'Outstanding' rating overall.

Assessment frameworks

Planning applications should be accompanied by a pre-assessment, demonstrating how the BREEAM Technical Standards and/or Home Quality Mark (HQM) Star rating, or any future replacement standards, will be met. Evidence demonstrating the project has been registered with BRE during the design stage shall be submitted with any application and conditions will be imposed to secure appropriate certification to demonstrate compliance with this policy.

Householder development

Proposals for householder development are encouraged to be as energy efficient and sustainable as possible incorporating the principles of both this policy and Policy DPS1: Climate Change.

Energy use

All new developments should follow the energy hierarchy to contribute to reducing carbon emissions: being lean (using less energy), being clean (supplying energy efficiently) and being green (using renewable energy).

Demonstrate how opportunities for incorporating decentralised, renewable and low carbon energy schemes have been taken into all new development in line with Policy DPS3: Renewable and Low Energy Carbon Schemes.

Prevent overheating

All new development shall demonstrate how design measures have been incorporated to:

- minimise potential overheating such as through the layout, orientation and design of buildings;
- maximise passive cooling through natural ventilation and other passive means. Reliance on air conditioning systems should be avoided. Green and blue infrastructure should be incorporated in line with Policy DPN3: Green Infrastructure to provide natural cooling and shading.

Water resources and water efficiency

New development proposals must accord with the findings of the Gatwick Sub Region Water Cycle Study with respect to water resources, water quality, water supply and wastewater treatment.

To achieve the sustainable water consumption rates above all development must demonstrate that opportunities have been taken to incorporate measures to reduce water use and reuse water including:

- Water efficient fittings and appliances;
- Rainwater harvesting;

- Greywater recycling; and
- Sustainable drainage systems in accordance with Policy DPS4: Flood Risk and Drainage.

All development will be required to meet the relevant minimum standards set out above until they are superseded by higher national standards.

Soil

Best practice should be complied with to protect soils during construction from compaction, pollution and erosion. Undisturbed soils should be protected and measures should be taken to minimise sterilisation of soils by permanent impermeable surfaces.

Minimise waste

In accordance with relevant policies in the West Sussex Waste Local Plan, all development will be required to support the circular economy by minimising construction, demolition and excavation waste disposed of in landfill and follow the waste hierarchy to maximise recycling and re-use of material.

New development shall be designed with adequate and easily accessible storage space that supports separate collection of dry recyclables and food waste, as well as residual waste taking account of guidance in the Mid Sussex Design Guide SPD.

DPS3: Renewable and Low Carbon Energy Schemes

Policy: Strategic
Review Status: Minor Update
Strategic Objectives: 1 – Sustainable Development and Adaptation to Climate Change

Carbon emissions in Mid Sussex reduced by 38% between 2005 and 2018⁴, supported by a reduction in fuel consumption and an increase in cleaner sources of energy. Over the same 13-year period, fuel consumption in Mid Sussex fell by 9.5% to 3,048.4 GWh. The largest consumer sector remains the Domestic sector followed by Road Transport and Industry & Commercial.

The Mid Sussex Sustainable Energy Study (2014) assessed the potential for renewable energy schemes in Mid Sussex and concluded that the level of technical and capacity constraints in the District were likely to prevent major new renewable energy schemes from coming forward over the Plan period. Renewable energy schemes were likely to be relatively small-scale and the local community could have a key role through Neighbourhood Plans or other local initiatives. Such projects could help support energy security, respond to fuel

⁴ Source: Department for Business, Energy & Industrial Strategy, 2020 (CO2 emissions estimates 2005-2018 in Mid Sussex (tonnes per capita))

poverty, reduce carbon emissions and provide a longer-term financial return for communities.

The National Planning Policy Framework (paragraph 155, NPPF) lists the use of renewable resources, including the development of renewable energy, as a core planning principle. Paragraphs 155 and 156 of the NPPF requires local planning authorities to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily and support community-led initiatives for renewable and low carbon energy.

In relation to Gatwick Airport, any proposed development would need to comply with Aerodrome Safeguarding requirements to ensure that the operational integrity and safety of the airport are not compromised. Schemes such as large banks of solar panels will need to be assessed at an early stage as they have the potential to impact on navigational aids at the airport.

DPS3: Renewable and Low Carbon Energy Schemes

Proposals for new renewable and low carbon energy projects (other than wind energy development – see below), including community-led schemes, will be permitted provided that any adverse local impacts, including cumulative, can be made acceptable, with particular regard to:

- i. Landscape and visual impacts such as on the setting of the South Downs National Park and High Weald Area of Outstanding Natural Beauty, and the appearance of existing buildings;
- ii. Ecology and biodiversity, including protected species, and designated and non-designated wildlife sites;
- iii. Residential amenity including visual intrusion, air, dust, noise, odour, traffic generation, recreation and access.

Proposals for wind energy development involving one or more wind turbines will be granted if:

- the development site is in an area identified as suitable for wind energy development in the 2014 Sustainable Energy Study, or as updated;
- the development is of an appropriate scale; and
- following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

Assessment of impacts will need to be based on the best available evidence, including landscape capacity studies.

Opportunities for incorporating decentralised, renewable and low carbon energy schemes into all new development should be considered from the outset utilising the Mid Sussex Design Guide SPD.

For all new proposals, there should be appropriate plans and mechanisms in place for the removal of the installation on cessation of generation and restoration of the site to either its original use or an acceptable alternative use.

DPS4: Flood Risk and Drainage

Policy:	Strategic
Review Status:	No Update
Strategic Objectives:	1 – Sustainable Development and Adaptation to Climate Change

The district is generally an area of low flood risk. The main flood risk is from surface water (pluvial), followed by risk from rivers and streams (fluvial). The Strategic Flood Risk Assessment identifies areas that are at risk from flooding from a range of sources and has been used to inform the preparation of the District Plan. Strategic Flood Risk Assessment mapping is kept up-to-date with new flood events and updated releases of information from the Environment Agency.

The Strategic Flood Risk Assessment provides information on the use of Sustainable Drainage Systems (SuDS) to avoid increased flood risk or adverse impact on water quality. Well-designed SuDS rarely function with only a single purpose and should be considered early in the design process due to their relationship with other design considerations. The Mid Sussex Design Guide SPD contains advice and examples of incorporating SuDS into developments.

Guidance on the potential benefits, suitability and feasibility for different SuDS types is available in the 'Water. People. Places.' document prepared for South East England authorities. This guidance should be used as part of the initial planning and design process for all types of residential, commercial and industrial development.

Development proposals in areas at risk of flooding will be considered in accordance with the National Planning Policy Framework (paragraphs 166, 167 and 168). Development proposals in areas at risk of flooding should be supported by site-specific flood risk assessments in accordance with paragraphs 167 and 168 of the NPPF.

The 2020 Gatwick Sub Region Water Cycle Study provides an assessment of the capacity of current water infrastructure to accommodate growth without adversely affecting the environment. The Study sets out a number of recommendations that address capacity and quality issues identified in the Study, summarised in Section 13.2. The use of Sustainable Drainage Systems (SuDS) continue to have an important role in managing flood risk, with added potential benefits on water resources, climate resilience, water quality, biodiversity and amenity.

DPS4: Flood Risk and Drainage

Proposals for development will need to follow a sequential risk-based approach, ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. The District Council's Strategic Flood Risk Assessment (SFRA) should be used to identify areas at present and future flood risk from a range of sources including fluvial (rivers and streams), surface water (pluvial), groundwater, infrastructure and reservoirs.

Particular attention will be paid to those areas of the District that have experienced flooding in the past and proposals for development should seek to reduce the risk of flooding by achieving a reduction from existing run-off rates.

Sustainable Drainage Systems (SuDS) should be implemented in all new developments of 10 dwellings or more, or equivalent non-residential or mixed development⁵ unless demonstrated to be inappropriate, to avoid any increase in flood risk and protect surface and ground water quality.

Arrangements for the long-term maintenance and management of SuDS must also be identified through a maintenance and management plan, to be secured by condition at planning application stage.

For the redevelopment of brownfield sites, any surface water draining to the foul sewer must be disconnected and managed through SuDS following the remediation of any previously contaminated land.

SuDS should be sensitively designed and located to promote improved biodiversity, an enhanced landscape and good quality spaces that improve public amenities in the area, where possible.

The preferred hierarchy of managing surface water drainage from any development is:

1. Infiltration Measures,
2. Attenuation and discharge to watercourses; and if these cannot be met,
3. Discharge to surface water only sewers.

Land that is considered to be required for current and future flood management will be safeguarded from development and proposals will have regard to relevant flood risk plans and strategies.

DPS5: Water Infrastructure and Water Environment

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	1 – Sustainable Development and Adaptation to Climate Change 6 – Infrastructure to Support Sustainable Communities

Mid Sussex District is located in an area of serious water stress. Development must be positively planned to minimise its impact on water resources and water quality and to provide resilience against the impacts of climate change including security of water supply.

A growing population and an increase in development will place pressure on wastewater treatment works, with some having limited available capacity to meet these needs.

Developers will be required to demonstrate that there is adequate capacity or additional infrastructure can be provided in time both on and off the site to serve the development and that it would not lead to problems for existing users. Developers will need to show that they have engaged with service providers at the earliest opportunity to establish the proposed development's demand for water supply and wastewater infrastructure and how this can be met. In some circumstances this may make it necessary for developers to carry out

⁵ As set out in Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2010.

appropriate studies to ascertain whether the proposed development will lead to overloading of existing water and wastewater infrastructure.

It is essential to ensure that infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. Where there is a capacity constraint and no improvements are programmed by the statutory undertaker the developer will need to contact the statutory undertaker/s to agree the improvements required and how these will be funded prior to any occupation of the development.

DPS5: Water Infrastructure and Water Environment

Development should protect and enhance water resources and water quality and take measures to control pollution of the water environment. Development will only be permitted where it can be demonstrated that it would not result in an unacceptable risk to or adversely affect the quality, quantity, levels and ecology of surface water and groundwater resources including reservoirs.

Water infrastructure

Development proposals which increase the demand for off-site water service infrastructure will be permitted where the applicant can demonstrate:

- that sufficient capacity already exists off-site for foul and surface water provision. Where capacity off-site is not available, proposals must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development's occupation; and
- that there is adequate water supply infrastructure to serve the development. Where water supply infrastructure is not sufficient or available, proposals must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development's occupation.

Planning conditions and/ or obligations will be used to secure necessary infrastructure provision.

Development should connect to a public sewage treatment works. If this is not feasible, proposals should be supported by sufficient information to understand the potential implications for the water environment.

The development or expansion of water supply or sewerage/ sewage treatment facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long-term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impacts and that any such adverse impact is minimised.

DPS6: Health and Wellbeing

Policy: Strategic
Review Status: New Policy

Strategic Objectives: 1 – Sustainable Development and Adaptation to Climate Change
5 – Create and Maintain Green Infrastructure
6 – Infrastructure to Support Sustainable Communities
12 – Support Safe, Healthy and Inclusive Communities
13 – Provide Housing to Meet Community Needs
14 – Create Accessible Environments
15 – Provide Cultural, Leisure and Sporting Facilities

The built and natural environment is a determinant of health and wellbeing. The places where people live and work can affect health and wellbeing both positively and negatively. The design and quality of neighbourhoods can create opportunities to facilitate healthy lifestyles such as through the provision of green space, inclusive design, adopting the principles of a 20 minute neighbourhood and supporting the ability to choose to walk and cycle over the use of the private car. The design and quality of neighbourhoods can also exacerbate health inequalities such as through the convenience of unhealthy food choices or high levels of pollution or crime.

Whilst Mid Sussex is one of the least deprived areas in the country, there are opportunities to improve health and wellbeing through the creation and management of a high quality built and natural environment. This policy sets out the measures that development must take to ensure a positive impact on health and wellbeing and to enable healthy lifestyles.

This policy primarily relates to new residential and commercial development, however, all development, including householder development, can contribute to enabling healthy lifestyles such as by incorporating measures to reduce crime and to provide resilience against the effects of climate change.

Proposals for major residential and commercial development need to undertake a screening for a Health Impact Assessment (HIA). A Health Impact Assessment is a useful tool that helps to identify the health impacts of a proposed plan or project and can ensure future health and wellbeing needs are met. An HIA makes recommendations to maximise the positive health and wellbeing impacts, minimise the negative health and wellbeing impacts and reduce health inequalities.

DPS6: Health and Wellbeing

All new development must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address health and wellbeing needs in Mid Sussex, as identified in the Joint Strategic Needs Assessment and West Sussex Joint Health and Wellbeing Strategy.

In order to maximise opportunities to enable healthy lifestyles, all new development must (where applicable for the type of development proposed):

- i. Be of high quality in its design and construction and be set within an attractive environment;
- ii. Be well-designed to ensure legibility of layout and the public realm including through the use of materials;
- iii. Meet the needs of the community through accessible, inclusive and safe design including incorporating measures to reduce opportunities for crime;
- iv. Prioritise active travel such as walking and cycling and sustainable transport such as public transport;
- v. Incorporate green infrastructure and biodiversity;

- vi. Provide opportunities for both high quality private outdoor space and publicly accessible open and green space;
- vii. Support and facilitate healthy eating including through the provision, where possible, of local and domestic food production such as allotments, community growing spaces and community orchards;
- viii. Be supported by the necessary infrastructure;
- ix. Take opportunities to increase community connectivity and social inclusion such as by providing spaces for the community to gather, socialise and interact;
- x. Take opportunities to improve the factors that can contribute to poor health and social inequalities such as noise, air quality, crime, access to education and employment, and local amenity; and
- xi. Incorporate measures to provide resilience against the effects of climate change including overheating, flood risk and drought.

Detailed policy requirements are set out elsewhere in this Plan.

Proposals for major residential and major commercial developments* must set out how they address the requirements of this policy as part of a planning application. In order to satisfy this policy requirement, applicants will need to undertake a screening for a Health Impact Assessment (HIA). If necessary, a full HIA proportionate to the development proposed, will need to be prepared to demonstrate the health outcomes on the health and wellbeing of communities.

*As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015 or as amended.

9. Natural Environment and Green Infrastructure



Natural Environment and Green Infrastructure	DPN1: Biodiversity, Geodiversity and Nature Recovery DPN2: Biodiversity Net Gain DPN3: Green Infrastructure DPN4: Trees, Woodland and Hedgerows DPN5: Historic Parks and Gardens DPN6: Pollution DPN7: Noise Impacts DPN8: Light Impacts and Dark Skies DPN9: Air Quality DPN10: Land Stability and Contaminated Land
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DPN1: Biodiversity, Geodiversity and Nature Recovery

Policy: Review Status: Strategic Objectives:	Strategic Major Update 3 – Protect Valued Landscapes 5 – Create and Maintain Green Infrastructure
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Biodiversity and geodiversity are important natural capital assets and provide benefits as part of ecosystem services. Nature recovery is important for delivering improvements to nature, ecological networks and green infrastructure.

The District has a number of valued landscapes, habitats and species that need to be protected and enhanced. There are:

- 13 Sites of Special Scientific Interest (SSSI)
- 50 Local Wildlife Sites (LWS)
- 6 Local Nature Reserves (LNR)
- Over 1,400 areas of ancient woodland covering over 5,200Ha.
- Priority habitats found in Mid Sussex including ancient woodland, coastal & floodplain grazing marsh, deciduous woodland, ghyll woodland, lowland calcareous grassland, lowland fen, lowland heathland, lowland meadow, reedbed, traditional orchard, and wood-pasture & parkland.

Whilst designated nature conservation sites and priority habitats are of significant value, the overall ecological network of habitats and species is important for biodiversity and nature recovery. The fragmentation of habitats and deterioration of the wider ecological network is a threat to biodiversity and nature recovery particularly in the context of climate change.

Soil is a valuable natural resource and is under threat from loss and degradation. The structure and health of soil is important for food production, biodiversity and carbon storage. Development should protect and enhance soils.

All development can contribute to biodiversity improvements and nature recovery and it is expected that development incorporates biodiversity features; restores, enhances and creates ecological networks; and delivers green infrastructure. Development should align with the objectives and priorities of the Local Nature Recovery Strategy and other relevant local strategies.

DPN1: Biodiversity, Geodiversity and Nature Recovery

Biodiversity and geodiversity are important natural capital assets and provide benefits as part of ecosystem services. Nature recovery is important for delivering improvements to nature, ecological networks and green infrastructure.

Development proposals will also need to be in accordance with DPN2: Biodiversity Net Gain.

Biodiversity will be protected and enhanced by ensuring development:

- Protects existing biodiversity by retaining features of interest, including connecting routes as part of wider ecological networks, and ensuring the appropriate long-term management of those features;
- Takes appropriate measures to avoid and reduce disturbance to sensitive habitats and species in accordance with the mitigation hierarchy set out in national policy. Unavoidable damage to biodiversity must be offset through ecological enhancements and mitigation measures (or compensation measures in exceptional circumstances and as a last resort);
- Contributes and takes opportunities to improve, enhance, manage and restore biodiversity and green infrastructure, so that there is a net gain in biodiversity, including through creating new designated sites and locally relevant habitats, and incorporating biodiversity features within developments;
- Minimises habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats and increase coherence and resilience;
- Promotes the restoration, management and expansion of priority habitats in the District; and
- Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated Local Wildlife Sites, Local Nature Reserves and irreplaceable habitats such as Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including priority habitats, wildlife corridors, ancient, aged or veteran trees, Biodiversity Opportunity Areas, areas identified for nature recovery, and Nature Improvement Areas.

Designated sites will be given protection and appropriate weight according to their importance and the contribution they make to wider ecological networks and nature recovery.

Soils are important for biodiversity and carbon storage. Soils will be protected and enhanced, including the best and most versatile agricultural land, by development

avoiding soil disturbance, compaction and erosion. Development should not result in soil pollution.

Geodiversity will be protected by ensuring development prevents harm to geological conservation interests, and where possible, enhances such interests. Geological conservation interests include Regionally Important Geological and Geomorphological Sites.

Development should seek to meet the objectives of the Local Nature Recovery Strategy, taking opportunities to deliver ecological networks and green infrastructure. Development will need to demonstrate that it will not harm or adversely affect an area or areas identified as opportunities for nature recovery.

DPN2: Biodiversity Net Gain

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	3 – Protect Valued Landscapes 5 – Create and Maintain Green Infrastructure

The requirement for mandatory biodiversity net gain was introduced by the Environment Act 2021. Biodiversity net gain seeks to deliver measurable improvements for biodiversity by creating or enhancing habitats in association with development. Biodiversity net gain can be delivered on-site, off-site or through a combination of on-site and off-site measures, however, the implementation of biodiversity net gain should align with the local objectives and priorities for biodiversity improvements and nature recovery.

The mitigation hierarchy set out in the National Planning Policy Framework should be followed: firstly by avoiding harm to biodiversity, then providing mitigation with compensation as a last resort.

The Council will encourage development to maximise opportunities to deliver higher levels of biodiversity net gain especially where development is located in or in proximity to the Biodiversity Opportunity Areas or priority habitats.

DPN2: Biodiversity Net Gain

Development (as defined in the Environment Act 2021 or its secondary legislation or as amended by the government) will need to deliver a net gain in biodiversity which will contribute to the delivery of ecological networks, green infrastructure and nature recovery.

Development will need to demonstrate through a Biodiversity Gain Plan that measurable and meaningful net gains for biodiversity will be achieved and will be secured and managed appropriately.

Principles of Biodiversity Net Gain

Development will need to demonstrate that good practice principles for biodiversity net gain have been followed.

Development will need to demonstrate that the mitigation hierarchy has been followed.

Proposals for biodiversity net gain will also need to be in accordance with Policies DPN1: Biodiversity, Geodiversity and Nature Recovery; DPN3: Green Infrastructure; and DPN4: Trees, Woodland and Hedgerows, and avoid harm to irreplaceable habitats, protected sites and priority habitats.

Biodiversity net gain, including off-site biodiversity net gain, should align with the objectives and priorities of the Nature Recovery Network, Local Nature Recovery Strategy and other relevant local strategies, contributing and connecting to wider ecological networks and green infrastructure. Consideration should be given to landscape character when developing proposals for biodiversity net gain.

It is expected that development proposals will enhance existing biodiversity and incorporate features to encourage biodiversity and pollination within and around the development.

Level of Biodiversity Net Gain

Biodiversity net gain will be calculated and assessed using the Government's published biodiversity metric. The biodiversity net gain calculation and assessment should be completed by a suitably experienced and qualified ecologist and submitted in full with the application for development.

The minimum percentage of biodiversity net gain required will be 10% as set out in legislation (or as amended by the government) or greater where it is required in another policy or a Supplementary Planning Document. The Council will encourage a higher level of biodiversity net gain and developments should seek to maximise opportunities, especially where development is located in or in proximity to the Biodiversity Opportunity Areas or priority habitats.

A minimum percentage of biodiversity net gain of 20% will be required on Significant Sites DPSC1 – DPSC3.

The Council will publish further guidance on delivering biodiversity net gain on its website. This guidance will be reviewed periodically to ensure it reflects local priorities and opportunities.

DPN3: Green Infrastructure

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	5 – Create and Maintain Green Infrastructure 6 – Infrastructure to Support Sustainable Communities 15 – Provide Cultural, Leisure and Sporting Facilities

Green infrastructure (including blue infrastructure) delivers a range of environmental, social and economic benefits including resilience to climate change, positive health and wellbeing effects, nature-based solutions and supporting nature recovery.

Existing green infrastructure assets, links and the overall multi-functional network will be protected and new green infrastructure will be encouraged as part of development

proposals. To ensure the existing green infrastructure network is protected, important green infrastructure assets and links will be safeguarded from development.

Land which will be required to create and deliver a multi-functional 'Green Circle' around Burgess Hill will be safeguarded from development. In particular, the following areas as shown on the Policies Maps will be safeguarded as green infrastructure and allocated for informal open space:

- Batchelors Field;
- Land south of Greenlands Drive;
- Nightingale Lane Meadows/ Nightingale Lane Open Space;
- Hammonds Ridge Meadows;
- Maltings Farm;
- Malthouse Lane Meadows;
- Eastlands Farm;
- Grassmere Meadow;
- Pangdene Lane Meadows;
- Land north of Sussex Way;
- Land to the north of Sheddingdean and Leylands Park;
- Bedelands Farm Local Nature Reserve;
- Land along the railway line to the north and south of Wivelsfield Station; and
- Land in the Northern Arc.

The following areas as shown on the Policies Maps will be safeguarded as green infrastructure and allocated for informal open space or linear open space:

- Land from Turvey Wood/ Franklands Wood to the Scrase Valley, Haywards Heath
- Ashenground and Bolnore Woods, Haywards Heath
- Ashplats Wood, East Grinstead
- Spring Copse, East Grinstead
- St. Margaret's Loop, East Grinstead
- Worth Way
- Forest Way

DPN3: Green Infrastructure

Green infrastructure (including blue infrastructure) delivers a range of environmental, social and economic benefits including resilience to the effects of climate change, positive health and wellbeing effects, nature-based solutions and supporting nature recovery.

Green infrastructure assets, links and the overall multi-functional network will be protected and enhanced by ensuring development:

- Responds to and incorporates existing on-site and off-site green infrastructure into the development design; and
- Provides new green infrastructure integrated into the development design; and
- Contributes to the wider green infrastructure network by taking opportunities to improve, enhance, manage and restore green infrastructure, and providing links to existing green infrastructure including outside the development's boundaries.

Applicants should consider from the outset the landscape assets of the site and how they may be used to create part of a coherent landscape structure that links to existing and proposed landscapes to form open space networks whenever possible, revealing existing landscape features.

Green infrastructure design will be expected to demonstrate that opportunities have been taken to:

- Strengthen connectivity and resilience of ecological networks; and
- Improve resilience to the effects of climate change; and
- Support health and wellbeing by providing access to green space, nature and rights of way.

Green infrastructure design should be informed by and respond to existing evidence and guidance on the multi-functional green infrastructure network including Biodiversity Opportunity Area statements, priority habitats, green infrastructure mapping, ecological surveys and landscape character assessments.

Appropriate arrangements and funding for the future long-term management and maintenance of green infrastructure should be identified and implemented. Where appropriate, the Council will seek to secure this via planning conditions and/or planning obligations.

To help deliver a multi-functional green infrastructure network and to protect existing green infrastructure assets and links, the Council has identified land to be safeguarded from development as shown on the Policies Map.

Land which will be required to create and deliver a multi-functional 'Green Circle' around Burgess Hill will be safeguarded from development and the 'Green Circle' will be allocated for informal open space as shown on the Policies Map.

Important green infrastructure assets and links will be safeguarded and allocated for informal open space or linear open space as shown on the Policies Maps.

DPN4: Trees, Woodland and Hedgerows

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	3 – Protect Valued Landscapes
	4 – Protected Built and Historic Environment
	5 – Create and Maintain Green Infrastructure

Trees, woodland and hedgerows make a valuable landscape, amenity and biodiversity contribution to the District, both in urban and rural areas. Mid Sussex is a heavily wooded district with two thirds of this being ancient woodland.

Trees, woodland and hedgerows form part of the District's green infrastructure, and in particular, are important for health and well-being, biodiversity, and increasing resilience to the effects of climate change.

Ancient woods are irreplaceable wildlife habitats with complex ecological conditions that have developed over centuries. They contain a wide range of wildlife including rare species,

however, because the resource is limited and highly fragmented, ancient woodland and their associated wildlife are particularly vulnerable and must be protected from damaging effects of adjacent and nearby land uses that could threaten the integrity of the habitat and survival of its special characteristics.

The District Plan recognises this contribution and will support the protection of trees, woodland and hedgerows, as well as encouraging new planting. Development will be required to incorporate trees, woodland and hedgerows into the design and landscaping scheme.

All hedgerows on farmland and open land are protected and consent is required from the District Council to remove them. The Hedgerow Regulations 1997 also define 'important' hedgerows as being of particular archaeological, historical, wildlife or landscape value.

The District Council will make Tree Preservation Orders or attach planning conditions, in line with national guidance, to protect specific trees, a group of trees or woodlands in the interests of amenity or where they are threatened by development. The amenity value of trees will take into account visibility and characteristics relating to the individual, collective and wider impact including:

- Size and form; and
- Future potential as an amenity; and
- Rarity, cultural or historical value; and
- Contribution to, and relationship with, the landscape; and
- Contribution to the character and appearance of a conservation area.

DPN4: Trees, Woodland and Hedgerows

Trees, woodland and hedgerows are valuable natural capital assets including for biodiversity, nature recovery, green infrastructure, health and wellbeing, and increasing resilience to the effects of climate change.

Protection of trees, woodland and hedgerows

The District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. In particular, ancient woodland and ancient, aged or veteran trees will be protected.

Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance, will not normally be permitted.

Development (including construction and operational activities) resulting in the direct or indirect deterioration or loss of irreplaceable habitats including ancient woodland and ancient, aged or veteran trees will not be permitted unless there are wholly exceptional reasons and in such circumstances, appropriate compensation measures will be provided.

New trees, woodland and hedgerows

Proposals for new trees, woodland and hedgerows should be of suitable species, usually native, and where required for visual, noise or light screening purposes, trees, woodland and hedgerows should be of a size and species that will achieve this purpose.

Proposals for new woodland creation will need to follow best practice guidance and take into account a range of considerations including:

- The biodiversity and amenity value of the existing habitat; and
- The landscape and its character; and
- Heritage and archaeology features; and
- Protected species; and
- Opportunities for natural regeneration; and
- Opportunities to connect to and extend existing woodland; and
- The long-term management arrangements for new woodland planting; and
- Resilience to the effects of pests, disease and climate change.

Development and trees, woodland and hedgerows

Trees, woodland and hedgerows will be protected and enhanced by ensuring development:

- incorporates existing important trees, woodland and hedgerows into the design of new development and its landscape scheme;
- prevents damage to root systems and takes account of expected future growth; and where possible, incorporates retained trees, woodland and hedgerows within public open space rather than private space to safeguard their long-term management;
- has appropriate protection measures throughout the development process;
- secures appropriate long-term management arrangements;
- takes opportunities to plant new trees, woodland and hedgerows within the new development to enhance on-site green infrastructure and increase resilience to the effects of climate change; and
- does not sever ecological corridors created by these assets.

Works to trees

Proposals for works to trees, including felling, will be considered taking into account:

- the condition and health of the trees; and
- the contribution of the trees to the character and visual amenity of the local area; and
- the amenity and nature conservation value of the trees; and
- the extent and impact of the works; and
- any replanting proposals.

Inappropriate or excessive works to trees that will damage their health and/or amenity value will be resisted.

Proposals for works to trees, including felling, may be refused if sufficient information is not provided to justify why works are necessary.

The felling of protected trees will only be permitted if there is no appropriate alternative. Where a protected tree or group of trees is felled, a replacement tree or group of trees, on a minimum of a 1:1 basis and of an appropriate size and type, will normally be required. The replanting should take place as close to the felled tree or trees as possible having regard to the proximity of adjacent properties.

Use of buffer zones

Development should be positioned as far as possible from ancient woodland with a minimum buffer of 15 metres maintained between ancient woodland and the development

boundary. A buffer will also be required for ancient, aged and veteran trees and should be at least 15 times larger than the diameter of the tree or 5m from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. The size of a required buffer zone may vary according to the nature of the site and the proposed development, and if there are other impacts likely to extend beyond the minimum buffer zone distance. Buffer zones should contribute to green infrastructure and wider ecological networks and consist of a semi-natural habitat with appropriate planting. These requirements for an ancient woodland or tree buffer will apply unless superseded by a more environmentally favourable national standard set out in legislation or guidance.

DPN5: Historic Parks and Gardens

Policy: Non-Strategic
Review Status: No Update
Strategic Objectives: 3 – Protect Valued Landscapes
11 – Support Mid Sussex as a Visitor Destination

There are 9 Registered Parks and Gardens of Special Historic Interest in Mid Sussex. In addition there are a large number of historic parks and gardens which are unregistered but which appear on the West Sussex Historic Environment Record. The need to protect such landscapes is also recognised.

DPN5: Historic Parks and Gardens

The character, appearance and setting of a registered park or garden, or park or garden of special local historic interest will be protected. This will be achieved by ensuring that any development within or adjacent to a registered park or garden, or park or garden of special local historic interest will only be permitted where it protects and enhances its special features, setting and views into and out of the park or garden.

DPN6: Pollution

Policy: Non-Strategic
Review Status: New Policy
Strategic Objectives: 3 – Protect Valued Landscapes
12 – Support Safe, Healthy and Inclusive Communities

To protect people, their health and quality of life, and the natural environment, a suite of policies has been developed to prevent development resulting in pollution or hazards. This policy makes clear that all forms of pollution are included with more detailed policy requirements for noise impacts, light impacts, air quality, land stability and contaminated land. This policy also makes clear that mitigation measures may be necessary for development likely to increase levels of pollution.

The Council will publish detailed guidance on its website.

DPN6: Pollution

Development should not result in pollution or hazards, including air, noise, vibration, light, water, soil, odour, dust or other pollutants, which significantly adversely impact on people, including health and quality of life, and the natural environment, including nature conservation sites.

Mitigation measures may need to be implemented for development that is likely to increase levels of pollution, taking into account any cumulative impacts.

Development proposals will need to take into account the Council's published guidance⁶.

Detailed policy requirements are set out in Policies:

- DPN7: Noise Impacts
- DPN8: Light Impacts and Dark Skies
- DPN9: Air Quality
- DPN10: Land Stability and Contaminated Land

DPN7: Noise Impacts

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	3 – Protect Valued Landscapes 12 – Support Safe, Healthy and Inclusive Communities

New development needs to be managed to protect the natural environment and people's health and quality of life from unacceptable levels of noise.

Development proposals will need to take into account the Council's published guidance on noise impacts.

DPN7: Noise Impacts

The natural environment and people's health and quality of life will be protected from unacceptable levels of noise.

Areas valued for tranquillity for recreation and amenity reasons, including protected landscapes and their setting and nature conservation sites, will be protected from unacceptable levels of noise.

Development will only be permitted where it:

- avoids significant adverse impacts on health and quality of life; and
- mitigates and minimises adverse impacts on health and quality of life; and
- where possible, contributes to the improvement of health and quality of life.

Development will be expected to be located, designed and controlled to avoid or minimise any potential significant adverse impacts from noise. Development should have good acoustic design including orientating or organising buildings (including consideration of the internal layout of buildings) to locate more noise sensitive areas, such as the principal

⁶ Such as the [Air Quality and emissions mitigation guidance for Sussex \(2020\)](#)

habitable rooms, away from potential sources of noise. Parking arrangements should be carefully considered to avoid noise and headlight nuisance.

Noise sensitive development, such as residential, will not be permitted in close proximity to existing or proposed development generating high levels of noise, or other sources of high levels of noise such as commercial/ industrial sites or transport sources, unless adequate sound insulation measures, as supported by a noise assessment, are incorporated within the development.

Noise generating development will be permitted where it can be demonstrated that nearby noise sensitive uses (existing or planned) will not be exposed to noise impact that will significantly adversely affect the amenity of existing and future users.

If required by the local planning authority, the applicant will be required to provide:

- an assessment of the impact of noise generated by a proposed development; or
- an assessment of the effect of noise by an existing noise source upon a proposed development.

Development proposals will need to take into account the Council's noise guidance.

DPN8: Light Impacts and Dark Skies

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	3 – Protect Valued Landscapes 12 – Support Safe, Healthy and Inclusive Communities

New development needs to be managed to protect the natural environment and people's health and quality of life from unacceptable levels of light pollution.

It is important that artificial light does not contribute to sky glow, glare and light spillage which impacts on the visibility of the night sky, biodiversity and local character. Dark night skies including those in protected landscapes should be valued and protected from light pollution.

DPN8: Light Impacts and Dark Skies

The natural environment and people's health and quality of life will be protected from unacceptable levels of light pollution.

Development proposals must demonstrate that all opportunities to reduce light pollution (including sky glow, glare and light spillage) have been taken including minimising impacts on local amenity, intrinsically dark landscapes including protected landscapes and areas important for nature conservation and nature recovery.

Artificial lighting proposals (including outdoor lighting, floodlighting and new street lighting) should be minimised in terms of intensity and number of fittings. The applicant should demonstrate that:

- the minimum amount of lighting necessary to achieve its purpose is specified or otherwise justified on safety or security grounds; and

- the design and specification of the lighting would minimise sky glow, glare and light spillage in relation to the visibility of the night sky, local amenity and local character; and
- the means of lighting would be unobtrusively sited and well-screened by landscaping; and
- low energy lighting is used; and
- there would not be an adverse impact on wildlife such as through consideration of the appropriate colour and temperature of lighting.

Where lighting of a landmark or heritage feature is proposed, the level and type of illumination used would enhance the feature itself.

Development proposals will need to take into account the Institute of Lighting Professionals guidance and other relevant guidance.

DPN9: Air Quality

Policy:	Non-Strategic
Review Status:	Minor Update (to policy SA38 Site Allocations DPD)
Strategic Objectives:	3 – Protect Valued Landscapes
	12 – Support Safe, Healthy and Inclusive Communities

Air quality monitoring and modelling undertaken by the Council indicates that there is good air quality within most of the District. The main source of air pollution in the District is road traffic emissions mostly from major roads. Air pollution is associated with a number of adverse health impacts.

Mid Sussex District has one Air Quality Management Area (AQMA) at Stonepound Crossroads in Hassocks. It was declared in 2012 due to high levels of nitrogen dioxide and exceedances are attributed to the topography of the area and the volume of road traffic. Since the AQMA was declared there has been an overall reduction in measured nitrogen dioxide and various measures have been implemented designed to limit the exceedance of the nitrogen dioxide air quality objective.

DPN9: Air Quality

The natural environment and people's health and quality of life will be protected from unacceptable levels of poor air quality.

The use of active and sustainable travel measures and green infrastructure to reduce pollution concentrations and exposure is encouraged.

Development proposals will need to take into account the Council's air quality guidance.

The Council will require applicants to demonstrate that there is not an unacceptable impact on air quality. The development should minimise any air quality impacts, including cumulative impacts from committed developments, both during the construction process and lifetime of the completed development, either through a redesign of the development proposal or, where this is not possible or sufficient, through appropriate mitigation.

Where sensitive development is proposed in areas of existing poor air quality and/ or where major development is proposed, including the development types set out in the Council's current guidance (Air Quality and Emissions Mitigation Guidance for Sussex (2021 or as updated)) an air quality assessment will be required.

Development proposals that are likely to have an impact on local air quality, including those in or within relevant proximity to existing or candidate Air Quality Management Areas (AQMAs) or designated nature conservation areas sensitive to changes in air quality, will need to demonstrate measures/ mitigation that are incorporated into the design to minimise any impacts associated with air quality.

Mitigation measures will need to demonstrate how the proposal would make a positive contribution towards the aims of the Council's Air Quality Action Plan where it is relevant and be consistent with the Council's current guidance as stated above.

Mitigation measures will be secured either through a negotiation on a scheme, or via the use of planning condition and/ or planning obligation depending on the scale and nature of the development and its associated impacts on air quality.

In order to prevent adverse effects on the integrity of the Ashdown Forest SPA and SAC, new development likely to result in increased traffic may be expected to demonstrate how any air quality impacts, including in combination impacts, have been considered in relation to the Ashdown Forest SAC. Any development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate for any potential adverse effects.

DPN10: Land Stability and Contaminated Land

Policy:	Non-Strategic
Review Status:	New Policy
Strategic Objectives:	3 – Protect Valued Landscapes 12 – Support Safe, Healthy and Inclusive Communities

It is important to consider ground conditions when preparing development proposals and any risks from land instability or contamination. Adequate and effective measures will be required to protect land stability and land quality, including measures to protect the natural environment and people from unacceptable risks.

DPN10: Land Stability and Contaminated Land

Development proposals should consider if a site is suitable for its proposed use taking into account ground conditions and any risks from land instability or contamination.

Investigations and assessments of sites located in or in close proximity to potentially unstable or contaminated land will be required to be submitted as part of a planning application. The investigations and assessment work should consider the nature and extent of the risk, and potential impacts to human health, adjacent land uses and the natural environment.

Adequate and effective measures will be required to protect land stability and land quality, including measures to protect the natural environment. In particular, measures should be taken to avoid:

- unacceptable risks to the health of future users and occupiers of the development or people in the locality;
- risks to the structural integrity of buildings or structures on or adjoining the site;
- contamination to soil, watercourses, water bodies, groundwater or aquifers;
- harm to wildlife and the natural environment.

10. Countryside



Countryside	<p>DPC1: Protection and Enhancement of the Countryside</p> <p>DPC2: Preventing Coalescence</p> <p>DPC3: New Homes in the Countryside</p> <p>DPC4: High Weald Area of Outstanding Natural Beauty</p> <p>DPC5: Setting of the South Downs National Park</p> <p>DPC6: Ashdown Forest SPA and SAC</p>
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DPC1: Protection and Enhancement of the Countryside

<p>Policy: Strategic</p> <p>Review Status: Minor Update</p> <p>Strategic Objectives:</p>	<p>3 – Protect Valued Landscapes</p> <p>11 – Support Mid Sussex as a Visitor Destination</p> <p>15 – Provide Cultural, Leisure and Sporting Facilities</p>
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Mid Sussex is a rural District, and the countryside is an asset that is highly valued by the Council and local residents and is recognised as having social value in enhancing the health and wellbeing of residents and visitors. The countryside is a working environment that needs to be managed in a way that enhances the attractiveness of the rural environment whilst enabling traditional rural activities to continue. The rural economy will be supported by other policies within this Plan that permit small-scale development and changes of use that will further economic activities that are compatible with the District's rural character. Its environmental worth will be protected and enhanced by the policies in this Plan.

The primary objective of the District Plan with respect to the countryside is to secure its protection by minimising the amount of land taken for development and preventing development that does not need to be there. At the same time, it seeks to enhance the countryside, support the rural economy by accommodating well-designed, appropriate new forms of development and changes in land use where a countryside location is required and where it does not adversely affect the rural environment.

The Capacity of Mid Sussex District to Accommodate Development Study (June 2014, paragraph 2.138) describes high quality soil as an invaluable and non-renewable natural resource and identifies provisional Agricultural Land Classification Grades across the District which suggest only 455.7 hectares of Grade 2 land (1.4% of the District) and no Grade 1 land within Mid Sussex. A large proportion of the District (63.8%) is Grade 3 land with the potential to be classified as Grade 3a (i.e. best and most versatile agricultural land). Not all land has been surveyed in detail and more detailed field surveys may be required to inform decisions about specific sites. Where identified, Grade 1, 2 and 3a agricultural land should

be protected from development due to its economic importance and geological value. This is the land which is most flexible, productive and efficient and can best deliver future crops for food and non-food uses.

Minerals are a finite resource and can only be worked where they are found. Therefore it is important to use them in the most efficient manner to secure their long term conservation. Where a development is sited in a West Sussex Minerals Consultation Area, further work will be required in conjunction with West Sussex County Council as the Minerals Planning Authority to identify whether minerals are accessible in sufficient amounts to be economically viable to extract.

DPC1: Protection and Enhancement of the Countryside

The countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and:

- it is necessary for the purposes of agriculture; or
- it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.

The best and most versatile agricultural land (Grades 1, 2 and 3a) will be protected from non-agricultural development proposals and will be protected from being covered by artificial surfaces that will prevent future use of the soils. Where significant development of any grade of agricultural land is demonstrated to be necessary, detailed field surveys should be undertaken and proposals should seek to use areas of poorer quality land in preference to that of higher quality.

Development proposals should demonstrate they are informed by landscape character. The Mid Sussex Landscape Character Assessment, the West Sussex County Council Strategy for the West Sussex Landscape, the Capacity of Mid Sussex District to Accommodate Development Study and other available landscape evidence (including that gathered to support Neighbourhood Plans) will be used to assess the impact of development proposals on the rural and landscape character.

Built-up area boundaries are subject to review by Neighbourhood Plans or through a Development Plan Document produced by the District Council.

Economically viable mineral reserves within the district will be safeguarded.

DPC2: Preventing Coalescence

Policy:	Non-Strategic
Review Status:	No Update
Strategic Objectives:	2 – Maintaining Settlement Identity and Character

The settlement pattern of Mid Sussex makes an important contribution to the distinctive character of Mid Sussex and therefore a strategic objective of the Plan is to promote well located and designed development that reflects the distinctive towns and villages, retains their separate identity and character and prevents coalescence.

DPC2: Preventing Coalescence

The individual towns and villages in the District each have their own unique characteristics. It is important that their separate identity is maintained. When travelling between settlements people should have a sense that they have left one before arriving at the next.

Provided it is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside, development will be permitted if it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements, and would not have an unacceptably urbanising effect on the area between settlements.

Local Gaps can be identified in Neighbourhood Plans or a Development Plan Document produced by the District Council, where there is robust evidence that development within the Gap would individually or cumulatively result in coalescence and the loss of the separate identity and amenity of nearby settlements. Evidence must demonstrate that existing local and national policies cannot provide the necessary protection.

DPC3: New Homes in the Countryside

Policy:	Non - Strategic
Review Status:	Minor Update
Strategic Objectives:	3 – Protect Valued Landscapes 10 – Support Strong and Diverse Rural Economy 13 – Provide Housing to Meet Community Needs

The National Planning Policy Framework is clear that the development of isolated homes should be avoided (paragraph 80). However, it is recognised that exceptional circumstances may exist that justify new homes in the countryside. The policy below provides clear guidance on how proposals for such developments will be considered. It also contains criteria on the re-use of rural buildings and replacement dwellings in the countryside.

DPC3: New Homes in the Countryside

1. New homes in the countryside, defined as areas outside the built-up area boundaries, will be permitted in specific circumstances, as set out below:
 - i. Accommodation is essential to enable the operation of an agricultural, forestry or similar rural enterprises requiring full time rural workers to live at, or near, their place of work;
 - ii. In the case of new isolated homes in the countryside, where the design of the dwelling is of exceptional quality, is truly outstanding and would significantly enhance its immediate setting and is sensitive to the character of the local area;
 - iii. Development would involve the subdivision of an existing residential building;
 - iv. The proposed development meets the requirements of Policy DPH2: Sustainable Development – Outside Built-Up Area;
 - v. The proposed development is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside; or
 - vi. Affordable housing in accordance with Policy DPH38: Rural Exception Sites.

2. Permanent agricultural (includes forestry and similar land-based rural enterprise requiring full time rural workers) dwellings will only be permitted to support existing agricultural activities on well-established agricultural units where:
- i. The need cannot be fulfilled by another existing dwelling on, or any other existing accommodation near to, the agricultural unit; and
 - ii. It can be proven that it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times; and
 - iii. It can be proven that the rural enterprise is economically viable. This should include demonstrating that the enterprise has been established continuously for the previous three years and profitable for at least one of them; and
 - iv. It can be proven that the size and location of the dwelling is commensurate with the established functional requirement of the agricultural unit.

Temporary agricultural dwellings essential to support a new rural enterprise either on a newly created agricultural unit or on an established one will be subject to the criteria above and should normally be provided by temporary accommodation.

Applications for the removal of agricultural occupancy conditions will only be permitted where it can be proven that there is no longer any need for the dwelling for someone solely, mainly or last working in agriculture or forestry or other rural based enterprise. This will be based on an up-to-date assessment of the demand for farm (or other occupational) dwellings in the area as a whole, and not just on a particular holding.

New 'granny annexes' that are physically separate to the dwelling are defined as a new home and are subject to the same requirements as above.

3. Re-use of rural buildings for residential use

The re-use and adaptation of rural buildings for residential use in the countryside will be permitted where it is not a recently constructed⁷ agricultural building which has not been or has been little used for its original purpose and:

- i. the re-use would secure the future of a heritage asset; or
- ii. the re-use would lead to an enhancement of the immediate setting and the quality of the rural and landscape character of the area is maintained.

4. Replacement dwellings in the countryside

Replacement dwellings in the countryside will be permitted where:

- i. The residential use has not been abandoned;
- ii. Highway, access and parking requirements can be met;
- iii. The replacement dwelling is of equivalent size, scale and massing and within the same or similar position of the existing dwelling, unless there are demonstrable benefits in relocating the dwelling; and
- iv. The scale, size and massing of the replacement dwelling should maintain or where possible enhance the quality of the natural and/or built landscape, particularly in the High Weald Area of Outstanding Natural Beauty.

New dwellings, including conversions, located within the Ashdown Forest 7km Zone, will be required to comply with Policy DPC6: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).

⁷ The term 'recently constructed' will generally be held to apply to buildings constructed within five years of a planning application for their re-use or adaptation.

DPC4: High Weald Area of Outstanding Natural Beauty

Policy:	Strategic
Review Status:	Minor Update
Strategic Objectives:	3 – Protect Valued Landscapes 11 – Support Mid Sussex as a Visitor Destination

An Area of Outstanding Natural Beauty (AONB) is an area of land protected by the Countryside and Rights of Way Act 2000 for its outstanding natural beauty. The purpose of the landscape designation is to conserve and enhance the natural beauty of the area.

The High Weald AONB was designated in 1983. It has an area of 1,461 sq km and covers four counties and 11 districts. Nearly 50% of Mid Sussex District is within the High Weald AONB; there are 163.6 sq km of AONB land within Mid Sussex District which is approximately 11% of the High Weald AONB.

The High Weald AONB is a historic landscape characterised by a deeply incised, ridged and faulted landform of clays and sandstone, with numerous gill streams and woodlands. Small irregularly-shaped and productive fields typically used for livestock grazing are often bounded by hedgerows and woodland. Dispersed historic settlements of farmsteads and late Mediaeval villages are characteristics as are historic routeways.

The High Weald AONB Management Plan is the strategy for looking after the High Weald AONB in order to achieve the statutory purpose of conserving and enhancing the High Weald AONB. The Management Plan can be used to guide environmental land management and assess the impact of development or other changes on the High Weald AONB. The High Weald AONB Statement of Significance sets out what comprises the natural beauty of the High Weald.

DPC4: High Weald Area of Outstanding Natural Beauty

Development within the High Weald Area of Outstanding Natural Beauty (AONB), as shown on the Policies Maps, will only be permitted where it conserves and enhances natural beauty and has regard to the High Weald AONB Management Plan, in particular;

- the identified landscape features or components of natural beauty and to their setting;
- the traditional interaction of people with the landscape and nature, and appropriate land management;
- the historic landscape, character and local distinctiveness, historic settlement pattern, sense of place and setting of the AONB; and
- the conservation of wildlife and cultural heritage.

Development should demonstrate a positive contribution to the objectives of the High Weald AONB Management Plan and take account of the High Weald Housing Design Guide including applying a landscape-led design approach that reflects High Weald character; using high quality architecture; responding to the historic pattern and character of settlements; and protecting dark skies.

Proposals which support the land-based economy and social well-being of local communities within the AONB that are compatible with the conservation and enhancement of natural beauty will be supported.

Development on land that contributes to the setting of the AONB will only be permitted where it does not detract from the visual qualities and essential characteristics of the AONB, and in particular should not adversely affect the landscape character and views into and out of the AONB by virtue of its location or design.

DPC5: Setting of the South Downs National Park

Policy:	Strategic
Review Status:	No Update
Strategic Objectives:	3 – Protect Valued Landscapes 11 – Support Mid Sussex as a Visitor Destination

The South Downs was established as a National Park in 2010 and over 10% of Mid Sussex District is within the South Downs National Park. The areas of land surrounding the South Downs National Park contribute to the setting of the South Downs National Park.

The statutory purpose for National Parks is set out in the Environment Act 1995. Section 61 provides for the two purposes of National Parks:

- i) To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
- ii) To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Mid Sussex District Council works in partnership with the South Downs National Park Authority to conserve and enhance the landscape and scenic beauty of the South Downs National Park.

DPC5: Setting of the South Downs National Park

Development within land that contributes to the setting of the South Downs National Park will only be permitted where it does not detract from, or cause detriment to, the visual and special qualities (including dark skies), tranquillity and essential characteristics of the National Park, and in particular should not adversely affect transitional open green spaces between the site and the boundary of the South Downs National Park, and the views, outlook and aspect, into and out of the National Park by virtue of its location, scale, form or design.

Development should be consistent with National Park purposes and must not significantly harm the National Park or its setting. Assessment of such development proposals will also have regard to the South Downs Partnership Management Plan and South Downs Local Plan and other adopted planning documents and strategies.

DPC6: Ashdown Forest SPA and SAC

Policy: Strategic
Review Status: Minor Update
Strategic Objectives: 3 – Protect Valued Landscapes

The District Council has undertaken a Habitats Regulations Assessment to test whether the District Plan, in combination with other plans and projects, is likely to have an adverse impact on the integrity of the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).

The main potential impacts arising from the District Plan that are likely to have a significant effect on Ashdown Forest are recreational disturbance to protected breeding birds from an increase in visitors to Ashdown Forest and atmospheric pollution affecting the heathland habitat from increased traffic and associated nitrogen deposition.

Increased recreational activity arising from new residential development and related population growth is likely to disturb the protected near-ground and ground nesting birds on Ashdown Forest. Mitigation measures are necessary to counteract the effects of potential increasing recreational pressure on the Ashdown Forest SPA arising from new residential development within a 7km zone of influence around the Ashdown Forest SPA. Mitigation measures will help to ensure that the conservation objectives for the Ashdown Forest SPA and SAC are met which will prevent a deterioration of the conservation status of qualifying species for which the SPA has been classified and the qualifying habitats and species for which the SAC has been designated.

There are two parts to the mitigation: Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM). The SANG and SAMM mitigation approach set out in Policy DPC6 aligns with the strategic solution for recreational disturbance on the Ashdown Forest SPA which is supported by Natural England. This strategic solution ensures the requirements of the Habitats Regulations are met with regard to the in combination effects of increased recreational pressure on the Ashdown Forest SPA arising from new residential development.

The purpose of SANG is to provide alternative greenspace to attract visitors away from the Ashdown Forest SPA. It aims to reduce overall visitor and recreational pressure on Ashdown Forest, and to provide for the needs of dog walkers in particular. Relevant development will need to either provide a SANG or make a financial contribution to a strategic SANG.

The second part of mitigation is to provide a financial contribution towards a SAMM strategy. This aims to manage visitors on-site at Ashdown Forest. The Joint SAMM Strategy is a strategic co-ordinated approach to mitigation in partnership with Lewes, Sevenoaks, Tandridge and Wealden District Councils, Tunbridge Wells Borough Council, Natural England, and the Conservators of Ashdown Forest. The SAMM Partnership for Ashdown Forest is actively working to deliver access management projects to address issues arising from visitor pressure and undertake monitoring at both Ashdown Forest and the four operational SANG sites.

In terms of atmospheric pollution, no further measures are necessary at this stage, however, all planning applications will need to be assessed to consider any air quality impacts and to prevent adverse effects on the integrity of the Ashdown Forest SAC.

DPC6: Ashdown Forest SPA and SAC

In order to prevent adverse effects on the integrity of the Ashdown Forest SPA and SAC, new development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.

Recreational pressure

Mitigation requirements for recreational pressure impacts will be sought in accordance with the strategic solution for the Ashdown Forest SPA and SAC in force at the time of the application. The zone of influence and mitigation requirements may be subject to revision to take account of new evidence on visitor patterns or monitoring.

Within a 400 metres buffer zone around Ashdown Forest, mitigation measures are unlikely to be capable of protecting the integrity of the SPA and, therefore, residential development will not be permitted.

Within a 7km zone of influence around the Ashdown Forest SPA, residential development leading to a net increase in units will be required to contribute to mitigation through:

- 1) The provision of Suitable Alternative Natural Greenspace (SANG) to the minimum level of 8Ha per 1,000 net increase in population; or a financial contribution to a strategic SANG acceptable to provide mitigation for the development; and
- 2) A financial contribution to the Ashdown Forest Strategic Access Management and Monitoring (SAMM) Strategy.

Development proposed adjacent or close to the boundary of the 7km zone of influence may require mitigation for the SPA. Such proposals for development will be dealt with on a case-by-case basis and assessed through a site-specific Habitats Regulations Assessment at the application stage.

Air quality

New development likely to result in increased traffic will need to be assessed through a site-specific Habitats Regulations Assessment at the application stage to consider any air quality impacts and to prevent adverse effects on the integrity of the Ashdown Forest SAC.

11. Built Environment



Built Environment	DPB1: Character and Design DPB2: Listed Buildings and Other Heritage Assets DPB3: Conservation Areas
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DPB1: Character and Design

Policy: Review Status: Strategic Objectives:	Strategic Minor Update 1 – Sustainable Development and Adaptation to Climate Change 2 – Maintaining Settlement Identity and Character 3 – Protect Valued Landscapes 4 – Protected Built and Historic Environment 5 – Create and Maintain Green Infrastructure 12 – Support Safe, Healthy and Inclusive Communities 14 – Create Accessible Environments
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Mid Sussex has a high quality built and natural environment and this requires the design of new development to respect the character of towns and villages as well as the character of the buildings. This policy requires high quality in design with new development that contributes positively to the private and public realm (including streets and open spaces), protects valued townscapes, creates accessible and inclusive environments whilst maximising sustainability opportunities.

In relation to Gatwick Airport, any proposed development would need to comply with Aerodrome Safeguarding requirements to ensure that the operational integrity and safety of the airport are not compromised. For example, there may be restrictions on height, on the detailed design of buildings or on development which might create an aircraft 'bird strike' hazard.

DPB1: Character and Design

All new development should be of high quality and must respond appropriately to its context, be inclusive and prioritise sustainability. This includes the design and layout of new buildings, alterations to existing buildings and the design of surrounding spaces.

All applicants will be required to demonstrate that development takes the following into account:

Understanding the Context

- i. reflects the distinctive character of the towns and villages and protects their separate identity and valued townscapes;
- ii. is sensitive to the countryside including the topography;

Layout, Streets and Spaces

- iii. includes appropriate landscaping and greenspace;
- iv. contributes positively to, and clearly defines, public and private realms and designed with active building frontages facing streets and public open spaces to animate and provide natural surveillance;
- v. incorporates a green infrastructure plan that maximises opportunities to retain existing trees and incorporate new trees (i.e. in parks and community orchards), including delivering tree-lined streets and protects open spaces and gardens that contribute to the character of the area;
- vi. incorporates well integrated parking and servicing areas that do not dominate the street environment, particularly where high density housing is proposed;

Establishing the Structure

- vii. is organised around green transport principles and creates a pedestrian and cyclist -friendly layout that is safe, well connected, legible and accessible;
- viii. optimises the potential of the site to accommodate development especially on brownfield sites and in locations close to facilities or with good public transport links.
- ix. take the opportunity to encourage community interaction by creating layouts with a strong neighbourhood focus/centre; larger (500+ dwellings) schemes will also normally be expected to incorporate a mixed use element;

High Quality Building Design

- x. creates a sense of place while addressing the character and scale of the surrounding buildings and landscape through the consideration of the scheme's design, layout, size, scale, massing and views;
- xi. incorporates sustainable construction principles and is designed for adaptation and future weather events; and

Residential Amenity

- xii. does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook, daylight and sunlight, and noise, air and light pollution (see Policies DPN6, DPN7, DPN8 and DPN9).

Further information and guidance on supporting the delivery of high-quality new development, including design principles, can be found in the Mid Sussex Design Guide SPD

DPB2: Listed Buildings and Other Heritage Assets

Policy: Non-Strategic
Review Status: Minor Update

Strategic Objectives: 4 – Protected Built and Historic Environment

The heritage assets of the District include over 1,000 Listed Buildings, 25 Scheduled Ancient Monuments which are identified on the policies map and over 500 sites of archaeological interest which appear on the West Sussex Historic Environment Record. The District also includes many other buildings which, whilst not statutorily listed are of architectural merit or of local historic interest, make a valuable contribution to the character of the area.

In accordance with Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the District Council will have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.

DPB2: Listed Buildings and Other Heritage Assets

Listed Buildings

Development will be required to preserve or enhance listed buildings and their settings. This will be achieved by ensuring that:

- A thorough understanding of the significance of the listed building and its setting has been demonstrated. This will be proportionate to the importance of the building and potential impact of the proposal;
- Alterations or extensions to a listed building respect its historic form, scale, setting, significance and fabric. Proposals for the conversion or change of use of a listed building retain its significance and character whilst ensuring that the building remains in a viable use;
- Traditional building materials and construction techniques are normally used. The installation of uPVC windows and doors will not be acceptable;
- Satellite antennae, solar panels or other renewable energy installations are not sited in a prominent location, and where possible within the curtilage rather than on the building itself;
- Special regard is given to protecting the setting of a listed building;
- Where the historic fabric of a building may be affected by alterations or other proposals, the applicant is expected to fund the recording or exploratory opening up of historic fabric.

Other Heritage Assets

Development that retains buildings which are not listed but are of architectural or historic merit, or which make a significant and positive contribution to the street scene will be permitted in preference to their demolition and redevelopment.

The Council will seek to preserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the character and quality of life of the District. Significance can be defined as the special interest of a heritage asset, which may be archaeological, architectural, artistic or historic.

Proposals affecting such heritage assets will be considered in accordance with the policies in the National Planning Policy Framework (NPPF) and current Government guidance.

DPB3: Conservation Areas

Policy:	Non-Strategic
Review Status:	No Update
Strategic Objectives:	2 – Maintaining Settlement Identity and Character 4 – Protected Built and Historic Environment 11 – Support Mid Sussex as a Visitor Destination

The District Council's 36 conservation areas are protected through national planning legislation but are designated locally. They range from the historic town centre of East Grinstead through to smaller villages and settlements. The key characteristics of each of the conservation areas are described in conservation area character summaries on the Council's website. The Council has also produced more detailed conservation area appraisals and management plans for some conservation areas which assess local character and promote environmental enhancements. The conservation area character appraisals will be reviewed where necessary and the Council will support local groups such as local history societies to undertake this work.

DPB3: Conservation Areas

Development in a conservation area will be required to preserve or enhance its special character, appearance and the range of activities which contribute to it. This will be achieved by ensuring that:

- New buildings and extensions are sensitively designed to reflect the special characteristics and appearance of the area in terms of their scale, density, design and through the use of complementary materials;
- Open spaces, gardens, landscaping and boundary features that contribute to the special character and appearance of the area are protected. Any new landscaping or boundary features are designed to reflect that character;
- Traditional shop fronts that are a key feature of the conservation area are protected. Any alterations to shopfronts in a conservation area will only be permitted where they do not result in the loss of a traditional shopfront and the new design is sympathetic to the character of the existing building and street scene in which it is located;
- Existing buildings that contribute to the character of the conservation area are protected. Where demolition is permitted, the replacement buildings are of a design that reflects the special characteristics and appearance of the area;
- Activities such as markets, crafts or other activities which contribute to the special character and appearance of the conservation area are supported;
- New pavements, roads and other surfaces reflect the materials and scale of the existing streets and surfaces in the conservation area.

Development will also protect the setting of the conservation area and in particular views into and out of the area.

New buildings of outstanding or innovative design may be acceptable in conservation areas provided that their impact would not cause material harm to the area.

12. Transport



Transport	DPT1: Placemaking and Connectivity DPT2: Rights of Way and Other Recreational Routes DPT3: Cycling DPT4: Parking and Electric Vehicle Charging Infrastructure DPT5: Off Airport Car Parking
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DPT1: Placemaking and Connectivity

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 8 – Opportunities to Live and Work within Communities 12 – Support Safe, Healthy and Inclusive Communities 14 – Create Accessible Environments 15 – Provide Cultural, Leisure and Sporting Facilities

Strategic objectives of the District Plan form the principles which seek to support sustainable communities which are safe, healthy and inclusive, creating environments that are accessible to all members and encourage opportunities to walk, cycle and ride to common destinations. Paragraph 105 of the National Planning Policy Framework (NPPF) encourages significant growth to be focused on location which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, helping to reduce congestion and emissions, and improve air quality and public health.

The District Plan seeks to deliver development which embodies the principles of a 20-minute neighbourhood which make it easier for people to walk, cycle and use public transport and deliver attractive, well planned places which are designed to be inclusive, safe and equitable for all users. Strategic Objective 6 seeks to ensure that development is accompanied by the necessary infrastructure to support development and the community.

The National Planning Policy Framework requires that development should only be refused on highway grounds where there would be an unacceptable impact on highway safety, or where, *‘the residual cumulative (transport) impacts on the road network would be severe’* (Paragraph 111). The Mid Sussex Transport Study has been prepared in consultation with West Sussex County Council (WSCC) in their capacity as the Highway Authority and National Highways (NH) as the Highway Authority for the Strategic Road Network. The Study informs whether the development proposed by the District Plan is practical to deliver in principle; and whether mitigation of any significant impacts arising from the development on the transport network can be cost effectively mitigated. Any transport mitigation that is required to support development, will be included within the Infrastructure Delivery Plan.

The District Plan is in line with and will be delivered in support of the Vision and Objectives of the West Sussex Transport Plan 2022-2036 (WSTP). The WSTP aims to support development which will assist the transition of the transport network towards a path to net zero carbon by 2050 through mass electrification, reduced use of fossil-fuels and local living. The aspiration of better connected communities, which allow residents to live healthy lifestyles and utilise active, public and shared travel modes, whilst minimising adverse impacts such as air pollution and protecting the quality of life of residents, will be delivered through five thematic strategies in the WSTP:

- Active Travel Strategy
- Shared Transport Strategy
- Rail Strategy
- Access to Gatwick Airport Strategy
- Road Network Strategy

The WSTP seeks to move away from a 'predict and provide' approach which historically has focused on building capacity in the network to cater for forecast traffic growth which has often led to exacerbate other impacts, such as health and well-being and achieving climate change mitigation.

The WSTP sets out how the County Council, working with its strategic partners, intends to address key challenges by improving, maintaining and managing the transport network in the period to 2036. The WSTP also sets out the strategy for guiding future investment in across West Sussex to deliver its vision. It sets a framework to guide decisions on how best to address transport, economic, social and environmental challenges to deliver the plan.

The County Council is also a constituent member of the Sub-national Transport Body, Transport for the South East (TfSE) who are developing a strategy for the South East that sets out a strategy for the transport network up to 2050; the strategy is intended to guide future decisions on strategic transport investment. The District Council acknowledge that travel needs and patterns do not obey county boundaries which highlights the need for a continued commitment for affective partnership working with neighbouring authorities and local transport authorities to help deliver strategic improvements to travel. The County Council acknowledge that partnership working will be necessary with other public, private and third sectors to help deliver their strategy and to affect real change to travel in the south east.

As highlighted by the WSTP, Travel within Mid Sussex is currently dominated by car travel; public transport and active travel modes are not seen as viable options for many journeys, although commuting by rail is relatively high in the towns. The district is experiencing issues of congestion on the road network leading to traffic related air quality issues at Hassocks, with monitoring at other locations in the district such as East Grinstead. Bus services in rural areas are limited and high frequency services in the three main towns is lacking.

In accordance with paragraph 112 of the NPPF, priority should be given first to pedestrian and cycle movements; and second, so far as possible to facilitating access to high quality public transport. Travel networks need to be rebalanced in favour of more sustainable modes with developments focusing on trip reduction and the promotion of active and public transport as genuine alternatives to the private car. Transport considerations need to be fundamental throughout the planning process and not retrofitted and the networks on which people will walk, cycle, and use public transport should be considered before any highway layout is planned. Developments should embody the 20-minute neighbourhood principles, enabling local living through provision of advanced digital infrastructure and ensuring that the

capacity, layout, and design of these sustainable networks meet the needs of local residents so that new communities have a genuine opportunity to embrace more sustainable travel habits from the outset.

All new developments will be required to demonstrate as a first priority, that all sustainable travel interventions have been fully explored and sustainable mitigation maximised. Any residual impacts shall then be assessed and the need for physical highway mitigation explored. Depending on the size and likely transport impact of development, a Transport Statement or Transport Assessment will be submitted alongside planning applications. In line with Government guidance, developers are encouraged to enter into pre-application discussions at an early stage in order to front-load the planning application process and enable early consideration of all the fundamental issues relating to a development.

DPT1: Placemaking and Connectivity

Development shall provide appropriate infrastructure to support the vision and objectives of the West Sussex Transport Plan 2022-2036 and meet the requirements of the NPPF.

To meet these objectives:

- a) Development that is likely to generate significant amounts of movement and/or have a significant impact on the transport network shall provide a Transport Assessment / Statement, Sustainable Transport Strategy and Travel Plan to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it and to accord with the requirements of the NPPF.
- b) Demonstrate how all relevant sustainable travel interventions (for the relevant local network) will be maximised and taken into account in terms of their level of mitigation before considering physical highway infrastructure mitigation.
- c) Development shall integrate relevant requirements of Chapter 4 of the Mid Sussex Design Guide SPD and be designed to prioritise sustainable and active modes of travel, providing safe and convenient routes for walking and cycling through the development and linking with existing and enhanced networks beyond; before the highway layout is planned.
- d) Create liveable communities which strive to embody the 20-minute neighbourhood concept and deliver attractive, healthy places that have a permeable street network within the site with clearly defined route hierarchies that are safe and designed for all users and supporting desirable opportunities for people to choose not to travel by car.
- e) New streets shall be designed to adoptable standard which can easily incorporate advanced digital infrastructure, including fibre. .

DPT2: Rights of Way and Other Recreational Routes

Policy:	Non-Strategic
Review Status:	No Update
Strategic Objectives:	5 – Create and Maintain Green Infrastructure
	15 – Provide Cultural, Leisure and Sporting Facilities

Mid Sussex District benefits from an extensive, albeit fragmented, network of public rights of way totalling around 600km, including footpaths, bridleways, byways and restricted byways.

Two Sustrans national cycle routes cross the District:

- NCN20 (along the A23) London to Brighton via Crawley.
- NCN21 (Worth Way and Forest Way) Crawley to East Sussex via East Grinstead.

Rights of way, Sustrans national cycle routes and other recreational routes can facilitate healthy lifestyles by providing opportunities for sustainable and active travel as well as recreation.

The protection and enhancement of the rights of way network along with other recreational routes, including signage, is important to provide access to the countryside and green infrastructure links.

DPT2: Rights of Way and Other Recreational Routes

Rights of way, Sustrans national cycle routes and recreational routes will be protected by ensuring development does not result in the loss of or does not adversely affect a right of way or other recreational routes unless a new route is provided which is of at least an equivalent value and which does not sever important routes.

Access to the countryside will be encouraged by:

- Ensuring that (where appropriate) development provides safe and convenient links to rights of way and other recreational routes;
- Supporting the provision of additional routes within and between settlements that contribute to providing a joined up network of routes where possible;
- Where appropriate, encouraging making new or existing rights of way multi-functional to allow for benefits for a range of users. (*Note: 'multi-functional will generally mean able to be used by walkers, cyclists and horse-riders).*

DPT3: Active Travel

Policy:	Non-Strategic
Review Status:	New Policy
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 12 – Support Safe, Healthy and Inclusive Communities 14 – Create Accessible Environments

Transport is the largest contributor to UK domestic greenhouse gas (GHG) emissions, responsible for 27% in 2019⁸. The past 30 years have seen other sectors GHG emissions decline however transport has remained fairly constant and efficiency improvements to vehicles has been matched by increasing number of journeys. The Government's plan to decarbonise transport in Britain is linked to their commitment for the UK's emissions to be net zero by 2050⁹.

⁸ Department for Transport (DfT) Decarbonising Transport – A Better Greener Britain 2021

⁹ Climate Change Act 2008 (2050 Target Amendment) Order 2019.

In support of the government's target to achieve net zero carbon by 2050 and reduce emissions associated with car travel, developments need to ensure they provide an environment which makes active travel an easy and attractive choice. Easily accessible, conveniently located, and secure cycle storage, close to the main entrance of a building helps to reduce some of the inconvenience of choosing to cycle. Boosting the number of people in a community choosing to regularly cycle has multiple benefits not only to helping tackle climate change but also improving air quality, reducing congestion and noise pollution on our roads, but also improving health and wellbeing.

Journeys below five miles represented 58% of all private car journeys in 2019 and provide the biggest opportunity for switching to cycling and walking¹⁰. The WSTP Active Travel Strategy encompasses the needs of pedestrians, cyclists, equestrians, persons of reduced mobility and micro-mobility solutions, focusing on the majority of journeys which are short distance to increase the use of active travel modes accessible for all.

DPT3: Active Travel

Development will be required to help remove barriers to active travel and create a healthy environment in which people chose to walk and wheel; facilitated by:

- a) Where appropriate, providing high quality, fit for purpose active travel infrastructure, within the development which links to existing networks and builds on the schemes identified in the Mid Sussex Local Cycling and Walking Infrastructure Plan (LCWIP).
- b) Providing appropriate levels of cycle parking facilities (taking account of WSCC Guidance on Parking at New Developments 2020 and subsequent iterations), well designed and laid out to be under cover, secure, conveniently located and easily accessible, close to the main entrance of the premises and in accordance with the guidance in the Mid Sussex Design Guide SPD.

DPT4: Parking and Electric Vehicle Charging Infrastructure

Policy: Non-Strategic
Review Status: New Policy
Strategic Objectives: 6 – Infrastructure to Support Sustainable Communities

Paragraph 107 of the NPPF identifies that if setting local parking standards, policies should take account of accessibility, type, mix and use of the development, public transport provision, car ownership and the need to ensure adequate provision of spaces charging plug-in and other ultra-low emission vehicles.

Guidance on parking standards are set out in to the West Sussex County Council Guidance on Parking at New Developments (2020) and some Neighbourhood Plans and account will

¹⁰ DfT Decarbonising Transport A Better Greener Britain 2021

be given to the factors set out in paragraph 107 of the NPPF when considering parking levels in a development.

West Sussex Transport Plan and the Council's Sustainable Economic Strategy (SES) 2022 support increased use of electric vehicles and reduced use of fossil-fuels and provision of the infrastructure to support their use. The Council fully supports recent changes to Building Regulations Schedule 1 Part S and will seek to ensure developments are designed to be able to accommodate the relevant requirements for residential development. Where feasible higher standards for non-residential development in line with Policy DPT4 below, unless or until higher standards are required nationally.

DPT4: Parking and Electric Vehicle Charging Infrastructure

Development will be required to:

- a) Provide adequate and well-integrated car parking, taking account of the guidance in the Mid Sussex Design Guide SPD and the WSCC Guidance on Parking at New Developments¹¹ (2020 and subsequent iterations) along with the accessibility of the site to services and sustainable travel infrastructure, and the type, mix and use of development.
- b) Parking associated with all new residential development shall be laid out to ensure the relevant requirements of Schedule 1 Part S of the Building Regulations regarding Electric Vehicle Charging are met.
- c) All new non-residential buildings with more than 10 associated parking spaces within the site boundary, shall provide a minimum of 2 'Fast' (7kW) or faster, Electric Vehicle Charging points; cable routes shall be provided for 50% of the remaining total number of spaces.

DPT5: Off-Airport Car Parking

Policy:	Non-Strategic
Review Status:	New Policy
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities

Gatwick Airport Limited (GAL) are progressing plans to bring the existing standby runway into routine use. This is known as the Northern Runway Project. As part of this project GAL are developing a Sustainable Transport Strategy to facilitate a shift to sustainable transport modes when travelling to and from the airport. As part of this strategy GAL are looking at opportunities to reduce the number of parking spaces per passenger travelling through the airport. Controlling the extent of airport related parking, on and off airport helps encourage the use of alternatives whilst ensuring sufficient parking is available to passengers and staff

¹¹ **West Sussex Guidance on Parking in New Developments:** referenced in respect of the number and type of parking spaces required to support a development and not to Electric Vehicle Charging standards on the basis policy DPT4 requirements exceed those of the WSCC Guidance.

who have no other option. The most sustainable location for airport related car parking is within the airport boundary.

DPT5: Off-Airport Car Parking

Proposals for additional off-airport car parking facilities or extensions to existing airport related car parking site will not be permitted.

Proposals for the relocation of existing off-airport parking that result in a net increase in parking will not be permitted.

13. Economy



Economy	<p>DPE1: Sustainable Economic Development</p> <p>DPE2: Existing Employment Sites</p> <p>DPE3: Employment Allocations</p> <p>DPE4: Town and Village Centre Development</p> <p>DPE5: Within Town and Village Centre Boundaries</p> <p>DPE6: Development Within Primary Shopping Areas</p> <p>DPE7: Smaller Villages and Neighbourhood Centres</p> <p>DPE8: Sustainable Rural Development and the Rural Economy</p> <p>DPE9: Sustainable Tourism and the Visitor Economy</p>
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DPE1: Sustainable Economic Development

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	<p>1 – Sustainable Development and Adaptation to Climate Change</p> <p>2 – Maintaining Settlement Identity and Character</p>

The District Plan strategy is based on the Council’s aspiration for sustainable economic growth established with a vision to make Mid Sussex a vibrant and attractive place for business and people to thrive. This aspiration will contribute towards enhancing the prosperity of the Gatwick Diamond and Greater Brighton City Region, providing the opportunity for the residents of Mid Sussex to work locally and reduce the need to commute.

The joint Economic Growth Assessment (2020) and subsequent focused update for Mid Sussex (2021) highlights a high degree of economic inter-relationship between Crawley, Horsham and Mid Sussex. Overall economic strength is dependent on ongoing and continued joint-working and effective management of strategic issues across the economic sub-region, particularly with those authorities whose economies are critically interrelated to Mid Sussex. The Council will continue to support the Mid Sussex economy and wider economic sub-region in collaboration with other local authorities and alongside the work of the Coast to Capital Local Enterprise Partnership over the Plan period.

The District Plan reflects the requirements of the National Planning Policy Framework paragraph 82, by setting out a clear economic vision and strategy, identifying strategic sites or setting criteria for supporting local and inward investment to anticipated need whilst

seeking to address potential barriers to investment which might exist, such as inadequate infrastructure. Policy DPE1: Sustainable Economic Development encourages new businesses to the District in order to meet aspirations for economic growth and the wider benefits this would bring.

The Council's Sustainable Economy Strategy (SES) (2022 - 2025) sets out the Council's vision for a vibrant district that is attractive, resilient and innovative that balances well-being, environmental protection and sustainable economic growth. The Strategy and associated Action Plan establish a renewed focus on sustainable growth, enabling the economy to grow whilst reducing carbon emissions. This includes supporting resource efficient consumption; reducing ecological footprints; improving residential skills and health and well-being; promoting green innovation; creating new jobs; attractive investment; and supporting business formation and growth.

The SES focuses on three themes, each of which is underpinned by strategic objectives and performance measures, linked to the most relevant United Nations Sustainable Development Goals:

People – protecting and creating better employment (particularly in the new and emerging green economies); developing skills; improving pathways to work; and reducing pay inequality.

Place – reducing the Council's carbon emissions; supporting businesses to reduce their carbon emissions and to both recover from the pandemic and to grow; encouraging business start-ups; promoting sustainable business practices; developing digital infrastructure; enhancing biodiversity; providing new homes; creating quality town and village centres which meet local needs; and improving active travel connectivity.

Partnerships – The Council's guiding principles of working in partnership are openness, trust, honesty and mutual respect. The Council will agree and deliver shared goals, based on common values and will maintain regular and effective communication with all our partners.

The SES and Action Plan will support the delivery of Policy DPE1: Sustainable Economic Development; attracting and promoting inward investment, facilitating high value employment development, effective partnership working to secure key supporting infrastructure including rolling out fibre and 5G infrastructure, the revitalisation of the town centres and development of centres of excellence and clusters of specialist industries.

The Economic Growth Assessment Update (December 2021) identifies employment need over the plan period based on demographic data and employment growth projections aligned with forecast housing growth set out in policy DPH1: Housing. The latest growth projections identify no outstanding residual employment need, as there is sufficient committed supply (e.g. planning permissions and allocations) already planned for. There is therefore no requirement to allocate additional employment land within this Plan.

The strategy for achieving sustainable economic prosperity and resilience, taking account of the District's role at a sub-regional level within the north west Sussex economic area will focus on; supporting successful delivery of committed development, helping to secure timely delivery of key supporting infrastructure, encouraging inward investment and providing support for existing businesses.

In order to help address identified skills shortages in the district, and working in partnership with the council, sustainable settlements allocated in the plan will be required to demonstrate how they will contribute to and support local employment and skills development and training.

DPE1: Sustainable Economic Development

Sustainable economic development will be achieved by:

- Ensuring major development proposals (including sustainable settlements allocated within this District Plan) demonstrate how they will contribute to addressing identified local skills shortages and support local employment, skills development and training.
- Encouraging high value employment development of appropriate land and premises to meet the needs of 21st century businesses which embody sustainable practices, support a circular economy and the achievement of Carbon Net Zero by 2050;
- Supporting existing businesses, and allowing them room to expand;
- Promoting inward investment opportunities, promotion and expansion of clusters or networks of knowledge and data driven, creative or high technology industries; and
- Seeking the appropriate infrastructure to support business growth – in particular advanced digital infrastructure including fibre.

DPE2: Existing Employment Sites

Policy:	Non- Strategic
Review Status:	Minor Modification (to policy SA34 Site Allocations DPD)
Strategic Objectives:	1 – Sustainable Development and Adaptation to Climate Change 2 – Maintaining Settlement Identity and Character

The Council's Sustainable Economic Strategy (SES) (2022) Objective 1 seeks to maintain the high employment rate in Mid Sussex and reduce out-commuting and supports a policy framework to meet this need. District Plan Policy DPE1: Sustainable Economic Development sets out the broad policy position related to delivery of high value employment land, promoting inward investment opportunities, supporting existing businesses and securing necessary infrastructure to support growth in the sector whilst addressing local skills shortages.

The Plan also identifies the need to maintain a range of sites and premises across the district to suit a full spectrum of business needs is vital to achieving the council's vision of; 'A vibrant district that is attractive, resilient and innovative that balances social well-being, environmental protection and sustainable economic growth' (SES 2022). In a district which is under pressure for housing, it is vital to ensure appropriate management of existing employment land.

Policy DPE2 seeks to strike an appropriate balance between ensuring protection of valued employment generating sites, whilst enabling sites which are no longer economically viable for continued employment use to be considered for appropriate alternative uses. Protection, intensification and redevelopment of existing employment sites for continued employment use is therefore prioritised in order to provide varied local employment opportunities, help reduce unnecessary travel and support sustainable and balanced communities. This policy provides a framework to support consistent decision making in relation to proposals for changes to existing employment sites.

The existing employment sites identified by policy DPE2 are located throughout the district and offer a varied portfolio of uses, accommodation and opportunities, which in turn demand different values, all of which help support balanced and sustainable communities which provide both housing and employment opportunities. A number of sites are modest in scale and contain historic uses and older accommodation and may therefore demand lower value rental income but nevertheless remain well used and are affordable. This policy is necessary to prevent the inappropriate loss of employment land motivated by higher value uses such as residential whilst allowing for flexibility in accordance with paragraph 81 of the NPPF, helping to create the conditions in which business can invest, expand and adapt.

In accordance with criteria (i) and (ii) of the policy for proposals involving the loss of employment generating uses, planning applications will need to be accompanied by details of comprehensive marketing and a financial appraisal of the site which demonstrates the continued use of the site for employment is no longer viable. The marketing exercise will need to demonstrate not only the existing site is unviable, but also that any redevelopment for continued and alternative employment use is unviable.

A sequential approach will be applied for development proposals on existing and allocated employment sites identified on the Policies Map. The sequential approach will be to secure employment based redevelopment as a priority, appropriate mixed-use employment second to that and lastly redevelopment for alternative non-employment generating use(s).

DPE2: Existing Employment Sites

Existing Employment Sites – Protection, Intensification and Redevelopment

Protection:

Existing Employment Sites, classified as those in use classes E(g), B2: General Industrial or B8: Storage or Distribution (as shown on the Policies Map) are protected; proposals that would involve their loss will be resisted. Proposals on Existing Employment Sites that would involve the loss of employment land or premises will only be supported where it can be clearly demonstrated by the applicant that the site/premises are no longer needed and/or viable for employment use.

Development proposals outside the traditional employment use classes (E(g), B2 and B8) 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:

- (i) Details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing marketing conditions; and

- (ii) A financial appraisal that demonstrates that the development of any employment generating use is unviable.

Similarly, support will also be given 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 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.

Intensification and redevelopment:

Proposals for intensification within the boundary of Existing Employment Sites will be supported providing it is in accordance with other development plan and national policies.

Redevelopment for employment use within the boundary of Existing Employment Sites (as shown on the Policies Map) will be supported where it does not result in the overall loss of employment floorspace or where any loss can be fully justified.

Proposals for *alternative uses*, with the exception of residential use, within Existing Employment Sites will only be supported where it can be demonstrated that the sequential approach has been applied to the redevelopment of the site, and the proposals support their integrity and function as centres of employment.

Existing Employment Areas – Expansion

Within the built-up area, expansion of Existing Employment Sites and premises for E(g)/B2/B8 uses will be supported where the business requirements cannot be met within the existing site/ premises through acceptable on-site expansion or intensification; and that relocation to existing stock is not preferable.

Outside the built-up area, expansion of Existing Employment Sites for E(g)/B2/B8 uses will only be supported where:

- Detailed layout and design are in keeping with its countryside location; and
- The expansion is contiguous with the boundary of an existing employment site; and
- Where the impacts of expansion are assessed in-combination with the existing site, and the overall impact of existing plus expansion is considered acceptable.

DPE3: Employment Allocations

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	1 – Sustainable Development and Adaptation to Climate Change 2 – Maintaining Settlement Identity and Character

The Economic Growth Assessment Update (December 2021) identifies employment need over the plan period. This is based on demographic data and employment growth projections aligned with forecast housing growth set out in policy DPH1: Housing. The latest growth projections identify no outstanding residual employment need, as there is sufficient committed supply (e.g. planning permissions and allocations) already planned for. Whilst there is potential for a deficit in Light/General industrial, this could be met by supply in Mixed B1 which includes Light/General Industrial uses.

Use	Requirement (ha)	Committed Supply (ha)	Over-Supply / Deficit (ha)
Office - E(g)(i)/(iii)	3.4	4.9	+1.5
Light Industrial - E(g)(iii)	29.6	12.9	-9
General Industrial - B2	-7.7		
Storage and Distribution - B8	1.8	18.9	+17.1
Mixed B1	n/a	7.6	+7.6
TOTAL	27.1	44.3	+17.2

There is therefore no requirement to allocate additional employment land within this Plan. However, sustainable settlements DPSC2 and DPSC3 present an opportunity to provide a mix of uses on site to create sustainable communities, DPSC1 – Land west of Burgess Hill is adjacent to The Hub and Science and Technology Park therefore is ideally situated next to existing employment opportunities already. The provision of employment space on these sites will provide opportunities for residents to live and work locally, reducing the need to travel.

DPE3: Employment Allocations

To support balanced communities and to provide opportunities for people to work close to where they live, employment land will be required to be provided on Significant Sites:

- DPSC2: Land to the South of Reeds, Sayers Common
- DPSC3: Land at Crabbet Park, Copthorne

Development must be in accordance with the site-specific requirements set out in the policies above.

DPE4: Town and Village Centre Development

Policy: Strategic
Review Status: Major Update
Strategic Objectives: 9 – Create and Maintain Town and Village Centres

Town and Village Centres play an important role in local communities and development will be supported where it enhances their vitality and viability. The Council supports the regeneration and renewal of the three key town centres of Burgess Hill, East Grinstead and Haywards Heath; these town centres provide a range of shops, leisure attractions and other

facilities which play a key role in serving each town and the surrounding villages and rural areas. The Mid Sussex Retail Study Update (2022) has however identified vulnerabilities across each of the three key centres that warrant policy protection from out-of-centre competitors to support redevelopment of town centre sites, in addition to efforts to enhance the vitality and viability of the towns.

The districts village centres also have an important range of services and facilities that supply the day-to-day requirements of local residents, neighbouring small villages and the countryside areas surrounding the villages. The Retail Study Update (2022) found that the village centres are performing above national averages and it is important that these and other smaller centres remain vibrant and successful in order to continue to support their communities, reducing the need to travel and enabling more 'local living'¹².

In accordance with paragraph 86 of the National Planning Framework and as informed by the Mid Sussex Retail Study Update (2022), Policy DPE4: Town and Village Centre Development defines a hierarchy of the districts town and larger villages. Defining the hierarchy of these centres will assist in supporting development which is proportionate to the status of the centre within the hierarchy and maintains the distinctive character of the centre. The policy also defines the boundary for each of the centres and seeks to support uses which allow them to grow and diversify in order to respond to rapid changes in the retail and leisure industries.

The National Planning Practice Guidance (PPG) sets out that for planning purposes, town centres comprise a location where main town centre uses are concentrated, including city and town centres, district centres and local centres.

Annexe 2 of the National Planning Policy Framework (NPPF) defines a 'town centre' as an:

Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in the development plan, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

Proposals for retail, leisure and office and other 'main town centre'¹³ uses (as defined by the NPPF) should be in a defined town centre location in accordance with the sequential test for town centre uses. Where planning applications are for main town centre uses proposed on the 'edge of centre'¹⁴ (as defined by the NPPF), outside the town centre or out of town and are not in accordance with the District Plan or Neighbourhood Plan, the Council will apply a sequential test and require an impact assessment as set out in the NPPF.

When assessing planning applications for retail developments outside a town centre, the Retail Study Update (2022) considers that a local impact threshold of 500m² would continue

¹² **Local living:** The term is used in the West Sussex Local Transport Plan 2022 and is a similar concept to that of the 20 minute neighbourhood.

¹³ **Main town centre uses:** Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)

¹⁴ **Edge of centre:** For retail purposes, a location that is well connected to, and up to 300 metres from, the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

to be justified as an alternative to the default threshold of 2,500m² identified by the National Planning Policy Framework. The level of detail included within a Retail Impact Assessment should be proportionate to the scale and type of retail floorspace proposed, and should be agreed between the Council and the applicant on a case-by-case basis.

The Retail Study Update (2022) also considered the district’s need for retail and leisure provision. This included quantitative and qualitative assessments of capacity, taking account of population and spending growth across the plan period. Whilst these calculations identified capacity for additional convenience goods floorspace over the plan period, limited capacity was found for additional comparison goods and leisure floorspace over the plan period.

The convenience floorspace capacity was found to have largely resulted from the strong performance of larger out-of-centre store and was not considered to justify new allocations. Given the relative performance of town centre facilities and the availability of vacant retail floorspace across the districts centre, it was concluded that the need could be met through existing and proposed facilities within the Council’s defined centres.

DPE4: Town and Village Centre Development

Development within a defined Town or Village Centre will be supported where a proposal is proportionate to the status of that centre within the hierarchy as set out in the table below:

Town Centres	Burgess Hill
	East Grinstead
	Haywards Heath
Village Centres	Crawley Down
	Cuckfield
	Hassocks
	Hurstpierpoint
	Lindfield

Town and Village Centre Boundaries

Town and Village Centre Boundaries for each settlement in the hierarchy are defined on the Policies Maps and are illustrated Appendix 2

Sequential Test for Town Centre Uses

A sequential test must be applied to planning applications for main town centre uses that are not in an existing defined Town or Village Centre and are not in accordance with the District Plan and the relevant Neighbourhood Plan. The sequential test will require:

- applications for main town centre uses to be located in town centres; or, if suitable sites are not available,
- in edge of centre locations where the site is accessible and well connected to the town centre; or, if suitable sites are not available,
- at accessible out of centre sites that are well connected to the town centre.

Where an application fails to satisfy the sequential test, or fails to meet other requirements of this policy, it should be refused.

For the purposes of the sequential test, Neighbourhood Centres do not perform the same function as Town and Village Centres. Proposals in Neighbourhoods should reflect their role in meeting the day to day needs of the local community in accordance with policy DPE7.

Local Threshold for Retail Impact Assessments

Planning applications proposing the construction of 500m² or more gross floorspace for the sale of convenience or comparison goods outside a town centre must be accompanied by a Retail Impact Assessment in order to demonstrate that they would not have a significant adverse impact on a town centre, either on their own or cumulatively in the area.

DPE5: Within Town and Village Centre Boundaries

Policy: Strategic
Review Status: Major Update
Strategic Objectives: 9 – Create and Maintain Town and Village Centres

Policy DPE5 supports the development of main town centre uses within defined Town and Village Centres with the primary focus of supporting development that will sustain and enhance the vitality and viability of the centre.

This policy supports flexibility to amalgamate and subdivide existing units in a centre to ensure it can adapt to the changing needs of existing and future occupiers and create high quality premises. In certain circumstances and subject to consideration of heritage impacts, it may be acceptable to allow a proportionate net loss in floorspace to facilitate a proposal, providing all resultant units are of a viable to support an occupier's needs, including staff welfare and storage facilities.

The impact of the trend towards online retail, accelerated by Covid-19 has had an impact on our highstreets and many retailers have gone out of business, leaving commercial spaces vacant whilst another occupant is yet to be found. The effect of vacant premises can blight local town and village centres, harming the overall vitality and viability of the centre; particularly where they remain empty for long periods of time.

Support from the Government for temporary and meanwhile uses has been given through changes to planning legislation and in particular the relaxation of changes of use and the introduction of Classes E and F in the Town and Country Planning (Use Classes) Order 1987 (as amended), together with publishing standard leases for the occupation of redundant town centre properties as part of the Government's 'Meanwhile Project' – www.meanwhile.org.uk

The term 'meanwhile use' refers to the short-term use of temporarily empty shops or spaces until they can be brought back into commercial use. Meanwhile uses are generally for the

benefit of the community in the form of meeting spaces, exhibitions, informal training and learning spaces, rehearsal space, pop-up shops, microbrewery and taproom, and cafes.

The benefit of supporting such temporary uses can counter the harmful impact of the unit remaining vacant, providing opportunities to keep the area vibrant whilst the landlord of the building continues to look for a new commercial occupant.

The installation of delivery lockers have the potential assist in supporting linked trips to a centre where they are sensitively installed to ensure they do not restrict accessibility either physically by the structure or by those seeking to use the lockers. Their location in a centre also needs careful consideration of matters including access by sustainable travel modes, security and design.

DPE5: Within Town and Village Centre Boundaries

Within Town and Village Centre Boundaries as defined on the Policies Map, development of 'main town centre uses', as defined by the NPPF, will be supported, having regard to relevant Town Centre Masterplans. Support will also be given for:

- a) The amalgamation or subdivision of units, subject to meeting the requirements of policies DPB2 and DPB3 relating to heritage impacts.
- b) Temporary 'meanwhile' uses where they deliver community benefits, do not harm amenity and do not compromise the future redevelopment of the site.
- c) Delivery lockers where it can be demonstrated that their installation would enhance the vitality and viability of the centre and would not restrict accessibility.

DPE6: Development within Primary Shopping Areas

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	9 – Create and Maintain Town and Village Centres

Within each of the three Town Centres, as required by paragraph 86 of the NPPF and informed by the Mid Sussex Retail Study (2022), a smaller area is defined as the centres 'Primary Shopping Area' (PSA). The NPPF defines PSAs as a '*...defined area where retail development is concentrated*'. The Village Centre Boundaries are attributed to the same policy recognition as the PSA.

Within the PSAs the Council will seek to maintain a predominance of Class E Commercial, Business and Service Uses as defined by the Town and County Planning (Use Classes) Order 1987 (as amended), that would sustain and enhance the vitality and viability of the Centre and would not result in harm to amenity. When determining applications within defined Town and Village Centres, non-town centre uses are those uses falling outside the NPPF definition of 'main town centre uses'.

Policy DPE6 seeks to ensure the Council maintain an element of appropriate control over new developments within the PSAs through the use of conditions. Where appropriate the

policy supports the use of additional control over permitted changes of a new development to avoid over concentration of uses which could harm the vitality and viability.

Where a loss of Class E or main town centre use is proposed, any application must be supported by appropriate marketing over a suitable time period. 'Appropriate marketing' is where a use has been prominently marketed for the existing and alternative Class E Uses, with reasonable terms and conditions, certified by an appropriately qualified professional; in some circumstances the Council may require this to be independently verified at the applicant's expense. The time period for marketing will be dependent on-site specific circumstances and in accordance with Government guidance, developers are encouraged to enter into pre-application discussions with the council in order to determine the appropriate parameters. The usual time period is likely to be 12 months of a vacant unit.

DPE6: Development within Primary Shopping Areas

Primary Shopping Areas (PSAs) are defined on the Policies Map and are illustrated at Appendix 2. For Town Centres, this is a smaller area within the Town Centre boundary. For Village Centres, the PSA corresponds with the Village Centre Boundary.

- (1) In order to support thriving Centres in the district, development proposals within defined Primary Shopping Areas, (as shown on the Policies Map), involving the loss of Class E Uses will only be supported where:
- a) a main town centre use is proposed,
 - b) it can be demonstrated that the proposed use will sustain and enhance the vitality and viability of the centre,
 - c) neighbouring amenity is protected,
 - d) an active frontage is maintained at ground floor level, and;
 - e) it does not result in a concentration of uses that harm the vitality and viability of the centre.

Residential uses will be supported at upper storeys. Residential at ground floor level will be resisted unless it can be demonstrated that:

- a) the vitality and viability of the centre is not harmed;
 - a) an attractive and active frontage to the public realm is maintained, and;
 - b) no harm would be caused to the character of the streetscene.
- 2) New developments for retail, food and beverage, and associated services uses (Use Class E(a), (b), (c)) within the Primary Shopping Area will be supported with the implementation of restrictions to maintain the mix of uses as permitted to ensure the vitality and viability of the centre is not harmed.
- 3) The loss of Class E and/or main Town Centre Uses to alternative non-main town centre uses will only be supported where evidence can be provided that demonstrates:
- a) the existing and any alternative Class E use is no longer viable; this must be demonstrated through evidence of vacancy and proactive marketing for an appropriate period of time,
 - b) the proposed use would enhance the vitality and viability of the centre, and;
 - c) it would not result in adverse impacts on neighbouring amenity.

DPE7: Smaller Village and Neighbourhood Centres

Policy: Non-Strategic
Review Status: Major Update
Strategic Objectives: 9 – Create and Maintain Town and Village Centres
10 – Support Strong and Diverse Rural Economy

The Plan seeks to support a prosperous rural economy in accordance with paragraph 84 of the National Planning Policy Framework.

The Mid Sussex Retail Study Update (2022) focused on the three town centres and the village centres of Crawley Down, Cuckfield, Hassocks, Hurstpierpoint and Lindfield. However, the district's smaller villages and neighbourhood centres also have an important role to play for their communities and have a range of services and facilities that supply the day-to-day requirements of local residents, neighbouring small villages and the countryside areas surrounding the villages. Although, people may have to travel further to gain access to some services that are not provided by these smaller centres, it is important that they remain vibrant and successful in order that they can continue to support their local communities and reduce the need for unnecessary travel.

DPE7: Smaller Village and Neighbourhood Centres

Outside of defined Town and Village Centre boundaries:

Smaller villages, neighbourhood centres and parades of five or more¹⁵ main town centre uses should be protected to meet the needs of their own communities and countryside areas, except where the existing use is no longer viable, and the proposed use is appropriate in scale and function, will not result in adverse amenity impacts, or is in accordance with a relevant Neighbourhood Plan.

DPE8: Sustainable Rural Development and the Rural Economy

Policy: Non-Strategic
Review Status: Minor Update
Strategic Objectives: 4 – Protected Built and Historic Environment
10 – Support Strong and Diverse Rural Economy

Although Mid Sussex is a rural district, agriculture only accounts for a small proportion of all businesses in district. The rural area supports a large number of diverse businesses that make an important contribution to the rural economy. Rural economic development should be encouraged where it provides good quality long-term employment, helps to improve local skills and services and contributes towards sustaining a high quality environment and well-being of the local community in accordance with policy DPC1: Protection and Enhancement of Countryside.

¹⁵ **Local neighbourhood parades:** DCLG publication 'Parades to be Proud of' defines local neighbourhood parades as: 'Typically located in the heart of a residential community, urban and rural, often with around 5-10 units, providing walk in convenience shopping and limited local services.'

This policy conforms to the National Planning Policy Framework, where it relates to Supporting a prosperous rural economy (paragraph 84). Small scale enterprises needed for the processing, distribution and local retailing of local produce should be positively supported along with sustainable growth and expansion of other types of business in rural areas this will allow the District's rural economy to grow and will improve the quality of life and environment for rural communities.

This policy will not apply within the High Weald Area of Outstanding Natural Beauty, where a more restrictive policy approach, Policy DPC4: High Weald Area of Outstanding Natural Beauty, will be adopted (National Planning Policy Framework paragraph 174).

DPE8: Sustainable Rural Development and the Rural Economy

Provided a development is not in conflict with Policy DPC1: Protection and Enhancement of Countryside and Policy DPC2: Preventing Coalescence, and the rural location (outside the built-up area boundaries on the Policies Maps) of the enterprise is justifiable to support a prosperous rural economy in accordance with national policy in the NPPF:

- 1) new small-scale* economic development, and extensions to existing facilities, including leisure and tourism-related development, within the countryside will be permitted provided:
 - it supports sustainable growth and the vitality of all types of businesses in the rural economy; and
 - it involves conversion of existing buildings and/ or well-designed new buildings, where possible on previously developed sites; and
 - it maintains or where possible enhances the quality of the rural setting.

- 2) diversification of activities on existing farm units and other land-based rural businesses will be permitted provided:
 - they are of a scale which is consistent to the location of the farm holding; and
 - they would not prejudice the agricultural use of a farm unit.

- 3) the re-use and adaptation of agricultural and forestry buildings for business or sustainable rural tourism and leisure use in the countryside will be permitted provided:
 - the building is genuinely redundant for agricultural or forestry use; and
 - it is not a recently constructed** agricultural building which has not been or has been little used for its original purpose;
 - the building is demonstrated to be structurally sound and capable of conversion without substantial reconstruction or extension;
 - the site is served by an existing suitable access to the local road network; and
 - the appearance and setting are not adversely affected;

Development for accessible local services and community facilities will be supported in line with policy DPI6.

* Small scale defined as usually being no more than 350m² of floorspace for converted and/or new build development and/or a total site area of 350m² for change of use of land applications.** Recently constructed is defined as being within the previous five (5) years.

DPE9: Sustainable Tourism and the Visitor Economy

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	7 – Encourage Business and Thriving Local Enterprise 10 – Support Strong and Diverse Rural Economy 11 – Support Mid Sussex as a Visitor Destination

Tourism makes an important contribution to the economy of Mid Sussex. The District has world-class gardens, historic houses, picturesque villages, international award-winning vineyards and fine cuisine.

The Bluebell Railway, a privately-owned heritage railway, is an important visitor attraction to Mid Sussex. The Bluebell Railway has restored and operated scheduled steam train services on sections of the former Lewes to East Grinstead line since 1960. In view of the Bluebell Railway's value to the local and regional tourist economy and as a public transport link, the Council has supported the completion of the line to East Grinstead. In the long-term, the Bluebell Railway plans to reinstate the disused branch line westwards from Horsted Keynes (via Ardingly) to a terminus at Haywards Heath. The completion of this section will connect the Bluebell Railway with main line rail services at both East Grinstead and Haywards Heath.

The proposed western extension of the Bluebell Railway from Horsted Keynes to Haywards Heath is considered to be a project of District-wide importance and is fully supported by the Council. This policy therefore safeguards the route of the proposed reinstated railway link between East Grinstead and Haywards Heath railway stations for the Bluebell Railway's operating requirements and passenger facilities, as shown on the Policies Map.

DPE9: Sustainable Tourism and the Visitor Economy

The retention of existing tourism accommodation* and attractions will be supported where it is well located and, if it is outside of the built-up area boundary, it respects the character of the countryside.

Where development proposals are brought forward for the change of use of existing tourism accommodation* and attractions, it will need to be demonstrated that there is no realistic prospect of the continued use of the existing provision. The Council will assess such proposals having regard to the market, economy and supply of tourism accommodation* and attractions at the time of the application. Applicants may need to provide:

- evidence of marketing actively conducted for a reasonable period of time;
- evidence that alternative visitor uses have been fully explored;
- an appraisal indicating that the existing use is no longer viable;
- evidence that the site has not been made deliberately unviable;
- evidence of the suitability of the site to accommodate the alternative visitor use; and
- evidence that the reduction of floorspace or bed spaces in the case of tourism accommodation is the only way of improving the standard of the existing tourist facility.

Development proposals for new tourism accommodation* and attractions, or expansions or improvements to existing tourism accommodation* and attractions, will be supported where it is not in conflict with Policy DPE8: Sustainable Rural Development and the Rural Economy and Policy DPC1: Protection and Enhancement of the Countryside, and where it is demonstrated that:

- It increases the range and/or quality of tourist facilities;
- There would be no harm on highway safety or severe residual cumulative impacts on the road network;
- It encourages sustainable travel opportunities;
- It will not adversely affect the character, landscape, historical significance, appearance and amenity of the area;
- Opportunities are taken to use existing buildings where possible;
- The design and layout of the proposals, including ancillary facilities, are sensitive to the existing character and setting;
- It does not have an adverse effect on residential amenity in the local area;
- It will not have an adverse effect on the vitality and viability of existing facilities in the locality or relevant assets of community value; and
- It meets the requirements of other relevant development plan policies.

The route of the proposed reinstated Bluebell Railway link between East Grinstead and Haywards Heath railway stations (as shown on the Policies Map) will be safeguarded from any development which could prevent its completion.

In particular, land along the route of the railway corridor between Horsted Keynes and Haywards Heath railway stations which will be required to deliver the proposed reinstated railway link and associated facilities for the Bluebell Railway will be safeguarded from development.

* Tourism accommodation includes hotels, guesthouses, bed and breakfast establishments, self-catering accommodation and outdoor accommodation such as caravan sites, camping sites and glamping sites (including yurts, log cabins and pods).

14. Sustainable Communities



Sustainable Communities	DPSC1: Broad location to the west of Burgess Hill DPSC2: Land to the south of Reeds Lane, Sayers Common DPSC3: Land at Crabbet Park, Copthorne
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Three sites have been identified as having potential to deliver sustainable urban extensions at locations which have not previously been considered suitable for growth. These urban extensions will deliver mixed used development, supported by infrastructure to create sustainable communities. Due to the scale of these significant site allocations, not all of the sites will be delivered in the Plan Period (up to 2039). However, the sites are allocated for the total amount, with only yield delivered during the plan period contributing to meet the Plan requirement set out in **DPH1: Housing**.

Settlement	Site	Number of homes within Plan Period (up to 2039)	Total Yield
Burgess Hill	Broad location to the West of Burgess Hill	1,400	1,400
Sayers Common	Land to the south of Reeds Lane, Sayers Common	1,850	2,000
Copthorne	Land at Crabbet Park, Copthorne	1,500	2,300

DPSC1: Land to the West of Burgess Hill

Burgess Hill is an area of significant growth with 3,500 homes consented as part of the Northern Arc Development, along with a significant investment in infrastructure. Land to the west of Burgess Hill is an area that is suitable for further sustainable growth being well connected to existing and planned sustainable transport networks.

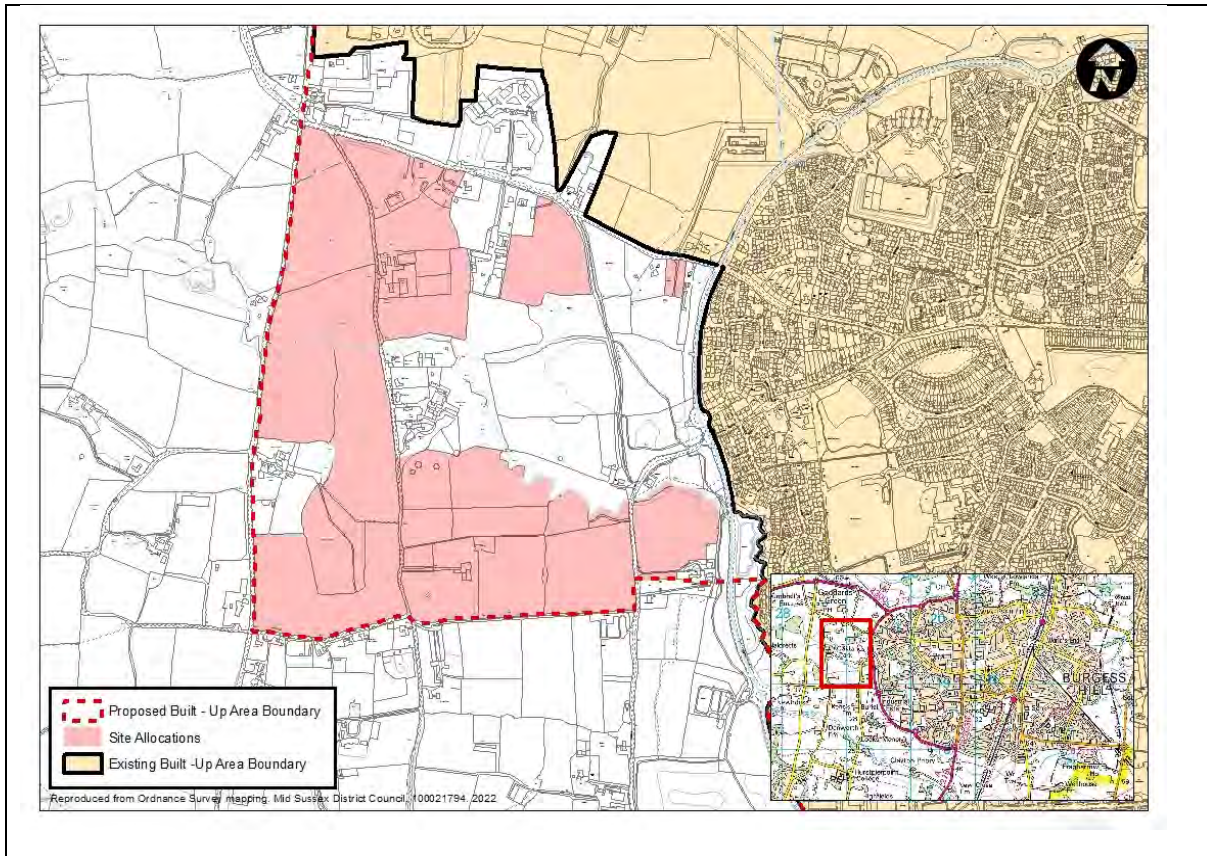
Note: the boundary shown on the site map below represents the extent of the site inclusive of all allocations (residential, employment, facilities and services) listed under “Allocation” below. Built development may not extend to the site boundary; for instance, landscape buffers, retention of existing natural boundaries, open space and village/country parks will be included within and/or on the site boundary.

The site promoter has prepared a visioning document for this site, which includes an indicative masterplan showing approximate location of uses and mitigation. This is available

to view at www.midsussex.gov.uk/DistrictPlan by following the links to District Plan Review and Evidence Base.

DPSC1: Land to the West of Burgess Hill					
SHELAA Ref:	740	Settlement:	Burgess Hill	Gross Site Area (ha):	67.7
Indicative Development Capacity					
Net Residential Dwellings		1,400			
Employment		TBC			
Older Persons Accommodation		Proportion TBC			
Retail / Community		TBC			
Gypsy and Traveller Provision		Provision of equivalent financial contribution towards off-site provision of pitches.			
Infrastructure		<p>On site:</p> <ul style="list-style-type: none"> • Extra Care housing provision¹⁶ • 2FE Primary School • Playspace • Self-service Library • Leisure including sport pitches and community pavilion • Neighbourhood centre – retail, leisure and workspace • Sustainable transport measures and provision • Allotments • Wastewater infrastructure <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sport facilities where need not met on site • Community buildings where need not met on-site • Emergency services • Healthcare • Railway Station improvements <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable transport measures and provision • Highways works 			

¹⁶ Housing that is suitable for older persons and those with specialist accommodation or care needs



Policy Requirements

Land to the west of Burgess Hill, as shown on the inset map, is allocated as an urban extension to Burgess Hill. Development will be in accordance with a comprehensive masterplan to be agreed with the Council and provide:

- Approximately 1,400 new homes; including provision for extra care housing
- A new primary school and play pitches
- Open space, sports pitches and village green
- Neighbourhood centre with community facilities, locate extra care housing provision and transport hub nearby
- Sustainable travel connections to Burgess Hill and links to employment centred around the A2300
- Green travel corridors for cycle and pedestrian access throughout with links to the 'Green Circle'
- Central bus route
- Protection of setting of Grade II Listing Building at North End Farm to the west of the site.
- Retention and enhancement of historic routeways of High Hatch Lane and Pangdean Lane
- Avoid developing areas of existing flood risk and mitigate impacts through integration of multi-functional SUDS drainage network
- Provision of type 4 terminal foul pumping station

This is in addition to the General Principles for Site Allocations set out in policy DPH4.

DPSC2: Land to the South of Reeds Lane, Sayers Common

The significant site at Reeds Lane lies to the west of Sayers Common and north of Albourne. The site will deliver a sustainable urban extension to Sayers Common, bringing new community facilities and services to the area as part of a mixed use development.

Note: the boundary shown on the site map below represents the extent of the site inclusive of all allocations (residential, employment, facilities and services) listed under “Allocation” below. Built development may not extend to the site boundary; for instance, landscape buffers, retention of existing natural boundaries, open space and village/country parks will be included within and/or on the site boundary.

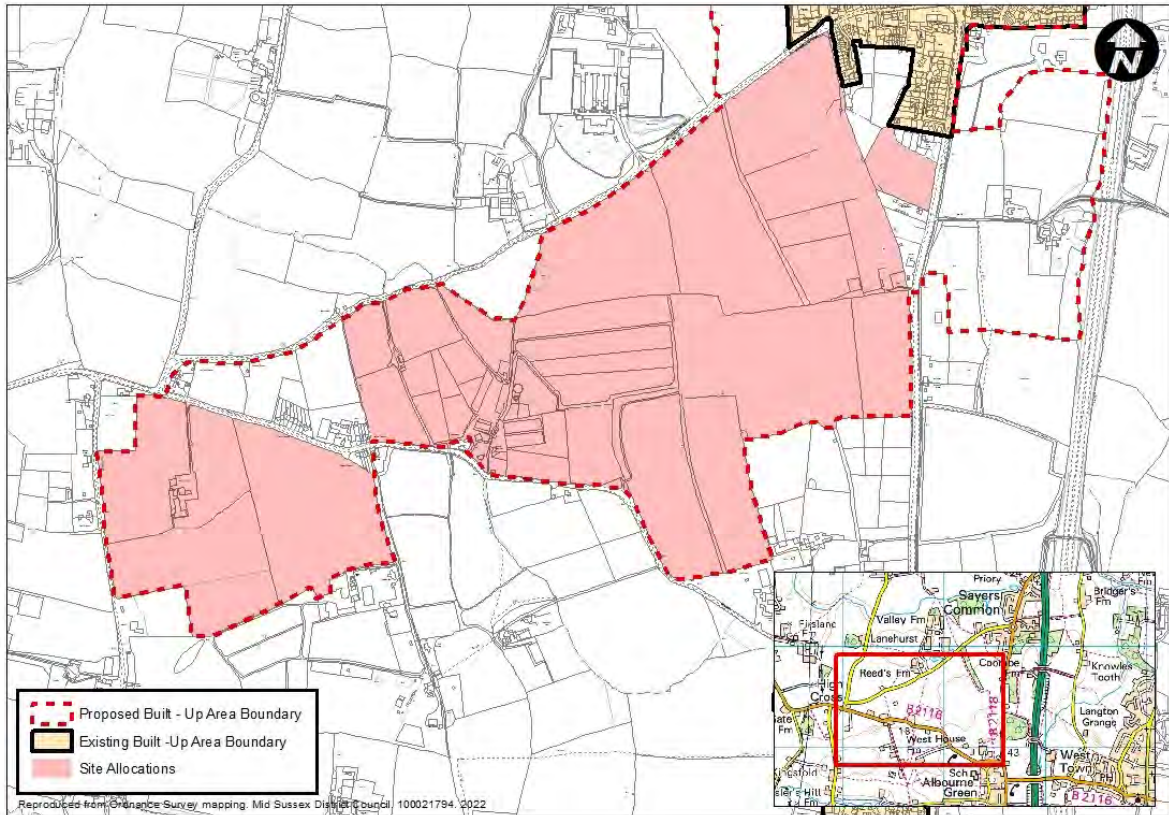
The site promoter has prepared a visioning document for this site, which includes an indicative masterplan showing approximate location of uses and mitigation. This is available to view at www.midsussex.gov.uk/DistrictPlan by following the links to District Plan Review and Evidence Base.

DPSC2: Land to the South of Reeds Lane, Sayers Common					
SHELAA Ref:	799	Settlement:	Sayers Common	Gross Site Area (ha):	88.5
Indicative Development Capacity					
Net Residential Dwellings	2,000 (approximately 1,850 to 2039)				
Employment	5,000 – 9,000sqm E Class				
Older Persons Accommodation	Proportion TBC				
Retail / Community	2,000 – 4,000sqm				
Gypsy and Traveller Provision	6 permanent pitches				
Infrastructure	<p>On site:</p> <ul style="list-style-type: none"> • Extra Care housing provision¹⁷ • All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form • Playspace • Self-service Library • Leisure • Sustainable transport measures and provision • Healthcare provision • Community facilities • Wastewater infrastructure <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sport facilities • Community buildings • Emergency services • Healthcare 				

¹⁷ Housing that is suitable for older persons and those with specialist accommodation or care needs

Provision of:

- Sustainable Transport measures and provision
- Highways improvements



Policy Requirements

Land to the south of Reeds Lane, Sayers Common, as shown on the inset map, is allocated as an urban extension to Sayers Common. Development will be in accordance with a comprehensive masterplan to be agreed with the Council and provide:

- Approximately 2,000 new homes, 1,850 of which are within the Plan Period; including provision of extra care housing
- Neighbourhood centre with community facilities, locate extra care housing provision and transport hub nearby
- A new primary school
- Provision of land for employment uses
- Provision of new waste water treatment works on site
- Sustainable travel connections to Burgess Hill

This is in addition to the General Principles for Site Allocations set out in policy DPH4.

Opportunities to improve connectivity and masterplanning between the eastern and western parcels of the site, by inclusion of further land parcels on the southern boundary, should be investigated. Any extension to the site must ensure there is significant open space and landscaping on the southern boundary to ensure a gap between Sayers Common and Albourne, to maintain the separate identity of these settlements.

DPSC3: Land at Crabbet Park

Crabbet Park lies to the south of Copthorne village and is separated from Crawley by the M23. Whilst the site is capable of delivering around 2,300 new homes, it is estimated only 1,500 will be deliverable within the Plan period.

Note: the boundary shown on the site map below represents the extent of the site inclusive of all allocations (residential, employment, facilities and services) listed under “Allocation” below. Built development may not extend to the site boundary; for instance, landscape buffers, retention of existing natural boundaries, open space and village/country parks will be included within and/or on the site boundary.

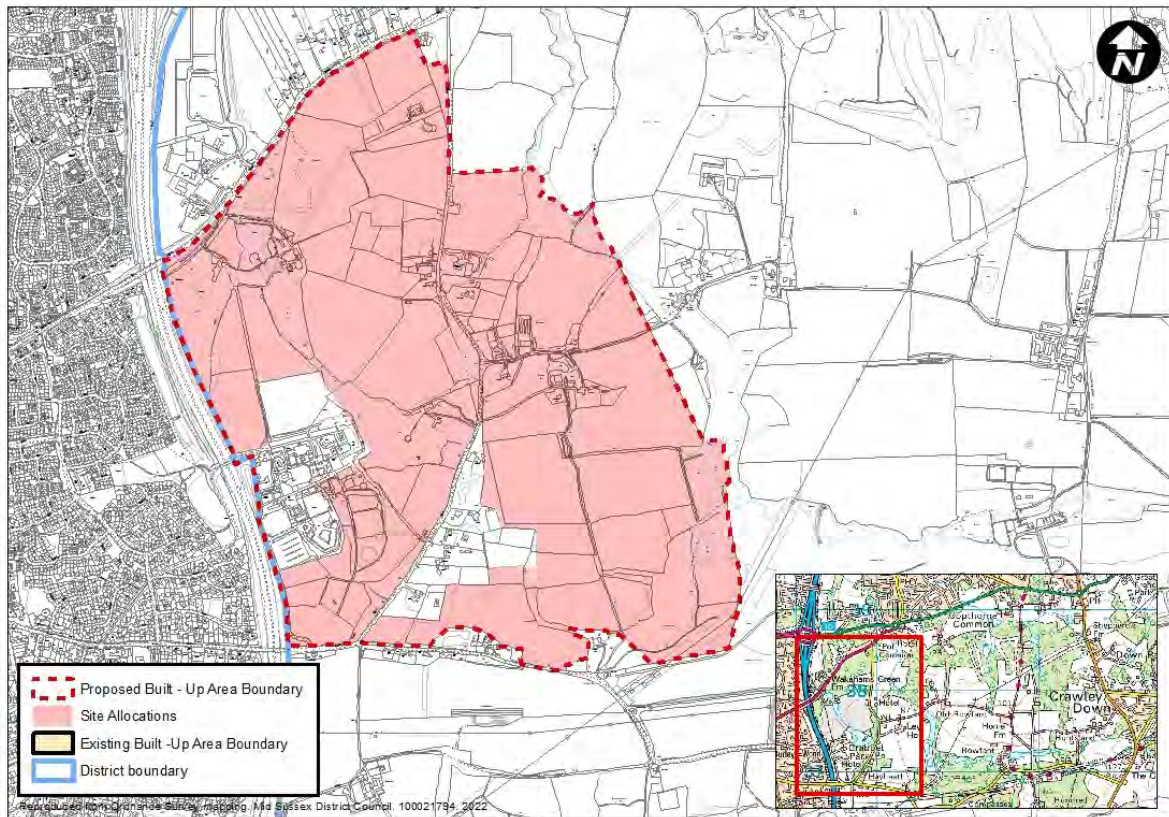
The site promoter has prepared a visioning document for this site, which includes an indicative masterplan showing approximate location of uses and mitigation. This is available to view at www.midsussex.gov.uk/DistrictPlan by following the links to District Plan Review and Evidence Base.

DPSC3: Land at Crabbet Park					
SHELAA Ref:	18	Settlement:	Copthorne	Gross Site Area (ha):	172
Indicative Development Capacity					
Net Residential Dwellings	2,300 (approximately 1,500 to 2039)				
Employment	TBC				
Older Persons Accommodation	Proportion TBC				
Retail / Community	TBC				
Gypsy and Traveller Provision	Provision of equivalent financial contribution towards off-site provision of pitches.				
Infrastructure	On site: <ul style="list-style-type: none"> • Extra Care housing provision¹⁸ • All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form • Playspace • Self-service Library • Leisure • Sustainable transport measures and provision • Healthcare provision • Community facilities • Wastewater infrastructure Financial contributions towards the provision of: <ul style="list-style-type: none"> • Sport facilities • Community buildings • Emergency services • Healthcare 				

¹⁸ Housing that is suitable for older persons and those with specialist accommodation or care needs

Provision of:

- Sustainable Transport measures and provision
- Highways works



Policy Requirements

Land at Crabbet Park, as shown on the inset map, is allocated for a mixed-use development. Development will be in accordance with a comprehensive masterplan to be agreed with the Council and provide:

- Approximately 2,300 new homes, 1,500 of which are within the Plan Period; including provision of extra care housing
- Provision of employment land to support local jobs
- Provision of a new primary school
- Neighbourhood centre with community facilities, locate extra care housing provision and transport hub nearby
- Improved linkages to cycling and walking network to improve sustainable transport routes to Three Bridges train station, Crawley Town Centre and areas of employment centre including links to the Worth Way.
- Mitigation of impact of the development on the AONB which lies to the south of the site.

This is in addition to the General Principles for Site Allocations set out in policy DPH4.

15. Housing



Housing	<p>DPH1: Housing</p> <p>DPH2: Sustainable Development - Outside BUA</p> <p>DPH3: Sustainable Development - Inside BUA</p> <p>DPH4: General Development Principles for Housing Allocations</p> <p>DPH5 – DPH25: Housing Site Allocations</p> <p>DPH26: Older Persons Housing and Specialist Accommodation</p> <p>DPH27 – DPH28: Older Persons Housing and Specialist Accommodation - Allocations</p> <p>DPH29: Gypsies, Travellers and Travelling Showpeople</p> <p>DPH30: Self and Custom Build Housing</p> <p>DPH331: Housing Mix</p> <p>DPH32: Affordable Housing</p> <p>DPH33: First Homes</p> <p>DPH34: Rural Exception Sites</p> <p>DPH35: Dwelling Space Standards</p> <p>DPH36: Accessibility</p>
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DPH1: Housing

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	<p>12 – Support Safe, Healthy and Inclusive Communities</p> <p>13 – Provide Housing to Meet Community Needs</p>

The Local Housing Need (LHN) for housing is 20,142 dwellings (an average of 1,119 dwellings per annum). This figure has been calculated using the standard method and there are no exceptional circumstances to justify an alternative approach.

As at 1st April 2022 there were 10,786 commitments made up from planning permissions and development plan allocations that have yet to be implemented. In addition there were 1,187

completions in 2021/22, the first year of the Plan. Therefore, to ensure the housing need is met in full the District Plan needs to make provision for is 8,169 dwellings.

The strategic sites allocated in the 2018 District Plan are making good progress with the first completions on the Northern Arc taking place 2022 and will continue through the plan period, with final completions on the site anticipated during 2033/34; over half of the 600 homes are now completed at Pease Pottage and the on-site school open; finally, the Clayton Mills site at Hassocks has full planning permission and work has commenced.

The spatial strategy of this Plan is to focus growth to locations that support the sustainability of existing settlements. This will be achieved through sustainable growth at existing settlements and for urban extensions that improve sustainability of existing settlements. Some smaller settlements, that are not currently sustainable, have the potential to accommodate high levels of growth, supported by improvements to infrastructure.

An Infrastructure Delivery Plan has been prepared to identify what infrastructure provision is needed and where and when it needs to be delivered in order to support the development and anticipated future growth identified in this Plan.

To ensure the housing need is met in full a number of additional housing sites have been allocated.

Policy Ref	Site	Settlement	Yield
DPH5	Batchelors Farm, Keymer Road, Burgess Hill	Burgess Hill	33
DPH6	Land at Hillbrow, Janes Lane, Burgess Hill		25
DPH7	Burgess Hill Station		300
DPH8	Land off West Hoathly Road, East Grinstead	East Grinstead	45
DPH9	Land at Hurstwood Lane, Haywards Heath	Haywards Heath	45
DPH10	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath		30
DPH11	Land east of Borde Hill Lane, Haywards Heath		60
DPH12	Orchards Shopping Centre, Haywards Heath		100
DPH13	Land to west of Turners Hill Road, Crawley Down	Crawley Down	350
DPH14	Hurst Farm, Turners Hill Road, Crawley Down		37
DPH15	Land rear of 2 Hurst Road, Hassocks	Hassocks	25
DPH16	Land west of Kemps, Hurstpierpoint	Hurstpierpoint	90
DPH17	The Paddocks Lewes Road Ashurst Wood	Ashurst Wood	8-12
DPH18	Land at Foxhole Farm, Bolney	Bolney	200
DPH19	Land at Chesapeake and Meadow View Reeds Lane Sayers Common	Sayers Common	33

DPH20	Land at Coombe Farm London Road Sayers Common		210
DPH21	Land to west of Kings Business Centre Reeds Lane Sayers Common		100
DPH22	Land south of LVS Hassocks London Road Sayers Common		200
DPH23	Ham Lane Farm House Ham Lane Scaynes Hill	Scaynes Hill	30
DPH24	Challoners Cuckfield Road Ansty	Ansty	37
DPH25	Land to the west of Marwick Close Bolney Road Ansty		45
TOTAL			2,007

The National Planning Policy Framework allows local planning authorities to make an allowance for windfall sites in the housing supply if there is compelling evidence to do so. The Urban Capacity Study (2022) sets out the evidence that supports the inclusion of a windfall allowance. The study concludes that there is evidence to justify an allowance of 466 on identifiable larger sites; 79 units per annum from non-identifiable sites of less than 5 units; and a further 25 units per annum from non-identifiable sites from other sources such as office to residential conversions. A windfall allowance of allowance of 1,714 units over the plan period is included in policy DPH1 (from year 6 onwards at an average of 143¹⁹ pa for 12 years).

DPH1: Housing

The District's Local Housing Need is 20,142 dwellings over the Plan Period.

Minimum Housing Need

The Housing Need will be met from the following sources:

Commitments (Existing allocations and Permissions)	10,786
Completions 2021/22	1,187
Sustainable Communities – Significant Sites	4,750
DPSC1: Land to West of Burgess Hill	1,400
DPSC2: Land to the South of Reeds, Sayers Common	1,850
DPSC3: Land at Crabbet Park, Copthorne	1,500
Housing Sites DPH5 – DPH25	2,007
Windfall allowance	1,714
<i>Of which larger identifiable sites</i>	466
<i>Of which smaller and other non-identifiable sites</i>	1,248
Total Housing supply from 2021 - 2039	20,444
Mid Sussex Housing Need	20,142
Total under/over supply for resilience	+302

In order to minimise the pressure for additional housing development the net loss of residential dwellings will not be permitted unless there are specific circumstances that justify the loss.

¹⁹ 143 pa due to rounding.

DPH2: Sustainable Development – Outside the Built-up Area

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

It is recognised that in order for the villages to continue to grow and thrive, in many cases, it is necessary to expand beyond the existing built-up area boundaries, as defined on Policies Maps. In addition to the allocation of additional for land for housing, there are opportunities for small scale (fewer than 10 dwellings) windfall or unplanned development on the edge of settlements.

DPH2: Sustainable Development – Outside the Built-up Area

Outside defined built-up area boundaries, as defined on the Policies Map, the expansion of settlements will be supported where it meets identified local housing, employment and community needs and:

1. The site is allocated in the District Plan, a Neighbourhood Plan or Development Plan Document or where the proposed development is for fewer than 10 dwellings: and
2. The site is contiguous with an existing built-up area of the settlement, as defined on Policies Maps; and
3. The development is demonstrated to be sustainable, including by reference to the settlement hierarchy, as set out in Table 2.

The developer will need to satisfy the Council that:

- The proposal does not represent an underdevelopment of the site with regard to Policy DPB1: Character and Design and Mid Sussex Design Guide SPD; or
- A large site is not brought forward in phases that individually meet the threshold but cumulatively does not.

DPH3: Sustainable Development – Inside the Built-up Area

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

Most settlements in the District have built-up area boundaries which are defined on Policies Maps. Within these settlements there are opportunities for infilling and redevelopment of land to maximise the potential of these areas to accommodate further development. Such sites provide opportunity for sustainable development, often well located to existing services and public transport networks, reducing both the need to travel and pressure to build on the countryside. Whilst such sites are not normally allocated for development, they are a source

of 'unidentified' or 'windfall' sites which make an important contribution to the overall housing land supply.

DPH3: Sustainable Development – Inside the Built-up Area

With defined built-up area boundaries, as defined on Policies Maps, development will be permitted within towns and villages. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale with particular regard to DPB1: Character and Design and Mid Sussex Design Guide SPD.

In areas with good accessibility to shops and services or good public transport links that minimise the need to travel and/or reliance on private cars, there may be an opportunity to deliver a greater concentration of development.

DPH4: General Development Principles for Housing Allocations

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

Allocations within the District Plan must be compliant with the development plan when read as a whole; this includes national policy, policies within this plan, and within 'made' Neighbourhood Plans.

Annex 1 sets out an overview of the policy requirements that are relevant for all allocated sites. This is not an exhaustive list however demonstrates the considerations that will need to be addressed when submitting planning applications for allocated sites.

Policy DPH4 sets out additional General Principles that apply for all housing allocations. These are supplemented by site-specific requirements which are set out in individual site policies.

DPH4: General Principles for Housing Allocations

All housing allocations must be delivered in accordance with the development plan policies when read as a whole, and site-specific requirements set out in individual allocation policies:

- **Sustainable Communities: Significant Sites:** DPSC1 – DPSC3
- **Housing Allocations:** DPH9 – DPH29

In addition, all Significant Sites and Housing Allocations must:

Urban design principles

- Design sites in accordance with the Mid Sussex Design Guide SPD
- Design sites within the High Weald AONB in accordance with the **High Weald Housing Design Guide**.
- Provide a high degree of integration and connectivity between new and existing communities.

- Design new development at a density that is appropriate for the location.
- Make a positive contribution towards local character and distinctiveness.
- Create safe communities through appropriate design and layout that reduces the likelihood of crime and anti-social behaviour.

Landscape considerations

- Undertake Landscape and Visual Impact Assessment or Appraisal (LVIA) on any rural and edge of settlement sites. In the AONB the LVIA will utilise the AONB Management Plan components as landscape receptors. The LVIA will need to inform the site design, layout, capacity and any mitigation requirements.
- Provide a Landscape Strategy to identify how natural features on site have been retained and incorporated into the landscape structure and design of the site and informed the landscaping proposals for the site.
- Submit Arboricultural Impact Assessment and Arboricultural Method Statements for all sites where development will be within 15 metres of any trees, measured from the trunk.

Historic environment and cultural heritage

- Undertake pre-determination evaluation of potential archaeological features on the site prior to any planning application being submitted, unless it can be demonstrated that such an evaluation is not appropriate for this site. Appropriate mitigation may be required depending on the outcome of that evaluation.
- Respect listed buildings, conservation areas, scheduled monuments, the historic landscape, registered parks and gardens and their settings and look for opportunities to enhance or better reveal their significance. All heritage assets, including those that are undesignated, will need to be conserved and enhanced.
- Provide Heritage Impact Assessments, where appropriate, to establish the significance of heritage assets and their settings, the impact of development on this significance and, if appropriate, mitigation strategies

Biodiversity and Green Infrastructure

- Carry out and submit habitat and species surveys at the earliest opportunity in order to inform the design and conserve important ecological assets from negative direct and indirect effects.
- Protect and enhance green infrastructure and green corridors by ensuring built development integrates existing green infrastructure into the layout of the scheme, reinforcing and providing new green infrastructure and connections to existing corridors to develop a connected network of multi-functional greenspace, including incorporating opportunities to contribute to strategic green infrastructure.
- Improve access to, and understanding of natural greenspace and nature conservation features, including recognising the importance and role of green infrastructure to the ecosystem, biodiversity, public rights of way, health and well-being, the water environment, community facilities and climate change. Green infrastructure is to be incorporated with SuDS, where possible, to improve biodiversity and water quality.

Access and highways

- Provide a Transport Assessment and Sustainable Transport Strategy to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable travel infrastructure to support it.
- Highway infrastructure mitigation is only considered once all relevant sustainable travel interventions (for the relevant local network) have been fully explored and have been taken into account in terms of their level of mitigation.
- Identify how the development will provide safe and convenient routes for walking and cycling through the development and linking with existing networks beyond. Create a permeable road network within the site with clearly defined route hierarchies.

- Safeguard Public Rights of Way (PRoW) and protect their amenity.

Flood risk and drainage

- Provide a site-specific Flood Risk Assessment (FRA)/surface water drainage strategy in areas at risk from fluvial or surface water flooding to inform the site layout and any appropriate mitigation measures that may be necessary. Areas at risk of flooding should be avoided in the first instance.
- Undertake a sequential approach to site layout by avoid developing areas at risk of flooding including climate change allowance.

Utilities

- Liaise with water, gas and electricity providers to ensure that appropriate works are carried out in a timely manner to support development, if needed.

Contaminated Land

- Investigate any potential land contamination from current or historical on site or adjacent land uses.

Minerals Safeguarding

- Consult with West Sussex County Council regarding any applications for development in a Minerals Safeguarding Zone or Consultation Area and address the requirements of Policy M9 in the West Sussex Joint Minerals Local Plan – 2018.

Aerodrome Safeguarding Requirements

- Ensure that proposed development does not impact on the safe operation of Gatwick Airport. The following must be taken into consideration:
 - Impact of buildings & structures on navigational aids & instrument flight procedures
 - Schemes that contain large areas of landscaping, water bodies including SUDS schemes, buildings with large areas of flat/shallow pitched roofs and waste & recycling sites could attract birds in large numbers which could increase the bird strike risk to the airport
 - Large and/or coloured lighting schemes close to the airport
 - Wind turbines or large areas of solar panels

In addition, all Significant Sites must:

- Deliver a development which will support a vibrant and inclusive community which embodies the 20-minute neighbourhood²⁰ principles of a complete, compact, and well-connected neighbourhood, with advanced digital infrastructure, in which people can meet the majority of their daily needs within a short walk or cycle ride and opportunities to include food growing areas are taken.
- Deliver a layout which accords with Chapter 4 of the Mid Sussex Design Guide SPD and is designed from the concept stages to prioritise sustainable and active modes of travel, providing safe and convenient routes for walking and cycling through the development and linking with existing and enhanced networks beyond.
- Deliver a landscape led approach to the master planning of the development, ensuring on site green infrastructure assets are protected and enhanced, and provides connectivity to wider green infrastructure networks;
- Secure a minimum biodiversity net gain of 20% to be demonstrated through a Biodiversity Gain Plan which sets out how net gains for biodiversity will be achieved,

²⁰ The Town and County Planning Association 'Guide to 20-minute Neighbourhoods - Creating Heathier, Active, Prosperous Communities' (March 2021).

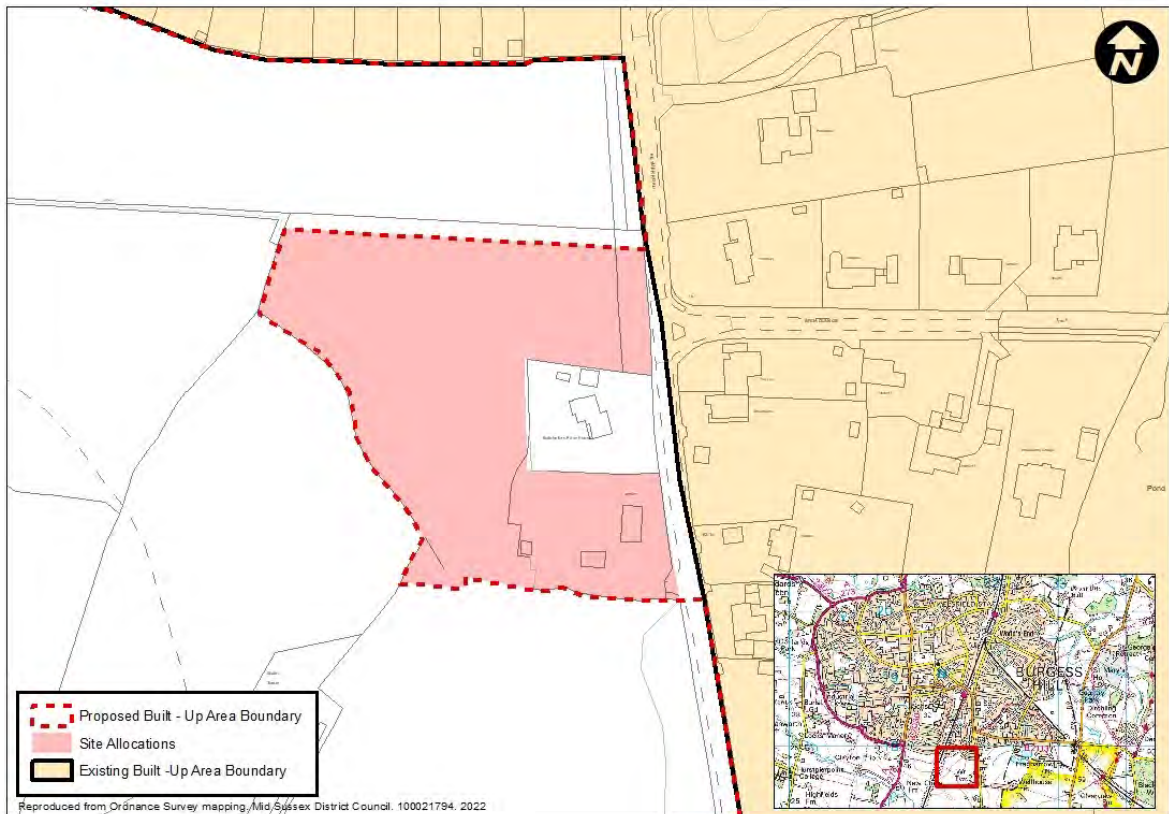
secured and managed appropriately taking into account the Council's objectives and priorities for biodiversity net gain and nature recovery;

- Provide a suitable mix of housing including affordable housing, older persons and extra care accommodation and self-build plots;
- Provision of permanent pitches, or equivalent financial contribution towards off-site provision for Gypsies and Travellers who travel to contribute towards the total identified need within the District commensurate with the overall scale of residential development proposed by the significant site development;
- Provision of Use Class C2 Extra Care and older person specialist accommodation towards the total identified need within the District commensurate with the overall scale of residential development proposed by the significant site development;
- Provide land for employment uses, unless it is demonstrated that there is not demand for employment land at that location;
- Submit an Employment and Skills Plan with the planning application to secure improvements to the skills of local people and to enable them to take advantage of the resulting employment opportunities;
- Provide public transport, walking and cycling infrastructure to nearby settlements that provide higher order service and transport interchanges;
- Provide necessary transport improvements that take account of the wider impact of the development;
- Meet at least 4* Rating of the BRE Home Quality Mark (HQM) with a minimum score of 55 credits in the energy category; and
- Meet a maximum water consumption standard of 85 litres per person per day (including external water use) to minimise the impact of the development on water resources and water quality. Rainwater harvesting and greywater recycling measures should be incorporated into the development as well as using water efficient fittings and appliances. Water neutral developments will be encouraged where this is possible.

DPH5: Batchelors Farm, Keymer Road, Burgess Hill

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	573	Settlement:	Burgess Hill
Gross Site Area (ha):	1.5	Number of Dwellings:	33
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Transport <p>Provision of:</p> <ul style="list-style-type: none"> • Highway works • Sustainable Transport measures 	



Policy Requirements

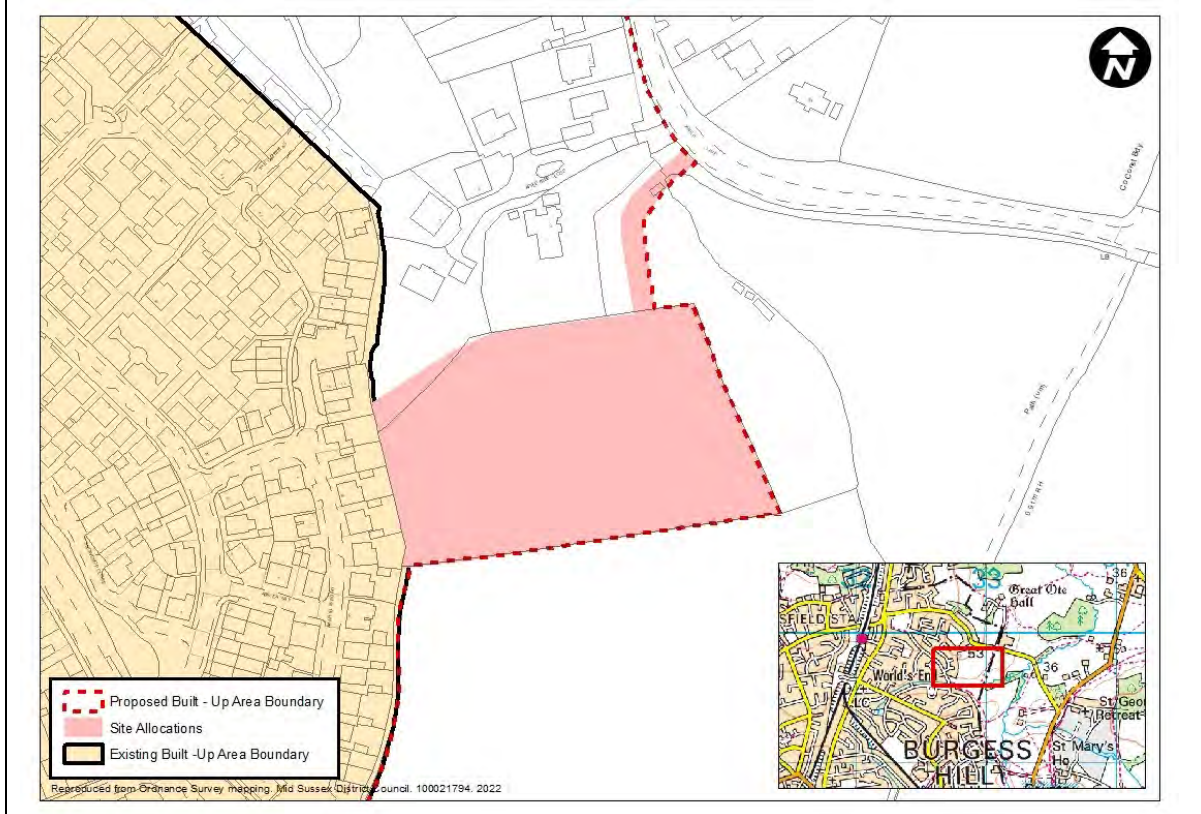
- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.

- Prioritise cycle and pedestrian connections throughout the site with direct links to the Batchelors Farm Nature Reserve to the west.
- Provide suitable access from Keymer Road.
- Retain, protect and enhance mature trees across the whole site and hedgerows along the boundaries and ensure development provides a positive edge to these features and the wider countryside including Batchelors Farm Nature Reserve to the west.

DPH6: Land at Hillbrow, Janes Lane, Burgess Hill

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	1030	Settlement:	Burgess Hill
Gross Site Area (ha):	1.2	Number of Units:	25
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Transport <p>Provision of:</p> <ul style="list-style-type: none"> • Highway works • Sustainable Transport measures 	

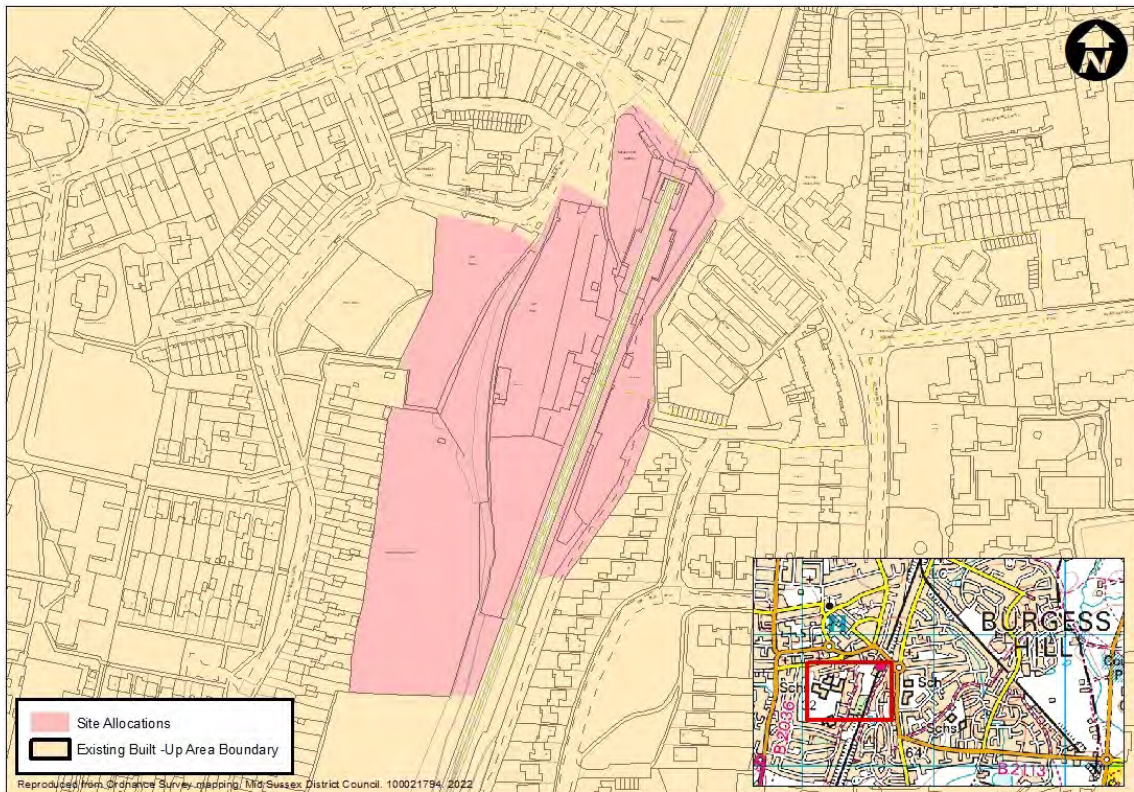


Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Prioritise cycle and pedestrian connections throughout the site and onto Janes Lane.
- Provide suitable access from Janes Lane which avoids loss of mature trees.
- Retain, protect and enhance mature trees across the whole site and hedgerows along the boundaries and ensure development provides a positive edge to these features and the wider countryside.

DPH7: Burgess Hill Station, Burgess Hill

SHELAA:	1123	Settlement:	Burgess Hill
Gross Site Area (ha):	3.5	Number of Units:	300
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Transport • Healthcare • Emergency services <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport measures 	



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Masterplan a comprehensive redevelopment scheme which takes account of the principles of Neighbourhood Plan Policy TC5 The Station Quarter, delivering attractive

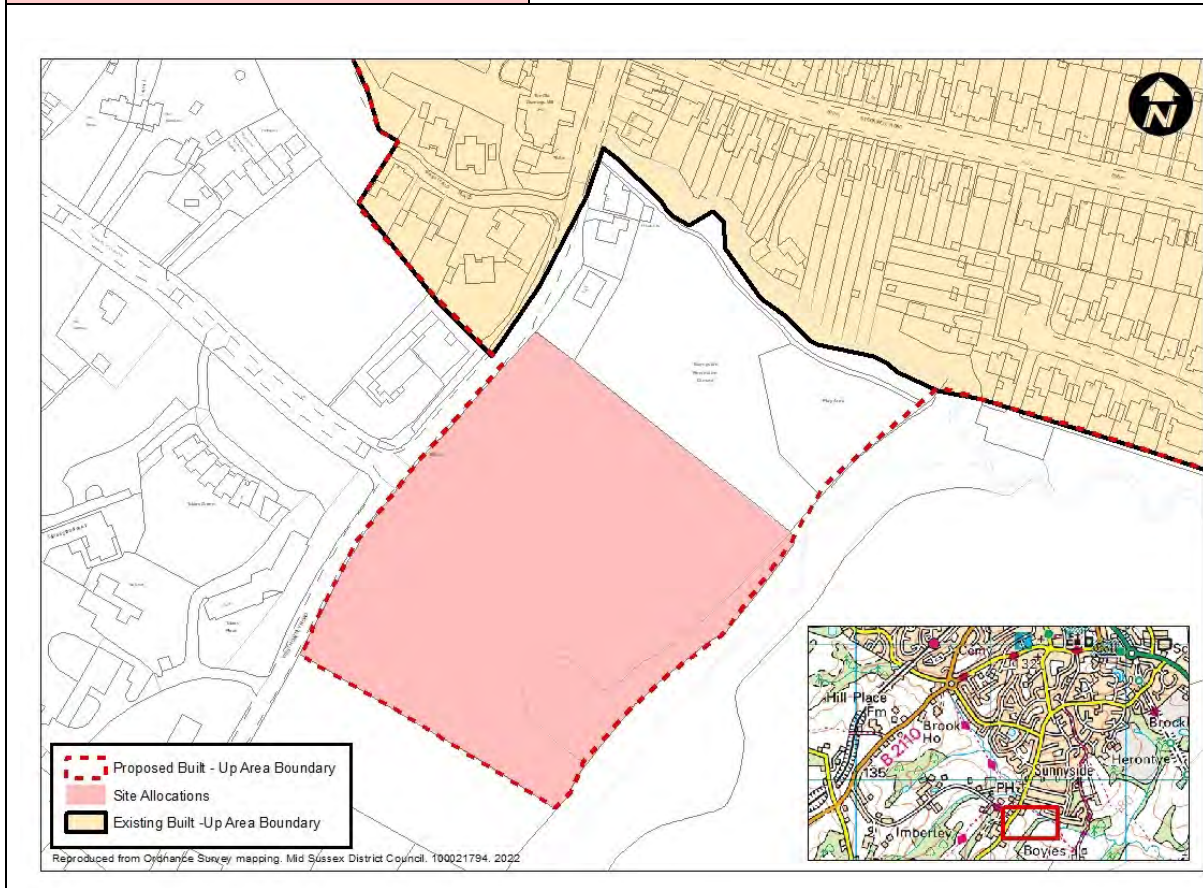
and accessible mixed use development and transport mobility hub, creating a new gateway development to Burgess Hill.

- Optimise use of the site by delivering a high density, sustainable development which has a strong sense of place, focused on high quality open space and carefully landscaped public realm, providing an appropriate setting for the scale of development.
- Orientate development positively to address existing open space at Queens Crescent Park along with any proposed areas of open space.
- In consultation with the Local Planning Authority, address requirements for children's equipped playspace, either on-site, and/or by financial contribution to upgrade existing facilities at Queen's Crescent Playground.
- Create a mobility hub which prioritises sustainable and active travel links throughout the development establishing a permeable layout with safe links to the wider network, taking account of the Place & Connectivity Programme and LCWIP.
- Provide secure and conveniently located cycle parking facilities and ensure car parking well designed to ensure it does not dominate the streetscape.
- Support will be given for appropriately located and designed delivery lockers.
- Provide a detailed assessment of allotment need and ensure suitable re-provision of the allotment space and/or justification for any reduction in the provision to the satisfaction of the Local Planning Authority.
- Provide suitable design and necessary mitigation for noise associated with the use and operation of the railway and station.

DPH8: Land off West Hoathly Road, East Grinstead

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	198	Settlement:	East Grinstead
Gross Site Area (ha):	1.8	Number of Dwellings:	Up to 45
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing • Open space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Play space • Sports facilities • Ashdown Forest SPA and SAC mitigation measures • Community buildings • Library • Education • Sustainable Travel <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport measures • Highway works 	



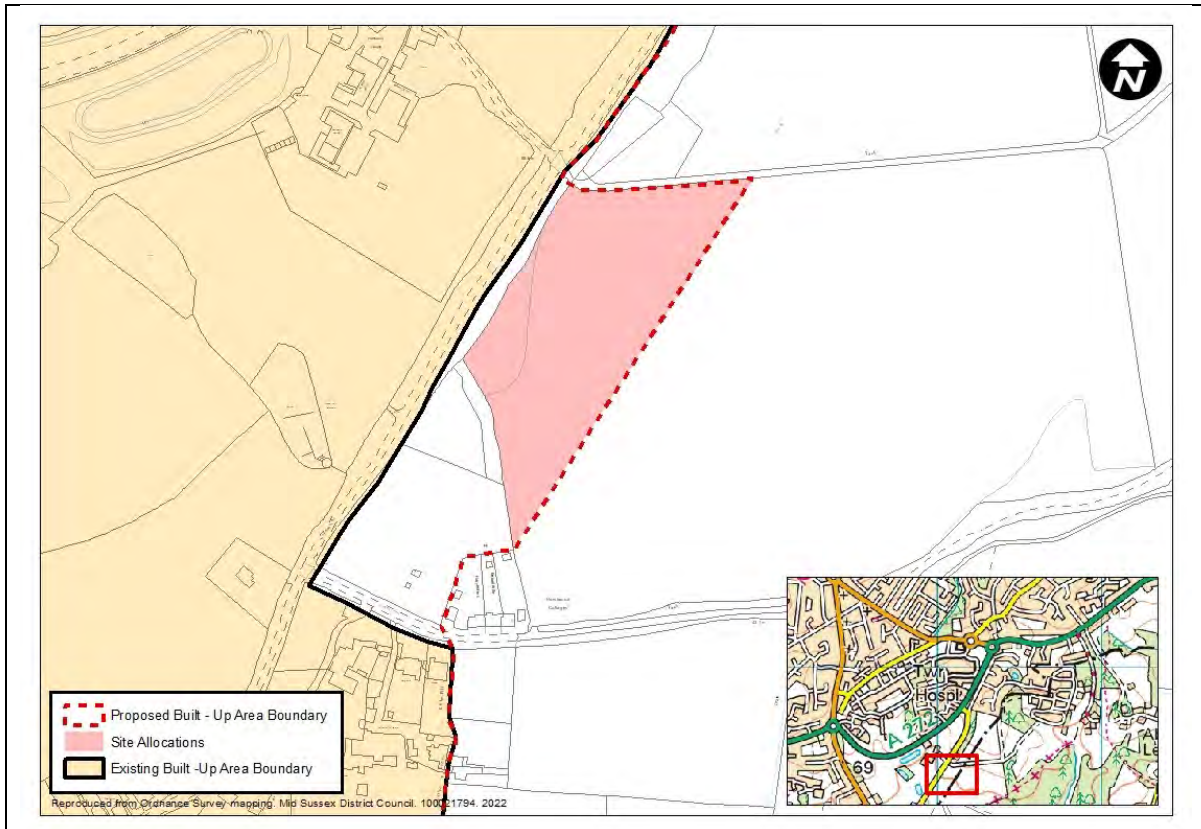
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable access from West Hoathly Road.
- Provide a footpath link to East Grinstead along West Hoathly Road.
- Take a landscape-led approach to development.
- Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB.
- Take into account the objectives of the High Weald AONB Management Plan, the High Weald Housing Design Guide and the Colour Study.
- Take account of the surrounding settlement pattern and character in the design and layout of the site in order to conserve and enhance the High Weald AONB.
- Provide an appropriate buffer for the ancient woodland to the east of the site in line with Policy DPN4.
- Retain and enhance mature trees/ hedgerows on site boundaries.
- Provide parkland as part of the development and a link to Sunnyside Recreation Ground.

DPH9: Land at Hurstwood Lane, Haywards Heath

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	858	Settlement:	Haywards Heath
Gross Site Area (ha):	1.8	Number of Units:	45
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Transport <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable transport measures • Green infrastructure to neighbouring allocated site 		



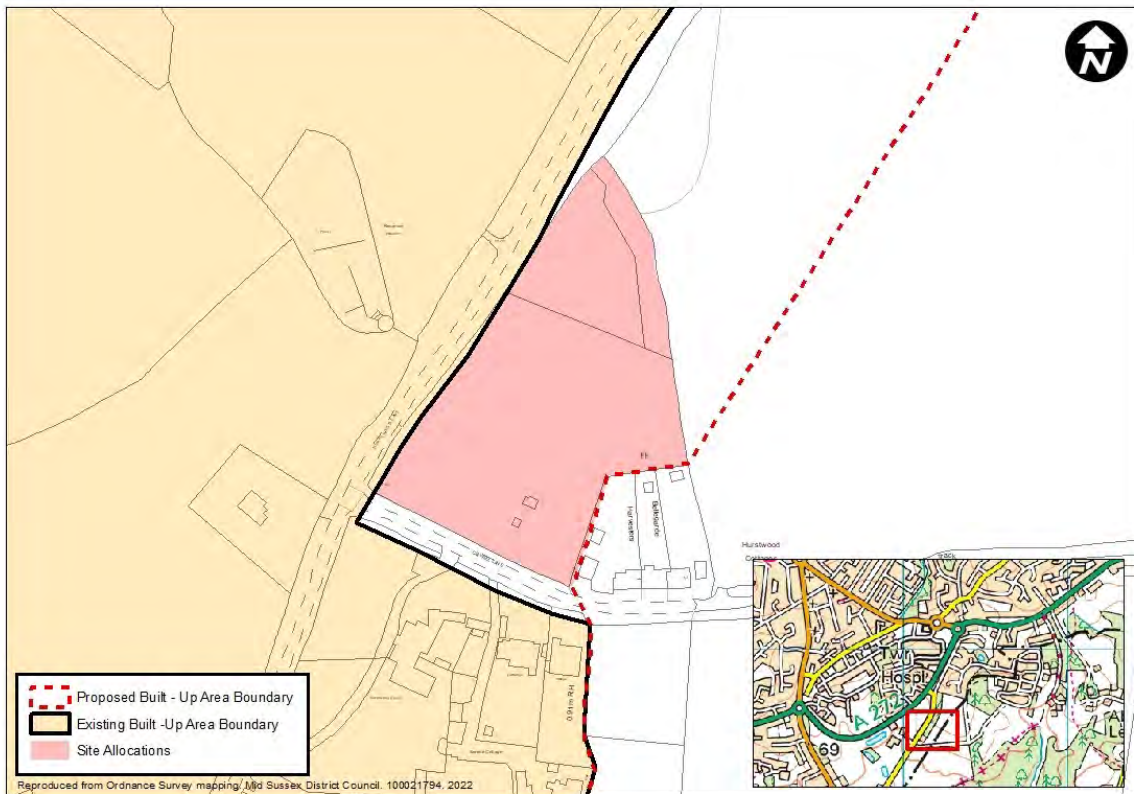
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Integrate development with the site to the south (DPH10) and the wider Hurst Farm development (the Haywards Heath Neighbourhood Plan allocation) such as through the design of the site layout and by providing pedestrian and cycling connections between the developments, green infrastructure and ecological corridors.
- Provide access to integrate with the wider Hurst Farm development (the Haywards Heath Neighbourhood Plan allocation).
- Respect and retain the rural character of Hurstwood Lane.
- Retain the trees and ground levels along Hurstwood Lane (which forms the western boundary of the site) and in the western part of the site.
- Measures will be necessary to mitigate the impact of development on the landscape character of the surrounding area, including a landscape buffer on the eastern site boundary
- Provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west of the site, including ecological corridors.

DPH10: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	508	Settlement:	Haywards Heath
Gross Site Area (ha):	1	Number of Units:	30
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Play space Sports facilities Community buildings Library Education Sustainable Transport <p>Provision of:</p> <ul style="list-style-type: none"> Sustainable transport measures Green infrastructure to neighbouring allocated site 	



Policy Requirements

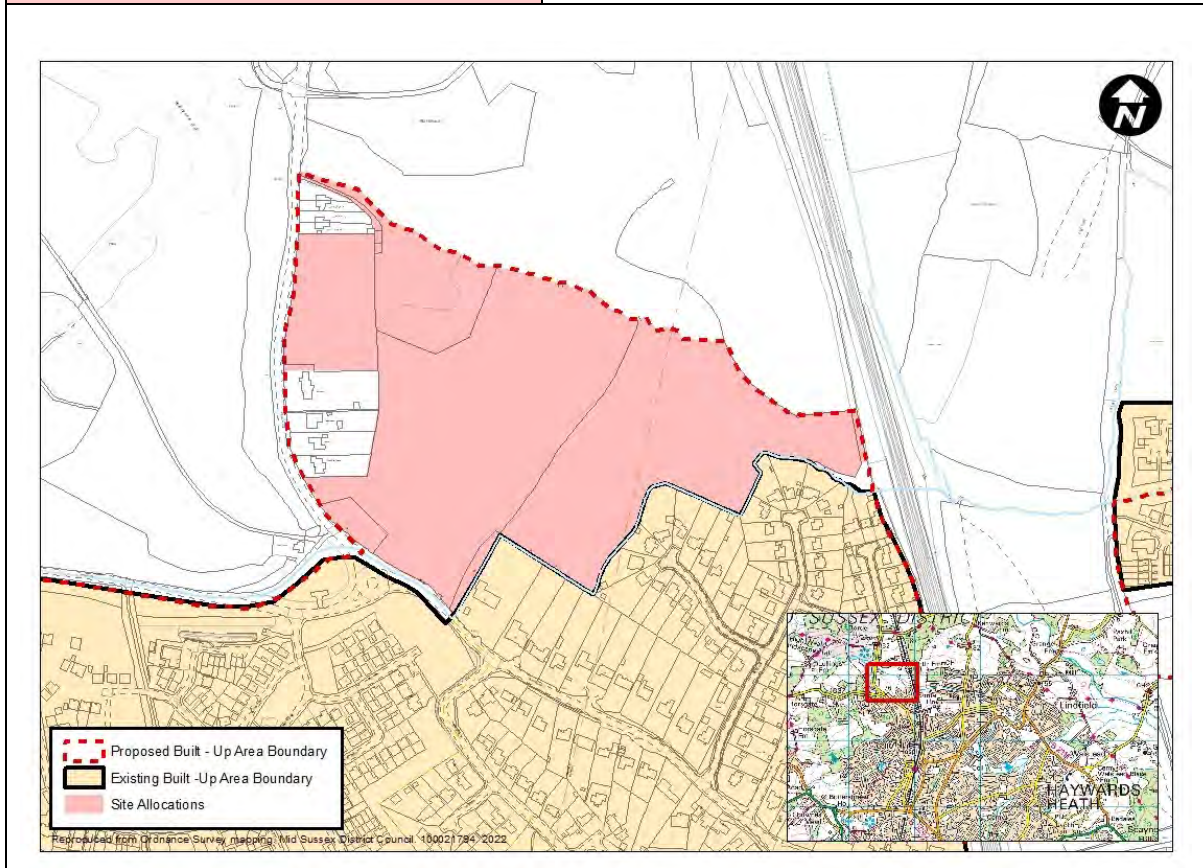
- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations

- Integrate development with the site to the north (DPH9) and the wider Hurst Farm development (the Haywards Heath Neighbourhood Plan allocation) such as through the design of the site layout and by providing pedestrian and cycling connections between the developments, green infrastructure and ecological corridors.
- Provide access to integrate with the wider Hurst Farm development (the Haywards Heath Neighbourhood Plan allocation).
- Respect and retain the rural character of Hurstwood Lane.
- Retain the trees and ground levels along Hurstwood Lane which forms the western boundary of the site.
- Retain the trees on the site boundaries to provide a landscape buffer to the wider countryside.
- Measures will be necessary to mitigate the impact of development on the landscape character of the surrounding area.

DPH11: Land east of Borde Hill Lane Haywards Heath

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	556	Settlement:	Haywards Heath
Gross Site Area (ha):	10.5	Number of Units:	60
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing • Playspace <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sports facilities • Community buildings • Library • Education • Sustainable Travel and/or Highways Improvements • Healthcare • Emergency Services <p>Provision of:</p> <ul style="list-style-type: none"> • Highway works • Sustainable transport measures 	



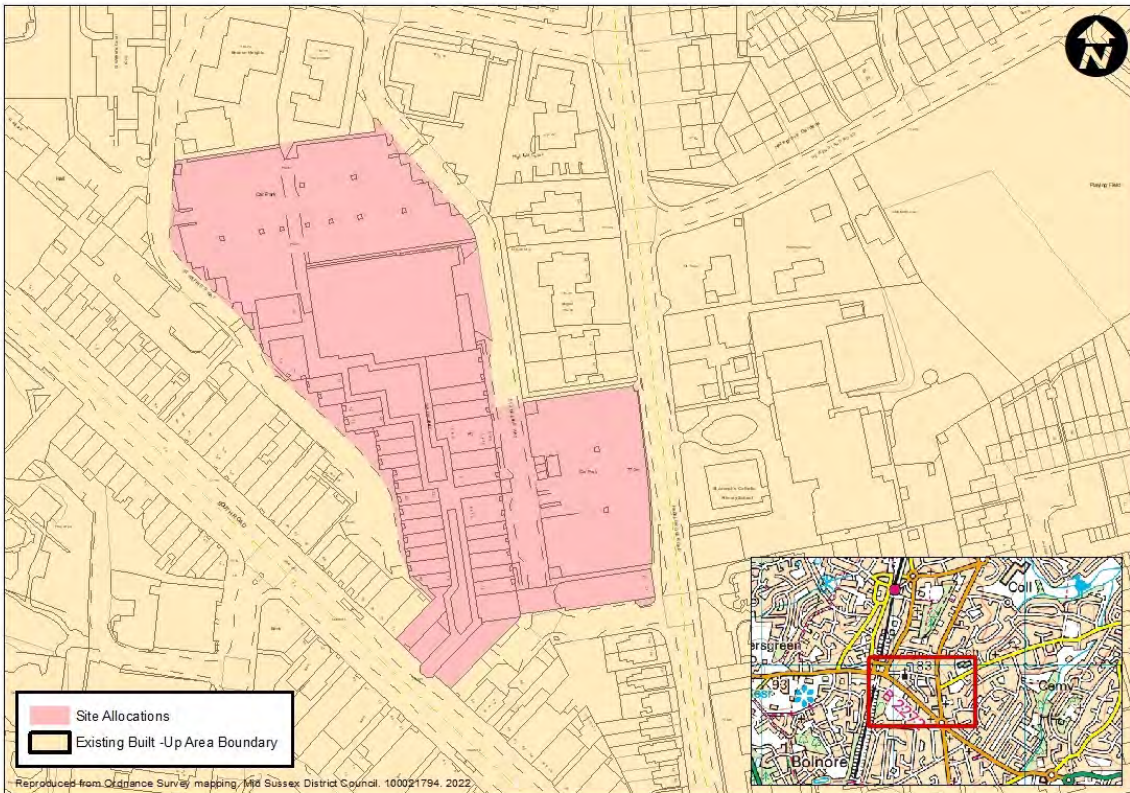
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Provide suitable vehicular, pedestrian and cycle access from Borde Hill Lane via fourth arm from roundabout, south west of site.
- Roundabout to be enlarged and positioned to allow safe movement of road users and provision of new dropped kerbs and tactile paving on southern approach, in agreement with the Highways Authority.
- Contain development to central and eastern parts of site to reduce potential impacts on setting on High Weald AONB (to be informed by an LVIA).
- An Archaeological Impact Assessment and mitigation will be required
- Provide appropriate mitigation to address the potential impact on nearby Grade II listed building 'South Lodge'. The mitigation strategy should be informed by a Heritage Impact Assessment.

DPH12: Orchards Shopping Centre, Haywards Heath

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	1121	Settlement:	Haywards Heath
Gross Site Area (ha):	1.9	Number of Units:	100
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Travel • Healthcare • Emergency services <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport measures • Car parking 	



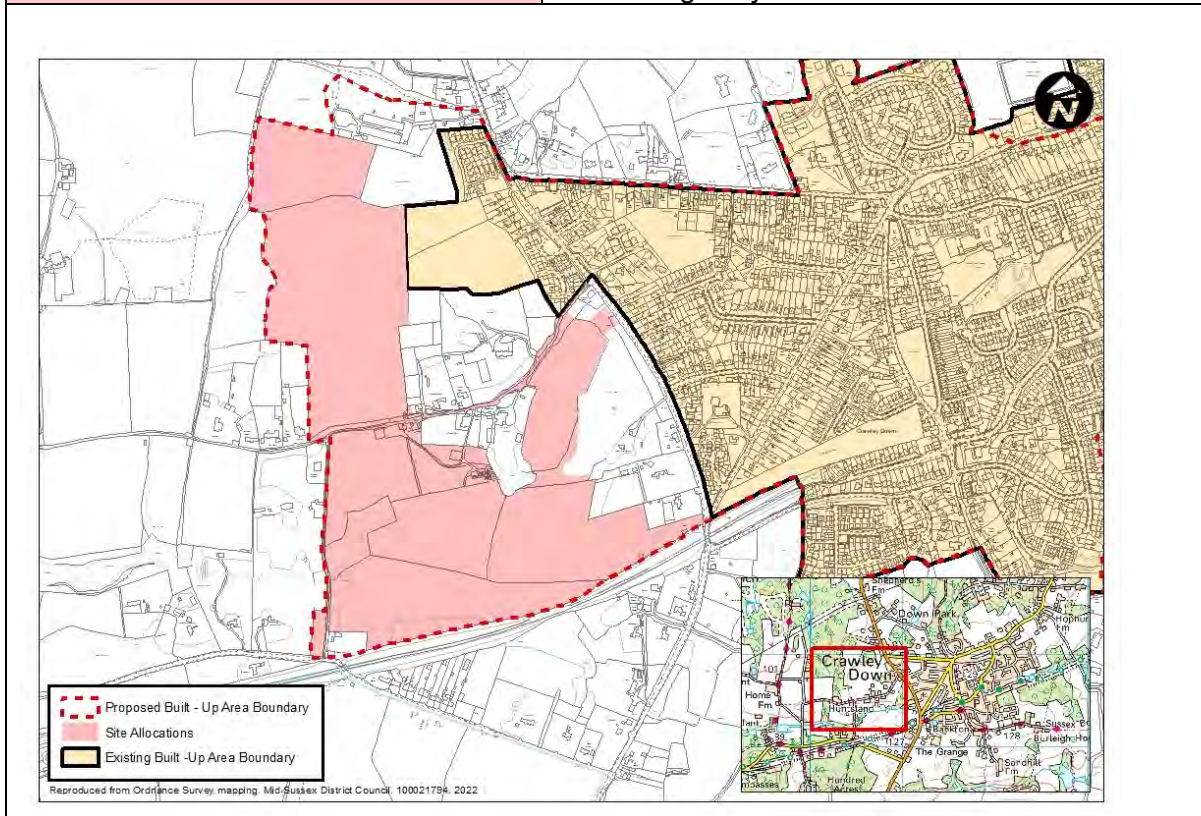
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Deliver a mixed use development including retail, leisure, residential and other complimentary town centre uses to help provide a central and diverse hub for the town centre.
- Pedestrian routes through the site should be clear and link well to adjacent areas.
- Maximise active frontages in the design of any redevelopment.
- Enhance car parking within the town centre through the provision of multi-storey and/or decked car parking, optimising the site's topography and taking into account the design principles set out in the 2020 Mid Sussex Design Guide SPD.
- Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II* listed building 'St Wilfrids Church'.
- Take into account the 2021 Haywards Heath Town Centre Masterplan SPD and opportunities for The Orchards Shopping Centre (Chapter 5).

DPH13: Land to west of Turners Hill Road, Crawley Down

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	688	Settlement:	Crawley Down
Gross Site Area (ha):	33.7	Number of Units:	350
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing • Open space • Playspace • Sports pitches • 50 bed (C2) care home • Community building/Doctor surgery <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Community buildings • Library • Ashdown Forest SPA and SAC mitigation measures • Education • Sustainable Transport • Healthcare • Emergency services <p>Provision of:</p> <ul style="list-style-type: none"> • sewerage network upgrades • Sustainable transport measures • Highway works 	



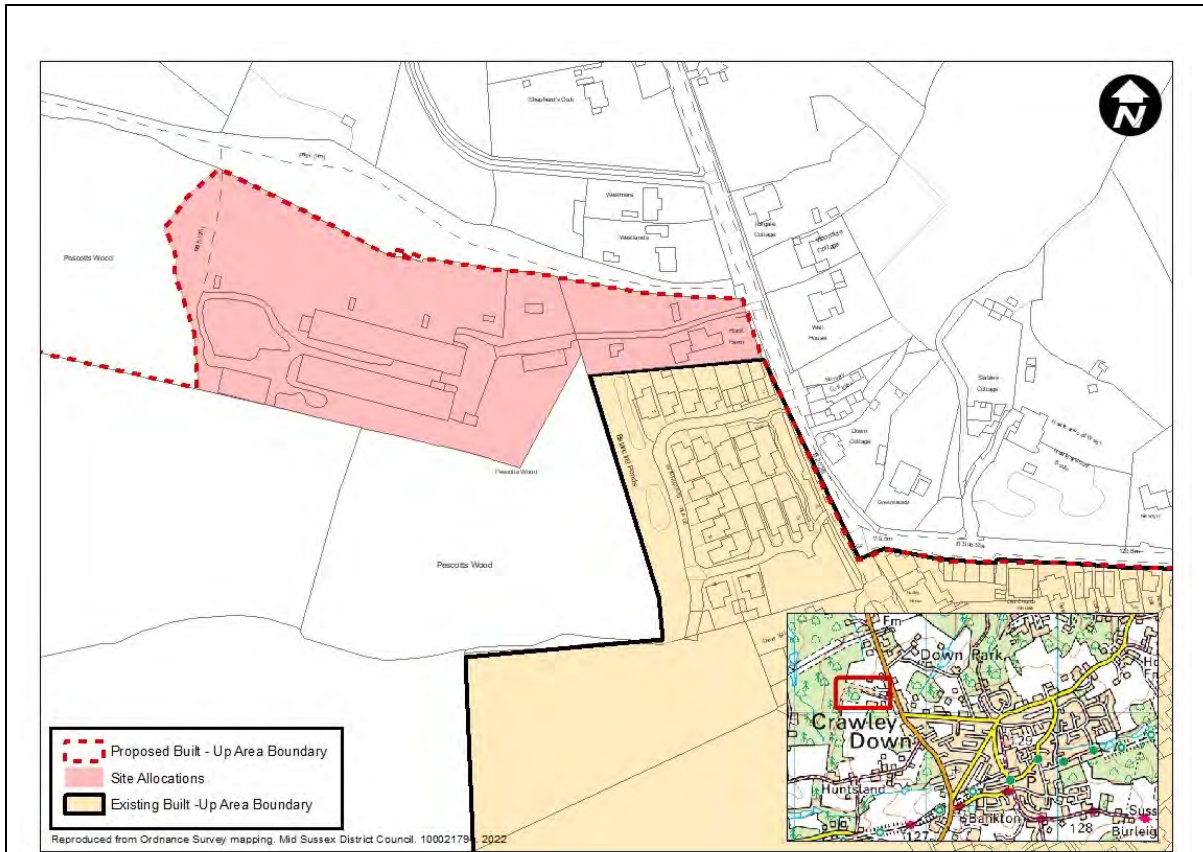
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Provide suitable vehicular, pedestrian and cycle access via Turners Hill Road
- The site is located in a largely rural area and the following requirements and mitigation will be necessary as part of master planning:
 - o Retention and enhancement of perimeter screening
 - o Avoid development in most sensitive areas, including central ridge
 - o Mitigation of the impact of development on the affected areas of ancient woodland and veteran trees, including buffers
 - o Assessment of areas of archaeological interest – Crest of Sandstone Ridge and stream running through the High Weald that has a potential pre-historic bank
- Provision of parkland in southern part of site and along western boundary linking to north section of site
- Enhanced pedestrian and cycle connections to Crawley Down, including the Worth Way

DPH14: Hurst Farm, Turners Hill Road, Crawley Down

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	743	Settlement:	Crawley Down
Gross Site Area (ha):	2.2	Number of Units:	37
Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Ashdown Forest SPA and SAC mitigation measures • Education • Sustainable Transport 		



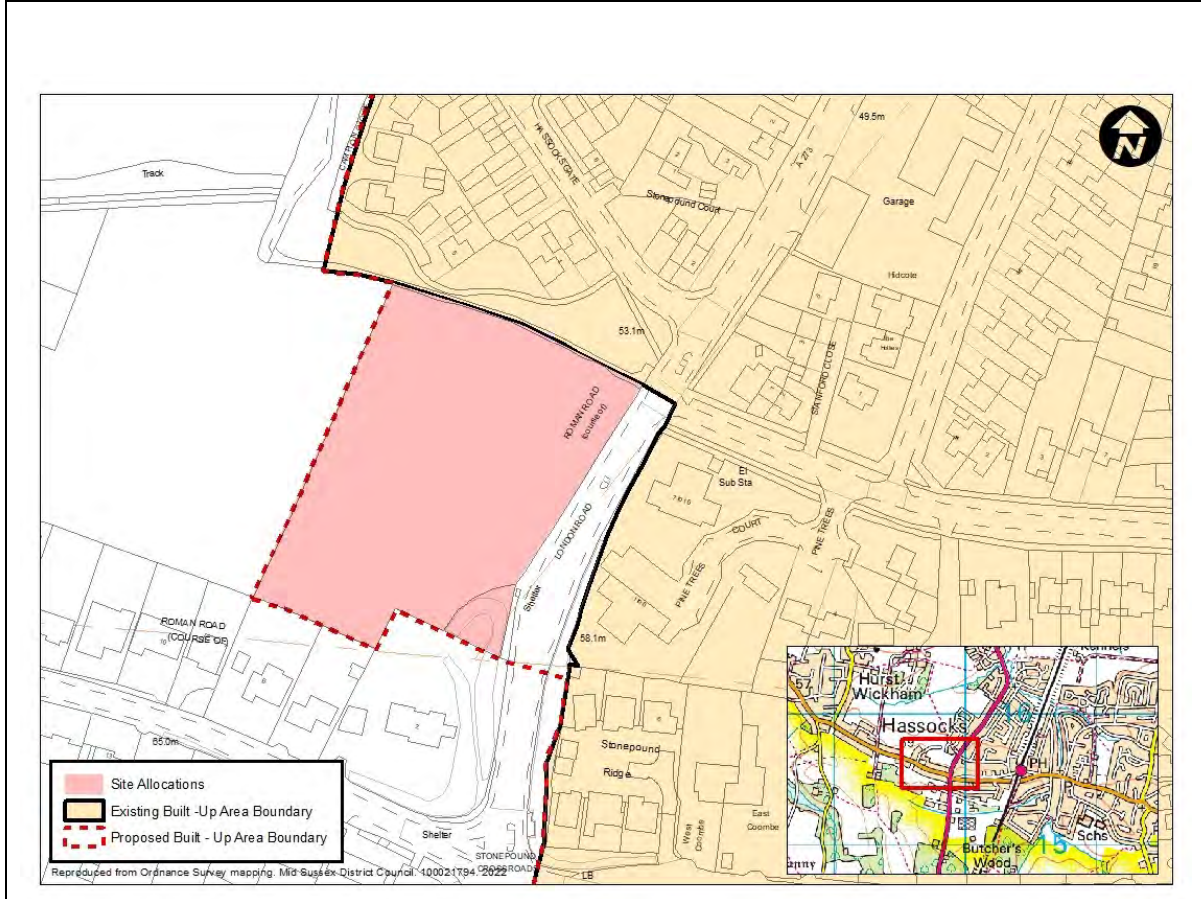
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Provide suitable vehicular, pedestrian and cycle access from Turners Hill Road
- Mitigation measures will be required to protect the setting and form of parts of the site that fall within and adjacent to sensitive landscape areas
- Ancient woodland is located along the western and south eastern edges of the site, appropriate buffers will be required
- Provide appropriate mitigation to address the potential impact on Grade II listed building 'Westlands'. The mitigation strategy should be informed by a Heritage Impact Assessment.

DPH15: Land rear of 2 Hurst Road, Hassocks

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	210	Settlement:	Hassocks
Gross Site Area (ha):	0.9	Number of Units:	25
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport measures • Highway works 	



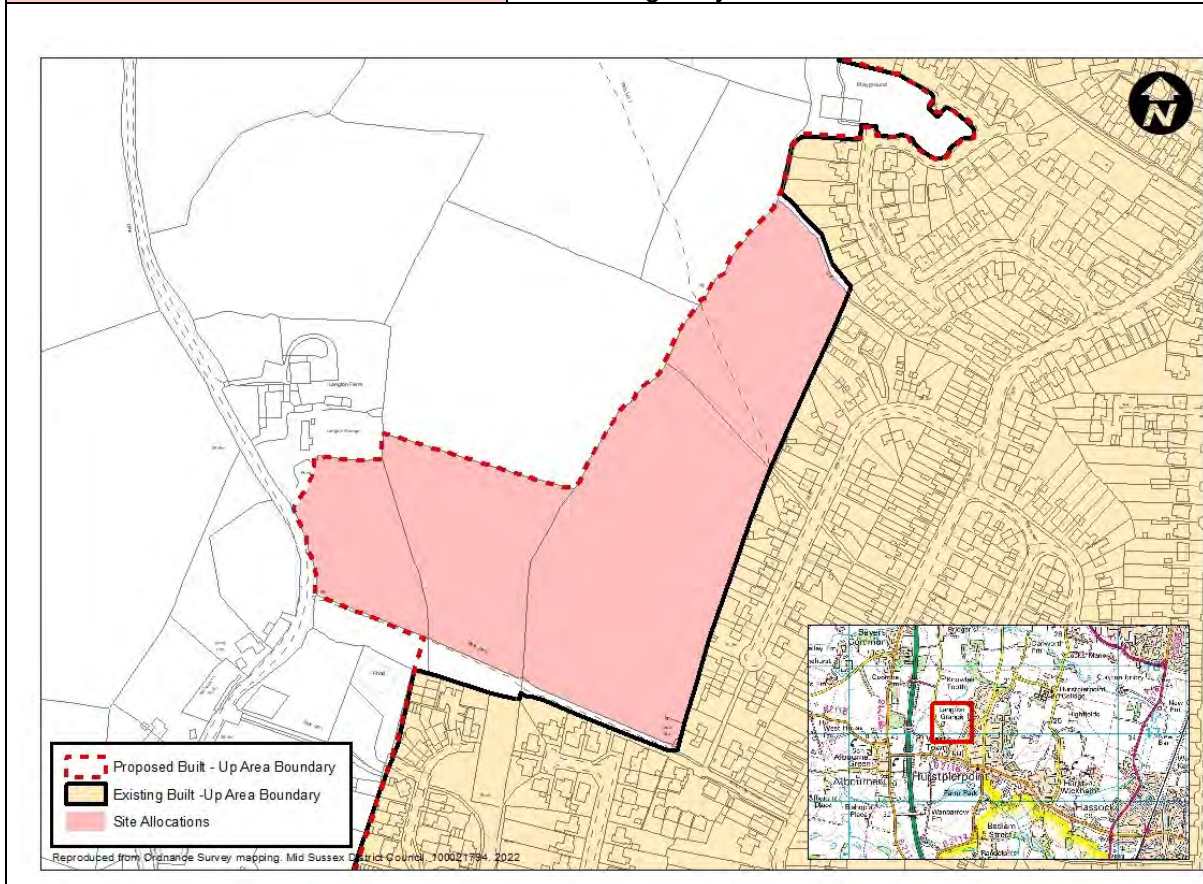
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Provide suitable vehicular, pedestrian and cycle access from London Road, including necessary off-site highways improvements to ensure traffic movements along London Road are not impeded. This will include the provision of a right hand turn into the site.
- Retain and enhance mature trees/ hedgerows along site boundaries, including screening to A273.
- Mitigate potential impacts from development on TPOs in south east corner and along northern boundary.
- Provide appropriate landscaping taking into account any sensitive, longer views to the north west of the site.

DPH16: Land west of Kemps, Hurstpierpoint

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	13	Settlement:	Hurstpierpoint
Gross Site Area (ha):	5.8	Number of Dwellings:	90
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Playspace Sport facilities Community buildings Library Education Sustainable Transport Healthcare Emergency Services <p>Provision of:</p> <ul style="list-style-type: none"> Wastewater treatment and sewerage network upgrades Sustainable transport measures Highway works 	



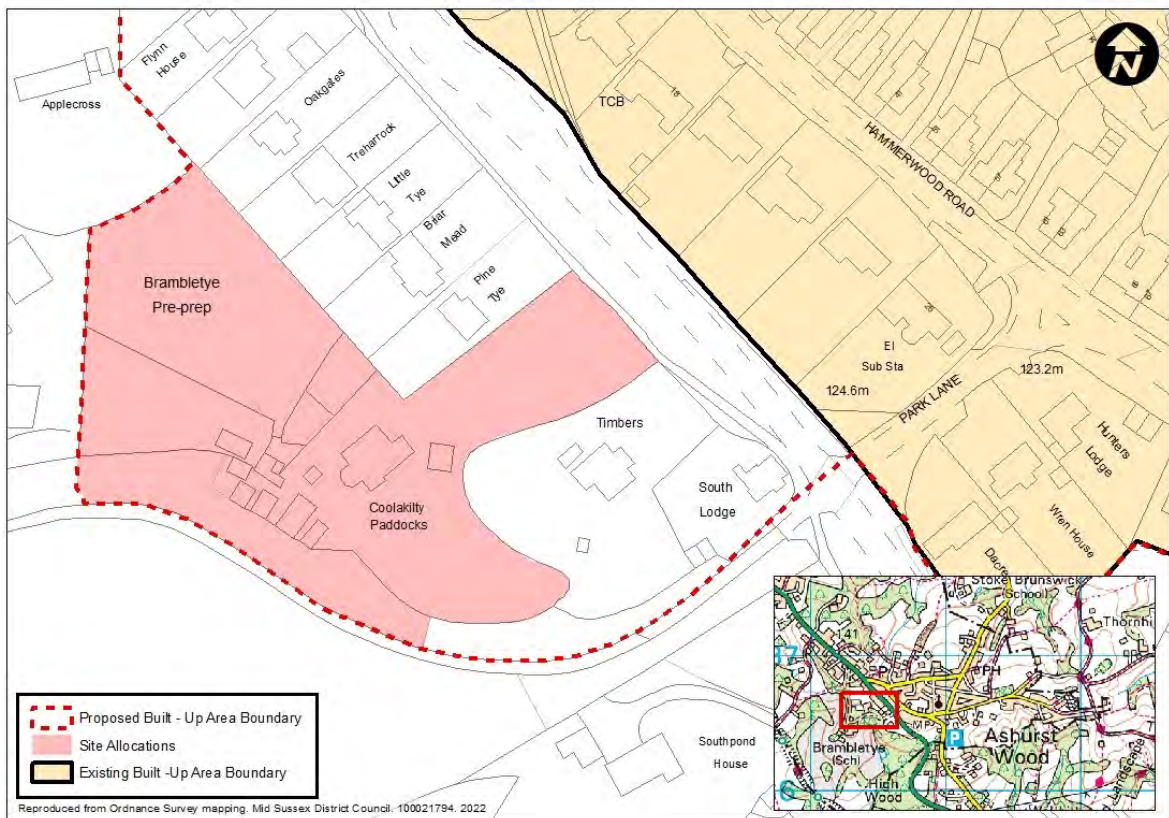
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable access from Orchard Way.
- Take a landscape-led approach to development.
- Retain and enhance mature trees/ hedgerows on site boundaries and within the site.
- Protect and enhance the streams on the western boundaries and crossing the site.
- Provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west of the site, including ecological corridors.
- Provide open green space, locally equipped playspace, SuDS.
- Retain and enhance the existing PROW crossing the site.
- Create new pedestrian and cycle links to connect to the existing PROW network.
- Provide appropriate mitigation to address the potential impact on the neighbouring Grade II listed building 'Langton Grange' and the Langton Lane Conservation Area. The mitigation strategy should be informed by a Heritage Impact Assessment.

DPH17: The Paddocks, Lewes Road, Ashurst Wood

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	984	Settlement:	Ashurst Wood
Gross Site Area (ha):	0.84	Number of Dwellings:	8-12
Infrastructure		On-site: <ul style="list-style-type: none"> 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> Playspace Sport facilities Community buildings Library Education Ashdown Forest SPA and SAC mitigation measures 	



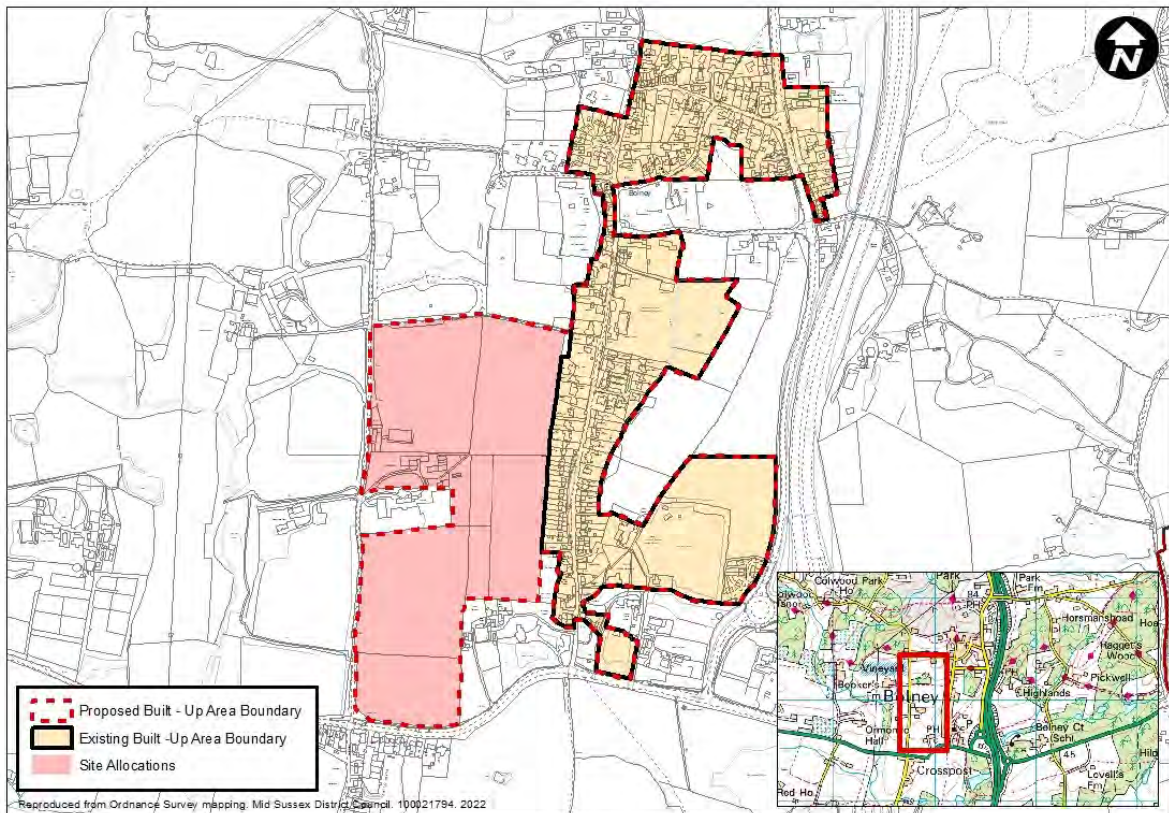
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable access from Lewes Road.
- Take a landscape-led approach to development.
- Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB.

- Retain mature trees/ hedgerows on site boundaries. The layout of the site should take into account the location of the trees and allow for their future retention and to prevent overshadowing into private gardens.
- Avoid the appearance of a car-dominated layout in the design of the development in accordance with the Mid Sussex Design Guide SPD.

DPH18: Land at Foxhole Farm, Bolney

SHELAA:	1120	Settlement:	Bolney
Gross Site Area (ha):	18.4	Number of Dwellings:	200
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> 30% affordable housing Country Park Community Allotments Community Facility Land education provision <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Playspace Sport facilities Community buildings Education Sustainable Transport Healthcare Emergency Services <p>Provision of:</p> <ul style="list-style-type: none"> Sustainable transport measures Highway works 		



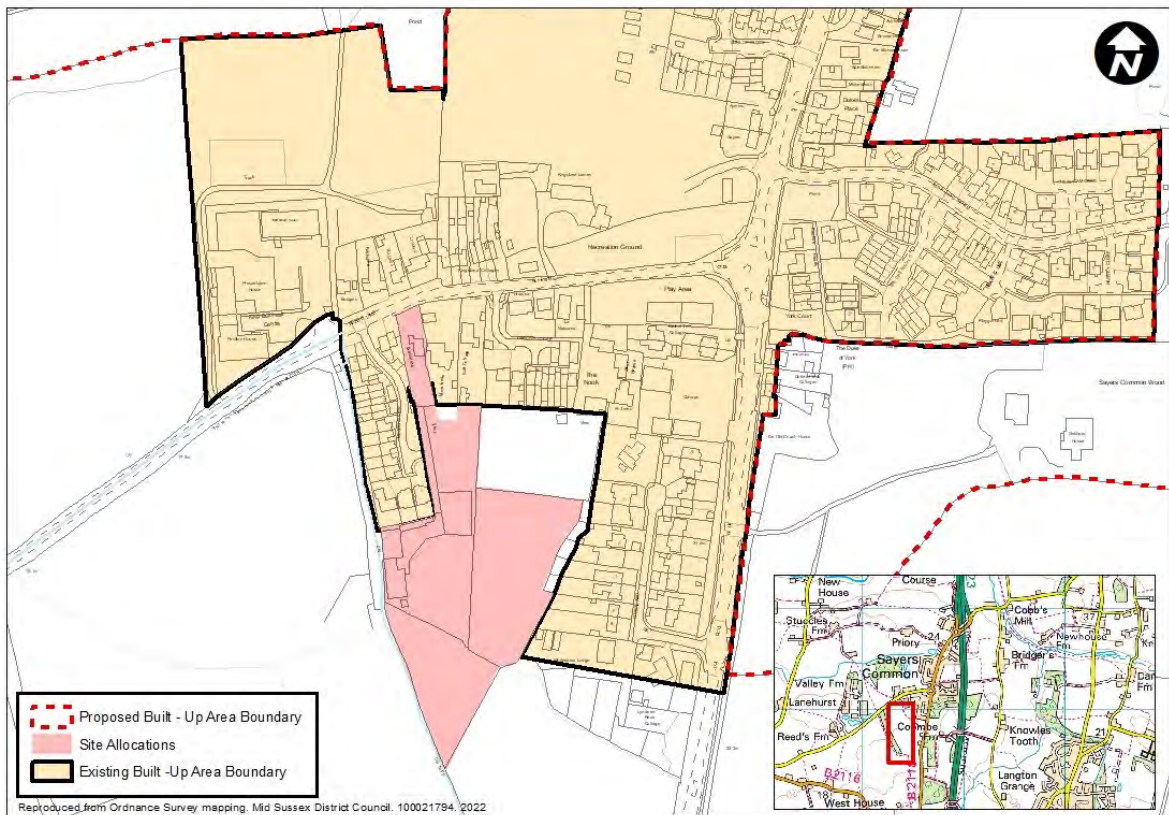
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable vehicular, pedestrian and cycle access from Cowfold Road (A272).
- Provide additional pedestrian and cycle access to The Street from north of the site between Westmeadow and Downland.
- Retain mature trees/ hedgerows along site boundaries.
- Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II listed building, 'Walnut and Well Cottage', and Bolney Conservation Areas (North and South).
- Provide country park and community allotments.
- Provide a community facility (e.g. community retail)
- Provide community working hub
- Explore opportunities on-site to enhance education provision in the village that meets an identified local need

DPH19: Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	1026	Settlement:	Sayers Common
Gross Site Area (ha):	1.5	Number of Dwellings:	33
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Playspace Sport facilities Community buildings Library Education Sustainable Transport <p>Provision of:</p> <ul style="list-style-type: none"> Sustainable transport measures Highway works 	



Policy Requirements

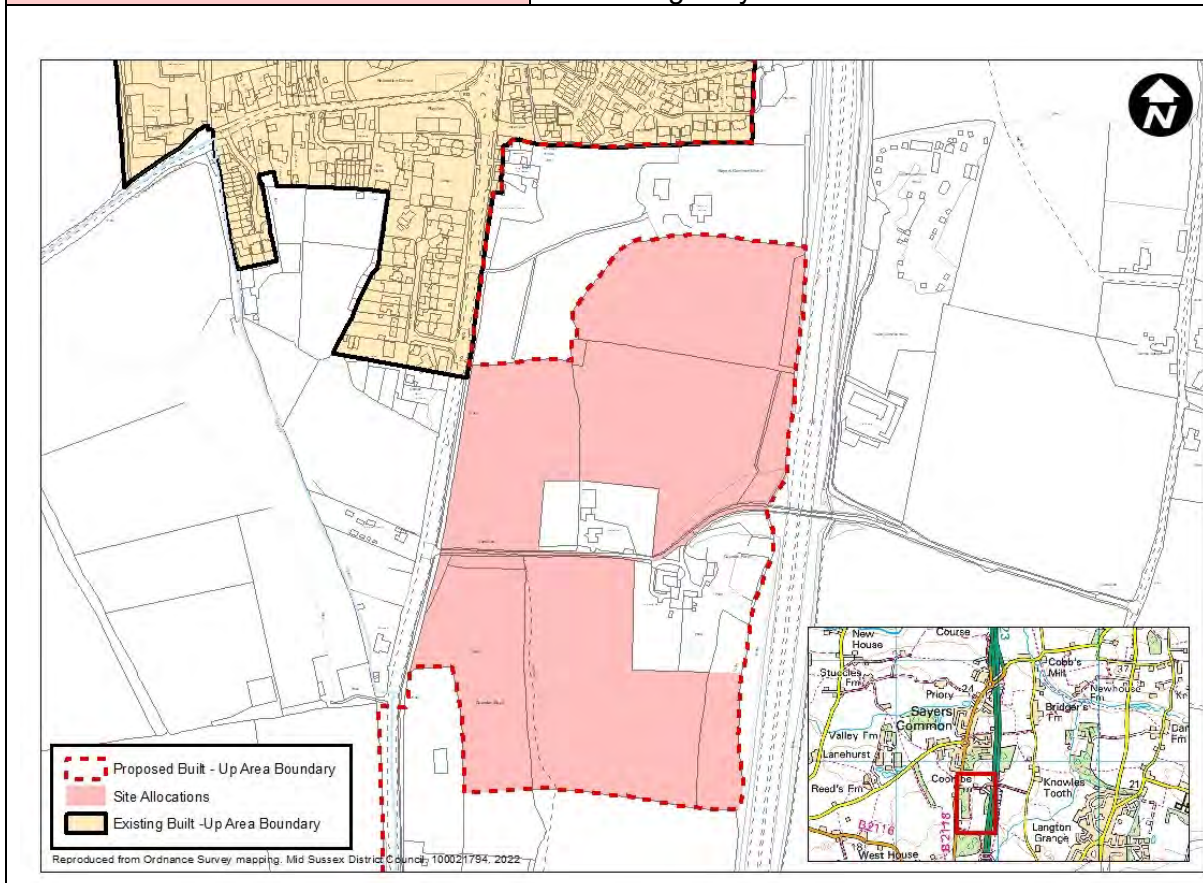
- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.

- Prioritise pedestrian and cycle access through the site into Significant allocation DPSC2 and towards Reeds Lane.
- Upgrade and integrate the existing PROW which crosses the southern portion of the site.
- Provide suitable access onto Reeds Lane either directly or via Meadow View.
- Avoid developing areas of existing flood risk and mitigate impacts through integration of SuDS.
- Retain, protect and enhance existing mature trees across the site and hedgerows along site boundaries and ensure development provides a positive edge to these features.

DPH20: Land at Coombe Farm, London Road, Sayers Common

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	601	Settlement:	Sayers Common
Gross Site Area (ha):	14.2	Number of Dwellings:	210
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport • Healthcare • Emergency Services <p>Provision of:</p> <ul style="list-style-type: none"> • Wastewater treatment and sewerage network upgrades • Sustainable transport measures • Highway works 		



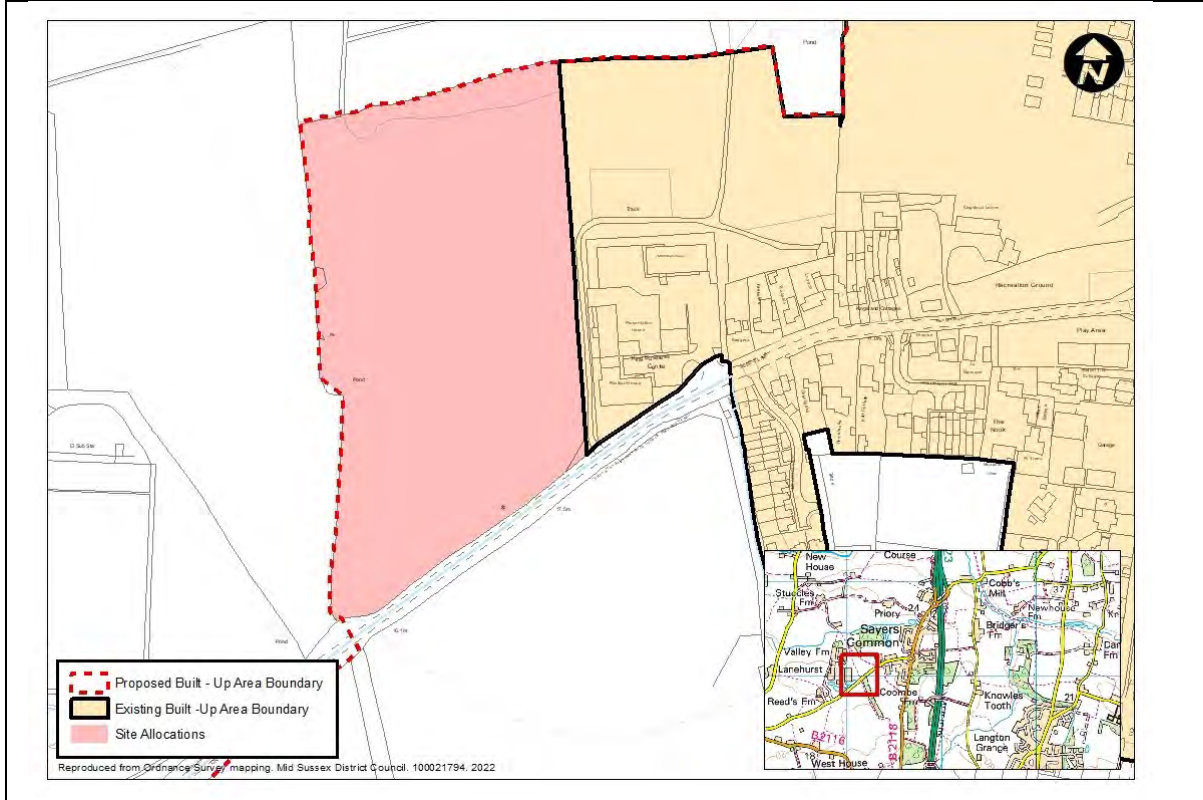
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II listed buildings 'Coombe Farmhouse' and 'Coombe Barn'.
- Prioritise pedestrian and cycle access throughout the site linking to Significant site allocation DPSC2 and bus stops on the B2118 to the west.
- Upgrade and integrate the existing PROW which crosses the site.
- Comprehensively masterplan development of the site including a main area of open space to create a focal point for the development and provide suitable access onto the B2118.
- Provide necessary buffer, protection and mitigation to areas of Ancient Woodland on and adjacent to the site, including measures to minimise public access to the woodland, provision of a woodland management plan and woodland enhancement package.
- Retain, protect and enhance mature trees across the site and hedgerows along site boundaries and ensure development provides a positive edge to these features and any areas of woodland.
- Avoid developing areas of existing flood risk and mitigate impacts through integration of SuDS.
- Mitigate noise impacts associated with the adjacent A23 to the east.

DPH21: Land to the West of Kings Business Centre, Reeds Lane, Sayers Common

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	830	Settlement:	Sayers Common
Gross Site Area (ha):	3.3	Number of Dwellings:	100
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport • Healthcare • Emergency Services <p>Provision of:</p> <ul style="list-style-type: none"> • Wastewater treatment and sewerage network upgrades • Highway improvements • Sustainable transport measures 	



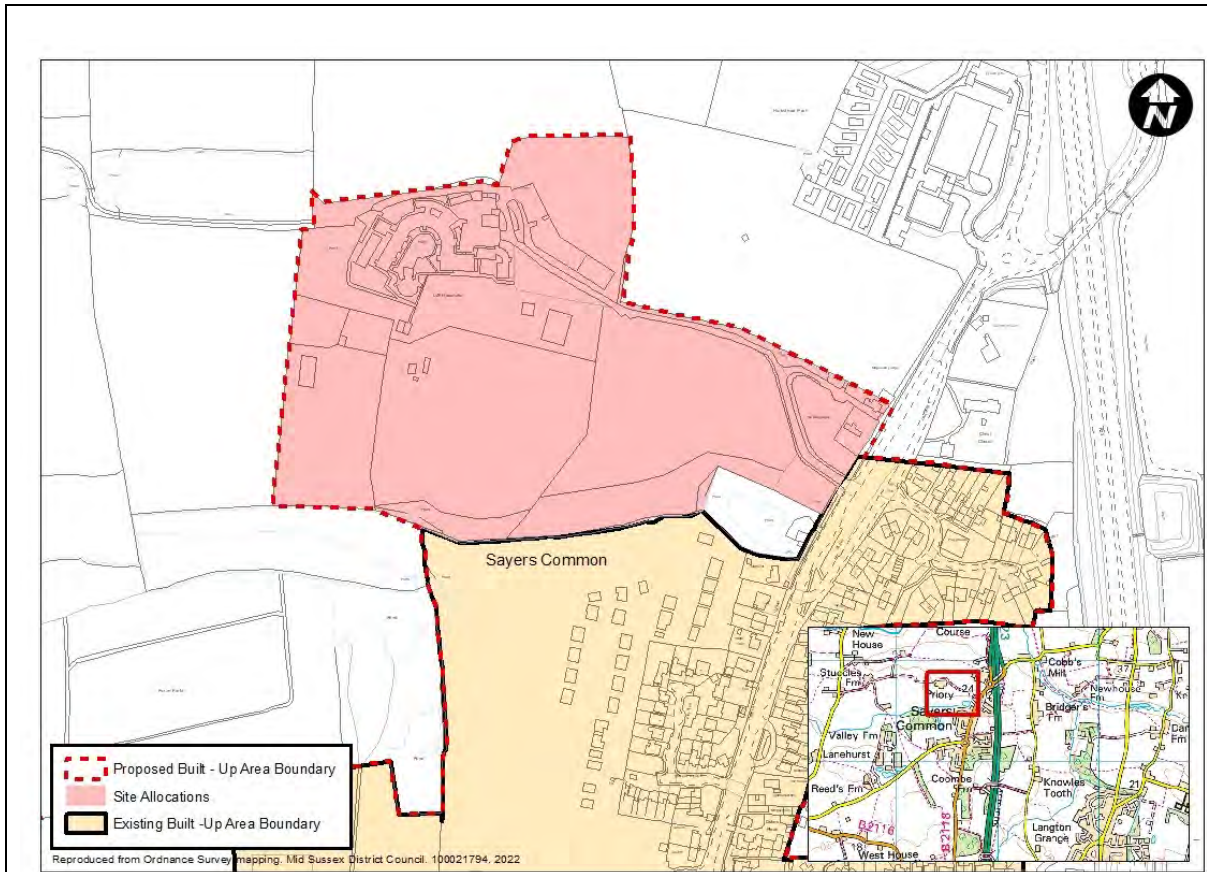
Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Comprehensively masterplan development of the site in combination with site allocation SA30 (Land to the North of Lyndon, Reeds Lane, Sayers Common) providing a main area of open space to create a focal point for the development and provide suitable access onto Reeds Lane.
- Prioritise pedestrian and cycle access throughout the combined development and create links to Significant site allocation DPSC2 to the south and provide appropriate extension to the footway on Reed's Lane.
- Upgrade and integrate the existing PROW which crosses the site.
- Retain, protect and enhance mature trees and hedgerows along the south, west and north boundaries along with the hedgerow adjacent to the Kings Business Centre to the east and ensure development provides a positive edge to these features and the site boundaries.
- Avoid developing areas of existing flood risk and mitigate impacts through integration of SuDS.
- Undertake an archaeological assessment and provide any appropriate mitigation arising from the results.

DPH22: Land at LVS Hassocks, London Road, Sayers Common.

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	1003	Settlement:	Sayers Common
Gross Site Area (ha):	10.2	Number of Dwellings:	200
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> • 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport • Healthcare • Emergency services <p>Provision of:</p> <ul style="list-style-type: none"> • Wastewater treatment and sewerage network upgrades • Highway works • Sustainable transport measures 		



Policy Requirements

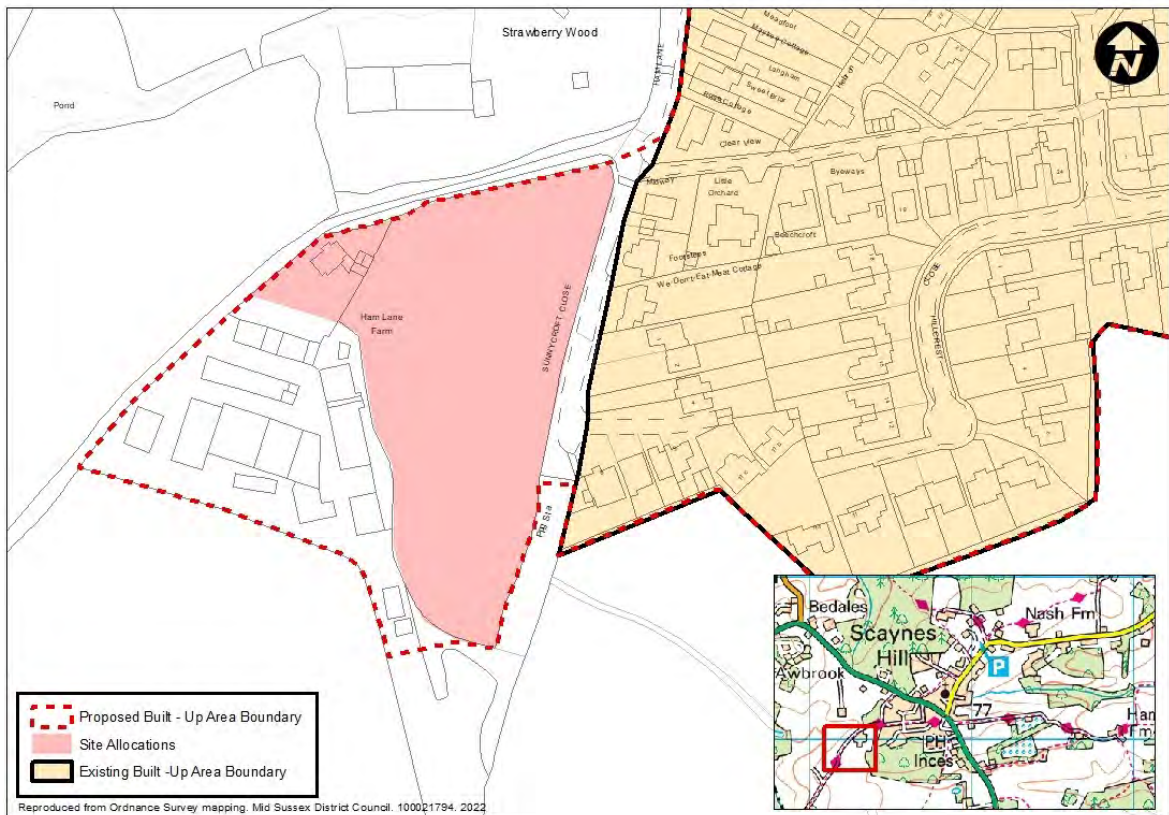
- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Prioritise pedestrian and cycle access throughout the development and integrate with and upgrade the existing PROW which crosses the site.
- Provide any necessary upgrades to the existing access onto B2118.
- Retain, protect and enhance mature trees and hedgerows across the site and ensure development provides a positive edge to these features and the wider countryside.
- Avoid developing areas of existing flood risk, particularly along the southern boundary and mitigate impacts through integration of SuDS.
- Undertake an archaeological assessment and provide any appropriate mitigation arising from the results.

DPH23: Ham Lane Farm House, Ham Lane, Scaynes Hill

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	1020	Settlement:	Scaynes Hill
Gross Site Area (ha):	0.97	Number of Dwellings:	30

Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Playspace Sport facilities Community buildings Library Education Sustainable Transport <p>Provision of:</p> <ul style="list-style-type: none"> Sustainable Transport measures Highway works
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Policy Requirements

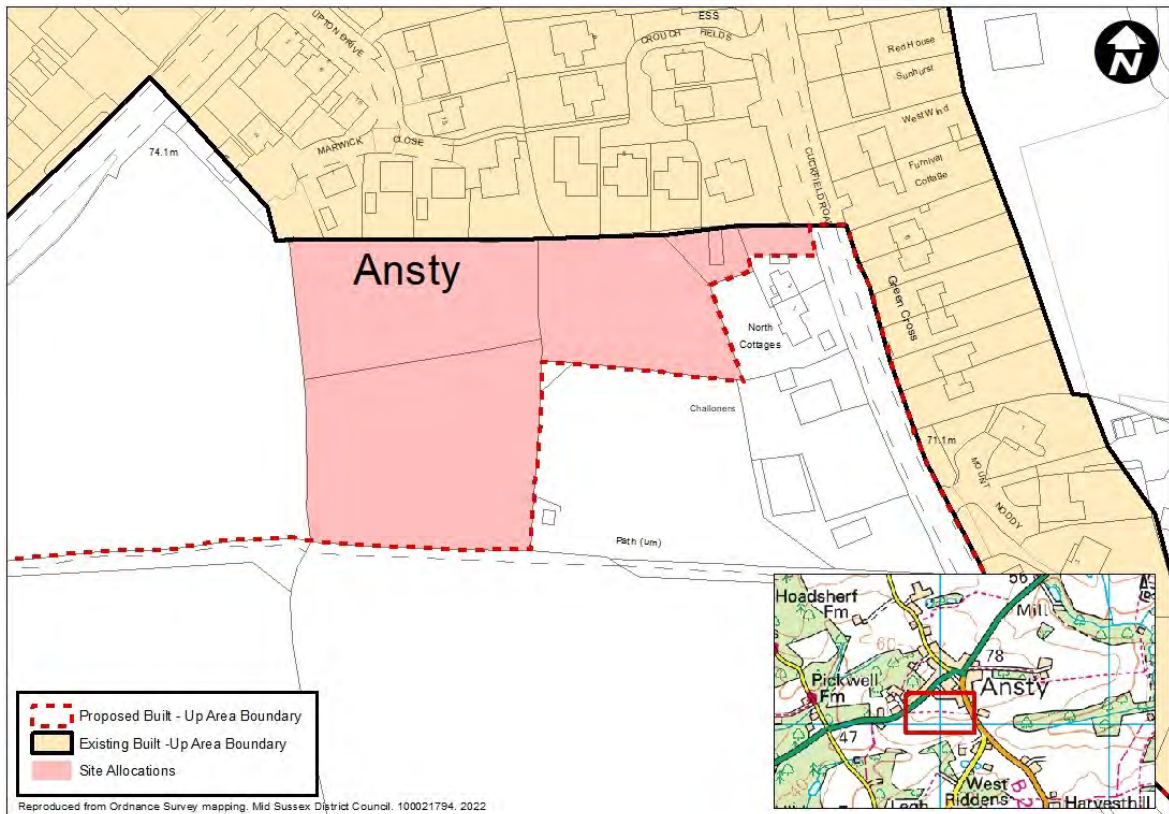
- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.

- Provide suitable vehicular, pedestrian and cycle access from Ham Lane.
- Create new pedestrian links to existing PROW network along site's southern boundary.
- Retain existing mature trees and hedgerows along site boundary.
- Mitigation of potential adverse noise impacts from adjacent industrial workshops.
- Exclude development within Ancient Woodland buffer in south east corner of site.

DPH24: Challoners, Cuckfield Road, Ansty

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	631	Settlement:	Ansty
Gross Site Area (ha):	1.3	Number of Dwellings:	37
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Playspace Sport facilities Community buildings Library Education Sustainable Transport <p>Provision of:</p> <ul style="list-style-type: none"> Sustainable Transport measures Highway works 	



Policy Requirements

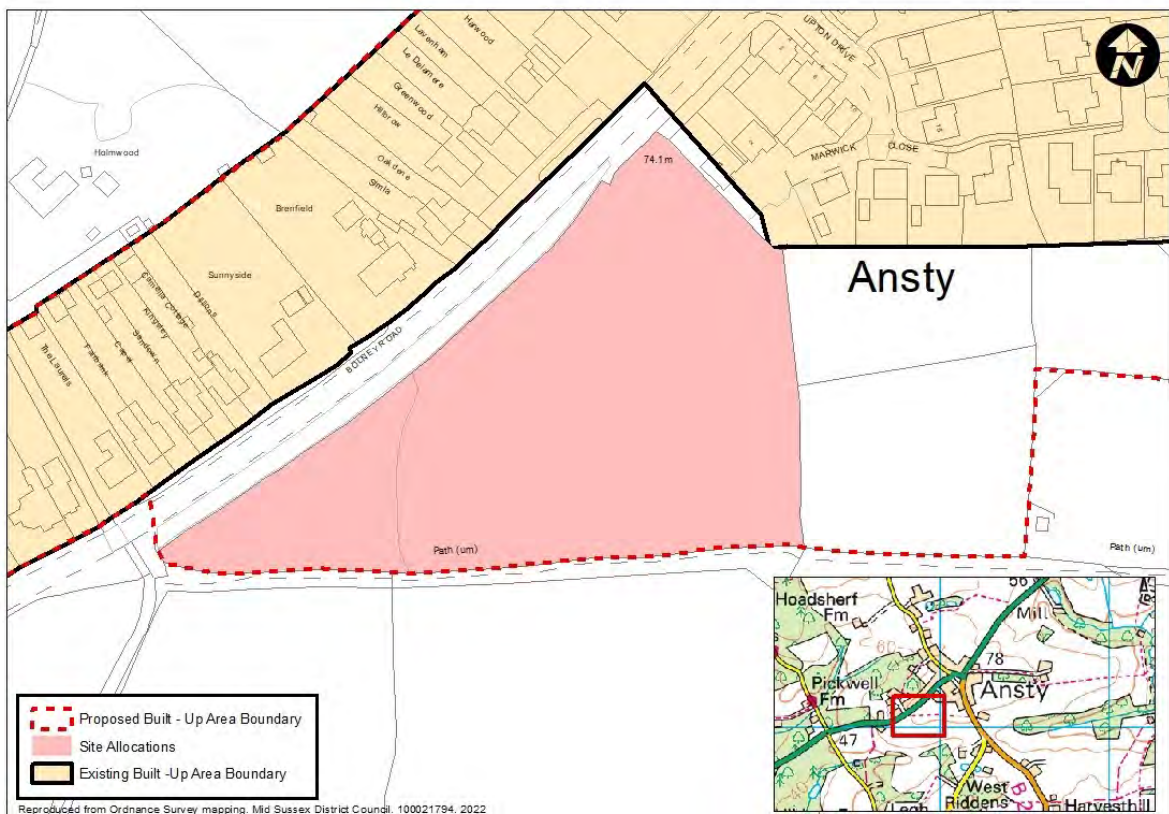
- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable access from Cuckfield Road.

- Retain and enhance mature trees/ hedgerows on site boundaries especially on the southern boundary adjacent to the PROW.
- Maintain the rural character of the PROW on the southern boundary of the site.
- The layout of the site should take into account the location of the trees and allow for their future retention and to prevent overshadowing into private gardens.
- The design and layout of the site should reflect a transition from the built environment to the rural countryside.
- The design and layout of the site should reflect the rural character of the settlement and avoid being too urban or suburban.
- Integrate development with the site to the west (DPH25) by providing pedestrian and cycling connections and green infrastructure connectivity.

DPH25: Land to the west of Marwick Close, Bolney Road, Ansty

Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

SHELAA:	784	Settlement:	Ansty
Gross Site Area (ha):	1.5	Number of Dwellings:	45
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> 30% affordable housing <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Playspace Sport facilities Community buildings Library Education Sustainable Transport <p>Provision of:</p> <ul style="list-style-type: none"> Sustainable Transport measures Highway works 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable access from Upton Drive and Marwick Close.

- Retain and enhance mature trees/ hedgerows on site boundaries especially on the southern boundary adjacent to the PROW and in the south-west of the site.
- Maintain the rural character of the PROW on the southern boundary of the site.
- The layout of the site should take into account the location of the trees and allow for their future retention and to prevent overshadowing into private gardens.
- The design and layout of the site should reflect a transition from the built environment to the rural countryside.
- The design and layout of the site should reflect the rural character of the settlement and avoid being too urban or suburban.
- Integrate development with the site to the east (DPH24) by providing pedestrian and cycling connections and green infrastructure connectivity.

DPH26: Older Persons' Housing and Specialist Accommodation

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

People are living longer and the proportion of older people within the district is growing. With this comes an increase in the number of people with long-term health and mobility problems. The 2021 Mid Sussex Strategic Housing Market Assessment (SHMA) sets out that the district is likely to see a significant increase in those aged 65 and over to 2038. It also shows a substantial rise in the number of older people with dementia and mobility problems. In those aged 16 to 64, other disabilities, including impaired mobility, are also projected to increase over the Plan period. The provision of suitable accommodation, including type and tenure, capable of supporting an older population and range of disabilities is therefore important in delivering sustainable, mixed and balanced communities.

Whilst more attention may need to be paid towards matters of design, neighbouring land uses and security, proposals for older persons' housing are considered to usually have a lesser impact on existing communities, for instance through lower vehicle usage levels and reduced parking requirements. For this reason, provided the scheme makes efficient use of land, any site considered appropriate for housing development would be positively considered for such older person accommodation through the decision-making process.

Under this Policy, the loss of such facilities for the redevelopment to alternative uses would be prevented unless the scheme or a replacement scheme was proved to be no longer viable or suitable for its intended use; or that there is an existing duplicate facility in the locality that can accommodate the impact of the loss of the facility; or that a replacement facility will be provided in the locality.

It is acknowledged that some existing older persons' housing and specialist accommodation are relatively small in size, and if such schemes were closed on grounds of the suitability for their intended use, then there might be significant doubt on the viability of redevelopment of the site to another specialist scheme. In such cases, the Council will consider alternative provision such as accessible flats for older people.

DPH26: Older Persons' Housing and Specialist Accommodation

Older Persons' Housing Need

Over the Plan Period there is an estimated need for 1,887 additional dwellings with support or care and 211 additional bedspaces. The need by type identified by the 2021 SHMA is set out below:

Accommodation Type and Tenure	Need (units/ bedspaces)	
Housing with Support (<i>retirement living or sheltered housing</i>)	Market	801
	Affordable	15
Housing with Care (<i>extra care</i>)	Market	857
	Affordable	214
Residential Care Bedspaces	n/a	300
Nursing Care Bedspaces	n/a	0 ²¹

Older Persons' housing need to 2038 (2021 SHMA)

²¹ The Council's 2021 SHMA shows that there is currently an oversupply of 89 Nursing Care Bedspaces in the district, therefore provision should be focussed on other forms of older persons' accommodation, unless latest evidence indicates otherwise.

Site Allocations

To ensure that a sufficient amount of older persons' housing and specialist accommodation is delivered to meet identified needs, the Council makes provision for older persons' accommodation as part of the following site allocations:

- DPSC1: Land at west of Burgess Hill
- DPSC2: Land to the south of Reeds Lane, Sayers Common
- DPSC3: Land at Crabbet Park, Copthorne
- DPH13: Land to west of Turners Hill Road, Crawley Down

The amount of land made available should be commensurate with the overall scale of development proposed at the significant sites.

In addition, two sites are allocated specifically for older persons' specialist accommodation:

- DPH27: Land at Byanda, Hassocks
- DPH28: Land at Hyde Lodge, London Road, Handcross

The precise yield and accommodation type will be determined following further work with site promoter/ landowners and commensurate increases to overall yields. This type of accommodation can be provided at higher densities.

Allocations and proposals for older persons' accommodation will be required to:

- i. provide affordable housing in line with Policy DPH32, where classified as C2 or C3; and
- ii. be in accordance with the identified need as shown in the table above.

New developments

Proposals for new older persons' housing and those with specialist accommodation needs will be supported where the following criteria are met:

- iii. The site is allocated for such a use within the District Plan, Site Allocations DPD or Neighbourhood Plan, or the site is located within or contiguous to the Built-Up Area Boundary, as defined on the Policies Map;
- iv. The site is accessible by foot or public transport to local shops, services, community facilities and the wider public transport network;
- v. The planning application is 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 for residents, staff and visitors;

Extensions to Older Person's Accommodation and Specialist Housing

Proposals for extensions, upgrades and/or annexes to older person's housing and specialist accommodation will be supported where:

- vi. There is a demonstrable need to support the existing accommodation; and
- vii. The design respects the character and appearance of the host building and local area and is sub-servient to the existing building; and
- viii. The cumulative additions are not disproportionate to the original building; and
- ix. It does not result in an unacceptable loss of privacy for existing or neighbouring residents.

Loss of Older Persons' Accommodation and Specialist Housing

The loss of existing specialist forms of accommodation for older people and those with specialist housing needs will not be supported unless it is demonstrated to the Council's satisfaction that:

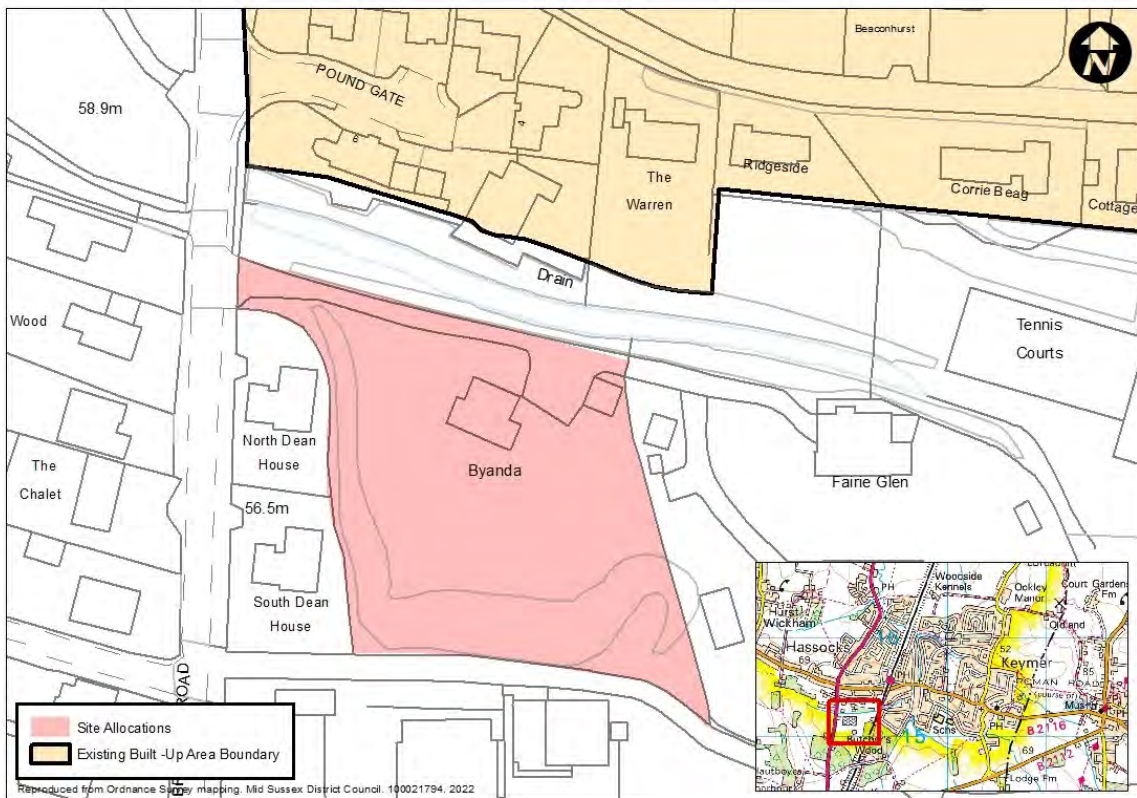
- x.** There is no longer an identified need for the type of housing;
- xi.** Suitable alternative provision is, or will be, provided locally so that there is no net loss; or
- xii.** The accommodation no longer meets minimum standards required to provide acceptable care and it is not practicable or viable to improve the accommodation to minimum standards or adapt for alternative specialist accommodation.

The housing need for Older People and Specialist Housing Accommodation has been established through the SHMA and is set out above. The provision of older persons' and specialist accommodation is provided by specialist providers and to some extent is market driven by demand for particular specialist 'products' and the business operations of the providers. The District Plan can facilitate the delivery of specialist accommodation through the allocation of suitable sites, but it will be for the providers to deliver.

Very few sites have been submitted to the call for sites for specialist accommodation that are in sustainable locations that deliver the spatial strategy of the Plan. However, there are a number of sites that will be allocated to meet this need.

DPH27: Land at Byanda, Hassocks

DPH27: Land at Byanda, Brighton Road, Hassocks			
SHELAA	1101	Settlement	Hassocks
Gross Site Area (ha)	0.4ha	Number and type of older persons accommodation	TBC



Policy Requirements

Land at Byanda is on the southern side of Hassocks and well located for older persons' accommodation. The type and yield from the site will be confirmed following regulation 18 consultation.

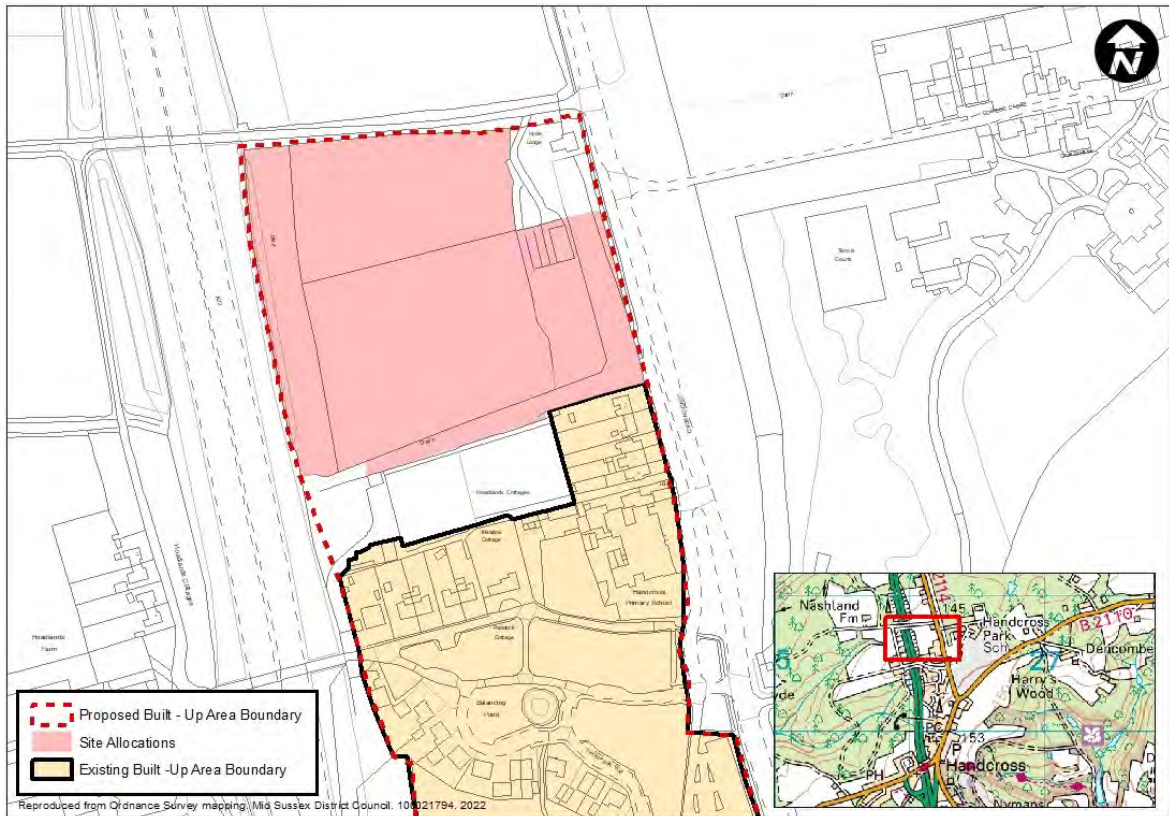
The General Development Principles in Policy DPH4 will apply to this site.

Objectives:

- Suitable vehicular, pedestrian and cycle access from Brighton Road.
- Retain existing mature trees and hedgerows along site boundaries.
- Mitigate risk from surface water flooding.

DPH28: Land at Hyde Lodge, Handcross

SHELAA	1106	Settlement	Handcross
Gross Site Area (ha)	3.0	Number and type of older persons accommodation	TBC



Policy Requirements

Land at Hyde Lodge, Handcross is located on the northern side of the village and is well located to services including health care. The type and yield from the site will be confirmed following regulation 18 consultation.

The General Development Principles in Policy DPH4 will apply to this site.

Objectives:

- Provide access from the B2114 London Road.
- Extend the 30mph speed limit northwards (to be discussed with the Highways Authority).
- Provide a pedestrian access in the south-east corner of the site where there is an existing gateway.
- Retain the existing rural character of London Road.
- Take a landscape-led approach to development
- Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB.
- Take into account the objectives of the High Weald AONB Management Plan, the High Weald Housing Design Guide and the Colour Study.

- The design and layout of the site should reflect a transition from the built environment to the rural countryside.
- The design and layout of the site should reflect the rural character of the settlement and avoid being too urban or suburban.
- Careful design to take into account and mitigate any impacts from noise and air quality from the A23.
- Retain the character of Hyde Lodge and its gardens.
- Retain and enhance mature trees/ hedgerows on site boundaries and the tree belt in the west of the site.
- Upgrade bus stop infrastructure, for example, bus shelter and real time information.

DPH29: Gypsies, Travellers and Travelling Showpeople

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

The Government has an overarching aim to ensure the fair and equal treatment of Gypsies and Travellers that facilitates their traditional and nomadic way of life whilst respecting the interests of the settled community.

National Planning Policy for Traveller Sites (2015) requires Local Planning Authorities to set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople to address the identified accommodation needs of Travellers in their area.

The 2022 Mid Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) considers the accommodation needs of Gypsies, Travellers and Travelling Showpeople and sets out the amount of permanent Gypsy and Traveller accommodation required within the district for the period to 2038. The majority of the identified need, outside the South Downs National Park, is already committed through the saved Northern Arc strategic site allocation; the residual need will be expected to be met by the Significant Site allocations within this Plan.

The GTAA does not indicate a need for further transit provision at this time as there is an operational public transit site in Chichester which serves the need of the West Sussex local authorities. In the event that a proposal comes forward it will be considered against the below criteria, taking into account the short-term nature of transit accommodation. Levels of unauthorised encampments in Mid Sussex by Gypsies, Travellers and Travelling Showpeople will be monitored over the plan period to identify any additional requirement for such provision.

DPH29: Gypsies, Travellers and Travelling Showpeople

The Mid Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2022) identifies a need for 4 net permanent pitches for Gypsies and

Travellers who still travel²² and 12 net permanent pitches for Gypsies and Travellers who no longer travel²³, for the period 2021 to 2038. Part of the 16-pitch need will be met by the delivery of existing commitments²⁴, as shown in the table below.

Gypsy and Traveller Provision

Gypsy and Traveller Pitch Provision	No longer travel	Still Travel
Minimum Permanent Pitch Requirement (2021 to 2038)	12	4
Commitments (as at 1 April 2021)	13	0
Total residual requirement	0	4

To ensure that a sufficient amount of suitable permanent accommodation for Gypsies, Travellers and Travelling Showpeople is delivered to meet identified needs within an appropriate timescale, the Council requires that on-site provision is made on Significant Site allocations to contribute to the overall need.

New and extensions to Gypsy, Traveller and Travelling Showpeople sites

In guiding the allocation of Gypsy, Traveller and Travelling Showpeople sites²⁵ (permanent and transit) and the consideration of planning applications, proposals will be supported provided that:

- i. The site or extension satisfies a clearly defined need, as evidenced by the Mid Sussex Gypsy and Traveller Accommodation Assessment, or the best available evidence;
- ii. The site is reasonably accessible to schools, shops, health and other local services and community facilities;
- iii. The site has or will have safe vehicular and pedestrian access to and from the road network and will have adequate provision for parking, turning space, servicing and emergency vehicles;
- iv. The development is appropriately located and designed or capable of being designed to in the case of outline applications, to ensure good quality living accommodation for residents and that the local environment (noise and air quality) of the site would not have a detrimental impact on the health and well-being of the residents;
- v. The sites are compatible with neighbouring land uses and minimise impacts on adjacent uses, built form and landscape character;
- vi. In rural and semi-rural areas sites should not dominate the nearest settled community;
- vii. Each pitch should be capable of accommodating 1 mobile home, 1 touring caravan, 2 car parking spaces, an amenity building and amenity space;
- viii. Sites for Travelling Showpeople should include adequate space for storage and/ or keeping and exercising any animals associated with Travelling Showpeople's needs;
- ix. Any site within the 7km zone of influence around Ashdown Forest will require an assessment under the Habitats Regulations to be undertaken and appropriate mitigation provided as required (Policy DPC6: Ashdown Forest

²² For Gypsies, Travellers and Travelling Showpeople who meet, or considered may meet, the definition of a Gypsy and Traveller and Travelling Showperson for planning purposes, provided in Annex 1- PPTS (2015)

²³ For Gypsies, Travellers and Travelling Showpeople who do not meet the definition of a Gypsy and Traveller and Travelling Showperson for planning purposes, provided in Annex 1- PPTS (2015)

²⁴ Commitments here relate to pitches with planning permission.

²⁵ For Gypsies and Travellers who meet the definition of a Gypsy, Traveller and Travelling Showperson for planning purposes, provided in Annex 1 – PPTS (2015) i.e. Gypsies and Travellers who still travel and settled Gypsies and Travellers who no longer travel.

- Special Protection Area (SPA) and Special Area of Conservation (SAC) refers); and
- x. In the case of proposals within the High Weald AONB, Policy DPC4: High Weald Area of Outstanding Natural Beauty will apply.

The determination of planning applications for new sites or extensions to sites providing accommodation for settled Gypsy and Traveller and Travelling Showpeople²⁶ use will be considered under the relevant District Plan policies.

Existing Gypsy, Traveller and Travelling Showpeople sites

Existing Gypsy and Traveller sites will be safeguarded for Gypsy and Traveller use. Planning permission will not be granted for an alternative use on an existing site unless an alternative, replacement site has been identified and developed to provide facilities of an equivalent or improved standard (including its location) whilst there remains a need for such sites as evidenced by the Gypsy and Traveller Accommodation Assessment, or the best available evidence.

Any new or extensions to existing Gypsy, Traveller or Travelling Showpeople sites²⁷ granted permanent planning permission shall also be safeguarded for such use.

The provision of permanent and suitable accommodation to meet the changing needs of current and future Gypsy, Traveller and Travelling Showpeople households will be monitored to ensure a suitable supply of such sites is provided at the appropriate time.

DPH30: Self and Custom Build Housing

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities
	13 – Provide Housing to Meet Community Needs

The Self-Build and Custom Housebuilding Act 2015 requires the Council to keep a register of people who are interested in building their own home. The register is an indication of the demand for this type of housing in the District. Under the Self-Build and Custom Housebuilding Regulations 2016 the Council is required to grant suitable development permissions to meet the demand from Part 1 entries on the register within a three-year period²⁸.

Self and custom-build housing can be delivered through a wide range of projects from, a traditional DIY self-build home to projects where the self-builder employs someone to build their home for them or a custom builder provides an element of choice in materials or layout. Community-led projects can also be defined as self-build. It can offer a form of housing which is generally more affordable and complements the supply of mainstream housing.

²⁶ For Gypsies, Travellers and Travelling Showpeople who do not meet the definition of a Gypsy and Traveller and Travelling Showperson for planning purposes, provided in Annex 1- Planning Policy for Traveller Sites (August 2015)

²⁷ For Gypsies and Travellers who meet and do not meet the definition of a Gypsy, Traveller and Travelling Showperson for planning purposes, provided in Annex 1 – PPTS (2015) i.e. Gypsies and Travellers who still travel and settled Gypsies and Travellers who no longer travel.

²⁸ The three-year period runs from the end of each Base Period (31 October to 30 October)

To help satisfy potential future demand the Council will look to allocations to deliver a number of serviced plots, and provision on other appropriate non-allocated sites will also be considered.

The provision of self or custom-build plots on a range of development types and sizes will support sustainable communities and offer a variety of opportunities to those who wish to build their own home. By requiring larger residential developments to provide a proportion of plots for self or custom build, it will help secure the delivery of suitable plots to meet current and future demand. Smaller residential developments will also be encouraged to deliver serviced plots, especially in areas where there is a significant demand, dependent on their suitability and viability.

The Council's 30% minimum affordable housing requirement will apply to self- and custom build schemes, but First Homes are not required. Self or custom housing plots must be provided in addition to affordable housing not instead of it.

The self- or custom-build plots will be secured by a legal agreement requiring that they be marked out and services provided, before being made available for sale exclusively to households on the Council's Self and Custom Build Register of Interest for a period of 6 months. If after the 6-month period a plot has not been purchased or reserved, it can be made available on the open market as self or custom-build. If a plot remains unsold after a period of 12 months, it must either remain on the market as a self or custom build plot or be offered to the Council or an approved Registered Provider, before being built out by the developer.

Planning obligations will need to include a requirement that each self or custom build property must be completed within 3 years of the plot being purchased and any affordable self or custom build must remain affordable in perpetuity; this will be secured via a planning obligation between the appropriate parties and the District Council.

DPH30: Self and Custom Build Housing

The District Council believes that self- and custom-build housing has an important role to play in increasing housing choice in the district, consequently:

- i. Proposals for self- or custom-build housing developments will be supported on suitable sites and subject to compliance with other relevant policies within the District Plan.
- ii. Provision of serviced plots for self- or custom-build housing will be encouraged on all new residential developments, subject to the level of demand for such housing, suitability of the site and viability.
- iii. A minimum of 5% of the residential plots on housing sites comprising of 100 or more dwellings, subject to feasibility and viability, will need to be provided as serviced plots for self- or custom-build housing.
- iv. Serviced plots will need to have a water supply, foul and surface water drainage, telecommunications and an electricity supply available at the plot boundary and legal access to a public highway.

- v. Affordable housing on self or custom build sites will need to be provided through an area of serviced land being made available at nil cost or through individual serviced plots being transferred at nil cost.
- vi. A design code, prepared by the developer and agreed with the District Council, will need to be followed for each site and individual plot passports will also be required.
- vii. Each self or custom build plot will need to form a separate phase of the development in order to facilitate the timely submission of a reserved matters planning application by the intended occupant of each plot.
- viii. Communities preparing Neighbourhood Plans will be encouraged to identify suitable sites for self or custom-build housing plots within their neighbourhood plan area.

The above policy will be monitored and kept under review, having regard to any changes to evidence of demand.

DPH31: Housing Mix

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

Providing a suitable mix of housing is essential to supporting sustainable, mixed and balanced communities; this includes delivering the appropriate size and type of housing. This policy seeks to ensure that the right size and mix of housing (including affordable housing) is provided within the district.

The 2021 Mid Sussex Strategic Housing Market Assessment (SHMA) identifies the greatest change in household projections within the district to 2038 will be from those households without dependent children; accounting for 31.9%. However, there remains a notable increase in households with dependent children; 19.6%. Providing a suitable mix of sized dwellings will offer choice for older households to downsize, more affordable options for younger households looking to get on the housing ladder and support the growing number of family households within the district.

The District Council supports the provision of flexible market housing and specialist accommodation or care appropriate for older persons through both public and private sector provision. Providing suitable and alternative housing for older people can free up houses that are otherwise under occupied.

Older persons' housing and specialist accommodation form a very specific part of the housing needs market. The analysis undertaken within the SHMA shows a notable growth in the population of older persons aged 65 and over within the district to 2038. This in turn is expected to result in an increase in the number of people with long-term health problems or disability, thus requiring suitable accommodation. Policy DPH26: Older Persons' Housing

and Specialist Accommodation sets out the estimated need and measures, including allocations, to help address this need.

The District Council also makes policy provision through Policy DPH36: Accessibility to ensure that new residential development provides accessible and adaptable dwellings and wheelchair-user dwellings to support the changes and needs of individuals and families at different stages of life.

The 2022 Mid Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) identifies the level of need for permanent Gypsy and Traveller accommodation in the district. Policy DPH29: Gypsies, Travellers and Travelling Showpeople identifies the pitch requirement and how the need is to be met.

With regards to other specific types of accommodation, the SHMA looked at the role of Build-to-rent and Co-Living as supplementary forms of housing. Build-to-Rent is purpose built housing that is typically 100% rented. Whilst to date only one Build-to-Rent scheme has come forward within the district, the SHMA notes that the private rented sector accounts for 18% of the district's housing stock in 2011, thereby having a clear role in the market. Co-Living is a modern form of shared housing with communal spaces and amenities often aimed at young professionals who are perhaps more transient. No schemes for co-living have come forward to date; however, with both Built-to-Rent and Co-Living housing the Council will monitor the demand and consider proposals against the relevant District Plan policies.

DPH31: Housing Mix

To support the delivery of sustainable, mixed and balanced communities, housing development will:

- 1) provide a mix of dwelling types and sizes from new development (including affordable housing) that reflects current and future local housing needs. The Council expects the ranges set out in the below table to be used as a starting point:

Housing Mix split

	1 bed / 2 person	2 bed / 4 person	3 bed / 5 person	4+bed / 6 person
Market housing	5-10%	20-25%	40-45%	25-30%
Affordable Ownership	10-15%	50-55%	25-30%	5-10%
Affordable Rented	30-35%	40-45%	15-20%	5-10%

- 2) Variations to the above will be considered where the Council is satisfied that:
 - i. The site characteristics and location dictate that there is a more appropriate mix of size of dwellings;
 - ii. There is an identified need for a particular size of dwelling in the nearest settlement; or
 - iii. There are demonstrable financial viability reasons for doing so.

Other accommodation types

To meet the identified current and future needs of different groups in the community, the Council will seek a range of accommodation types to be delivered on new developments which are of an appropriate size, scale and location. This could include provision of bungalows and other forms of suitable accommodation, where in accordance with the Mid Sussex Design Guide SPD.

The types of accommodation include that which is suitable for:

- Older persons (DPH26);
- People with disabilities (DPH40);
- People who wish to build their own home (DPH30);
- Build to Rent;
- Co-Living; and
- Gypsy and Traveller community (DPH29).

Where applicable, specific policies on the different accommodation types are identified against each of the above.

DPH32: Affordable Housing

Policy:	Strategic
Review Status:	Minor Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

The 2021 Mid Sussex Strategic Housing Market Assessment (SHMA) provides the underlying justification for requiring the provision of affordable housing on residential development through affordable housing policies. The SHMA highlights the clear need for both social and affordable rented housing. The net need for affordable home ownership housing is smaller, albeit its provision will support some of those households currently unable to access market housing as they fall within the rent/ buy 'gap' or experience barriers in obtaining a mortgage.

In order to respond to the identified need for affordable housing of different tenures and to help deliver mixed, balanced and sustainable communities, the Council will require the provision of 25% First Homes with the remaining 75% being provided as social or affordable rented homes, on all sites above the Affordable Housing threshold. The Council recognise that this mix does not meet the NPPF expectation that 10% of homes on major developments should be for affordable home ownership; however, it is supported by the SHMA findings which highlights a clear and acute need for rented affordable housing.

In setting affordable housing policies, the evidence of affordable housing need must be combined with other information, including the viability and deliverability of housing development, to set a level of affordable housing that is realistic and deliverable. The 2022 Mid Sussex Local Plan Viability Study applies the likely costs of new housing developments, including affordable housing and other policy requirements such as accessibility and space standards, environmental policies and infrastructure contributions (Section 106).

The requirement for the provision of a minimum of 30% affordable housing applies to all types of residential development. This includes changes of use, mixed use sites that

incorporate an element of residential development, sheltered and extra care housing schemes, conversions, built to rent and private rent schemes and any other developments where there is an increase in the number of residential units on the site.

Schemes delivering 100% affordable housing, self or custom build housing, or specialist accommodation (such as older persons' housing) are not required to provide First Homes only dwellings for affordable / social rent. There is also no requirement for First Homes on a rural exception site or on sites providing solely Build to Rent Homes.

Design

Any rented flats are to be provided in separate blocks, around separate cores or on separate floors or with separate access to any First Homes and open market flats, in order to meet Register Provider management and service charge requirements. Lifts must be provided in blocks of flats above 3 stories, and in 3 storey blocks of accommodation designed for the over 55's. No more than 6 x 1 bed flats are to be included in one block unless the scheme is a sheltered housing scheme.

A minimum of 4% of Affordable Housing units (rounded up to the next whole number) on suitable schemes unless agreed with the Council's Housing Enabling Officer, are to be wheelchair-accessible dwellings for rent, built to the requirements contained in Part M4(3)(1)(a) and (b) and Part M4(3)(2)(b) of schedule 1 of the Building Regulations 2010 as amended. The floor areas of these units should be approximately 20% larger in the case of flats and 30% larger in the case of houses, (as shown in the table below), in order to properly accommodate the requirements.

Dimensions, floor areas, manoeuvring zones and correctly sized furniture layouts, which meet the above requirements are to be clearly indicated on individual unit layouts (at a scale of 1:50). Three A1 sized hard copies of these layouts, and plans showing the associated parking provision, and access from the wheelchair accessible parking spaces to the wheelchair accessible dwellings, must be submitted to and agreed with the Council's housing team before reserved matters / full planning permission is granted. Final agreement of any details will also be required as a condition of planning consent.

Appropriate parking provision is to be provided for all affordable units, in line with that for open market housing. Car parking provision for wheelchair accessible dwellings must comply with the requirements detailed in M4(3) of Schedule 1 of the Building Regulations 2010 as amended.

Securing Affordable Housing Units

Registered Providers delivering the affordable housing are to be approved in writing by the Council, for each development/ phase of development. Each Registered Provider must have a local management base, commit to letting their properties through the Mid Sussex Common Housing Register, and be willing to help the Council meet those needs identified as a priority in the district.

Developers are to enter into a non-rescindable contract with a Registered Provider to deliver the affordable units, prior to works commencing on any development or phase of development. This will enable the Registered Provider to oversee all construction works and help ensure the delivery of the affordable housing.

Applicants are to build into their designs at pre application stage, and take into account when negotiating site acquisitions and undertaking development feasibility, the 30% affordable housing required in accordance with the occupancy, size, clustering, tenure and other requirements detailed here. An affordable housing statement, plan and schedule of accommodation must be provided prior to validation of the planning application, to demonstrate that these requirements will be met.

All categories of affordable housing are to be demonstrably affordable, taking account of local incomes, for those unable to meet their housing needs through the private housing market. Consequently, rents must be capped at a maximum of 80% of market rent, or the Local Housing Allowance Level for the relevant size of unit whichever is lower, unless they are social rents determined through the Government's rent policy.

All requirements for the provision of affordable housing, including the need for any subsidy to be recycled for alternative affordable housing provision, are to be built into and secured through an appropriate planning obligation. This must include the requirement for developments where the floorspace is not yet known but may exceed the threshold to provide the necessary affordable housing in such instances.

All affordable housing will require the Council's standard legal nomination agreement between the District Council and the Registered Provider, to be completed prior to occupation. This will enable the District Council to control the occupancy of the new affordable housing, and to ensure that it continues to be available to meet local housing needs in perpetuity. Occupancy criteria and nomination arrangements for both initial and future lettings, assignments and disposals will be detailed. Applicants will be nominated from the District Council's Common Housing Register, and in accordance with the Council's allocations scheme, and 100% nomination rights will be required in perpetuity.

DPH32: Affordable Housing

Delivering the amount and type of housing which meets the needs of all sectors of the community is a key objective of the District Plan. Consequently, the Council requires:

- i. a minimum of 30% on-site affordable housing, with the number of units rounded up to the next whole number, on all residential and mixed-use developments providing 10 dwellings or more, or with a maximum combined gross floorspace of greater than 1,000m²;
- ii. the full 30% affordable housing requirement to be provided on each and every phase of a phased development, and for the affordable housing to be fully integrated within the development;
- iii. developments in the High Weald Area of Outstanding Natural Beauty providing 6 – 9 dwellings, but with a maximum combined gross floorspace of less than 1,000m², to provide a commuted payment towards off-site provision equivalent to providing 30% on-site affordable housing;
- iv. in the case of redevelopment, at least the same number of affordable homes to be re-provided in accordance with current mix and tenure requirements, on sites where the most recent use included affordable housing;
- v. a mix of affordable housing tenure comprising 25% First Homes and 75% social or affordable rented, unless the best available evidence supports a different mix;

- vi. Unless otherwise agreed with the Council the tenure, type and size split on each site to be as shown in the table below. The majority of 2-bed/ 4 person units should be provided as houses rather than flats, wherever possible.

Affordable housing split

	1 bed / 2 person	2 bed / 4 person	3 bed / 5 person	4+ bed / 6 person
Affordable Ownership	10-15%	50-55%	25-30%	5-10%
Affordable Rented	30-35%	40-45%	15-20%	5-10%

- vii. A minimum of 4% of affordable housing units (rounded up to the next whole number) on all suitable schemes, unless otherwise agreed with the Council's Housing Enabling Officer, to be wheelchair accessible dwellings for rent, built to the requirements contained in Part M4(3)(1) (a) and (b) and Part M4(3)(2)(b) of schedule 1 of the Building Regulations 2010 as amended;
- viii. fully serviced land to be provided for the construction of the requisite number of affordable homes at nil cost, and for the affordable properties to be transferred to a Registered Provider at a price which reflects a nil land value and nil public subsidy;
- ix. affordable housing units to meet the occupational and minimum floor area requirements in the table below, or any other increased standard which supersedes these, since the units are likely to be fully occupied;

Minimum floor area standards

No. of Beds	No. of Persons	Minimum floor area - 1 storey (excluding staircases and hallways in the case of duplex flats/ coach houses/FOGs)	Minimum floor area - 2 storey	Minimum floor area - 3 storey	Minimum floor area - Wheelchair Accessible dwelling
1	2	50m ² / 538ft ²	58m ² / 624ft ²	-	60m ² / 646ft ² (1B/2PF)
2	4	70m ² / 753ft ²	79m ² / 850ft ²	-	84m ² / 904ft ² (2B/4PF) 103m ² / 1109ft ² (2B/4PH)
3	5	-	93m ² / 1001ft ²	99m ² / 1066ft ²	121m ² / 1302ft ² (3B/5PH)
3	6	-	102m ² / 1098ft ²	108m ² / 1163ft ²	133m ² / 1432ft ² (3B/6PH)
4	6	-	106m ² / 1141ft ²	112m ² / 1206ft ²	138m ² / 1485ft ² (4B/6PH)

- x. all affordable housing units to be fully integrated into the scheme layout, and provided in clusters of no more than 10 units with open market units in between each cluster, (a couple of extra units may be allowed in clusters which include flats), in order to create more balanced communities;

- xi. affordable housing units to be 'tenure blind' so that affordable and private homes are indistinguishable from one another, in terms of design, build quality, appearance, materials and site location.

Proposals which do not provide a minimum of 30% affordable housing will be refused, unless clear evidence demonstrates, to the Council's satisfaction, that the site cannot viably support the required number of affordable housing units. The Council's approach to the assessment of financial viability is set out in its viability policy (see Policy DPI7), but it should be noted that the submitted viability appraisal must be based on a policy compliant scheme, including 30% Affordable Housing. All viability appraisals will be made publicly available and will be assessed with the assistance of an external consultant at the developer's cost. A viability review will also be required later in the project, for all schemes which are not policy compliant. At the review stage more accurate information about build costs and sales values, will be able to be provided for assessment.

Financial contributions, in place of on-site affordable housing, will only be agreed where there are exceptional reasons preventing the provision of on-site affordable housing. These include where:

- there are prohibitively high service charges;
- schemes comprise less than 6 units;
- the development comprises a single block retirement scheme; or
- the Council wishes to use such funding to develop its own housing.

In such cases a financial contribution payable prior to works commencing and reflecting the full cost of providing alternative serviced land for the required number of units (rounded up if the resultant number is not a whole number), will be sought. The amount per unit will depend on the size, location and type of affordable housing required to be provided by the scheme. The contribution and attached provisions will be detailed in a planning obligation.

Development proposals will be expected to optimise the use of land, and any proposal which appears to have an artificially low density, in order to avoid the required thresholds for affordable housing, or reduce the amount of affordable housing to be provided, may be refused planning permission. Sites must also not be deliberately sub-divided in order to avoid the required affordable housing threshold being met or to reduce the amount of affordable housing required.

The above policy will be monitored and kept under review, having regard to the Council's Housing Strategy and any changes to evidence of housing needs.

DPH33: First Homes

Policy:	Strategic
Review Status:	New Policy
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

First Homes are a form of discounted market sale housing designed to allow people to get on to the housing ladder in their local area. On 24th May 2021, the Government announced its position on First Homes through a Written Ministerial Statement (WMS) and amended Planning Practice Guidance (PPG). Specific qualifying and eligibility criteria and requirements for First Homes are set out in the WMS and PPG.

First homes should seek to meet the needs of the local area and communities within it and Local Connection Criteria will be required to be met by purchasers. If after 3 months actively marketing the property, and a period of 3 months from the date of practical completion, a qualifying household has not reserved or bought the First Home the local connection criteria will be removed and the First Home made available to other eligible buyers. If there is no sale after a further 3 months the First Home can be switched to a normal market sale home but the discounted amount must be paid back to the Council.

All restrictions including discounts, eligibility and local connection criteria will be secured through the s106 agreement. Although the discount must remain at the same level on each subsequent sale, the price cap will only apply to the initial sale.

As with Rural Exception sites, First Homes Exception Sites are small sites which can come forward on non-allocated land, outside the built-up area boundaries, in order to deliver affordable housing. They cannot however come forward in designated rural areas as defined in Annex 2 of the NPPF, where rural exception sites are the sole permissible type of exception site. They must also meet a need which is not already being met elsewhere within the district through developer contributions.

Where it can be clearly demonstrated through evidence that, from a viability perspective, a First Homes Exception Site cannot support a scheme comprising 100% First Homes, the District Council will consider an element of open market housing and/or self-build housing. This will be limited to that required to facilitate scheme viability, up to a maximum of 20% of the overall scheme. Details of the evidence required to justify an element of market and/ or self-build housing is set out in the Viability Policy. Other forms of affordable housing may also be included where there is a demonstrable significant local need.

The 2021 Strategic Housing Market Assessment (SHMA) considers the role of First Homes and its potential contribution to delivering affordable housing in the district. Following an appraisal of house prices and incomes within the district, it concludes that within Mid Sussex First Homes could deliver 1- and 2-bedroom homes, when the minimum criteria are applied. This provision of smaller, affordable housing is considered to play an important role in helping people access their own home.

Schemes delivering 100% affordable housing, self or custom build housing, or specialist accommodation (such as older persons' housing) are not required to provide First Homes only dwellings for affordable / social rent. There is also no requirement for First Homes on a rural exception site or on sites providing solely Build to Rent Homes

DPH33: First Homes

First Homes are part of the Government's policy to promote home ownership and can be delivered through developer contributions and First Homes Exception sites.

First Homes will be supported by the District Council as part of the affordable housing requirement (DPH36), subject to the following criteria:

- i. First Homes must form 25% of the total number of affordable units on a site even where more than 30% affordable housing is being provided;
- ii. The dwellings are discounted by a minimum of 30% against the market value;
- iii. After the discount has been applied, the first sale of the home is priced no higher than £250,000;

- iv. The purchaser meets the First Homes eligibility criteria; and
- v. The local connection criteria are met by the purchaser.

In order to meet the Local Connection Criteria the purchaser must:

- 1. be ordinarily resident within the Mid Sussex District Council's administrative area and have been for a continuous period of not less than 12 consecutive months prior to exchange of contracts for the relevant First Home; and/or
- 2. have a close family association with the Mid Sussex District Council's administrative area by reason of a parent or child who is ordinarily resident within the Mid Sussex District Council's administrative area.

Or meet such other local connection criteria as may be published by the District Council from time to time as its "First Homes Local Connection Criteria" and which is in operation at the time of the relevant disposal of the First Home.

First Homes Exception Sites

The District Council will support First Homes Exception Sites provided that the following additional criteria are met:

- vi. The proposals are wholly or primarily for First Homes;
- vii. There is an identified local need for First Homes which is not already being met elsewhere in the district;
- viii. The development is located adjacent to an existing settlement containing key local services, including a local convenience shop, access to a bus stop with adequate services, and, if possible, a primary school;
- ix. The proposal is proportionate in size and scale to the existing settlement and respects its setting; and
- x. The site is not located within a designated rural area²⁹.

All affordable homes delivered as First Homes in the above circumstances will be secured through a S106 agreement to ensure that the discount and relevant eligibility and local connection criteria remain in perpetuity.

Neighbourhood Plans may apply their own First Homes eligibility criteria, including an increased minimum discount and lower price and income caps in line with national guidance. Alterations to the criteria or requirements must however be evidence based and not impede the delivery of homes.

DPH34: Rural Exception Sites

Policy:	Non - Strategic
Review Status:	Minor Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

Rural Exception Sites are sites used for affordable housing for local people in perpetuity, which would not normally be granted permission for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either

²⁹ National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985 (Annex 2, NPPF)

current or recent residents or have a current employment or close family connection to the Parish.

The 2021 Mid Sussex Strategic Housing Market Assessment (SHMA) reviewed the issue of rural housing within the district. The SHMA highlights the role of the Sussex Community Housing Hub and Action in Rural Sussex in delivering rural exception sites, with the support of the Council. The Council will continue to support the work of these groups, as well as work with parishes to identify sites specifically for affordable housing that will meet local needs.

Rural Exception Sites are different to First Homes Exception Sites which are covered under Policy DPH33: First Homes.

DPH34: Rural Exception Sites

The development of rural exception sites for affordable housing will be permitted provided that:

- i. the development comprises 100% affordable housing;
- ii. the housing is to meet the needs of current or recent residents of the Parish or those with a current employment or close family connection to the Parish;
- iii. The size of properties is justified by a Parish Housing Needs Survey carried out in the last 5 years;
- iv. The occupancy of the homes is restricted in perpetuity to those with a genuine local need for affordable housing;
- v. The scale of the development respects the setting, form and character of the settlement and surrounding landscape; and
- vi. The development is adjacent to, or in close proximity to, a rural settlement containing a local convenience shop and access to a bus stop with adequate bus services, and if possible a primary school.

Where it can be clearly demonstrated through evidence that, from a viability perspective, the site cannot support a scheme comprising 100% affordable housing, the District Council will consider an element of open market and/ or self or custom- build housing. This will be limited to that required to facilitate scheme viability, up to a maximum of 20% of the overall scheme, provided that:

- The requirements of ii), iii), v) and vi) can be met for the overall scheme and for the affordable housing element i) and iv) can be met; and
- The new development physically integrates the open market and affordable housing, which should seek to be 'tenure blind' and makes best use of the land.

Details of the evidence required to justify an element of open market and/ or self or custom- build housing is set out in the Council's Viability Policy (see Policy DPI7).

The delivery of rural exception sites should be led by Parish Councils, through planning applications, Community Right to Build schemes, Neighbourhood Development Orders or through Neighbourhood Plans and sites must be brought forward in partnership with the relevant Parish Council, a specialist rural Registered Provider and the Council's Planning and Housing Enabling Team.

DPH35: Dwelling Space Standards

Policy:	Non-strategic
Review Status:	No Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

The purpose of this policy is to set minimum space standards for all dwellings to ensure that the floor area of new homes and associated storage space is sufficient in size to secure a satisfactory standard of accommodation for their residents.

Dwelling space standards ensure that all residential development in Mid Sussex is of an acceptable size for the wellbeing of future occupants, that there is appropriate circulation space and that homes are highly functional in terms of typical day to day needs. The dwelling space standards help to achieve sustainable development, encouraging useable and flexible living environments in which residents can undertake a range of activities such as bringing up families, working from home and communal and social activities.

DPH35: Dwelling Space Standards

Minimum nationally described space standards, see Glossary, for internal floor space and storage space will be applied to all new residential development.

These standards are applicable to:

- Open market dwellings and affordable housing (see DPH32: Affordable Housing for the occupancy and minimum floor area requirements for Affordable Housing);
- The full range of dwelling types; and
- Dwellings created through subdivision or conversion.

All dwellings will be required to meet these standards, or subsequent improved standards, other than in exceptional circumstances where clear evidence will need to be provided to show that the internal form or special features prevent some of the requirements being met.

DPH36: Accessibility

Policy:	Non-strategic
Review Status:	Minor Update
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs 14 – Create Accessible Environments

Accessibility is about the ease and convenience with which a place can be used by people. This policy applies to both homes and places, including areas of open space and transport.

Dwelling space standards ensure that all residential development in Mid Sussex is of an acceptable size for the wellbeing of future occupants, that there is appropriate circulation space and that homes are highly functional in terms of typical day to day needs. The space standard helps to achieve sustainable development, encouraging useable and flexible living environments in which residents can undertake a range of activities such as bringing up families, working from home and communal and social activities, as well as providing for residents' changing needs by taking into account the spatial implications of providing improved accessibility and adaptability, particularly for older or less mobile people, including meeting the requirements of residential building accessibility standards in Building Regulations Approved Document M (Volume 1)³⁰.

The 2021 Mid Sussex Strategic Housing Market Area Assessment (SHMA) states that by 2038 the number of people over the age of 65 within the district is projected to increase by 43.5%. An older population is also likely to mean that there are more people with associated mobility problems. Whilst an ageing population is the main contributor to the increased need for wheelchair accessible homes the SHMA notes a rise in wheelchair user households aged under 60. The evidence indicates that there is also a disparity between wheelchair users and tenure, indicating a higher need for wheelchair accessible homes for those in affordable housing accommodation. Whilst the SHMA supports a target of 12% of new affordable homes to be wheelchair accessible, this policy seeks 4%. The lower figure is aligned with the Council's experience in successfully securing this level of provision and the level of need indicated by the housing register.

Providing homes which are built to at least Category 2 M4(2) accessible and adaptable standards will help ensure that homes are suitable and capable of meeting a household's changing needs. It is more practical and cost-effective if homes are built to these standards rather than retrofitting necessary alterations if this is even possible. Therefore, the policy requires that all new homes are built to at least Category 2 (M4(2)) adaptable and accessible standards. It also requires that a proportion of affordable homes are built to Category 3 (M4(3)(2)(b)) wheelchair user standards.

DPH36: Accessibility

All development will be required to meet and maintain high standards of accessibility so that all users can use them safely and easily.

This will apply to all development, including changes of use, refurbishments and extensions, open spaces, the public realm and transport infrastructure, and will need to be demonstrated by the applicant.

With regard to listed buildings, meeting standards of accessibility should ensure that the impact on the integrity of the building is minimised.

Category 2 - Accessible and Adaptable Dwellings

All residential developments will be expected to meet Category 2 – accessible and adaptable dwellings under Building Regulations – Approved Document M Requirement M4(2), with the following exceptions:

- i. Where new dwellings are created by a change of use;
- ii. Where the scheme is for flatted residential buildings of fewer than 10 dwellings;

³⁰ Schedule 1 of the Building Regulations 2010, as amended

- iii. Where specific factors such as site topography make such standards unachievable by practicable and/ or viable means;

Category 3 - Wheelchair-User Dwellings

- Category 3 – Wheelchair-user dwellings under Building Regulations – Approved Document M Requirement M4(3)(2)(a) adaptable will be required for a minimum of 5% of market homes, dependent on the suitability of the site and the need at the time.
- Where affordable housing is required, a minimum of 4% of the affordable housing units (rounded up to the next whole number), on all suitable schemes, unless otherwise agreed with the Council's Housing Enabling Officer, will be required to be wheelchair accessible dwellings (M4(3)(2)(b)) for rent.

The Requirement will also apply to private extra care, assisted living or other such schemes designed for frailer older people or others with disabilities and those in need of care or support services.

16. Infrastructure



Infrastructure	DPI1: Securing Infrastructure DPI2: Planning Obligations DPI3: Major Infrastructure Projects DPI4: Communications Infrastructure DPI5: Open Space, Sport and Recreational Facilities DPI6: Community and Cultural Facilities and Local Services DPI7: Viability
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DPI1: Securing Infrastructure

Policy:	Strategic
Review Status:	Major Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities

The delivery of the right levels and type of infrastructure is essential to support new homes, economic growth and the creation of sustainable communities. A strategic objective of the District Plan is to ensure that development is accompanied by the necessary infrastructure in the right place at the right time that supports development and sustainable communities. This ensures that development is adequately served without overstressing existing infrastructure and putting an unacceptable strain on the environment.

An Infrastructure Delivery Plan has been prepared to identify what infrastructure provision is needed and where and when it needs to be delivered in order to support the development and anticipated future growth identified in this Plan.

DPI1: Securing Infrastructure

Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of infrastructure and/or mitigation measures to meet the additional need arising from the proposal. Both on-site and off-site provision, including beyond the district boundary, may be required to address the impacts of development, including cumulative effects on the existing infrastructure.

Existing infrastructure services and facilities will be protected where they contribute to the needs of local communities, unless an equivalent replacement or improvement is provided or there is sufficient alternative provision of the same type in the area, and subject to requirements set out elsewhere in the Plan.

Infrastructure should be provided at the appropriate time, prior to the development becoming operational or being occupied. Applicants will be expected to have early engagement with infrastructure providers to ensure any necessary works can be undertaken in a timely manner. Larger developments may need to be phased to ensure that this requirement can be met.

Where a proposal would be made unviable in light of the infrastructure requirements, open book calculations verified by an independent consultant approved by the Council must be provided for consideration. All viability appraisals will be made publicly available and will be assessed with the assistance of an external consultant at the developer's cost. The Council's approach to the assessment of financial viability is set out in its viability policy (see Policy DPI7).

The design and layout of a development should ensure future access to utility infrastructure for maintenance and upgrading.

Proposals by service providers for the delivery of utility infrastructure required to meet the needs generated by new development in the District and by existing communities will be encouraged and permitted, subject to accordance with other policies within the Plan.

Infrastructure will need to be planned and delivered to ensure its future resilience against the impacts of climate change.

DPI2: Planning Obligations

Policy: Strategic
Review Status: New Policy
Strategic Objectives: 6 – Infrastructure to Support Sustainable Communities

Planning obligations will be used by the District Council to secure infrastructure in line with the statutory tests set out in the Community Infrastructure Levy Regulations 2010 (as amended) and national planning policy.

Planning obligations will only be sought where the following tests are met:

- i) Necessary to make the development acceptable in planning terms;
- ii) Directly related to the development; and
- iii) Fairly and reasonably related in scale and kind to the development.

An Infrastructure Delivery Plan has been prepared to identify what infrastructure provision is needed and where and when it needs to be delivered in order to support the development and anticipated future growth identified in this Plan.

DPI2: Planning Obligations

Where required, the Council will use planning obligations to address the impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations 2010 (as amended). This may include but is not limited to the planning obligations set out in the figure below.

Other planning obligations may be sought to secure policy requirements set out in this plan and to mitigate the specific impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations 2010 (as amended).

Appendix 3 sets out the infrastructure quantity and accessibility standards and formulae used to calculate contributions. The infrastructure standards may be reviewed and will be set following assessments of need and viability. Contributions will be subject to inflation reviews to ensure the necessary infrastructure can be delivered.

Where a planning obligation (which may also be known as a Section 106 Agreement or Unilateral Undertaking) is entered into, the Council and the County Council will secure fees associated with the monitoring of any planning obligations in addition to the Council's legal costs in drafting and completing the agreement. The current applicable fees to be levied will be shown on the Council's website.

DPI3: Major Infrastructure Projects

Policy: Strategic
Review Status: New Policy
Strategic Objectives: 6 – Infrastructure to Support Sustainable Communities

Policy DPI3: Major Infrastructure Projects sets out the approach that the Council will take in responding to major infrastructure applications either as determining authority or as a statutory consultee.

For the purposes of the District Plan, Major Infrastructure Projects (MIP's) are those infrastructure projects that would require Environmental Impact Assessment (EIA) as set out in Schedules 1 and 2 of the EIA Regulations 1999 (except predominantly residential schemes), and include those defined as Nationally Significant Infrastructure Projects (NSIP's).

The Planning Inspectorate is responsible for operating the planning process for NSIP's. Such projects require a type of consent known as 'development consent'. Development consent, where granted, is made by a Development Consent Order (DCO).

National Planning Statements (NPS) set out national case in principle for NSIP's and provide a national policy framework for the consideration of proposals by the Planning Inspectorate, with the final decision being made by Secretary of State. NPS are not part of the statutory development plan, local planning authorities will need to have regard to these when preparing local plans.

The Council has an important role as a statutory consultee in relation to NSIP applications, where there is the potential for the District to be affected by an NSIP proposal.

DPI3: Major Infrastructure Projects

In responding to major infrastructure proposals as a consultee or decision maker the Council will consider applications against the relevant national planning policy and the strategy and relevant policies of the development plan. The objective from the Council's perspective is that such proposals should, where possible, contribute positively to the implementation of the spatial strategy and meet the underlying objectives of the plan.

However, the Council will seek to adopt an approach which is consistent with relevant NPS and take into account operational requirements of the MIP.

For a NSIP the Council will take into account through the preparation of a Local Impact report, how proposals through their formulation and implementation, avoid or minimise adverse impacts or harm to local places, communities and businesses and maximise local benefits wherever possible. Where the Council is the decision maker, these matters will be taken into account through the planning application process. In all cases the Council will also assess where appropriate how the consideration of alternatives has informed the proposals.

The Council will consider the benefits and impacts of a proposal having regard to direct, indirect secondary and cumulative benefits and impacts, and benefits and impact interactions. This assessment will include the construction, operation and decommissioning (including restoration) stages of the project. It will also have regard to reasonably foreseeable development proposals in the local area, including other infrastructure projects and employment and residential development.

Depending upon the scale and nature of the proposals, in order to present sufficient information for the Council to undertake the assessment, it may request the preparation of Delivery Plans.

Delivery Plans will identifying measures to be taken to maximise benefits, to avoid and minimise impacts, and to mitigate and compensate for impacts, with respect to matters such as the economy, climate change, sustainability, the environment, biodiversity net gain, transport and movement, housing, local communities (including safety, health, leisure and general well-being) council services, and education where this is justified by reference to national policy.

The Management or Delivery plans should identify the systems and resources that will be used to implement the proposed measures.

DPI4: Communications Infrastructure

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 7 – Encourage Business and Thriving Local Enterprise 8 – Opportunities to Live and Work within Communities

High quality advanced digital and communications infrastructure is important for economic growth and social well-being. Digital connectivity is crucial for attracting businesses and for successful business locations. Digital connectivity also has social benefits facilitating social inclusion and providing opportunities to access employment, education and services.

However, the environment also needs to be protected and digital and communications infrastructure should take into account the visual amenity, character and appearance of a local area and should not have an unacceptable impact on sensitive areas.

One of the actions in the Sustainable Economy Strategy 2022-205 is for the Council to facilitate the delivery and use of advanced digital infrastructure (full fibre, wireless network

technology and other digital technologies) to support citizens, public services, existing and new economic activity within Mid Sussex.

Digital connectivity is also a way to implement the 20-minute neighbourhood, particularly in rural areas, and it will contribute to the features of sustainable communities.

DPI4: Communications Infrastructure

The Council will encourage the incorporation of high quality advanced digital infrastructure including fibre to new housing, employment and retail developments.

The expansion of the electronic communications network and digital infrastructure to the towns and rural areas of the District will be supported.

When considering proposals for new telecommunications equipment the following criteria will be taken into account:

- The location and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area. On buildings, apparatus and associated structures should be located and designed in order to seek to minimise impact to the external appearance of the host building;
- New telecommunications equipment should not have an unacceptable effect on sensitive areas, including areas of ecological interest, areas of landscape importance, Areas of Outstanding Natural Beauty, the South Downs National Park, archaeological sites, conservation areas or buildings of architectural or historic interest and should be sensitively designed and sited to avoid damage to the local landscape character;
- Preference will be for use to be made of existing sites rather than the provision of new sites.

When considering applications for telecommunications development, regard will be given to the operational requirements of telecommunications networks and the technical limitations of the technology.

DPI5: Open Space, Sport and Recreational Facilities

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 15 – Provide Cultural, Leisure and Sporting Facilities

Open space, leisure, sport and recreational facilities are important to support healthy lifestyles and should be retained where possible and provided alongside new development.

The facilities referred to in this policy include:

- Allotments, community growing spaces and community orchards
- Artificial turf and grass playing pitches and ancillary facilities
- Gyms, sports halls, swimming pools and fitness facilities
- Kickabout, skate parks, cycling and BMX tracks
- Leisure facilities such as bowling, ice rinks and outdoor activities

- Open space, amenity green space, parks and recreation grounds, natural green space, and nature conservation sites
- Play areas
- Tennis, netball and multi-use courts

It is important to note that open space, leisure, sport and recreational facilities often form part of the green infrastructure for an area and development proposals should also have regard to Policy DPN3: Green Infrastructure.

DPI5: Open Space, Sport and Recreational Facilities

Development that provides new and/or enhanced open space, leisure, sport and recreational facilities, including allotments, to support healthy lifestyles and in accordance with the strategic aims of the Playing Pitch Study, Play & Amenity Green Space Study and Community Buildings Study (or as the studies are updated) will be supported.

The provision of new open space, leisure, sport and recreational facilities, including the provision of public open space, play areas and equipment, will be required for all new residential developments in accordance with Policies DPI1: Securing Infrastructure and DPI2: Planning Obligations. On-site provision will be required where appropriate, including making land available for this purpose. Planning conditions and/or planning obligations will be used to secure such facilities. The design of open space and public realm should accord with the Mid Sussex Design Guide SPD.

Sites for appropriate open space, leisure, sport and recreational facilities to meet local needs will be identified through Neighbourhood Plans or a Development Plan Document produced by the District Council.

Proposals that involve the loss of open space, leisure, sports and recreational buildings and land, including playing fields, will not be supported unless:

- an assessment has been undertaken which has clearly shown the open space, leisure, sports or recreational land or building to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Whilst a site may be surplus to requirements for open space, leisure, sport and recreation use, it may still be of environmental, social or cultural value. The site's development may have unacceptable visual or amenity impact, or adversely affect its wider healthy lifestyles, green infrastructure or biodiversity functions, including for climate change mitigation and resilience. Applicants will therefore need to carefully consider such as proposal alongside other policies in this Plan.

DPI6: Community and Cultural Facilities and Local Services

Policy:	Non-Strategic
Review Status:	Minor Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 12 – Support Safe, Healthy and Inclusive Communities

Community and cultural facilities and local services are important and should be retained where possible and provided alongside new development.

The community facilities and local services referred to in this policy include:

- Activity halls and community centres
- Car parks
- Cemeteries and burial grounds
- Cultural venues such as theatres, performance spaces, cinemas, art centres, galleries and museums
- Education facilities
- Emergency services
- Healthcare facilities
- Libraries
- Local shops including banks and post offices
- Places of worship and church halls
- Public conveniences
- Public houses
- Sports club houses and pavilions
- Parish, village and town halls

DPI6: Community and Cultural Facilities and Local Services

The provision or improvement of community and cultural facilities and local services that contribute to creating sustainable communities will be supported where the proposal is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside and where:

- The need for the community or cultural facility or local service is clearly demonstrated;
- There would be no harm on highway safety or severe residual cumulative impacts on the road network;
- It encourages sustainable travel opportunities;
- It will not adversely affect the character, landscape, historical significance, appearance and amenity of the area;
- The design and layout of the proposals, including ancillary facilities, are sensitive to the existing character and setting;
- It does not have an adverse effect on residential amenity in the local area;
- It will not have an adverse effect on the vitality and viability of existing facilities in the locality or relevant assets of community value; and
- It meets the requirements of other relevant development plan policies.

Proposals that involve the loss of a community or cultural facility (including those facilities and services where the loss would reduce the community's ability to meet its day-to-day needs locally), will not be supported unless:

- an assessment has been undertaken which has clearly shown the community or cultural facility or local service to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative community and cultural provision, the benefits of which clearly outweigh the loss of the current or former use.

New residential development will be required to contribute to the provision of new or enhanced community facilities in accordance with Policies DPI1: Securing Infrastructure and DPI2: Planning Obligations. The on-site provision of new community facilities will be required on larger developments, where appropriate, including making land available for this purpose. Planning conditions and/or planning obligations will be used to secure such facilities.

DPI7: Viability

Policy:	Strategic
Review Status:	Minor Update
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

The economic viability of development is important in terms of supporting delivery in both plan making and the determination of planning applications. The District Council has accounted for the cumulative impact of its policy requirements on development viability, as part of the evidence base supporting the independent examination of its District Plan.

As a result, when negotiating site acquisitions and undertaking development feasibilities, account should be taken of all necessary requirements, and proposals should be designed in a way which accords with all Development Plan policies, including those regarding affordable housing provision.

The District Council is however aware that in some exceptional circumstances, a proposal may generate insufficient value to support the full range of developer contributions. In instances where, in the opinion of the applicant, a scheme cannot viably meet policy requirements, applicants will be required to robustly demonstrate that the site is clearly unviable by submitting for assessment a Viability Appraisal.

Viability Appraisal - Information requirements

Policy DPI7 identifies the criteria for considering development proposals where a non-policy compliant scheme is put forward. Table 1 of Appendix 3 contains the minimum information that should be contained within a Viability Appraisal. All assumptions applied to the Viability Appraisal model should be accessible and capable of variation to observe the impact of each on the model's outcome.

The costs and values included in the Viability Appraisal submitted to the District Council must be consistent with the corresponding information on current costs and values which the applicant is themselves relying upon to inform their own commercial decisions. A summary should be provided clearly setting out the exceptional reasons which it is felt are making the development proposal unviable.

A statement must also be included that the company undertaking the Viability Appraisal has not been instructed on the basis of performance related pay or incentivised in any other way according

to the outcome of the viability process and the level of planning obligations which the applicant is required to provide.

Viability Assessment

On completion of the Viability Assessment the District Council will confirm whether additional planning obligations are required over and above those proposed by the applicant through their Viability Appraisal. Heads of Terms will be included in the District Council's Planning Report, reflecting the outcome of the viability process and an application will be refused if terms cannot be agreed.

Advanced Stage Viability Review

The financial viability of a scheme will change over time due to the prevailing economic climate and changing property values and construction costs. It may be notably different at the time of delivery, as a result of changes in market conditions and uncertainties at planning application stage. Consequently, the practice of viability review to ensure that proposals are based on an accurate assessment of viability at the point of delivery has become increasingly well established. Table 2 of Appendix 3 sets out the information required for an Advanced Stage Viability Review.

The aim of the Advanced Stage Viability Review is not to carry out a completely new Viability Assessment of every item, but to assess whether additional value has been generated since the planning application stage Viability Assessment was carried out, as a result of a change in the Gross Development Value or the Build Costs

Table 3 of Appendix 3 contains the formula used to calculate any additional financial contributions due. 40% of any surplus generated as a result of increased values or reduced costs will be retained by the Developer, as an additional profit allowance to that agreed in the planning application stage Viability Assessment, to ensure that they also benefit from an improvement in the schemes viability and are incentivised to make the scheme as profitable as possible by maximising values and minimising Build Costs.

Any contribution payable to the District Council will be capped according to the level of contribution still required by policy and associated guidance. For affordable housing contributions, this will be based on the level of surplus required to provide the affordable housing necessary to meet the affordable housing requirement. Any additional surplus above this will be retained in full by the Developer as additional profit.

If there is no surplus resulting from the application of the formula, because Build Costs have increased but values have not or values have increased less than Build Costs, no payment would be required towards meeting the infrastructure contributions and affordable housing provision due.

Advanced Stage Viability Reviews will be required on all residential / mixed use schemes which do not meet infrastructure contributions or the District Plan affordable housing requirement in full at the grant of planning permission and these will take place on the sale/letting of 75% of the market residential units. In the case of all other non-policy compliant schemes an Advanced Stage Viability Review will take place three months prior to the expected date of practical completion.

Disclosure

The District Council has the right to provide information to external parties advising it on viability matters to fulfil its statutory function as Local Planning Authority. Regardless of any decision not to make specific elements of an appraisal publicly available, information will also be made available,

on a confidential basis, to Planning Committee members or any other District Council member who has a legitimate interest in seeing it.

The District Council may also need to release information to a third party where another body has a role in providing public subsidy, or where the application is subject to a planning appeal. Any decision not to disclose information will be subject to the District Council's obligations under the Freedom of Information Act and the Environmental Information Regulation.

DPI7: Viability

Where a planning application is not policy compliant, in respect of infrastructure contributions and/or Affordable Housing, at the time of submission the following approach will be taken:

I. A Viability Appraisal must be submitted by the applicant prior to validation of the planning application. It must be based on a policy compliant affordable housing scheme and the District Council's required tenure and size mix, and current costs and values. There must also be a clear correlation between a development's specification, Build Costs and development values.

II. It must be submitted in a clear and accessible format with full supporting evidence to substantiate the inputs and assumptions used. A full working electronic version of the Viability Appraisal model used will be required so that it can be fully tested and interrogated. The Viability Appraisal will be assessed by the District Council with advice from a suitably qualified external consultant/s and the cost of this external advice is to be borne by the Developer.

III. The Viability Assessment will consider whether the approach adopted and the inputs used are appropriate and adequately justified by evidence and experience. It will determine whether the level of infrastructure contributions and affordable housing provision proposed by the applicant are the maximum that can be viably supported or whether a greater level of policy compliance can be achieved.

IV. Where reductions in infrastructure contributions and/ or affordable housing provision are agreed on viability grounds at planning application stage the District Council will include the estimated Gross Development Value and Build Costs at this stage in a planning obligation, together with details of the required Advanced Stage Viability Review.

V. A viability review will be required later in the project, for all schemes where policy requirements are not met in full at the time planning permission is granted. This will enable any increase in viability to be calculated so that greater or full compliance with the Development Plan can be achieved. At the review stage accurate and up to date evidence of Build Costs and Sales Values, the key variables most likely to change over time, will be able to be provided for assessment.

VI. During the Advanced Stage Viability Review the Gross Development Value and Build Costs, will be re-assessed by the District Council with advice from a suitably qualified external consultant and the formula will be applied, to determine whether there has been an increase in viability from that anticipated when the planning application was submitted.

VII. If a surplus (i.e. further profit) results from the application of the formula, it will be split between the District Council and the Developer 60%/40% and the 60% payable to the District Council will be put towards infrastructure contributions and / or off-site affordable

housing provision. This will enable policy requirements which were not deemed deliverable at planning application stage to be met in full or part.

VIII. All Viability Appraisals will be made publicly available on the planning register, in order to increase openness and transparency in the planning process. Redaction of any information will only be allowed in exceptional circumstances

The above policy will also apply where a Developer is asserting that it is not viable to provide 100% affordable housing in the case of a Rural Exception Site, and consequently wishes to provide an element of open market and / or self-build housing up to a maximum of 20% of the total.

17. Implementation and Monitoring

Monitoring is an essential process to ensure the District Plan is meeting its strategic objectives. Below is the monitoring framework for the District Plan. It 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.

The indicators are reported through the Council's Authority Monitoring Report, usually on an annual basis. If it appears that policies are not being effective or are no longer appropriate in light of more recent national policies or local circumstances, then action will be taken to review the policy or policies concerned.

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPS1: Climate Change	1, 5	The objectives listed under DPS1 are monitored under their separate policy areas	-	-	-
DPS2: Sustainable Design and Construction	1	Number of residential schemes meeting 3*/3.5*/4* HQM with 50 credits in energy and/or 12 water ‘	Increase	Developer	Mid Sussex District Council monitoring
		Number of schemes meeting the ‘Excellent’ with ‘Outstanding’ in energy and water/ ‘Outstanding’ rating in the relevant BREEAM Technical Standard	Increase	Developer	Mid Sussex District Council monitoring
DPS3: Renewable and Low Carbon Energy Schemes	1	Number of renewable electricity installations	Increase	Developers, utility providers, local authority	Department for Business, Energy and Industrial Strategy
DPS4: Flood Risk and Drainage	1	Number of planning applications approved contrary to advice on flood risk/ flood defence grounds	Zero	Public agencies, local authority	Environment Agency

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPS5: Water Infrastructure and the Water Environment	1, 6	Number of planning applications approved contrary to advice given by the Environment Agency on water quality issues	Zero	Public agencies, Local Authority	Environment Agency/ Mid Sussex District Council monitoring
		Number of planning applications approved contrary to advice from the statutory sewerage/water undertaker	Zero	Statutory sewerage/ water undertakers, Local Authority	Mid Sussex District Council monitoring
		Incidents of major and significant water pollution within the District	Zero	Developers, Statutory sewerage/ water undertakers, Local Authority, Public agencies	Environment Agency
DPS6: Health and Wellbeing	1, 5, 6, 12, 13, 14, 15	Number of HIAs undertaken	Increase	Developer	Mid Sussex District Council monitoring
DPN1: Biodiversity, Geodiversity and Nature Recovery	3, 5	Amount of priority habitat lost	Zero	Public agencies, local authority	Sussex Biodiversity Records Centre monitoring
		Conditions of SSSIs	Improve	Public agencies, local authority	Sussex Biodiversity Records Centre monitoring
DPN2: Biodiversity Net Gain	3, 5	Percentage biodiversity net gain secured as demonstrated by the Biodiversity Metric	Maximise, but a minimum 10% biodiversity net gain	Developers	MSDC Monitoring Biodiversity Gain Plan
		Number and type of biodiversity units lost or gained	Maximise the biodiversity units gained	Developers	MSDC Monitoring Biodiversity Gain Plan
		Location of secured biodiversity net gain (on-site or off-site)	Secure relevant and meaningful biodiversity net gain linked to wider nature recovery	Developers	MSDC Monitoring Biodiversity Gain Plan

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPN3: Green Infrastructure	5, 6, 15	New green infrastructure assets	Increase	Developers	Mid Sussex District Council monitoring
DPN4: Trees, Woodland and Hedgerows	3, 4, 5	Area of ancient woodland lost	Zero	Developers, local authority	Sussex Biodiversity Records Centre monitoring
DPN5: Historic Parks and Gardens	3, 11	Number of applications permitted contrary to advice received from the Conservation Officer or Historic England	Zero	Local authority	Mid Sussex District Council monitoring
DPN6: Pollution	3, 12	Number of major pollution incidents in the District	Zero	Local authority	Mid Sussex District Council monitoring
DPN7: Noise Impacts	3, 12	Number of noise sensitive developments permitted close to sources of high levels of noise	Zero	Local authority	Mid Sussex District Council monitoring
DPN8: Light Impacts and Dark Skies	3, 12	Number of artificial lighting proposals permitted in the countryside	Minimise	Local authority	Mid Sussex District Council monitoring
DPN9: Air Quality	3, 12	Number of Air Quality Management Areas (AQMAs) in the District	Minimise	Local authority	Mid Sussex District Council monitoring
DPN10: Land Stability and Contaminated Land	3, 12	Number of land stability incidents	Zero	Local authority	Mid Sussex District Council monitoring
		Number of contaminated land incidents	Zero	Local authority	Mid Sussex District Council monitoring
DPC1: Protection and Enhancement of Countryside	3, 11, 15	Percentage of new and converted dwellings on previously developed (brownfield) land	Maximise	Developers, local authority	Mid Sussex District Council monitoring
		Amount of best and most versatile agricultural land lost	Minimise	Developers, local authority	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPC2: Preventing Coalescence	2	Number of planning permissions granted in Local Gaps, where these have been defined in neighbourhood plans	Minimise	Local authority	Mid Sussex District Council monitoring
DPC3: New Homes in the Countryside	3, 10, 13	Number of applications for new dwellings in the countryside overturned on appeal	Zero	Local authority	Mid Sussex District Council monitoring
DPC4: High Weald Area of Outstanding Natural Beauty	3, 11	Number of applications approved contrary to advice from Natural England or the High Weald AONB Unit	Zero	Local authority	Mid Sussex District Council monitoring
DPC5: Setting of the South Downs National Park	3, 11	Number of applications refused as contrary to this policy but overturned on appeal	Zero	Public agencies, local authority	Mid Sussex District Council monitoring
DPC6: Ashdown Forest SPA and SAC	3	SANG capacity	Sufficient for anticipated development	Local authority	Mid Sussex District Council monitoring
		SAMM projects implemented	In line with SAMM Strategy	SAMM Partnership	Mid Sussex District Council monitoring
DPB1: Character and Design	1, 2, 3, 4, 5, 12, 14	Number of planning applications refused as contrary to this policy but overturned at appeal	Zero	Public agencies, local authorities	Mid Sussex District Council Planning
DPB2: Listed Buildings and Other Heritage Assets	2, 4, 11	Number of listed buildings within the district.	No deterioration	Local authority	Mid Sussex District Council monitoring
DPB3: Conservation Areas	2, 4, 11	Number of Conservation Areas with appraisals and management proposals	Increase	Local authority	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPT1: Placemaking and Connectivity	5, 6, 8, 12, 14, 15	Number of sustainable transport schemes implemented	Maximise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
		Number of applications refused on transport grounds	Annual number	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
		Number of agreed travel plans in operation	Maximise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
DPT2: Rights of Way and Other Recreational Routes	5, 15	Number of applications resulting in a net increase in rights of way	Maximise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
		Number of applications resulting in a net loss of rights of way	Minimise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
DPT3: Active Travel	6	Increase in cycling as % of modal share	Maximise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
		Number of schemes identified in the LCWIP supported by applications	Maximise	Local authority	Mid Sussex District Council/ West Sussex County Council monitoring
DPT4: Parking and Electric Vehicle Charging Infrastructure	6	Number of charging points installed	Maximise	Local Authority	Mid Sussex District Council/ West Sussex County Council monitoring
DPT5: Off-Airport Car Parking	6	No net increase in off-airport parking	Minimise	Local Authority	Mid Sussex District Council/ West Sussex County Council monitoring
DPE1: Sustainable Economic Development	1, 2	Net increase / decrease in commercial E(g), B2: General Industrial and B8	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		Storage and Distribution			Availability Survey
		Employment land available – by type (net)	Monitor	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
		Provision of new employment floorspace in neighbouring authorities	Monitor of cross-boundary implications	Local Authorities	Local Authorities
		Number of new businesses setting up in the District	Maximise		Office for National Statistics
		Unemployment	Minimise		Office for National Statistics
DPE2: Existing Employment Sites	1, 2	Net increase / decrease in commercial E(g), B2: General Industrial and B8 Storage and Distribution floorspace	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
DPE3: Employment Allocations	1, 2	Net increase / decrease in commercial Class E, B2: General Industrial and B8 Storage and Distribution floorspace	Net increase per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
DPE4: Town and Village Centres	9	Net increase / decrease in commercial Class E, B2: General Industrial and B8 Storage and Distribution floorspace	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
DPE5: Within Town and Village Centre Boundaries	9	Net increase / decrease in commercial Class E, B2: General Industrial and B8	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		Storage and Distribution floorspace			Leisure Land Availability Survey
DPE6: Development within Primary Shopping Areas	9	Net increase / decrease in commercial Class E	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
		Net increase / decrease in non-town centre uses	Minimise	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey
DPE7: Smaller Village and Neighbourhood Centres	4	No net loss	Minimise	Local Authority	Mid Sussex District Council monitoring
DPE8: Sustainable Rural Development and the Rural Economy	4	Number of new commercial developments approved within the countryside	Increase	Developers, Local Authority	Mid Sussex District Council monitoring
DPE9: Sustainable Tourism and the Visitor Economy	7, 10, 11	New tourism accommodation or attractions	Number	Developers	Mid Sussex District Council monitoring
DPH1: Housing	12, 13	Housing completions in Mid Sussex	To meet identified needs	Developers, Local Authority, highway authority, public agencies, utility companies and service providers	Mid Sussex District Council/ West Sussex County Council annual monitoring
DPH2: Sustainable Development – Outside BUA	12, 13	Housing commitments by parish (outside of BUA) Neighbourhood Plan monitoring Housing commitments	No development to be permitted outside built-up area boundaries unless the site is allocated.	Mid Sussex District Council, Town and Parish Councils	Mid Sussex District Council Monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		contiguous to the BUA			
DPH3: Sustainable Development – Inside BUA	12, 13	Housing commitments on ‘windfall’ or ‘unidentified’ sites (inside BUA)	Maximise	Mid Sussex District Council	Mid Sussex District Council Monitoring
DPH4: General Principles for Housing Allocations	12, 13	The principles listed under DP7 are monitored under their separate policy areas	-	-	-
DPSC1: Significant Site – Land to the West of Burgess Hill	1, 2, 5, 6, 12-15	Number of dwellings completed	In accordance with DPH6	Developers	Mid Sussex District Council monitoring
		Completion of infrastructure requirements (<i>specifics to TBC</i>)	In accordance with DPH6	Developers	Mid Sussex District Council monitoring
DPSC2: Significant Site – Land to the South of Reeds Lane, Sayers Common	1, 2, 5, 6, 12-15	Number of dwellings completed	In accordance with DPH7	Developers	Mid Sussex District Council monitoring
		Completion of infrastructure requirements (<i>specifics to TBC</i>)	In accordance with DPH7	Developers	Mid Sussex District Council monitoring
DPSC3: Significant Site – Land at Crabbet Park	1, 2, 5, 6, 12-15	Number of dwellings completed	In accordance with DPH8	Developers	Mid Sussex District Council monitoring
		Completion of infrastructure requirements (<i>specifics to TBC</i>)	In accordance with DPH8	Developers	Mid Sussex District Council monitoring
DPH5-DPH25: Housing Site Allocations	12, 13	Number of dwellings completed	In accordance with relevant policy	Developers	Mid Sussex District Council monitoring
DPH26: Older Persons Accommodation	12, 13	Number of beds completed by type and tenure (Housing with Care, Housing with Support, Nursing Care. Market/Affordable	Increase	Developers	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPH27: Land at Byanda, Hassocks	12, 13	Number of beds completed	In accordance with DPH31	Developers	Mid Sussex District Council monitoring
DPH28: Land at Hyde Lodge, Handcross	12, 13	Number of beds completed	In accordance with DPH32	Developers	Mid Sussex District Council monitoring
DPH29: Gypsies, Travellers and Travelling Showpeople	12, 13	Number of net permanent pitches completed	Maximise	Local authority	Mid Sussex District Council monitoring
		Number of unauthorised encampments	Minimise	Local authority	Mid Sussex District Council monitoring
DPH30: Self/ Custom Build	12, 13	Number of self-build or custom build dwellings completed	Maximise	Developers, local authority	Mid Sussex District Council monitoring
DPH31: Housing Mix	12, 13	Number of dwellings granted planning permission by size (no. of beds)	In accordance with DPH35	Developers, local authority	Mid Sussex District Council monitoring
		Provision of each accommodation by type of total (house/ flat) (%)	To reflect need	Developers, local authority	Mid Sussex District Council monitoring
DPH32: Affordable Housing	12, 13	Gross number of affordable homes completed (by tenure: Affordable/ Social Rent and Affordable Home Ownership)	Maximise	Developers, local authority, Highway Authority, public agencies, utility companies and service providers	Mid Sussex District Council monitoring
		Financial contributions towards affordable housing provision	Maximise in compliance with DPH36	Developers, local authority, Highway Authority, public agencies, utility companies and service providers	Mid Sussex District Council monitoring
DPH33: First Homes	12, 13	Number of first homes completed	Maximise	Developers, Registered Providers, Local Authority	Mid Sussex District Council monitoring
DPH34: Rural Exception Sites	12, 13	Number of affordable housing dwellings completed on rural exception sites	Maximise in compliance with DPH38	Developers, Registered Providers, Local Authority	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPH35: Dwelling Space Standards	12, 13	Number of planning applications refused contrary to this policy but overturned on appeal	Zero	Developers, local authority	Mid Sussex District Council monitoring
DPH36: Accessibility	12, 13, 14	Number of planning applications refused contrary to this policy but overturned on appeal	Zero	Developers, local authority	Mid Sussex District Council monitoring
		Number of wheelchair-user dwellings completed (Category 2 and 3)	Maximise		
DPI1: Securing Infrastructure	6	Infrastructure provided through development	Infrastructure provided	Developers, local authority	Mid Sussex District Council monitoring
DPI2: Planning Obligations	6	Section 106 planning obligations monitoring	Amount secured, received and spent	Local authority	Mid Sussex District Council monitoring
DPI3: Major Infrastructure Projects	6	Number of EIA planning applications received	Infrastructure provided	Developers, local authority	Mid Sussex District Council monitoring
		Number of applications the Council is consulted on	Monitor	Developers, local authority	Mid Sussex District Council monitoring
DPI4: Communications Infrastructure	6, 7, 8	Amount of digital infrastructure installed	Maximise	Public agencies, local authority	Mid Sussex District Council monitoring
DPI5: Open Space, Sport and Recreational Facilities	6, 15	Amount of open space, leisure, sport and recreational facilities provided	In line with requirements	Developers, local authority	Mid Sussex District Council monitoring
		Amount of open space, leisure, sport and recreational facilities lost	Minimise	Developers, local authority	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPI6: Community and Cultural Facilities and Local Services	6, 12, 15	Amount of community and cultural facilities and local services provided	In line with requirements	Developers, local authority	Mid Sussex District Council monitoring
		Amount of community and cultural facilities and local services lost	Minimise	Developers, local authority	Mid Sussex District Council monitoring
DPI7: Viability	6, 12, 13	Number of applications accompanied by viability assessments challenging required contributions	In line with requirements	Developers, local authority	Mid Sussex District Council monitoring

18. Saved Policies

On adoption of the District Plan most of policies in the Mid Sussex District Plan (2018) will be replaced this District Plan. In addition, three policies from the Site Allocations DPD (2022) will also be replaced by policies in this District Plan.

There are also allocations from the Mid Sussex Local Plan (2004) and Small Scale Housing Allocations DPD (2008) which have not been implemented and will continue to be saved policies on adoption of this District plan.

The tables below set out which policies will be replaced and which policies continue to form part of the development plan.

Site Allocations Development Plan Document (2022) Policies that will be replaced on adoption of the District Plan 2021 - 2039

Site Allocation DPD Policy	Reason/ Replacement policy
SA GEN	Replaced by Annex1 and District Plan 2039 when read as a whole.
SA 1 Sustainable Economic Development	Individual site allocations remain saved
SA10 Housing	Replaced by DPH1
SA11 Housing allocations	Individual site allocations remain saved
SA38 Air Quality	Replaced by DPN9: Air Quality
SA34 Existing Employment Sites	Replaced by DPE2: Existing Employment Sites

District Plan (2018) Policies that will be replaced on adoption of the District Plan 2021 - 2039

District Plan Policy	Reason/ Replacement policy
DP1 Sustainable Economic Development	DPE1
DP2 Town and Village Centre Development	DPE4
DP3 Within Town and Village Centre Boundaries	DPE5 DPE6
DP4 Housing	DPH1
DP5 Planning to Meet Future Housing Need	not replaced
DP6 Settlement Hierarchy	DPH2 DPH3
DP12 Protection and Enhancement of the Countryside	DPC1
DP13 Preventing Coalescence	DPC2
DP14 Sustainable Rural Development and the Rural Economy	DPE7
DP15 New Homes in the Countryside	DPC3
DP16 High Weald Area of Outstanding Natural Beauty	DPC4
DP17 Ashdown Forest SPA and SAC	DPC6
DP18 Setting of the South Downs National Park	DPC5
DP19 Sustainable Tourism and the Visitor Economy	DPE8
DP20 Securing Infrastructure	DPI1
DP21 Transport	DPT1

DP22 Rights of Way	DPT2
DP23 Communications Infrastructure	DPI4
DP24 Leisure and Cultural Facilities	DPI5
DP25 Community and Local Services	DPI6
DP26 Character and Design	DPB1
DP27 Space Standards	DPH39
DP28 Accessibility	DPH40
DP29 Noise, Air and Light pollution	DPN6 DPN7 DPN8
DP30 Housing Mix	DPH35
DP31 Affordable Housing	DPH36
DP32 Rural Exception Sites	DPH38
DP33 Gypsies, Travellers and Travelling Showpeople	DPH33
DP34 Listed Buildings and Other Heritage Assets	DPB2
DP35 Conservation Areas	DPB3
DP36 Historic Parks and Gardens	DPN5
DP37 Trees, Woodland and Hedgerows	DPN4
DP38 Biodiversity	DPN1
DP39 Sustainable Design and Construction	DPS2
DP40 Renewable Energy Schemes	DPS3
DP41 Flood Risk and Drainage	DPS4
DP42 Water Infrastructure and the Water Environment	DPS5

Local Plan (2004) Policies that will no longer be saved on adoption of the District Plan 2021 - 2039

Saved Local Plan Policy	Reason
Burgess Hill	
BH1 Open Air Market, Cyprus Road	Burgess Hill Neighbourhood Plan polices, allow for residential development on site. No evidence of deliverability since site allocated in 2004.
BH2 The Oaks Centre, Junction Road	No evidence of deliverability since site allocated in 2004. Site in built up area and could come forward as windfall development subject to other policies in the Development Plan.
BH3 Station Yard and Car Park Burgess Hill	Replaced by District Plan Policy DPH7
East Grinstead	
EG2 The Portlands	Policy superseded by East Grinstead Neighbourhood Plan Policy EG4a.
EG5 East Grinstead Lawn Tennis Club	Land owner confirmed site not available for development.
Haywards Heath	
HH11 Land north of Rookery Farm	Policy superseded by Haywards Heath Neighbourhood Plan Policy H2. Site under construction.

Pease Pottage	
PP1 Hemsley nursery – residential (implemented) and public open space (not implemented)	Public Open Space now implemented
Turners Hill	
TH1 Land at Clock Field	Development complete
Rural Areas	
RA2 Rowfant Business Centre	The objectives of this policy are duplicated in other District Plan policies including DPT1 Transport. Site specific policy no longer required. Policy brought forward into Turners Hill Neighbourhood Plan.

Small Scale Housing Site Allocations DPD (2008) will no longer be saved on adoption of the District Plan 2021 - 2039

Small Scale Housing Site Allocations DPD Policy	Reason
SSH/1 Dunnings Mill Squash Club, East Grinstead	Implemented
SSH/2 Land at Junction of Windmill Lane and London Road, East Grinstead	Not implemented but no evidence that site is deliverable
SSH/3 Sandrocks Rocky Lane Haywards Heath	Implemented
SSH/4 Covers Timber Yard, Fairfield Way Burgess Hill	Implemented
SSH/5 Gas Holder Site Leyland Road Burgess Hill	Implemented
SSH/7 land south of the old Convent Moat Road East Grinstead	Implemented
SSH/8 L/A Moatfield Surgery St Michael's Road East Grinstead	Implemented
SSH/9 Land south of Grange Road Crawley Down	Implemented
SSH/10 land north west of Chatfield Road Cuckfield	Implemented
SSH/11 land at Gravelye lane/ Lyoth Lane Lindfield	Implemented
SSH/12 Land rear of Newton Road Lindfield	Implemented
SSH/13 Fodlers Meadow Burgess Hill	Implemented
SSH/14 Keymer Tiles Works Nye Road Burgess Hill	Implemented
SSH/15 Land north of Matlings Park Burgess Hill	Implemented
SSH/16 land adjacent to Manor Road Burgess Hill	Implemented

SSH/17 Land west of Mackie Avenue Hassocks	Implemented
SSH/18 land adjoining Ashplatts House Holtyle Road East Ginstead	Implemented

District Plan Policies that will be saved on adoption of the District Plan 2021 - 2039

Saved District Plan Policy	Policy type	Reason
DP7: General Principles for Strategic Development at Burgess Hill	Strategic allocation	Policy yet to be fully implemented
DP8: Strategic Allocation to the east of Burgess Hill Kingsway	Strategic allocation	Policy yet to be fully implemented
DP9: Strategic Allocation to the north and north-west of Burgess Hill	Strategic allocation	Policy yet to be fully implemented
DP10: Strategic Allocation to the east of Pease Pottage	Strategic allocation	Policy yet to be fully implemented
DP11: Strategic Allocation to the north of Clayton Mills	Strategic allocation	Policy yet to be fully implemented

Site Allocations Development Plan Document (2022) Policies that will be saved on adoption of the District Plan 2021 - 2039

Site Allocation DPD Policy	Policy type	Reason
SA2 Burnside Centre, Victoria Road	Employment Allocation	Not implemented
SA3 Site of Former KDG, Victoria Road	Employment Allocation	Not implemented
SA4 Land north of the A264 at Junction 10 of M23	Employment Allocation	Not implemented
SA5 Land at Bolney Grange Business Park	Employment Allocation	Not implemented
SA6 Marylands Nursery, Cowfold Road	Employment Allocation	Not implemented
SA7 Cedars, Brighton Road	Employment Allocation	Not implemented

SA8 Pease Pottage Nurseries, Brighton Road	Employment Allocation	Not implemented
SA9 Science and Technology Park	Employment Allocation	Not implemented
SA12 Land south of 96 Folders Lane	Housing Allocation	Not implemented
SA13 land south of Folders lane and east of Keymer road	Housing Allocation	Not implemented
SA14 land south of Selby Close	Housing Allocation	Not implemented
SA15 land south of Southway	Housing Allocation	Not implemented
SA16 St Wilfird's School	Housing Allocation	Not implemented
SA17 Woodfield House	Housing Allocation	Not implemented
SA18 Former East Grinstead Police Station	Housing Allocation	Not implemented
SA19 Land south Crawley Down Road	Housing Allocation	Not implemented
SA20 land south and west of Imberhorne School	Housing Allocation	Not implemented
SA21 land at Rogers Farm	Housing Allocation	Not implemented
SA22 land north of Burleigh Lane	Housing Allocation	Not implemented
SA23 land at Hanlye lane	Housing Allocation	Not implemented
SA24 land north of Shepherds Walk	Housing Allocation	Not implemented
SA25 land west of Selsfield Road	Housing Allocation	Not implemented
SA 26 land south of Hammerwood Road	Housing Allocation	Not implemented
SA27 land at St Martin close (West)	Housing Allocation	Not implemented
SA28 land south of The Old Police House	Housing Allocation	Not implemented
SA29 land south of St Stephens Church	Housing Allocation	Not implemented
SA30 land north of lyndon Reeds lane	Housing Allocation	Not implemented
SA31 Land to rear of Firlands Church Road	Housing Allocation	Not implemented

SA32 Withypitts Selsfield Road	Housing Allocation	Not implemented
SA33 Ansty Cross Garage	Housing Allocation	Not implemented
SA35 Safeguarding land for Strategic Highway improvements	Safeguarding	Not implemented
SA36 Wivelsfield Station	Safeguarding	Not implemented
SA37 Burgess Hill/ Haywards Heath cycle network	Safeguarding	Not implemented

Small Scale Housing Allocation DPD Policies that will be saved on adoption of the District Plan 2021 - 2039

Saved Small Scale Housing DPD Policy	Policy type	Reason
SSH/6 Station Goods Yard, Keymer Road, Hassocks	Housing allocation	Not implemented

Local Plan (2004) Policies that will continue to be saved on adoption of the District Plan 2038

Saved Local Plan Policy	Policy type	Reason
East Grinstead		
EG8 Stonequarry Woods	Housing	Planning Application pending consideration September 2022. Shows intention of land owner to bring site forward for housing development.

19. Glossary

Abbreviations

AONB Area of Outstanding Natural Beauty

AQMA Air Quality Management Areas

BOA Biodiversity Opportunity Area

BREEAM Building Research Establishment Environment Assessment Method

CIL Community Infrastructure Levy

DCO Development Consent Order

DPD Development Plan Document

HDT Housing Delivery Test

HIA Health Impact Assessment

HRA Habitats Regulations Assessment

IDP Infrastructure Delivery Plan

LDD Local Development Document

LDF Local Development Framework

LCWIP Local Cycling and Walking Infrastructure Plan

LDS Local Development Scheme

LEP Local Economic Partnership

LNR Local Nature Reserve

LPA Local Planning Authority

LSP Local Strategic Partnership

MR Monitoring Report

NPPF National Planning Policy Framework

NPPG National Planning Practice Guidance

NPs National Policy Statement

NSIP Nationally Significant Infrastructure Projects

OAN Objectively Assessed Need

PDL Previously Developed Land

PPG Planning Practice Guidance

RIGS Regionally Important Geological and Geomorphological Sites

SA Sustainability Appraisal

SAC Special Area of Conservation

SANG Suitable Alternative Natural Greenspace

SAMM Strategic Access Management and Monitoring

SCI Statement of Community Involvement

SEA Strategic Environmental Assessment

SFRA Strategic Flood Risk Assessment

SHMA Strategic Housing Market Assessment

SNCI Site of Nature Conservation Importance

SPA Special Protection Area

SPD Supplementary Planning Document

SSSI Sites of Special Scientific Interest

SuDS Sustainable Drainage Systems

Affordable Housing: housing for sale or rent, for those whose needs are not normally met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:

- a) **Affordable housing for rent:** meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).
- b) **Discounted market sales housing:** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and household prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.
- c) **Other affordable routes to home ownership:** is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low-cost homes for sale (at a price equivalent to at least 20% below market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.

Ancient Woodland – Areas that have had continuous woodland cover since 1600, non-statutory designations.

Aged or veteran tree – A tree which, because of its great age, size or condition is of exceptional value for wildlife, in the landscape or culturally.

Appropriate planning document – This could be a Development Plan Document, a Supplementary Planning Document, or technical note depending upon the role and objective of the document.

Area of Outstanding Natural Beauty (High Weald AONB) – Areas designated to conserve and enhance natural beauty, wildlife and cultural heritage; and to meet the need for quiet enjoyment of the countryside and have regard for the interests of those who live and work within them.

Biodiversity Net Gain – An approach to development that leaves development in a better state than before.

Biodiversity Opportunity Area – Areas that identify where the greatest opportunities for habitat creation and restoration lie at a landscape scale; they enable the efficient focusing of resources to where they will have the greatest positive conservation impact, representing a more efficient way of delivering action on the ground.

Burgess Hill Town-Wide Strategy – This strategy, prepared by Burgess Hill Town Council, sets out the general principles, visions and objectives for Burgess Hill over the plan period and provides a foundation on which policies addressing strategic development at Burgess Hill are based.

Carbon capture – A process to store carbon dioxide. Nature-based solutions to carbon capture can include restoration of ecosystems and tree planting to increase natural carbon storage. Nature-based solutions can also have benefits for biodiversity and nature recovery.

Carbon sequestration – The process of capturing and storing atmospheric carbon dioxide to reduce the amount of carbon dioxide in the atmosphere in response to climate change. Examples of carbon sequestration include storing carbon in trees through afforestation.

Carbon sink – An ecosystem that absorbs more carbon from the atmosphere than it releases, for example, plants, trees, soil and the ocean.

Circular Economy – The circular economy is a [model of production and consumption](#), which involves sharing, leasing, reusing, repairing, refurbishing and recycling existing materials and products as long as possible. In this way, the life cycle of products is extended and the production of waste is minimised.

Climate Change – Climate change is a large-scale, long-term shift in the planet's weather patterns or average temperatures (MET Office)

Commitments – Sites already in the planning process which have planning permission for residential development or are allocated in a Development Plan Document.

Community Facilities and Local Services – Public locations that meet a range of community needs such as providing support services, public information, and space for

group activities. Includes local shops, places of worship, public houses, education facilities, health and care facilities, libraries, emergency services, and community centres.

Community Infrastructure Levy – A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Comparison shopping – The provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.

Contiguous – sharing a common border, touching

Convenience Retailing Relates to the purchase of everyday essential items, including confectionary, food and drink, of goods in classification of individual consumption according to purpose (COCIP) categories such as: food and non-alcoholic beverages, tobacco, alcoholic beverages (off-trade), newspapers and periodicals, non-durable household goods.

Development Plan – As set out in section 38(6) of the Planning and Compulsory Purchase Act, an area's development plan consists of the Development Plan Documents contained within the Local Development Framework.

Development Plan Documents (DPDs) – These documents include the District Plan and the Small Scale Housing Allocation Development Plan Document.

District Plan – This document is the principal Development Plan Document, setting out the long-term strategic vision for the District, as well as objectives for the area and strategic policies.

Ecosystem services – The benefits and services provided to people and wider society by the natural environment. Ecosystem services are categorised into four types, however, there is significant interaction between them: Provisioning Services, Regulating Services, Supporting Services and Cultural Services.

Economic Viability – The financial feasibility of development.

Evidence base – The evidence that any development plan document, in particular the District Plan, is based on. It is made up of the views of stakeholders and background facts about the area.

Geodiversity – The range of rocks, minerals, fossils, soils and landforms.

Green Infrastructure – A network of multi-functional green and blue spaces and other natural features, urban and rural which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.

Gypsies and Travellers – Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

Habitats Regulations Assessment – An assessment of the potential effects of planning policies on European nature conservation sites.

Habitats Site – Any site which would be included within the definition at Regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of these regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Sites of Community Importance, Special Protection Areas and any relevant Marine Sites.

High Quality Business Park – a location which provides an appropriate mix of high quality well designed B1(b), B1(c), B2 and B8 premises set within a high quality public realm. The premises should offer a range and appropriate mix of sizes in order to accommodate different business requirements and to meet local employment needs.

Housing Delivery Test – Measures net homes delivered

Infrastructure – Includes roads and other transport facilities; flood defences; schools and other educational facilities; medical facilities; sporting and recreational facilities; and open spaces. Examples of key infrastructure categories, and the elements within each group are provided as follows.

Infrastructure Category	Elements Relevant to Mid Sussex
Transport	<ul style="list-style-type: none"> • Road networks • Rail networks • Bus services • Cycling, walking and equestrian routes • Other public rights of way (PROW) • Parking facilities
Education	<ul style="list-style-type: none"> • Pre-school and nursery schools • Primary and secondary education • Further and higher education • Special educational needs • Adult education
Health	<ul style="list-style-type: none"> • GPs, health centres and other community care facilities such as day-care centres • Clinical Commissioning Groups • Mental health hospitals and other support • Acute and general hospitals • Dental practices • Social care
Social Infrastructure	<ul style="list-style-type: none"> • Specialist accommodation and care falling within Use Class C2 • Social and community facilities, including buildings • Cultural facilities such as arts centres and museums • Sports centres and other recreation facilities • Sports pitches • Play space
Green Infrastructure	<ul style="list-style-type: none"> • Flood defences and flood management schemes

	<ul style="list-style-type: none"> • Sustainable Drainage Systems (SuDS) • Open spaces and parks • Allotments • Biodiversity and nature conservation
Green Infrastructure – Habitats Regulations mitigation	<ul style="list-style-type: none"> • Interventions necessary to mitigate the effects of development on nature conservation sites • Suitable Alternative Natural Greenspace (SANG) • Strategic Access Management and Monitoring (SAMM)
Blue Infrastructure	<ul style="list-style-type: none"> • Water network (that supports native species, maintains natural ecological processes prevents flooding, sustains air and water resources and contributes to the health and quality of life of local communities)
Public and Community Services	<ul style="list-style-type: none"> • Emergency services (ambulance, fire and rescue, police) • Community safety schemes • Libraries • Places of worship • Cemeteries • Waste management and disposal, including recycling facilities

Infrastructure Delivery Plan – Identifies infrastructure needed to support new homes and businesses over the Plan period.

Leisure and Cultural Facilities – This term refers to a broad range of facilities that are available to and enjoyed by the general public for arts, culture, sport and physical activity services including play spaces, open space, sports facilities, cinemas, museums, galleries, heritage and performance spaces.

Listed Building – A building of ‘special architecture or historic interest’ included on a statutory list compiled by the Secretary of State for Digital, Culture, Media and Sport

Local Community – A generic term, which includes all individuals (including the general public) and organisations external to the District Council. It includes the statutory and other consultees.

Local Development Document – The collective term for documents that form part of the Local Development Framework. These documents can either be a Development Plan Document, a Supplementary Planning Document or the Statement of Community Involvement.

Local Development Framework – Introduced by the Planning and Compulsory Purchase Act 2004 as the replacement for Local Plans. It is the term used to describe the whole portfolio of planning policy documents (Local Development Documents) setting out the planning strategy and policies for the area. It consists of Development Plan Documents, Supplementary Planning Documents, a Statement of Community Involvement, the Local Development Scheme and the Annual Monitoring Report.

Local Development Scheme – This document sets out the timetable for the preparation of the Local Development Documents. It identifies which Development Plan Documents and Supplementary Planning Documents are to be produced and when.

Local Enterprise Partnership (LEP) - A body, which was designated by the Secretary of State for Communities and Local Government and was established for the purpose of creating or improving the conditions for economic growth in an area.

Local Nature Reserve (LNR) – Designated by the local authority and managed for either nature conservation or to provide recreational opportunities to communities.

Local Distinctiveness – Local distinctiveness is the physical, environmental, economic or social factors that characterise an area (and most likely a combination of all four), as well as how an area interacts with others.

Localism Act 2011 – The Localism Act contains a new power of competence for local government, new Neighbourhood Plans and development orders, and a new duty to co-operate to replace Regional Strategies. It was given Royal Assent of 15th November 2011.

Mineral Consultation Area – A geographical area based on a Mineral Safeguarding Area, where the district or borough council should consult the Mineral Planning Authority for any proposals for non-minerals development.

Mobility hub – a recognisable place with an offer of different and connected transport modes supplemented with enhanced facilities and information features to both attract and benefit the traveller such as ‘real time’ passenger information, delivery lockers and e-bike/micro-mobility hire.

Monitoring Report – Part of the local development framework, the annual monitoring report assesses the implementation of the local development scheme and the extent to which policies in local development documents are being successfully implemented.

National Park (South Downs National Park) – Areas designated to conserve and enhance the natural beauty, wildlife and cultural heritage; and to promote opportunities for the understanding and enjoyment of the special qualities of the park.

Multi-functional – Where greenspace or rooms are able to perform a range of functions, affording greater social, environmental and economic benefits.

National Planning Policy Framework 2012 (NPPF) – Sets out the Government’s planning policies for England, and provides a framework within which local people and their accountable councils can produce their own distinctive local and Neighbourhood Plans, which reflects the needs and priorities of their communities.

National Planning Practice Guidance 2014 (NPPG) – A web-based resource containing categorised planning guidance to accompany national planning policy.

National Space Standards –

Number of bedrooms (b)	Number of bed spaces (persons)	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
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1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

* Where a 1b1p has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m² as shown bracketed.

Nature Improvement Areas – Inter-connected networks of wildlife habitats intended to re-establish thriving wildlife populations and help species respond to the challenges of climate change.

NPs National Policy Statement – sets out government policy and provides the legal framework for planning decisions.

NSIP Nationally Significant Infrastructure Projects –large scale projects falling into five categories (Energy, transport, water, waste water and waste)

Neighbourhood Centre/Local Centre - provided alongside housing development to meet the day to day needs of the local community. Uses include retail, education, health, employment, leisure, recreation and community uses sufficient to meet the day to day needs of the local community. The retail provision should be no more than 2,500m² within a single unit subject to it being demonstrated that there would not be a significant adverse impact on Burgess Hill or Haywards Heath Town Centres.

Neighbourhood Plans – Neighbourhood plans are a new way for communities to decide the future of the places where they live and work. The Government introduced the right to prepare Neighbourhood Plans through the Localism Act.

Objectively Assessed Need – The total amount of housing that would be needed to meet, as a minimum, expected levels of growth in population over the plan period. This level of growth expected should take into account demographics (i.e. birth/death rates and migration) and other signals that could influence future trends in demographics.

Policies Map – The adopted Policies Map illustrates all of the policies and proposals in the Development Plan Document and any saved policies that are included in the Local Development Framework.

Previously Developed Land (also known as brownfield land) - Land which is or was occupied by a permanent structure, including the curtilage of developed land (although it

should not be assumed that the whole curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.

Priority habitats and species – Species and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006.

Recreational Routes – These are routes usually created by local authorities, government agencies or volunteer organisations. The routes are usually waymarked and mainly follow existing rights of way. Recreational routes are an important leisure resource alongside the network of existing public rights of way.

Regionally Important Geological and Geomorphological Sites (RIGS) – Also referred to as Local Geological Sites, these are locally designated sites important for geology and geomorphology (i.e. the Earth's landforms and the processes which shape them). Although not having formal statutory protection, RIGS are often also designated as SSSIs.

Rural exception sites – Small sites used for affordable housing in perpetuity where sites would not normally be used for housing. Rural exception sites seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection.

Science Park – A business support environment that encourages and supports the start-up, incubation and development of innovation-led, high-growth, knowledge-based businesses. Initiatives called by other names such as Research Park, Innovation Centre, Technology Park, Technopole or technology-based Incubator – where they aspire to meet the essential criteria set out above - are also included within the definition.

Section 106 Agreement – A binding agreement between the Council and a developer on the occasion of granting a planning permission, regarding matters linked to the proposed development. Used to secure matters necessary to render planning applications acceptable by offsetting the costs of the external effects of development e.g. on local schools, which could not be secured through the imposition of planning conditions.

Section 278 Agreement – A binding agreement between the County Council and a developer used to secure necessary highway improvements to make development acceptable in planning terms.

Sites of Nature Conservation Importance (SNCI) – Locally important sites of nature conservation adopted by local authorities for planning purposes and identified in the local development plan.

Sites of Special Scientific Interest (SSSI) – Areas identified by Natural England as being of special interest for their flora, fauna, or geological or physiographical features.

Strategic Allocations and/or Strategic Development – These are allocations for specific or mixed uses of development contained in Development Plan Documents. The policies in the document will identify any specific requirements for individual allocations.

Strategic Site – A site that delivers 500 dwellings or more that is likely to contribute to a wider than local need and trigger the need for additional services. A strategic site would often provide on-site infrastructure such as a school, community facility, shop or employment land.

Special Area of Conservation (SAC) – Areas given special protection under the European Union’s Habitats Directive, which is transposed into UK law by the Habitats and Conservation of Species Regulations 2010.

Special Protection Area (SPA) – Areas which have been identified as being of international importance for the breeding, feeding, wintering or the migration of rare and vulnerable species of birds found within European Union countries. They are European designated sites, classified under the Birds Directive.

Suitable Alternative Natural Greenspace (SANG) – Green space that is of a quality and type suitable to be used as mitigation for the potential impact of development near the Ashdown Forest Special Protection Area.

Sustainable Community Strategy – Community strategies promote the economic, social and environmental well-being of their areas and contribute to the achievement of sustainable development. A copy of the Mid Sussex Sustainable Community Strategy can be viewed on the Mid Sussex District Council website at: www.midsussex.gov.uk, from the Community Service link.

Stakeholders – Stakeholders include any person or organisation, local or national, who have a legitimate interest in what happens in our area.

Strategic Access Management and Monitoring (SAMM) – A strategy setting out the measures that provide part of the mitigation for new residential development within 7km of the Ashdown Forest SPA. These measures focus on protecting the SPA from new recreational pressures through managing access (visitor) behaviour and monitoring both birds and visitors.

Strategic Flood Risk Assessment (SFRA) – An assessment by the District Council to inform the Local Development Framework of fluvial, surface water, groundwater, infrastructure and reservoir flood risks.

Supplementary Planning Documents – These documents provide supplementary information to the policies in the Development Plan Documents. They do not form part of the Development Plan and are not subject to independent examination.

Sustainability – The creation or maintenance of conditions that fulfil current and future economic, environmental and social requirements.

Sustainability Appraisal – Sustainability Appraisal is a tool for appraising policies to ensure that they reflect sustainable development objectives (i.e. social, economic and environmental

factors). It is required under the Planning and Compulsory Purchase Act to be carried out on all Development Plan Documents and Supplementary Planning Documents.

Sustainable Development – Development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The National Planning Policy Framework places a requirement on local planning authorities to positively seek opportunities to meet the development needs of their area and guide development to sustainable solutions.

Sustainable Drainage Systems (SuDS) – These are drainage systems designed to manage surface water and groundwater to sustainably reduce the potential impact of new and existing developments.

Sustainable Transport Modes – Including walking and cycling, ultra-low and zero emission vehicles, car sharing and public transport.

Travelling Showpeople – Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family's or dependants' more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily or permanently, but excludes Gypsies and Travellers as defined above.

Appendix 1: District Plan Policies – Review Status

Review Status

- **No Update Required:** Policy as written in the District Plan does not require any amendment – remains ‘in date’ with full weight.
- **Minor Update:** Policy as written in the District Plan is still in date however factual corrections, updates (e.g. cross-references or references to changes in policy/SPDs/guidance) or points of clarification are required. Does not change the overall meaning or requirements of the existing policy.
- **Major Update:** Existing policy requires a full review as a result of changing targets, strategy, updated evidence base or national policy.

Policy	Review Status	Reason
DP1: Sustainable Economic Development	Major Update	<ul style="list-style-type: none"> • Update Employment Need figures and economic forecasting, further allocations if required • To reflect the additional requirements set out in the revised NPPF (July 2021)
DP2: Town Centre Development	Major Update	<ul style="list-style-type: none"> • To update Shopping Frontage and any re-definition of town centre boundaries • To reflect evidence base updates, particularly retail needs • To reflect amendments set out in the revised NPPF (July 2021) • To reflect Covid-19 impacts and potential options to facilitate recovery
DP3: Village and Neighbourhood Centre Development	Major Update	<ul style="list-style-type: none"> • To reflect any amendments to be made to the Retail settlement hierarchy • To review change of use restrictions given Covid-19 impacts and to facilitate recovery • To review whether neighbourhood centres should be a requirement for new developments over a certain threshold
DP4: Housing	Major Update	<ul style="list-style-type: none"> • To account for revised Housing Requirement in light of Standard Method and unmet need • To establish the latest position in terms of current supply (completions/commitments) • To set out a strategy/sites to meet the housing need
DP5: Planning to Meet Future Housing Need	N/A	<ul style="list-style-type: none"> • The objectives of this policy are to be addressed through the preparation of the District Plan Review and set out as part of the Plan Strategy
DP6: Settlement Hierarchy	Major Update	<ul style="list-style-type: none"> • To review appropriateness of the ‘contiguous’ policy and to clarify the wording in relation to built-up areas • To review the Settlement Hierarchy and approach to distributing need in accordance with a potentially revised strategy

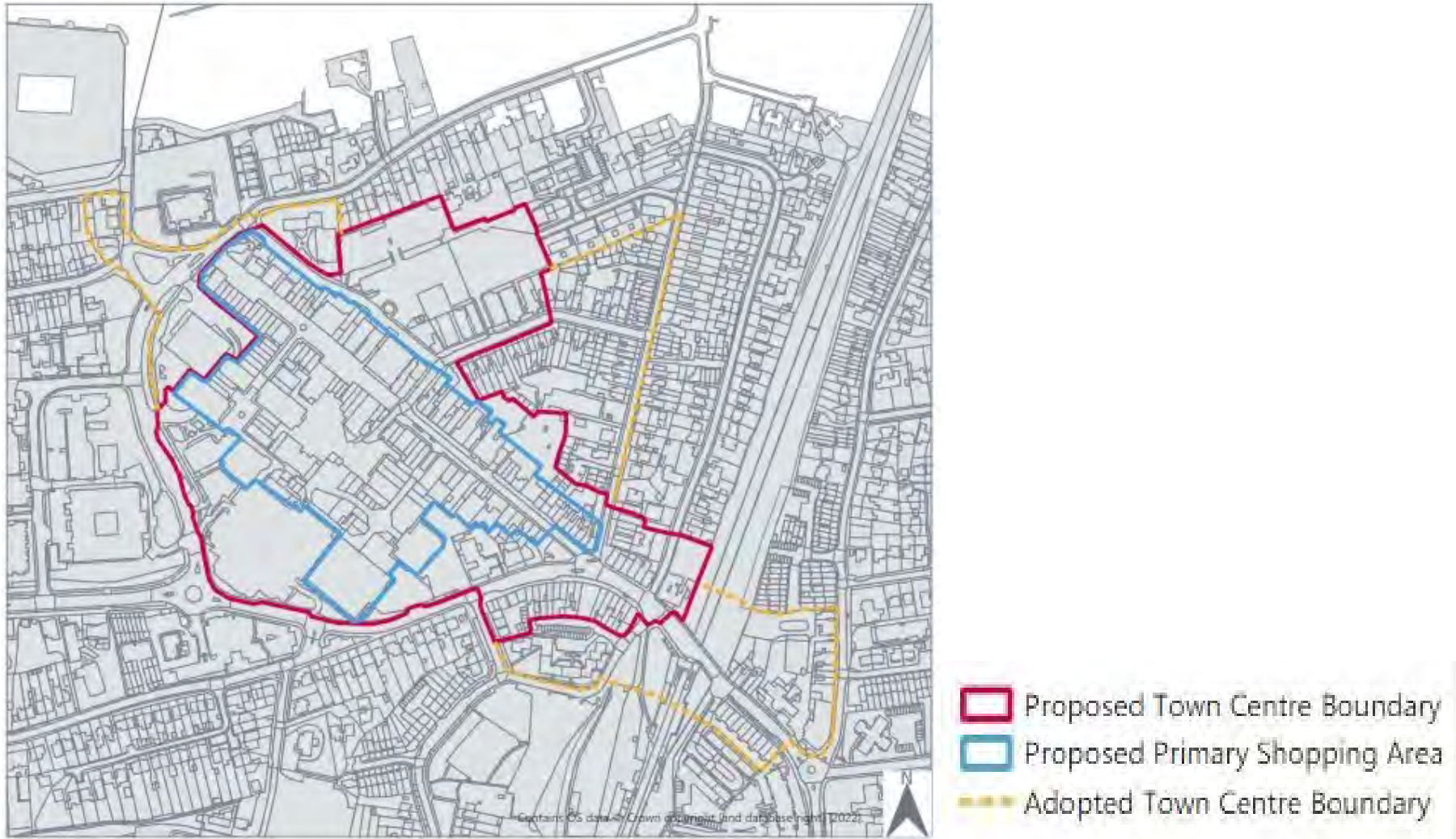
DP7 – DP11: Site Allocations	N/A	To be saved (i.e. will remain as ‘Commitments’ until development complete)
DP12: Protection and Enhancement of Countryside	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP13: Preventing Coalescence	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP14: Sustainable Rural Development and the Rural Economy	Minor Update	<ul style="list-style-type: none"> To reflect the additional requirements set out in the revised NPPF (July 2021) To reflect Covid-19 impacts and facilitate recovery
DP15: New Homes in the Countryside	Minor Update	<ul style="list-style-type: none"> To reflect the additional requirements set out in the revised NPPF (July 2021) Minor updates to references / for clarity
DP16: High Weald Area of Outstanding Natural Beauty	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP17: Ashdown Forest SPA and SAC	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy currently. Review may be required should the SANG/SAMM strategy require amendment – monitor.
DP18: Setting of the South Downs National Park	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP19: Sustainable Tourism	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP20: Securing Infrastructure	Major Update	<ul style="list-style-type: none"> To remove reference to pooling restrictions Update will be required should national policy or legislation introduce additional mechanisms for collecting developer contributions (e.g. National Infrastructure Levy)
DP21: Transport	Major Update	<ul style="list-style-type: none"> To reflect updated West Sussex Transport Plan To reflect the additional requirements set out in the revised NPPF (July 2021) To assess potential for additional parking/EV standards
DP22: Rights of Way and Other Recreational Routes	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP23: Communication Infrastructure	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity

DP24: Leisure and Cultural Facilities and Activities	Minor Update	<ul style="list-style-type: none"> Review the need to update this policy in light of emerging evidence e.g. Leisure studies
DP25: Community Facilities and Local Services	Minor Update	<ul style="list-style-type: none"> Review the need to update this policy in light of emerging evidence e.g. Leisure studies
DP26: Character and Design	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Add reference to Design Guide
DP27: Dwelling Space Standards	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP28: Accessibility	Minor Update	<ul style="list-style-type: none"> To reflect updated evidence within the SHMA The aims and objectives of this policy remain in date and consistent with national policy and current building regulations
DP29: Noise, Air and Light Pollution	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. An update to the 'air' element was included in the Sites DPD
DP30: Housing Mix	Major Update	<ul style="list-style-type: none"> Review of housing mix and whether the policy should be more specific C2 Need – to be addressed in this policy or standalone G&T Need – to be reviewed alongside DP33
DP31: Affordable Housing	Minor Update	<ul style="list-style-type: none"> Affordable housing need to be assessed in a revised SHMA, policy to be updated to reflect this evidence.
DP32: Rural Exception Sites	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP33: Gypsies, Travellers and Travelling Showpeople	Major Update	<ul style="list-style-type: none"> An update will be required to account for updated G&T needs evidence
DP34: Listed Buildings and Other Heritage Assets	Minor Update	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy. Minor updates to references / for clarity
DP35: Conservation Areas	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.
DP36: Historic Parks and Gardens	No Update Required	<ul style="list-style-type: none"> The aims and objectives of this policy remain in date and consistent with national policy.

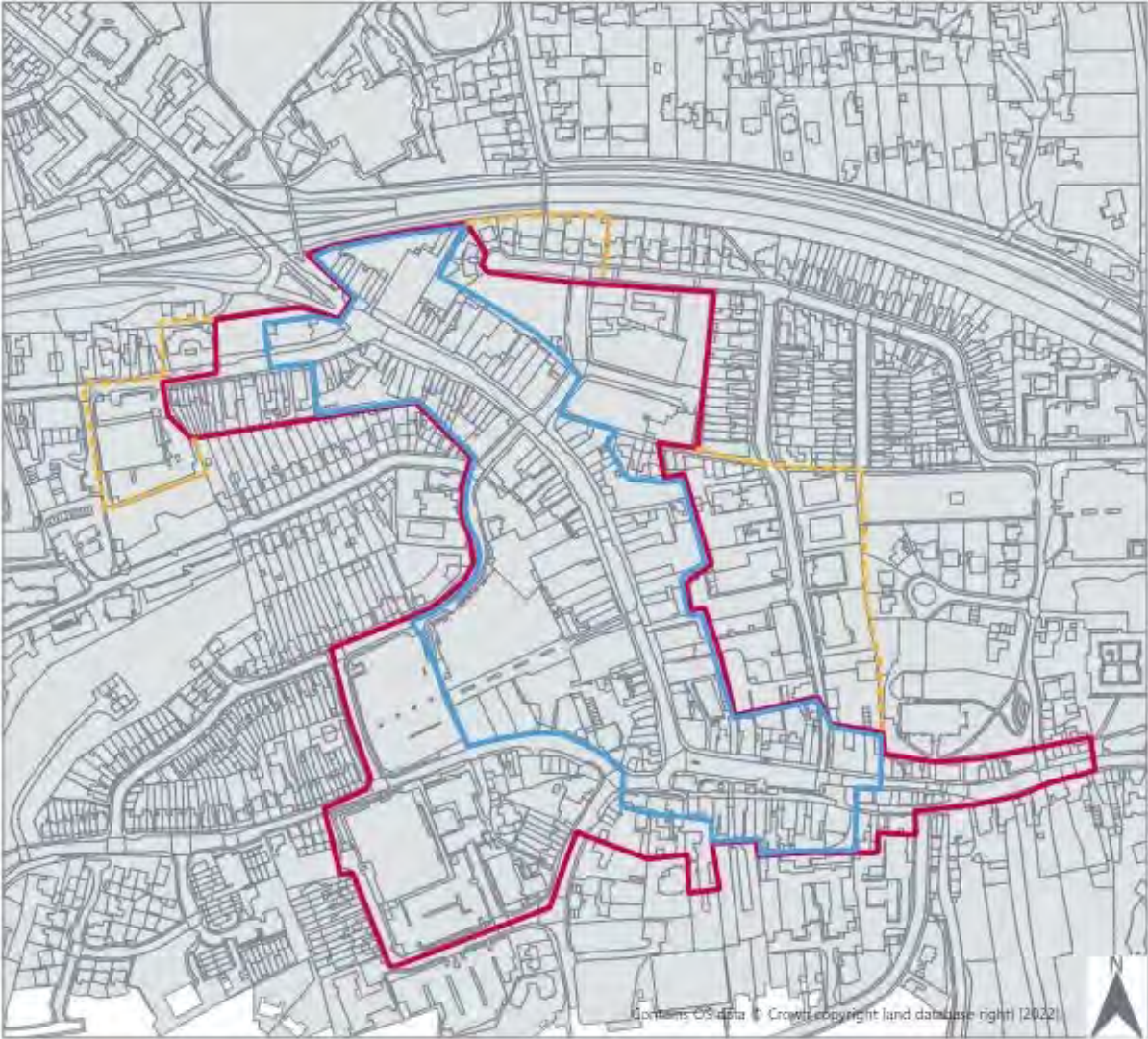
DP37: Trees, Woodland and Hedgerows	Minor Update	<ul style="list-style-type: none"> • The aims and objectives of this policy remain in date and consistent with national policy. • Minor updates to references / for clarity
DP38: Biodiversity	Major Update	<ul style="list-style-type: none"> • To account for forthcoming Government guidance on Biodiversity Net Gain
DP39: Sustainable Design and Construction	Major Update	<ul style="list-style-type: none"> • To reflect the outcomes of the Water Cycle Study and changes to Building Regulations (Future Homes Standard) • To reflect the additional requirements set out in the revised NPPF (July 2021)
DP40: Renewable Energy Schemes	Minor Update	<ul style="list-style-type: none"> • Policy provides sufficient support and therefore is in accordance with the revised NPPF (July 2021) • Minor updates to references / for clarity
DP41: Flood Risk and Drainage	No Update Required	<ul style="list-style-type: none"> • The aims and objectives of this policy remain in date and consistent with national policy.
DP42: Water Infrastructure and the Water Environment	Minor Update	<ul style="list-style-type: none"> • To reflect the outcomes of the Water Cycle Study and changes to Building Regulations (Future Homes Standard) • To reflect the additional requirements set out in the revised NPPF (July 2021)

Appendix 2: Town Centres and Primary Shopping Area Boundaries

Burgess Hill Town Centre

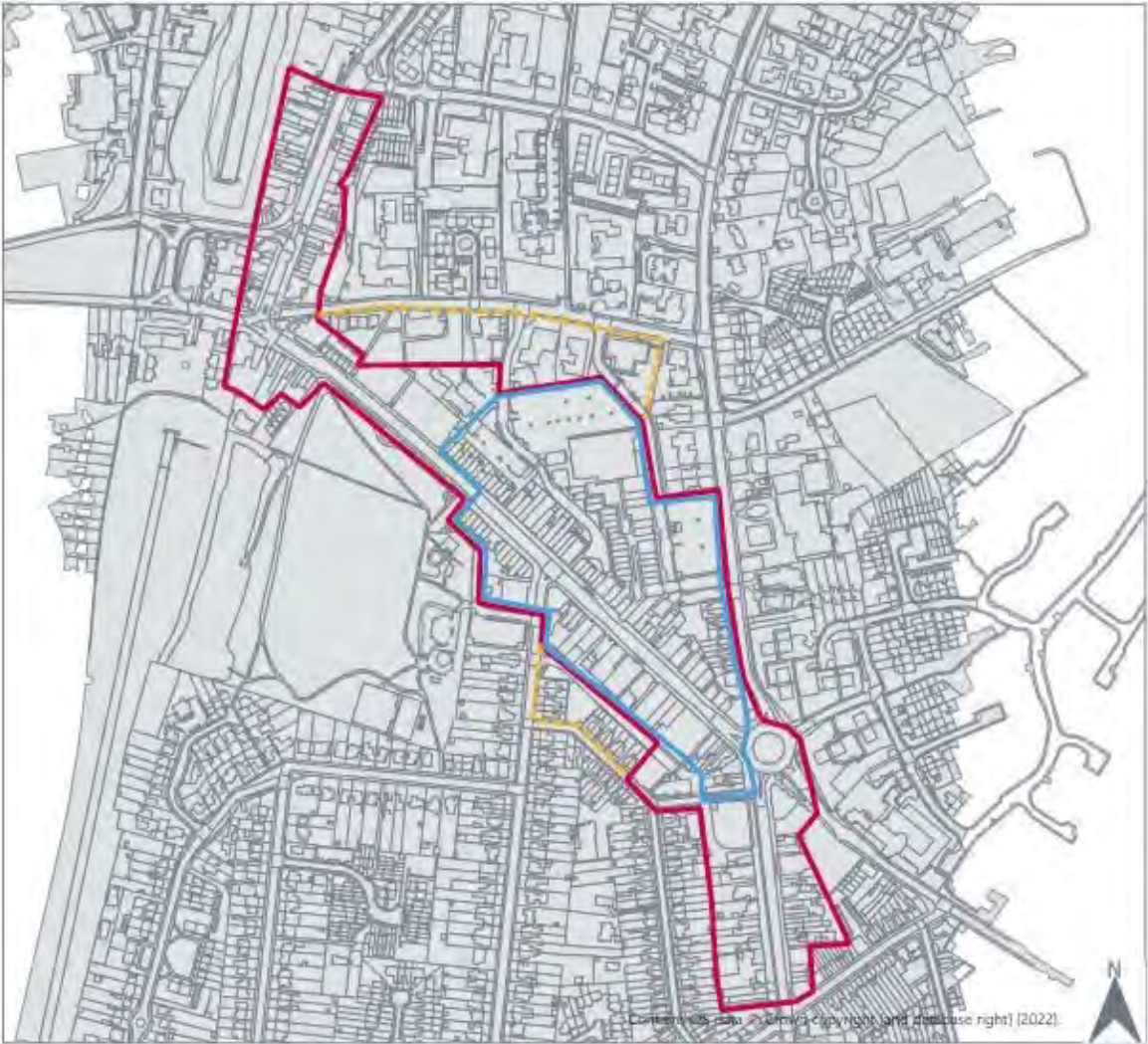





East Grinstead Town Centre



- Proposed Town Centre Boundary
- Proposed Primary Shopping Area
- Adopted Town Centre Boundary

Haywards Heath Town Centre



-  Proposed Town Centre Boundary
-  Proposed Primary Shopping Area
-  Adopted Town Centre Boundary

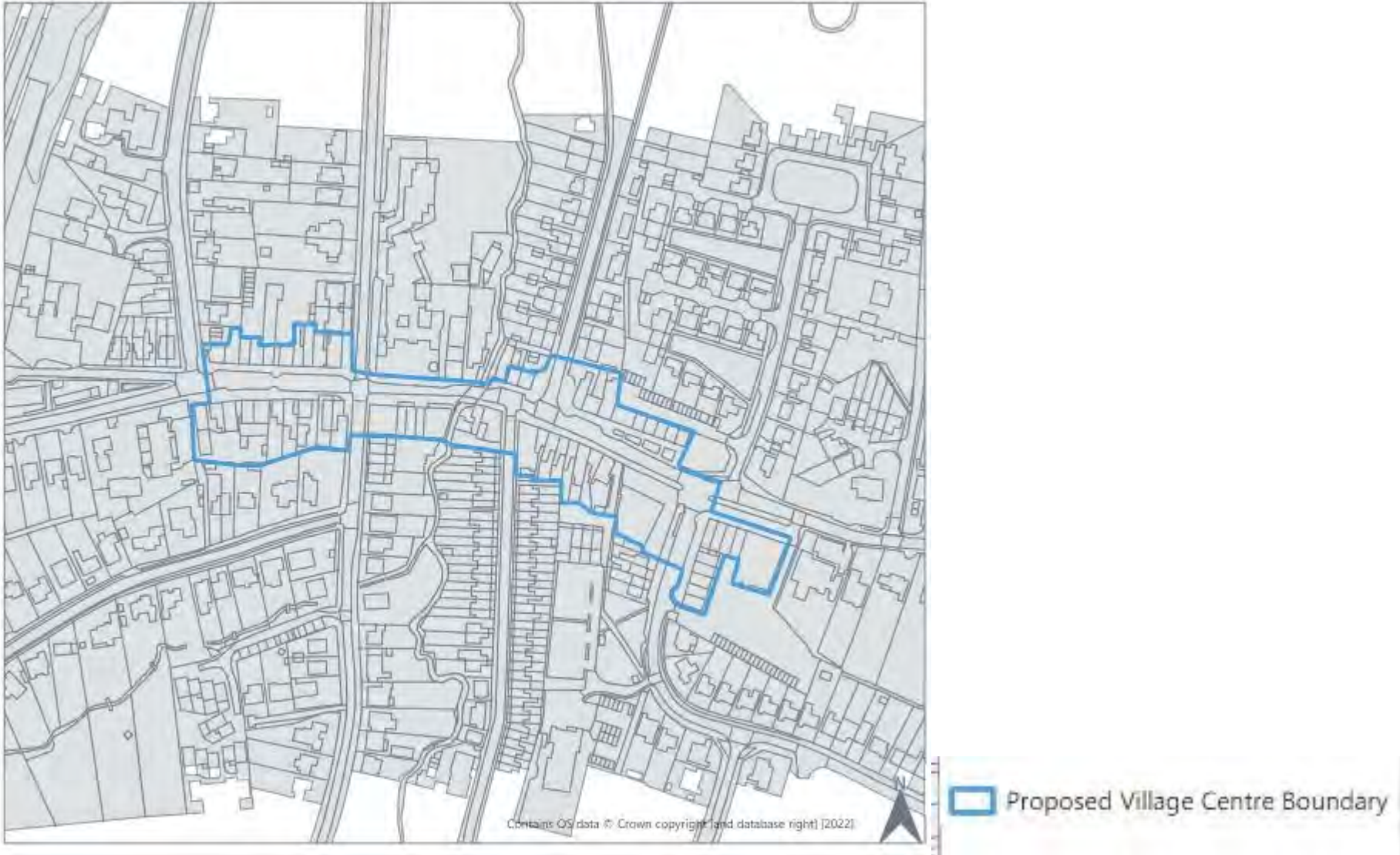
Crawley Down Village Centre



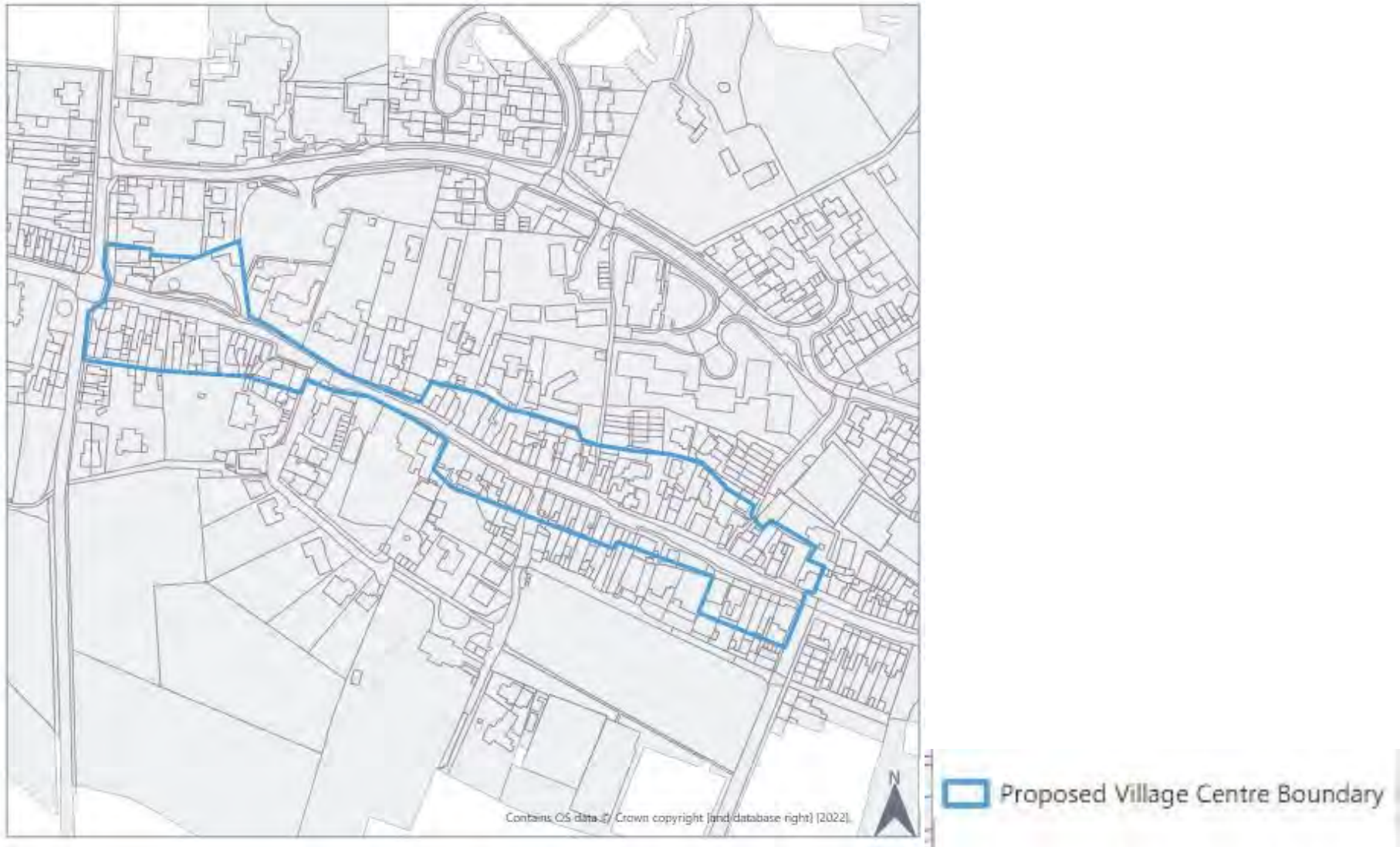
Cuckfield Village Centre



Hassocks Village Centre



Hurstpierpoint Village Centre



Lindfield Village Centre



- Proposed Village Centre Boundary
- Adopted Village Centre Boundary

Appendix 3: Policy DPI7: Viability supporting tables

Information Requirements for Viability Appraisal

Table 1 – Viability Appraisal information and data. The planning application Viability Appraisal should contain as a minimum the following information and data, which should be read in conjunction with Planning Practice Guidance.

	Information / data required	Notes
Appraisal format	<ul style="list-style-type: none"> Printed and electronic version of appraisal in a format that can be fully tested and interrogated Methodology utilised for the appraisal including details of any appraisal software or toolkits used 	
Scheme details	<ul style="list-style-type: none"> Gross and net site area and densities Residential unit numbers, sizes and types of units including a policy compliant split between private and affordable tenures Floor areas: <ul style="list-style-type: none"> Residential: Gross Internal Area (GIA) and Net Saleable Area (NSA) Commercial / Other: Gross Internal Area (GIA) and Net Internal Area (NIA) Proposed specification for each component of development, consistent with assumed costs and values, and target market / occupiers 	
Development programme	<ul style="list-style-type: none"> Project plan, including land acquisition, pre-build, construction and marketing periods and phasing where appropriate Viability cash flow where possible: The timing of cost and income inputs (including interest rates, capitalisation rates, loan costs residential sales rates with reference to project / construction plans and contracts and land / development / letting agreements as relevant). 	
Gross Development Value A	<ul style="list-style-type: none"> Anticipated residential Sales Values, ground rents, sales rates (per month), assumptions regarding forward sales and supporting evidence Anticipated rental values, yields and supporting evidence Details of likely incentives, rent-free periods, voids for any commercial element Anticipated value (and timing of payments) of affordable units based on evidence including details of discussions with Registered Providers and Registered Providers offers 	<ul style="list-style-type: none"> Assumptions relating to development values should be justified with reference to up to date transactions and market evidence relating to comparable new build properties within a reasonable distance of the site, and, where relevant & possible, arrangements with future occupiers. Information relevant to comparable properties should be fully analysed to demonstrate how this has been interpreted and applied to the application scheme. Viability Appraisals should be informed by discussions with a Registered Provider of affordable housing – providers may be able to indicate their likely offer prices Affordable housing values assumed within a Viability Appraisal should reflect the offer/s made by Registered Providers

		for purchasing the affordable housing element of the development and evidenced. Where input is not available, information on rents, management and repair costs, voids, yields / payback period requirements should be submitted. For Shared ownership - % share and rent level on retained equity should be included. Estimated % market value (MV) and £/sq. m indications are also useful benchmarks helping inform a view on the revenue assumptions.
Costs	<ul style="list-style-type: none"> • Build Costs per square metre based on RICS Build Costs Information Service (BCIS), with values correctly reflecting the specific proposal, and justified to show that an appropriate and reasoned approach has been taken in estimating the costs • Abnormal or exceptional costs not reflected in the land value/ price (and detailed reasons why this was not the case) • Where applicants seek to rely on a specific assessment of Build Costs rather than a recognised publicly available source of information (likely to be the case for larger schemes): expected build cost and supporting evidence including a fully detailed elemental cost plan demonstrating the basis of cost estimations and evidence of contractor costs. • Disaggregated abnormal costs (if relevant) that can be benchmarked against BCIS • Details of other costs such as demolition and supporting evidence including clarity on any additional assumptions such as those relating to external / site works 	<ul style="list-style-type: none"> • Development costs adopted within Viability Appraisals should be determined based on current day figures at the point of the planning application submission. • The RICS Build Costs Information Service (BCIS) is a publicly available source of cost information which can be used in Viability Appraisals. The selection of BCIS values must correctly reflect the specific nature, location and size of proposal, and be justified to show that an appropriate and reasoned approach has been taken in estimating the costs. • Abnormal costs should come with an explanation of the need / relevance and cost estimate information / reasoning for the assumed cost levels • It should not be assumed that abnormal costs would necessarily be borne exclusively at the expense of compliance with the Development Plan, as a site involving abnormal development costs is likely to attract a lower land value than could be achieved on a site where this was not the case. • Where a specific assessment of Build Costs is relied on, rather than standardised costs from a recognised source, or where any abnormal costs are applied, Build Costs will be reviewed on an open book basis as a part of a viability review. Costs should be provided for different components of the scheme including market and affordable housing. • The District Council will expect a clear correlation to be evident between a development's specification, assumed Build Costs and development values.
Fees	<ul style="list-style-type: none"> • Sales / letting and professional fees and supporting evidence 	<ul style="list-style-type: none"> • Build; sales / marketing costs

<p>Developer profit</p>	<ul style="list-style-type: none"> • Profit on cost or value • Supporting evidence from applicants to justify proposed target rates of profit taking account of the individual characteristics of the scheme 	<ul style="list-style-type: none"> • In accordance with the NPPG the District Council will avoid a rigid approach to profit levels. The District Council will consider the individual characteristics of each scheme when determining an appropriate profit level and will require supporting evidence from applicants and lenders to justify why a particular return is appropriate, having regard to site specific circumstances, market conditions and the scheme's risk profile. • The appropriate level of Developer profit will vary from scheme to scheme. This is determined by a range of factors including property market conditions, individual characteristics of the scheme, comparable schemes and the development's risk profile. The lower the scheme's risk profile, the lower the level of required profit and vice versa. • Profit requirements for affordable housing are generally much lower than those for market sale units given the lower levels of risk associated with securing occupation of affordable units compared with the sale of market units. • Assumptions made must be balanced and internally consistent. In line with this, it should be made clear how the profit level has been adjusted taking into account the other assumed inputs within an appraisal. For example, where a high build cost contingency or other costs at the upper end of typical parameters are adopted as a means of mitigating risk, this would equally be expected to influence the assumed profit target. • The District Council expects that the actual Developer return which is produced as part of the applicant's submitted Viability Appraisal should form the profit threshold (rather than a higher figure) and be regarded as a reasonable return for the applicant. • The most common approach for calculating Developer's profit in Viability Appraisals submitted as a part of the planning process is either as a factor of Gross Development Cost (GDC) or Gross Development Value (GDV)
<p>Benchmark land value</p>	<ul style="list-style-type: none"> • Existing Use Value (EUV) based on evidence including existing income, comparable data and details of condition of existing 	<ul style="list-style-type: none"> • Land value should reflect policy requirements, planning obligations, and CIL charges if applicable in the future

	<p>site. Justification for any alternative land use value / premium applied over EUV, taking account of circumstances of site and planning policy together with this policy</p> <ul style="list-style-type: none"> • Freehold/leasehold titles • Tenancy schedule - to include lease summaries (where appropriate) • Details of income that will continue to be received over the development period (where appropriate) • Arrangements between the landowner and Developer, including any land sale, development or tenancy agreements (where appropriate) • Evidence for how benchmark land value reflects planning policy 	<ul style="list-style-type: none"> • A market value approach may not be appropriate if schemes evidenced are not policy compliant. Where these concerns are evident the District Council will rely on the Existing Use Value / Existing Use Value plus a premium approach applying the guidance set out in this document. • Lower levels of affordable housing should only be tested in addition to a policy compliant scheme where warranted by genuine site specific viability constraints (including where an acceptable benchmark land value cannot be achieved) • An Alternative Use Value benchmark land value will only be accepted where there is a valid consent for the alternative use or if the alternative use would clearly fully comply with the Development Plan. • In any event bearing in mind that land can be overpaid for – a historic or actual site purchase may not be a good indicator of current site value
Planning Contributions	<ul style="list-style-type: none"> • Planning obligation costs • Any Community Infrastructure Levy if adopted in future 	<ul style="list-style-type: none"> • Likely planning obligations (and CIL if adopted in the future) should be included as a development cost in a Viability Appraisal • The timing and level of planning obligations that can be supported as a part of the Viability Appraisal process will be considered. Where these are necessary to make the development acceptable in planning terms however, and these cannot be secured, planning permission will not be granted. • Any CIL instalment policy (if adopted) should be reflected in assumed timings of payments.
Development finance	<ul style="list-style-type: none"> • Finance costs appropriate to the type of proposal, reflecting the fact that finance costs vary throughout the development period, with the majority of interest costs typically incurred during construction and bearing in mind the assumed land purchase timing(s) 	<ul style="list-style-type: none"> • A standardised approach will generally be adopted to finance costs, which should be appropriate to the type of proposal. • The viability model should reflect the fact that finance costs vary throughout the development period, with the majority of interest costs typically being incurred during construction.
Other	<ul style="list-style-type: none"> • A statement to verify the accuracy of the information submitted and that no incentives are being paid • Other information requested by the District Council having regard to the specific application • Depending on individual site circumstances further information may be required which may include: 	

	<ul style="list-style-type: none"> ○ Developers market analysis report; ○ Details of company overheads; ○ Copy of financing offer / letter; ○ Copy of cost plan; ○ Board report on scheme; ○ Letter from auditors concerning land values and write offs; ○ Sensitivity analysis showing different assumption options (e.g. low, medium and high scenarios).
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Advanced Stage Viability Review

Table 2 – The information required for the Advanced Stage Viability Review

The following information & data is required as evidence during the Advanced Stage Viability Review:

	Information / data required	Notes
Gross Development Value A	Gross Development Values (GDV) - all gross receipts or revenue received supported by evidence, including but not limited to: <ul style="list-style-type: none"> • Audited company accounts detailing all sold/ let transactions • Certified sales contracts or completion certificates detailing the purchase price for each sale • Land Registry records showing sale price information • Other receipts, such as income from hoardings 	
Estimated GDV	Estimated GDV for the unsold/ unlet components of the development at the point of review using detailed comparable information taking into account: <ul style="list-style-type: none"> • Any sales/ lettings that have taken place on the development • Income from any other sources. 	
Average residential values per sq. m	Average residential values per sq. m for market and affordable housing across the scheme based on the information provided above	
Actual Build Costs incurred	Payments made or agreed to be paid under the relevant building contract(s), including receipted invoices, or costs certified by the Developer's quantity surveyor, cost consultant or employers agent.	This is not required at planning application stage where Build Costs are based on relevant (index linked) BCIS figures

Estimated Build Costs	Estimated Build Costs to be incurred for the remainder of the development based on the agreed building contract(s) or estimation provided by the Developer's quantity surveyor, cost consultant or employers agent	This is not required at planning application stage where Build Costs are based on relevant (index linked) BCIS figures
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Table 3 - The Advanced Stage Viability Review Contribution Formula

The formula to be used at the Advanced Stage Viability Review to calculate any additional financial contribution payable towards infrastructure contributions and affordable housing provision which was not viable at planning application stage

<p>'Contribution' = $((A + B - C) - (D + E - F)) \times \text{APA}$</p> <p>A = Gross Development Value (GDV) achieved on sale/letting of 75% of residential units and GDV from other parts of the development sold / let and other income receipts *</p> <p>B = Estimated GDV for parts of the development that are yet to be sold / let and other income sources *</p> <p>C = GDV determined as part of the assessment of viability at planning application stage</p> <p>D = Actual Build Costs incurred at point of review *</p> <p>E = Estimated Build Costs for remainder of the development *</p> <p>F = Total Build Costs determined as part of the assessment of viability at planning application stage</p> <p>Notes: (A + B - C) is the change in GDV at the point of review (D + E - F) is the change in Build Costs at the point of review, which is subtracted from the change in GDV to establish whether additional value has been generated as a result of increased values or reduced Build Costs APA = 0.60 calculates the reduction in the contribution required, accounting for the 40% of additional value to be retained by the Developer as an additional profit allowance</p> <p>* Determined as part of the Advanced Stage Viability Review</p>

This formula will be used to calculate whether a 'surplus' is generated, due to the scheme being more financially viable than previously anticipated, by deducting any change in Build Costs from any change in Gross Development Value.

The change in Gross Development Value is calculated by adding together the actual Gross Development Value achieved at the date of review and the estimated Gross Development Value due and deducting from this the Gross Development Value determined as part of the assessment of viability at the planning application stage. The change in Build Costs is calculated by adding together the actual Build Costs incurred at the point of review and the estimated Build Costs due and deducting the total Build Costs determined as part of the assessment of viability at the planning application stage

GUIDANCE NOTE

Methodology

Any additional land value provided by a development over and above the value of the site in its existing use, or an accepted policy compliant alternative use, is dependent on the grant of planning permission, the basis of which is compliance with the Development Plan. Landowner expectations and speculation on land values need to be balanced against the legitimate needs of communities accommodating new development, including the provision of affordable housing and infrastructure.

The Residual Land Value methodology will be used when assessing the viability of schemes since it is consistent with the longstanding principle that policy requirements associated with securing planning permission are development costs that influence the level of any uplift in land value from the grant of planning permission or change of use of land for development.

It determines the 'residual' value that is left available to pay a landowner for their land, once the costs of development (and a reasonable profit for the Developer) are deducted from the gross development value generated by the development. This is then compared with the benchmark land value based on the existing use value or alternative use value of the site.

Existing use value is defined as the value of the site in its existing use, assuming that it remains in such use and has planning permission where necessary for that use. It excludes any hope value associated with proposed development on the site or potential alternative uses. Market transactions used to justify an existing use value must be genuinely comparable to the application site and should relate to sites and buildings of a similar condition and quality, or otherwise be adjusted accordingly.

A premium may be added to the Existing Use Value where justifiable, in order to provide a relevant incentive for the landowner to release the land for development.

An alternative Use Value approach to the benchmark land value will only be accepted where there is an existing implementable permission for that use or the alternative use would fully comply with the Development Plan, and the value attributed must take account of all policy requirements including affordable housing and infrastructure contributions.

If a proposal generates sufficient positive land value after also supporting a suitable level of profit as well as necessary development costs and planning obligations (ie the Residual Land Value is higher or equal to the Benchmark Land Value) it will generally be capable of implementation from a viability point of view. If not, the proposal may not go ahead, unless there are alternative funding sources to 'bridge the gap' or other compelling drivers for it to progress.

Transparency

It is common practice for applicants to seek to place confidentiality restrictions on viability information, normally as a request for exemption from disclosure under the Environmental Information Regulations 2004 and the Freedom of Information Act 2000, on the basis that this would adversely affect the confidentiality of commercial information which protects a legitimate economic interest.

The District Council recognises the importance of public participation and the availability of viability information in the planning process to District Councillors, officers and consultees. The District Council considers that disclosure would not cause an 'adverse effect' which would outweigh the public benefit of such an action; and that information submitted as a part of, and in support of a Viability Appraisal should be treated transparently and be available for wider scrutiny. In submitting

information, applicants should do so in the knowledge that this will be made publicly available alongside other application documents on the public planning register.

Redaction of any information will only be allowed in exceptional circumstances. Applicants wishing to make a case for exceptional circumstances will be required to provide full justification as to the extent to which the disclosure of a specific piece of information would cause an 'adverse effect' and harm to the public interest, to an extent not outweighed by the benefits of disclosure to the public.

The District Council will consider the matter of redaction carefully, with reference to the 'adverse effect' and overriding 'public interest' tests in the Environmental Information Regulations, as well as the specific circumstances of the case. Such issues should be raised at an early stage within the preapplication process. Any justification provided as to the extent of harm which would occur if the information was disclosed will also be placed on the public planning register, irrespective of whether or not accepted.

Annex 1: Overview of Policy Requirements for Housing Allocations

Allocations within the District Plan must be compliant with the development plan when read as a whole; this includes national policy, policies within this plan (including DPH4: General Principles for Housing Allocations and individual allocation policies), and within 'made' Neighbourhood Plans.

The following is a non-exhaustive overview of other development plan policies that will need to be taken into consideration:

Key Objectives

- Contribute towards necessary infrastructure provision, including transport, education, health, community and leisure facilities as required by District Plan Policy **DPI1: Securing Infrastructure**, the **Mid Sussex Infrastructure Delivery Plan (IDP)** and the **Mid Sussex Development Infrastructure and Contributions Supplementary Planning Document (SPD)**.
- Provide 30% affordable housing and a suitable mix of housing in line with District Plan Policies: **DPH31: Housing Mix** and **DPH32: Affordable Housing** and the **Mid Sussex Affordable Housing SPD**.

Urban design principles

- Design new development in accordance with District Plan Policy **DPB1: Character and Design** and with the design principles set out in the **Mid Sussex Design Guide SPD**.
- Design sites within the High Weald AONB regarding accordance with the **High Weald Housing Design Guide**.

Landscape considerations

- conserve and enhance the natural beauty of the High Weald, as set out in the **High Weald Management Plan 2019-2024** and District Plan Policy **DPC4: High Weald Area of Outstanding Natural Beauty**.
- Development within the setting of the South Downs National Park will need to be consistent with National Park purposes and special qualities, as set out in the **South Downs Local Plan** and **South Downs Partnership Management Plan** and with District Plan Policy **DPC5: Setting of the South Downs National Park**.

Social and community

- Contribute towards education capacity (early years, special education needs, primary, secondary and sixth form) in accordance with District Plan Policy **DPI1: Securing Infrastructure**, the **Mid Sussex District Plan IDP** and the requirements set out in the **Mid Sussex Development Infrastructure and Contributions SPD**.
- Contribute towards public open space, recreational and community facilities in accordance with District Plan policy **DPI5: Leisure and Cultural facilities**, **DPI6: Community Facilities and Local Services**, the **Mid Sussex District Plan IDP**, **Playing Pitch Study**, and the requirements set out in the **Mid Sussex Development Infrastructure and Contributions SPD**.

- Contribute towards health care provision, where appropriate, in accordance with District Plan Policy **DPI1: Securing Infrastructure** and the requirements set out in the **Mid Sussex Development Infrastructure and Contributions SPD**.

Historic environment and cultural heritage

- Provide Heritage Impact Assessments, where appropriate, to establish the significance of heritage assets and their settings, the impact of development on this significance and, if appropriate, mitigation strategies in accordance with District Plan policies **DPB2: Listed Buildings and other Heritage assets**, **DPB3: Conservation Areas** and **DPN5 Historic Parks and Gardens**.

Air Quality, Light, Noise and Amenity

- Investigate any potential adverse air, light and noise pollution impacts from the development itself and from neighbouring uses, ensuring that these are avoided, or appropriately mitigated, in accordance with District Plan Policy **DPN6: Noise, Air and Light Pollution** and **DPN9 relating to Air Quality**

Biodiversity and Green Infrastructure

- Conserve and enhance areas of wildlife value and ensure there is a net gain to biodiversity, using the most up-to-date version of the Biodiversity Metric. Avoid any loss of biodiversity through ecological protection and enhancement, and good design. Where it is not possible, mitigate and as a last resort compensate for any loss. Achieve a net gain in biodiversity (measured in accordance with Government guidance and legislation), for example, by incorporating new natural habitats, appropriate to the context of the site, into development and designing buildings with integral bat boxes and bird nesting opportunities, green/brown roofs and green walling, in appropriate circumstances in accordance with District Plan Policy **DPN1: Biodiversity**.

Access and highways

- contribute towards delivering sustainable development and appropriate infrastructure in accordance with District Plan Policy **DPT1: Transport** and the objectives of the **West Sussex Transport Plan 2011 – 2026**.
- Provide adequate car parking in accordance with District Plan Policy **DPT1: Transport**.

Flood risk and drainage

- use Sustainable Urban Drainage Systems (SuDS) principles and methods where possible to drain the surface water from the development. SuDS features shall be designed and managed to provide, where possible, an ecological and water quality enhancement, providing areas for amenity and recreation, in accordance with District Plan Policy **DPS4: Flood Risk and Drainage** and the **West Sussex Lead Local Flood Authority (LLFA) Policy for the Management of Surface Water** and the **Mid Sussex Drainage Advice for Developers**.

Ashdown Forest

- Developments resulting in a net increase in dwellings within the 7km zone of influence around the Ashdown Forest Special Protection Area (SPA) and Special

Area of Conservation (SAC) will require mitigation in order to prevent adverse effects on the Forest and shall accord with District Plan Policy **DPC6: Ashdown Forest SPA and SAC**.

Utilities

- Demonstrate that there is adequate water supply capacity and/or waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users in accordance with District Plan policy **DPS5: Water Infrastructure and the Water Environment**.

Sustainability

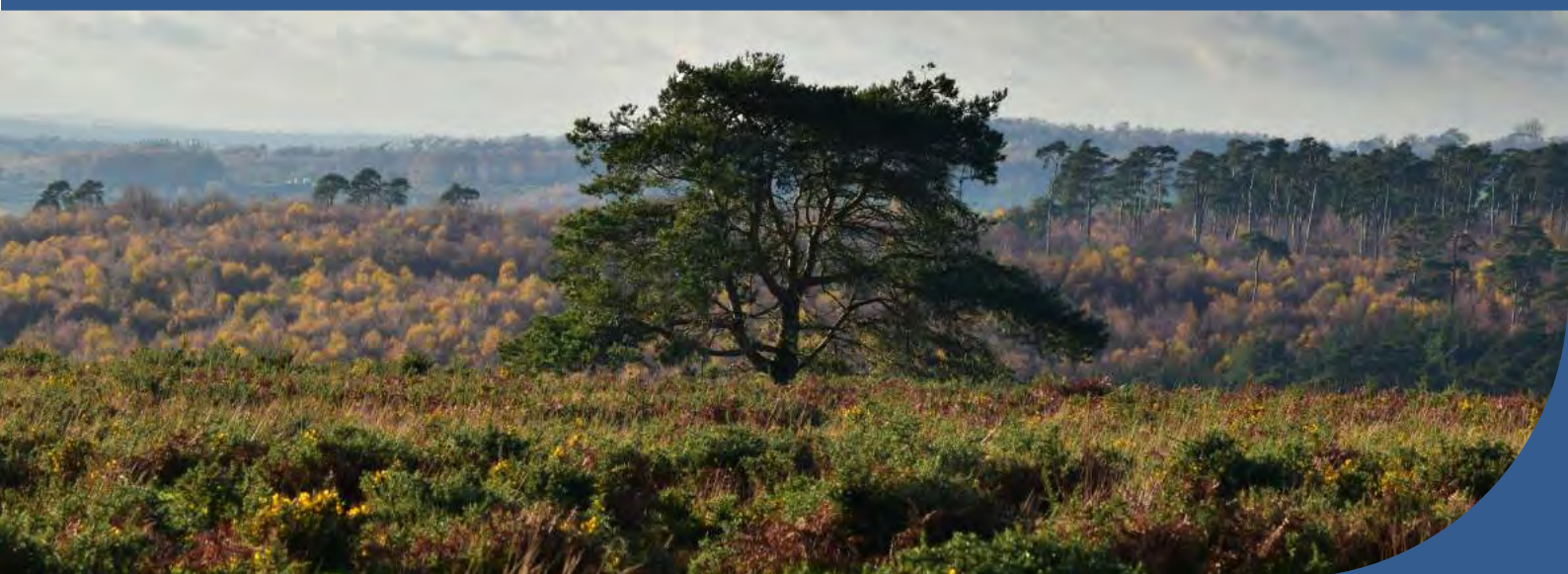
- Address sustainability at the conception stage of development proposals to exploit the benefits of passive design and orientation, fabric performance, energy efficiency measures and low carbon solutions; and wherever possible include on-site low or zero carbon technologies in accordance with District Plan policies **DPS2: Sustainable Design and Construction** and **DPS3: Renewable Energy Schemes**.
- Design development to be resilient to climate change, minimise energy and water consumption and mitigate against flood risk in line with **DPS2: Sustainable Design and Construction**, **DPS4: Flood Risk and Drainage** and **DPS5: Water Infrastructure and the Water Environment**.

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Sustainability Appraisal of the Mid Sussex Development Plan Review

Regulation 18 SA Report

October 2022





Sustainability Appraisal of the Mid Sussex Development Plan Review 2021 - 2039

Regulation 18 SA Report

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Front cover: Ashdown Forest by Mark Wordy

About this report & notes for readers

Lepus Consulting Ltd (Lepus) has prepared this report for the use of Mid Sussex District Council. There are a number of limitations that should be borne in mind when considering the conclusions of this report. No party should alter or change this report without written permission from Lepus.

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This Regulation 18 SA Report is based on the best available information, including that provided to Lepus by the Council and information that is publicly available. No attempt to verify these secondary data sources has been made and they have assumed to be accurate as published. This report was prepared between December 2021 and October 2022 and is subject to and limited by the information available during this time.

This report has been produced to assess the sustainability effects of the Mid Sussex Development Plan Review and meets the requirements of the SEA Directive. It is not intended to be a substitute for an Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Acronyms & Abbreviations

A&E	Accident and Emergency
ALC	Agricultural Land Classification
ANA	Archaeological Notification Area
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BMV	Best and Most Versatile
BUAB	Built Up Area Boundary
DEFRA	Department for Environment, Food and Rural Affairs
DfT	Department for Transport
DM	Development Management
DMRB	Design Manual for Roads and Bridges
DPR	District Plan Review
EU	European Union
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographical Information Systems
GP	General Practitioner
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
LSE	Likely Significant Effect
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
MHCLG	Ministry of Housing, Communities and Local Government
MSDC	Mid Sussex District Council
MSA	Mineral Safeguarding Area
NHS	National Health Service
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PRoW	Public Rights of Way
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHELAA	Strategic Housing and Employment Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
SuDS	Sustainable Drainage System
TAG	Transport Analysis Guidance
TPO	Tree Preservation Order

Executive Summary

About this report

- E1 Lepus Consulting has undertaken a Sustainability Appraisal (SA) of the Mid Sussex District Plan Review (DPR) 2021-2039. SA is the process of informing and influencing the preparation of a Development Plan to optimise its sustainability performance. SA considers the social, economic and environmental performance of the Development Plan.
- E2 Mid Sussex District Council (MSDC) adopted the Mid Sussex District Plan 2014-2031 in March 2018. In this document the Council committed to reviewing the District Plan, starting in 2021, in accordance with the 5-year review requirement set out in national policy. This SA accompanies the consultation draft (Regulation 18) Mid Sussex District Plan Review 2021 – 2039.
- E3 The DPR will set out the development strategy for the Mid Sussex District, excluding the area to the south, which lies within the South Downs National Park. The South Downs National Park Authority is the Local Planning Authority for those areas of the district lying within its boundaries.
- E4 This SA/SEA report is based on the findings of the Scoping Report, prepared by MSDC in November 2021¹. The Scoping Report describes the baseline context and identifies the key sustainability issues in the plan area which informs the preparation of the SA Framework. A copy of the SA Framework is provided in **Appendix A**. The Scoping Report also identifies other plans, projects, programmes, guidance and initiatives, which may influence the nature of change in the plan area.
- E5 The purpose of this report is to provide an appraisal of each option (called 'reasonable alternatives' in SA terms) in the DPR to identify their likely sustainability impacts on each objective of the SA Framework. This will help the Council to evaluate the sustainability performance of different options and to prepare a Local Plan which seeks to be more economically, environmentally and socially sustainable.

Summary findings

- E6 This report sets out the findings of the SA of the two alternative spatial options for the distribution of development, 42 reasonable alternative sites for residential development, two reasonable alternative sites for C2 use, and 85 draft DPR policies (26 of which are site allocation policies).
- E7 A total of 85 draft policies have been identified by MSDC. The majority of the draft DPR policies set out requirements for development proposals which ultimately seek to protect the natural and built environment and ensure there is sufficient social infrastructure to support new residents. This includes ensuring the delivery of an appropriate housing mix, affordable and accessible housing, protecting designated landscapes and biodiversity sites, such as the High Weald Area of Outstanding Natural Beauty (AONB), the setting to the South

¹ Mid Sussex District Council (2021) 'District Plan Review: Sustainability Appraisal: Scoping Report' Available at <https://www.midsussex.gov.uk/media/7441/sustainability-appraisal-consultation.pdf> [Date accessed: 28/09/22]

Downs National Park and Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC), managing flood risk and seeking to adapt to and mitigate climate change. This SA report also sets out recommendations on how to further develop these policies to maximise environmental and social benefits.

- E8 The SA has identified a range of positive and adverse potential impacts of the reasonable alternative sites on the objectives within the SA Framework. Some of the adverse impacts identified are associated with the loss of soil, surface water flooding and loss of or damage to ancient woodland. Some of these negative impacts could potentially be mitigated through policy, and the mitigating effects of the draft DPR policies upon reasonable alternative site allocations is presented in this SA report.
- E9 The DPR also sets out 26 site allocation policies, which include further site-specific mitigation requirements to guide the development, which in many cases would be likely to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for the relevant sites.
- E10 A Habitats Regulations Assessment (HRA) is being prepared alongside the development of the DPR to provide an in-depth assessment of the potential threats and pressures to Habitats sites and analysis of potential impact pathways. The final report to inform the HRA has not been completed at the time of preparing this SA. No Habitats sites other than Ashdown Forest SPA/SAC currently have an identified Zone of Influence (Zoi) within Mid Sussex District. The emerging Regulation 18 HRA² explored the potential for Likely Significant Effects (LSEs) at Ashdown Forest SPA/SAC and Castle Hill SAC, and found that an Appropriate Assessment was required regarding LSEs at Ashdown Forest arising from atmospheric pollution and recreational pressure. The preliminary findings indicate that through implementing appropriate mitigation (in liaison with Natural England) it will be possible to conclude that the DPR will not cause any adverse impacts on site integrity. The final conclusions of the HRA process will be used to inform and update the SA, when available, at the Regulation 19 Stage.

Next steps

- E11 This Regulation 18 SA Report is subject to consultation. This report represents the latest stage of the SA process. The SA process will take on board any comments received regarding this report and use them to inform the next stage of the appraisal process.

² AECOM (2022) Habitats Regulations Assessment of the Mid Sussex District Plan Review, Regulation 18. Draft – July 2022.

1 Introduction

1.1 Background

- 1.1.1 Mid Sussex District Council (MSDC) is in the process of preparing the Mid Sussex District Plan Review (DPR). As part of this process, a Sustainability Appraisal (SA) is being undertaken that incorporates the requirements of Strategic Environmental Assessment (SEA). The purpose of SA/SEA is to help guide and influence the DPR process by identifying, describing and evaluating the likely significant effects of the DPR and the reasonable alternative options in relation to environmental, social and economic factors.
- 1.1.2 Mid Sussex District Council (MSDC) adopted the Mid Sussex District Plan 2014-2031 in March 2018. In this document the Council committed to reviewing the District Plan, starting in 2021, in accordance with the 5-year review requirement set out in national policy. This SA accompanies the consultation draft (Regulation 18) Mid Sussex District Plan 2021 – 2039.
- 1.1.3 The DPR will set out the development strategy for the Mid Sussex District, excluding the area to the south, which lies within the South Downs National Park. The South Downs National Park Authority is the Local Planning Authority for those areas of the district lying within its boundaries.
- 1.1.4 This SA/SEA report is based on the findings of the Scoping Report, prepared by MSDC in November 2021³. The Scoping Report describes the baseline context and identifies the key sustainability issues in the plan area which informs the preparation of the SA Framework. A copy of the SA Framework is provided in **Appendix A**. The Scoping Report also identifies other plans, projects, programmes, guidance and initiatives, which may influence the nature of change in the plan area.
- 1.1.5 The purpose of this report is to provide an appraisal of each option (called ‘reasonable alternatives’ in SA terms) in the DPR to identify their likely sustainability impacts on each objective of the SA Framework. This will help the Council to evaluate the sustainability performance of different options and to prepare a Local Plan which seeks to be more economically, environmentally and socially sustainable.

1.2 Mid Sussex – Local context

- 1.2.1 Mid Sussex is a rural district in the South East of England. The district has three towns, Burgess Hill, East Grinstead and Haywards Heath (see **Figure 1.1**). The 2021 census records the number of residents as 152,600⁴. Approximately 62% of the Mid Sussex population live in the three towns, with the remaining 38% living in the villages. The district has a higher than average number of retired residents (aged over 65).

³ Mid Sussex District Council (2021) ‘District Plan Review: Sustainability Appraisal: Scoping Report’ Available at <https://www.midsussex.gov.uk/media/7441/sustainability-appraisal-consultation.pdf> [Date accessed: 28/09/22]

⁴ ONS (2022) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationandhouseholdestimatesenglandandwalescensus2021> [Date accessed: 04/10/22]

- 1.2.2 Nearly 50% of the district is within the High Weald Area of Outstanding Natural Beauty (AONB), and over 10% is within the South Downs National Park. Between lies an area of landscape known as the Low Weald. Mid Sussex is the tenth most wooded district in the South East and two-thirds of this woodland is classified as ‘ancient woodland’. It also has many sites valued for their biodiversity. Ashdown Forest, lying in neighbouring Wealden District Council area, is a Habitats site designated as both a Special Protection Area and Special Area of Conservation. Its proximity to Mid Sussex means that a Habitats Regulations Assessment (HRA) of the DPR is required. The district’s attractive natural environment and rich heritage makes it highly valued by its residents and a popular tourist destination.
- 1.2.3 Mid Sussex District has a very low level of unemployment. It has a relatively skilled and educated workforce and has access to further educational establishments within the district and two universities in Brighton. The district is well connected with good links by road and rail to London, Brighton and Gatwick and is within easy travelling distance of the Channel Tunnel, Southampton and Dover.
- 1.2.4 Several innovative and nationally known businesses are located in the district. A third of businesses are within the professional, scientific and technical, and information and communication sectors. There is a range of smaller businesses across sectors such as finance, service industries and light manufacturing. The nature of the local economy is strongly influenced by the wider regional context in which it sits. Mid Sussex is located in proximity to Crawley and London Gatwick Airport and within commuting distance of London and Brighton and the south coast. The Council is a partner in the Gatwick Diamond Initiative (an economic area centred upon the airport but covering nine local authority areas) and the larger ‘Coast to Capital’ Local Enterprise Partnership which stretches from Chichester in the west to Brighton in the south through to Croydon in the north.

1.3 The Development Plan Review

- 1.3.1 The Mid Sussex District Plan 2014-2031⁵ was adopted in March 2018. It provides a framework for new residential development, employment growth and infrastructure as well as measures to protect the natural and historic environment and support local communities.
- 1.3.2 The Mid Sussex District Plan set out the commitment for the Council to prepare a Site Allocations Development Plan Document (DPD) in order to allocate housing and employment sites to address the needs identified in the District Plan, to allocate a site for a Science and Technology Park, west of Burgess Hill and to set out additional strategic policies relating to the delivery of sustainable development. The Site Allocations DPD was adopted by the Council in June 2022.
- 1.3.3 Following the Examination in Public of the District Plan and the acknowledgement of the of the shortfall in housing supply within neighbouring authorities, the Council committed to an early review the District Plan commencing in 2021 with submission to the Secretary of State in 2023. This SA report assesses the sustainability performance of the alternative options considered during this Development Plan Review.

⁵ Mid Sussex District Council ‘Mid Sussex District Plan 2014 – 2031’ Adopted March 2018 Available at: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/> [Date Accessed: 28/09/22]

1.3.4 The District Plan Review will determine the overall strategy future development across the district for those areas outside the South Downs National Park (i.e. the Plan Area) to 2039 including the location of residential development to address the identified housing need.

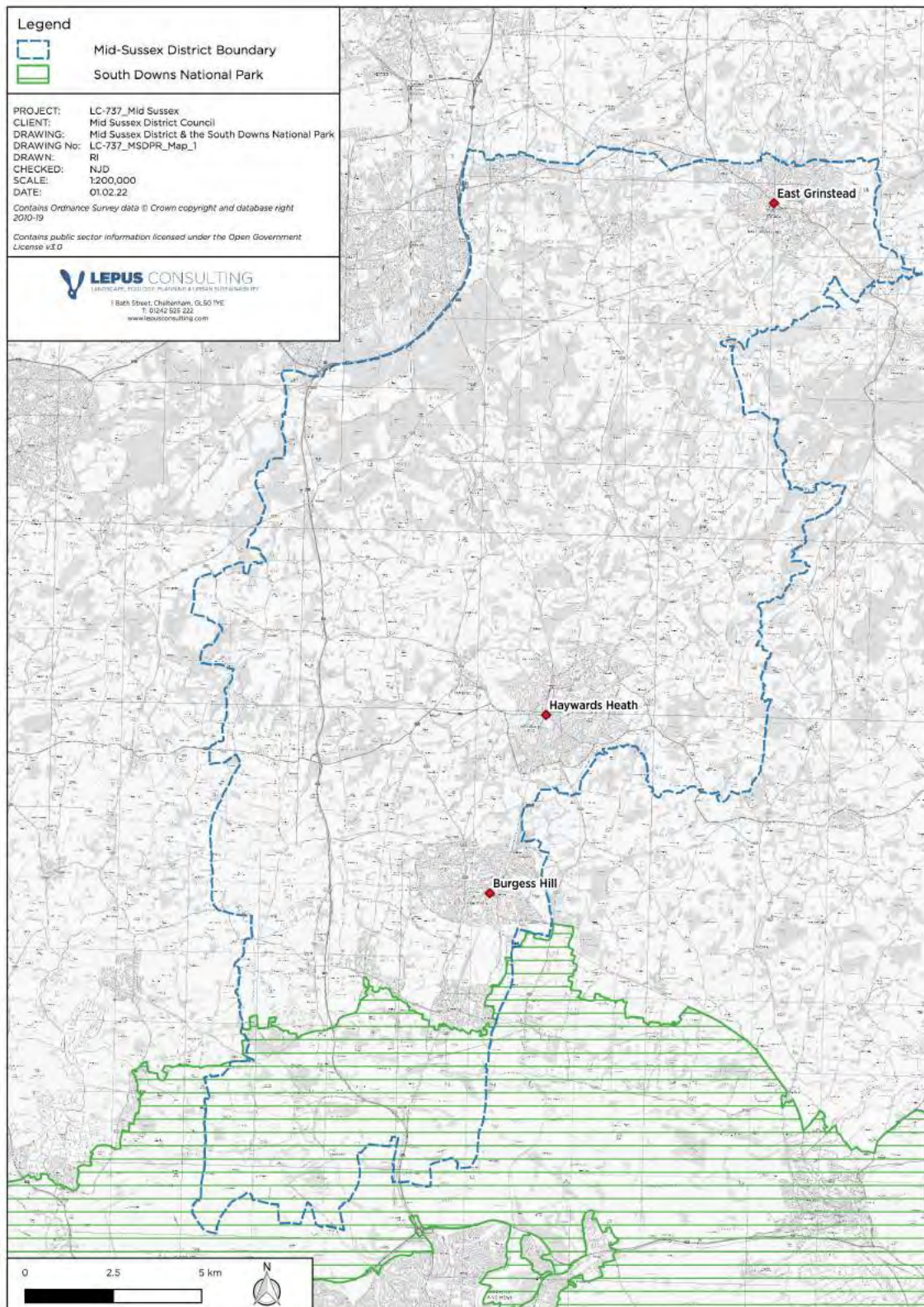


Figure 1.1: Mid Sussex District Plan Area (the District Plan Review applies to the area of Mid Sussex located outside of the South Downs National Park.)

1.4 Sustainability Appraisal and Strategic Environmental Assessment

- 1.4.1 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both obligations using a single appraisal process.
- 1.4.2 The European Union Directive 2001/42/EC⁶ (SEA Directive) applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport and more (see Article 3(2) of the Directive for other plan or programme types). The objective of the SEA procedure can be summarised as follows: *“the objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*.
- 1.4.3 The SEA Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004⁷ (SEA Regulations). Under the requirements of the SEA Directive and SEA Regulations, specific types of plans that set the framework for the future development consent of projects must be subject to an environmental assessment. Therefore, it is a legal requirement for the Mid Sussex DPR to be subject to SEA throughout its preparation.
- 1.4.4 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is a legal requirement as specified by S19(5) of the Planning and Compulsory Purchase Act 2004⁸ and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012⁹. SA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making.
- 1.4.5 Public consultation is an important aspect of the integrated SA/SEA process.

⁶ SEA Directive. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 28/09/22]

⁷ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date Accessed: 28/09/22]

⁸ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date Accessed: 28/09/22]

⁹ The Town and Country Planning Regulations 2012. Available at: <http://www.legislation.gov.uk/ukxi/2012/767/contents/made> [Date Accessed: 28/09/22]

1.5 Best Practice Guidance

1.5.1 Government policy recommends that both SA and SEA are undertaken under a single sustainability appraisal process, which incorporates the requirements of the SEA Directive. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment¹⁰;
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹¹;
- Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (NPPF)¹²;
- Ministry of Housing, Communities and Local Government (2018) Planning Practice Guidance (PPG)¹³; and
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans¹⁴.

1.6 Sustainability Appraisal

1.6.1 This report is a component of the SA of the Mid Sussex DPR. It provides an assessment of the likely effects of reasonable alternatives, as per Stage B of **Figure 1.2**, according to Planning Practice Guidance.

¹⁰ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date Accessed: 28/09/22]

¹¹ Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date Accessed: 28/09/22]

¹² National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf [Date Accessed: 28/09/22]

¹³ Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 28/09/22]

¹⁴ Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/1822/sea-sapracticeadvicefull2018c.pdf> [Date Accessed: 28/09/22]

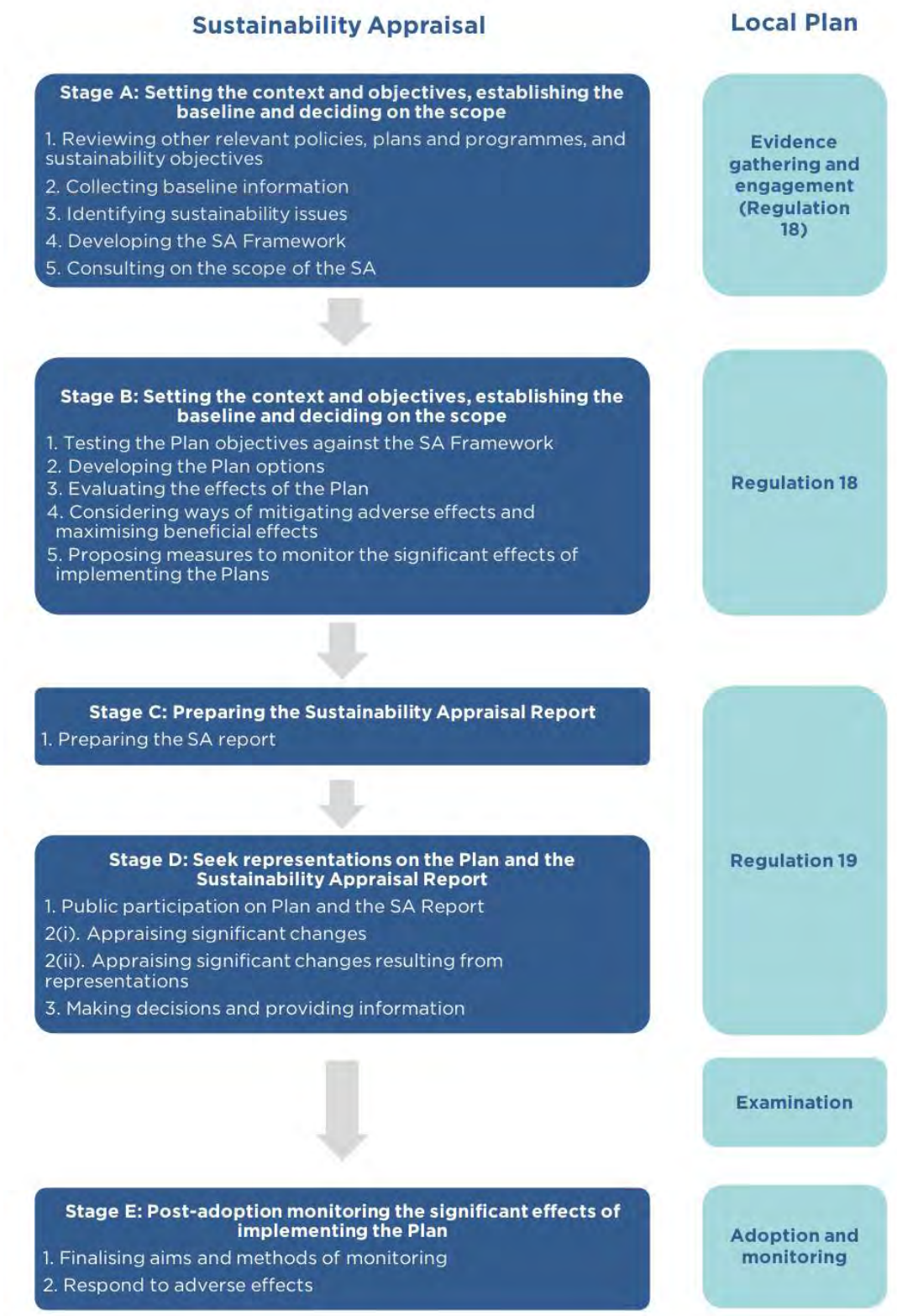


Figure 1.2: Sustainability appraisal process

1.7 The SA process so far

- 1.7.1 The Mid Sussex DPR will include the overall strategy for development in the plan area to 2039, including a vision for the future, relevant objectives, site allocations and planning policies.
- 1.7.2 The purpose of the DPR is to review existing planning policy documents and the evidence base and determine the development needed within the plan area to 2039. It will also set out policies which will guide the determination of planning applications.
- 1.7.3 **Table 1.1** below presents the of stages of the DPR and SA process undertaken to date. These represent Stages A and B of the SA process set out in **Figure 1.2**.

Table 1.1: The MSDPR and sustainability process so far

Date	Local Plan stage	Sustainability Appraisal
November 2021	Evidence Gathering	<p>Mid Sussex District Council DPR: Sustainability Appraisal Scoping Report</p> <p>This report reviews the key issues in relation to social, economic and environmental factors across the Mid Sussex plan area. These issues feed into the development of the SA Framework which sets out 14 criteria for the assessment of the sustainability performance of the plan options.</p>
November – December 2022	<p>Mid Sussex District Plan Review: Regulation 18</p> <p>This is the current stage of local plan preparation which is being assessed in this Sustainability Appraisal.</p>	<p>Sustainability Appraisal: Regulation 18</p> <p>The DPR has considered a number of reasonable alternatives including two spatial options and 44 sites, which have been assessed within this SA Report, as well as 85 draft policies set out in the DPR (which includes 26 site allocation policies).</p>

1.8 Scoping Report

- 1.8.1 In order to identify the scope and level of detail of the information to be included in the SA process, a SA Scoping Report was produced by Mid Sussex District Council in November 2021. The Scoping Report was subject to consultation with the statutory consultees and other relevant bodies.
- 1.8.2 The Scoping Report states that the review of the District Plan policies will likely result in the following status of each policy:
- Policies that remain 'in-date' and will not require amendment;
 - Policies that require minor update rather than a full review;
 - Policies that require a full review; and
 - New policies to supplement existing policies.

1.9 District Plan Review

- 1.9.1 MSDC is in the process of undertaking the Development Plan Review. Based on the evidence gathering and consultation undertaken previously, the Preferred Options Plan sets out SSDC's proposed approach to delivering the development needs of the district and the draft policies to guide the nature of the development and protect valuable community, historic and natural assets.
- 1.9.2 The total housing requirement for Mid Sussex District is 1,119 dwellings per annum, which equates to a total of 20,142 dwellings between 2021 and 2039. There are currently 10,786 commitments (sites already allocated or with planning permission) and 1,187 dwellings completed within the first year of the Plan period (2021/22). Therefore, to meet the housing need for the district, a minimum of 8,169 dwellings are required. The draft District Plan allocations and windfall allowance totals 8,471 dwellings.

1.10 Signposting for this report

- 1.10.1 This Regulation 18 SA Report sets out an assessment of the reasonable alternatives considered in the preparation of the Mid Sussex DPR, including two spatial options, 85 draft policies and 44 reasonable alternative sites. The SA report also sets out the reasons for selecting and rejecting reasonable alternative sites.
- 1.10.2 The appendices of this report provide essential contextual information to the main body of the report. The contents of this SA Report are listed below:
- **Chapter 2** sets out the methodology used to present and assess the findings of the SA process.
 - **Chapter 3** sets out an overview and analysis of the appraisal of the two spatial options for the distribution of development.
 - **Chapter 4** presents a summary of the reasonable alternative site assessments without the mitigating influence of the draft DPR policies.
 - **Chapter 5** sets out a summary of the sustainability performance of the draft DPR policies.
 - **Chapter 6** presents a summary of the reasonable alternative site assessments, including the considering of DPR policies as mitigation.
 - **Appendix A** presents the SA Framework.
 - **Appendix B** presents the complete assessment of the two spatial options.
 - **Appendix C** presents the complete assessment of the 44 reasonable alternative sites.
 - **Appendix D** presents the complete assessment of the 85 draft DPR policies.
 - **Appendix E** presents the post-mitigation site assessments.

2 Methodology

2.1 Scoping stage

2.1.1 The SA scoping report represented Stage A of the SA process (see **Figure 1.2**), and presents information in relation to:

- Identifying other relevant plans, programmes, projects, guidance and initiatives;
- Collecting baseline information;
- Identifying key sustainability issues;
- Preparing the SA Framework; and
- Consultation arrangements on the scope of the SA with the consultation bodies.

2.1.2 The Scoping Report¹⁵ was consulted on with the statutory bodies Natural England, Historic England and the Environment Agency, as well as other relevant parties. A range of comments were received during the consultation, primarily relating to the indicators. The comments received have largely been addressed, due in part to the assessment of reasonable alternative sites against a number of indicators within this SA report that were not previously listed in the Scoping Report and the full methodology as presented in this chapter.

2.1.3 The Scoping Report sets out the key sustainability issues in the SA Framework. Each of the reasonable alternatives or options appraised in this report have been assessed for their likely impacts on each SA Objective of the SA Framework. The SA Framework, which is presented in its entirety in **Appendix A**, is comprised of the following SA Objectives:

1. **Housing:** To ensure that everyone has the opportunity to live in a home for their need and which they can afford.
2. **Health and wellbeing:** To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.
3. **Education:** 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. **Community and crime:** To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.
5. **Flooding and surface water:** To reduce the risk to people, properties, the economy and the environment of flooding from all sources.
6. **Natural resources:** 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.
7. **Biodiversity and geodiversity:** To conserve and enhance the district's biodiversity and geodiversity.

¹⁵ Mid Sussex District Council (2021) 'District Plan Review: Sustainability Appraisal: Scoping Report' Available at <https://www.midsussex.gov.uk/media/7441/sustainability-appraisal-consultation.pdf> [Date accessed: 28/09/22]

8. **Landscape:** To protect, enhance and make accessible for enjoyment, the district's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place.
9. **Cultural heritage:** To protect, enhance and make accessible for enjoyment, the district's historic environment.
10. **Climate change and transport:** The reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.
11. **Energy and waste:** To increase energy efficiency and the proportion of energy generated from renewable sources in the district to help mitigate climate change and reduce waste generation and disposal.
12. **Water resources:** To maintain and improve the water quality of the district's watercourses and aquifers, and to achieve sustainable water resources management.
13. **Economic regeneration:** To encourage the regeneration and prosperity of the district's existing town centres and support the viability and vitality of village and neighbourhood centres.
14. **Economic growth:** To promote and sustain economic growth and competitiveness across the district to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.

2.1.4 The SA Framework is comprised of SA Objectives, decision-making criteria and monitoring indicators. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations¹⁶. Including the SEA topics in the SA Objectives helps to ensure that all environmental criteria of the SEA Regulations are represented. Consequently, the SA Objectives reflect all subject areas to ensure that the assessment process is transparent, robust and thorough.

2.1.5 It is important to note that the order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of reasonable alternatives.

¹⁶ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including “issues such as (a) biodiversity, (b) population, (c) human health, (d) fauna, (e) flora, (f) soil, (g) water, (h) air, (i) climatic factors, (j) material assets, (k) cultural heritage including architectural and archaeological heritage, (l) landscape and (m) the interrelationship between the issues referred to in subparagraphs (a) to (l).”

2.2 Assessment of reasonable alternatives

2.2.1 The purpose of this document is to provide an appraisal of the reasonable alternatives, also known as ‘options’, (those listed in **Table 1.1**) in line with Regulation 12 of the SEA Regulations¹⁷:

2.2.2 *“Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”.*

2.2.3 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Table 2.1**).

Table 2.1: Schedule 1 of the SEA Regulations

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

¹⁷ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Accessed 28/09/22]

2.3 Impact assessment and determination of significance

2.3.1 Significance of effect is a combination of sensitivity and impact magnitude. Sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing comparison, the greater will be the significance of effect.

2.4 Sensitivity

2.4.1 Receptor sensitivity has been measured through consideration as to how the receiving environment may be affected by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes.

2.4.2 A guide to the range of scales used in determining sensitivity is presented in **Table 2.2**. For most receptors, sensitivity increases with geographic scale.

Table 2.2: Impact sensitivity

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

2.5 Impact magnitude

2.5.1 Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change (see **Table 2.3**).

Table 2.3: Impact magnitude

Impact magnitude	Typical criteria
High	<ul style="list-style-type: none"> • Likely total loss of or major alteration to the receptor in question; • Provision of a new receptor/feature; or • The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or the impact is one of the following: <ul style="list-style-type: none"> • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or the impact is one of the following: <ul style="list-style-type: none"> • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

2.6 Significant effects

2.6.1 A single value from **Table 2.4** has been allocated to each SA Objective for each reasonable alternative. Justification for the classification of the impact for each SA objective is presented in an accompanying narrative assessment text for all reasonable alternatives that have been assessed through the SA process. The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations, where feasible, which states that the effects should include: “*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*”.

Table 2.4: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<p>The size, nature and location of development proposals would be likely to:</p> <ul style="list-style-type: none"> • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	<p>Either no impacts are anticipated, or any impacts are anticipated to be negligible.</p>
Uncertain +/-	<p>It is entirely uncertain whether impacts would be positive or adverse.</p>
Minor Positive +	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	<p>The size, nature and location of a development proposal would be likely to:</p> <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

- 2.6.2 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of a spatial option in terms of the relevant SA Objective, the precautionary principle¹⁸ has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the second column of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the impacts are indicative summarily and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option. Within the reasonable alternative site assessments, presented in **Appendix C**, the likely sustainability impacts are presented per ‘receptor’ within each SA Objective, offering further granularity in the presentation of effects.
- 2.6.3 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).
- 2.6.4 The level of effect has been categorised as minor or major. **Table 2.4** sets out the significance matrix and explains the terms used. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 2.6.5 Each reasonable alternative option that has been identified in this report has been assessed for its likely significant impact against each SA Objective in the SA Framework, as per **Table 2.4**. Likely impacts are not intended to be summed.
- 2.6.6 It is important to note that the assessment scores presented in **Table 2.4** are high level indicators. The assessment narrative text should always read alongside the significance scores. Topic specific methods and assumptions in **Boxes 2.1 to 2.14** offer further insight into how each significant effect score was determined.

2.7 Limitations of predicting effects

- 2.7.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 2.7.2 The assessments in this report are based on the best available information, including that provided to Lepus by MSDC and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

¹⁸ The European Commission describes the precautionary principle as follows: “If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered”.

2.7.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. All reasonable alternatives and preferred options are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.

2.7.4 The assessment of development proposals is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available.

2.7.5 All data used is secondary data obtained from the Council or freely available on the Internet.

2.8 Plan area statistics

2.8.1 To calculate some of the likely adverse impacts of the proposed development, an average people per dwelling needed to be calculated for each of the three districts. **Table 2.5** below shows the estimated population size and dwelling stock of the district, which was used to calculate the average people per dwelling. All data used was accurate and up to date at the time of assessment.

Table 2.5: Average people per dwelling in Mid Sussex in 2020

District	Estimated Population Size ¹⁹	Dwelling Stock ²⁰	People per Dwelling
Mid Sussex	152,142	65,503	2.32

2.9 SEA Topic methodologies and assumptions

2.9.1 A number of topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives (see **Boxes 2.1 to 2.14**). These should be borne in mind when considering the assessment findings.

¹⁹ Office of National Statistics (2021) Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland> [Date Accessed: 17/12/21]

²⁰ Ministry of Housing, Communities and Local Government (2021) Number of dwellings by tenure and district, England. Available at: <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants> [Date Accessed: 17/12/21]

2.10 SA Objective 1 – Housing

Box 2.1: SA Objective 1. Housing - Assessment methodologies and assumptions

1. Housing: To ensure that everyone has the opportunity to live in a home for their need and which they can afford.

MSDC has prepared evidence documents in relation to establishing housing needs over the Plan period. This includes a Strategic Housing and Employment Land Availability Assessment (SHELAA)²¹ and a Strategic Housing Market Assessment (SHMA). Options are assessed for the extent to which they will help to meet the diverse needs of current and future residents of the Plan area.

When striving for sustainable development, housing density should be considered carefully. High population densities can limit the accessibility of local key services and facilities such as hospitals, supermarkets and open spaces, including playgrounds and sports fields. High population densities also influence perceptions of safety, social interactions and community stability²².

Development proposals which would result in an increase of 99 dwellings or less would be likely to have a minor positive impact on the local housing provision. Development proposals which would result in an increase of 100 dwellings or more would be likely to have a major positive impact on the local housing provision.

Unless otherwise stated, it is assumed development options will provide a good mix of housing type and tenure opportunities.

Development proposals which would be expected to result in a net loss of housing across the Plan area would be expected to have an adverse impact on MSDC's ability to meet the required housing demand.

Development proposals which would result in the loss of nine dwellings or less would be likely to have a minor negative impact on local housing provision. Development proposals which would result in the loss of ten dwellings or more would be likely to have a major negative impact on the local housing provision.

Development proposals which would result in no net change in dwellings would be expected to have a negligible impact on the local housing provision.

Development proposals that seek to meet the housing needs for the whole community, including older people, Gypsy and Traveller communities, and those which would increase the supply of affordable homes, would be likely to have a positive impact on this SA Objective.

²¹ Mid Sussex District Council (2020) Strategic Housing and Economic Land Availability Assessment (SHELAA). Available at: <https://www.midsussex.gov.uk/planning-building/strategic-housing-and-economic-land-availability-assessment/> [Date Accessed: 28/09/22]

²² Dempsey, N., Brown, C. and Bramley, G. (2012) The key to sustainable urban development in UK cities? The influence of density on social sustainability. *Progress in Planning* 77:89-141

2.11 SA Objective 2 – Health and wellbeing

Box 2.2: SA Objective 2. Health and Wellbeing - Assessment methodologies and assumptions

2. Health and Wellbeing: To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.

Air Quality:

It is assumed that development proposals located in close proximity to main roads would expose site end users to transport associated noise and air pollution. In line with the DMRB guidance, it is assumed that receptors would be most vulnerable to these impacts located within 200m of a main road²³. Negative impacts on the long-term health of site end users would be anticipated where residents would be exposed to air pollution.

Air Quality Management Areas (AQMAs) are considered to be areas where the national air quality objectives will not be met.

Development proposals located within 200m of a main road or AQMA would be expected to have a minor negative impact on site end users' exposure to air pollution. Development proposals located over 200m from a main road and AQMA would be expected to have a minor positive impact on site end users' exposure to air pollution.

Health Facilities:

In order to facilitate healthy and active lifestyles for existing and new residents, it is expected that the MSDPR should seek to ensure that residents have access to NHS hospitals, GP surgeries, leisure centres and a diverse range of accessible natural habitats and the surrounding PRoW network. Sustainable distances to NHS hospitals and leisure centres are derived from Barton et al.²⁴.

Adverse impacts are anticipated where the proposed development would not be expected to facilitate active and healthy lifestyles for current or future residents.

For the purposes of this assessment, accessibility to a hospital has been taken as proximity to an NHS hospital with an A&E service. Distances of sites to other NHS facilities (e.g. community hospitals and treatment centres) or private hospitals has not been taken into consideration in this assessment. There are two NHS hospitals with an A&E department within the Plan area: Queen Victoria Hospital, East Grinstead, located in the north east and Princess Royal Hospital, Haywards Heath, located in the south east of the Plan area.

Development proposals located within 5km of one of these hospitals would be expected to have a minor positive impact on site end users' access to emergency health services. Development proposals located over 5km from these hospitals would be likely to have a minor negative impact on site end users' access to emergency health care.

There are numerous GP surgeries located across the Plan area. Travel time data provided by MSDC has been used to inform this assessment. Development proposals located within a 10 minute walk of a GP surgery would be expected to have a major positive impact on site end users' access to this essential health service and those within a 15 minute walk are likely to have a minor positive impact. Development proposals located within a 20 minute walk would have a negligible impact. Development proposal located over a 20 minute

²³ Design Manual for Roads and Bridges, Volume 11: Environmental Assessment, Section 3: Environmental Assessment Techniques, Part 1: Air Quality, Annex D2: Road Type. Available at: <http://www.semmms.info/wp-content/uploads/2016/06/Design-Manual-for-Roads-and-Bridges-Volume-11-Section-3-Part-1.-PDF-981Kb.pdf> [Date Accessed: 28/09/22]

²⁴ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

Box 2.2: SA Objective 2. Health and Wellbeing - Assessment methodologies and assumptions

walk from a GP surgery would be likely to have a minor negative impact on site end users' access to essential health care.

Access to leisure centres can provide local residents with opportunities to facilitate healthy lifestyles through exercise. Development proposals located within 1.5km of a leisure centre would be expected to have a minor positive impact on site end users' access to these facilities. Development proposal located over 1.5km from a leisure centre would be likely to have a minor negative impact on site end users' access to these facilities.

PRoW Network:

New development sites have been assessed in terms of their access to the local PRoW networks and public greenspace. In line with Barton et al.²⁵, a sustainable distance of 600m has been used for access to a PRoW. Development proposals that are located within 600m of a PRoW would be expected to have a minor positive impact on pedestrian accessibility and access to the countryside. Development proposals located over 600m from a PRoW could potentially have a minor negative impact on site end users' access to natural habitats, and therefore have an adverse impact on the physical and mental health of local residents.

Multi-functional greenspace:

By siting residential developments in close proximity to open greenspace and outdoor play spaces, a number of mental and physical benefits can result. A minor positive impact is expected for development proposals located within 300m of open greenspace (as per the Council provided threshold), and a minor negative impact could be expected for development proposals located outside of 300m from these facilities.

²⁵ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

2.12 SA Objective 3 - Education

Box 2.3: SA Objective 3. Education - Assessment methodologies and assumptions

3. Education: 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.

It is assumed that new residents in the Plan area require access to primary and secondary education services to help facilitate good levels of education, skills and qualifications of residents.

The Council have identified that development proposals within a 20 minute walk to a primary school are in a sustainable location to these facilities. In line with Barton et al.'s sustainable distances²⁶, for the purpose of this assessment, 1.5km is considered as the sustainable distance to a secondary school and 3km to a further education facility. All schools identified are publicly accessible state schools.

Due to the rural nature of the district and spread of secondary schools, there is an inevitability that pupils will need to travel relatively long distances. To this end, (and given their age) this is predominantly on public transport such as bus/train or dedicated school bus services. MSDC's site selection process therefore places more weight on the Primary School criteria as these should be located at a distance more accessible by foot/cycle/walking clubs/lift-share.

It is recognised that not all schools within Mid-Sussex are accessible to all pupils. For instance, independent and academically selective schools may not be accessible to all. Local primary schools may only be Infant or Junior schools and therefore not provide education for all children of primary school age. Some secondary schools may only be for girls or boys and therefore would not provide education for all. This has been considered within the assessment.

At this stage, there is not sufficient information available to be able to accurately predict the effect of new development on the capacity of local schools, or to incorporate local education attainment rates into the assessment.

There are numerous primary schools located across the Plan area. Travel time data provided by MSDC has been used to inform this assessment. Development proposals located within a 10 minute walk of a primary school would be expected to have a major positive impact on site end users' access to this essential health service and those within a 15 minute walk are likely to have a minor positive impact. Development proposals located within a 20 minute walk would have a negligible impact. Development proposal located over a 20 minute walk from a primary school would be likely to have a minor negative impact on site end users' access to essential health care.

Development proposals which would locate site end users within the target distance (1.5km) of a secondary school would be expected to have a minor positive impact for this objective. Development proposals which would locate site end users outside of the target distance of a secondary school would be expected to have a minor negative impact for this objective.

Development proposals which would locate new residents within the target distance to both a primary and secondary school would be expected to have a major positive impact on the education objective.

Development proposals which would locate new residents outside of the target distance to both a primary and secondary school would be likely to have a major negative impact on the education objective.

²⁶ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010.

2.13 SA Objective 4 – Community and crime

Box 2.4: SA Objective 4. Community and crime - Assessment methodologies and assumptions

4. Community and crime: To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.

Community facilities:

Sustainable access to community facilities, including libraries, banks and retail areas, is identified by the Council as being within a 15 minute walk from a proposed residential site, or 30 minutes via public transport.

Development proposals within a 10 minute walk or public transport journey from community facilities could expect a major positive impact on this objective, providing excellent access to these facilities. Sites which are located within 15 minutes' walk or 30 minutes public transport from community facilities are expected to have a minor positive impact on future residents' access to these facilities.

Development proposals which would locate new residents outside of the target travel times to community facilities would be expected to have a minor negative impact on the community and crime objective.

Built Up Area Boundaries:

Additionally, development proposals located over 150m from a Built Up Area Boundary (BUAB) would be expected to have a minor negative impact on the community and crime objective.

Crime and deprivation

Development proposals which would result in the provision of affordable housing, community services or would reduce crime/the fear of crime in the area would be expected to result in a positive impact for this objective, through helping to address inequality and promote safe and inclusive communities.

2.14 SA Objective 5 – Flooding and surface water

Box 2.5: SA Objective 5. Flooding and surface water - Assessment methodologies and assumptions

5. Flooding and surface water: To reduce the risk to people, properties, the economy and the environment of flooding from all sources.

Fluvial Flooding

The level of fluvial flood risk present across the Plan area is based on the Environment Agency's flood risk data²⁷, such that:

- Flood Zone 3: 1% or greater chance of flooding each year;
- Flood Zone 2: Between 0.1% - 1% chance of flooding each year; and
- Flood Zone 1: Less than 0.1% chance of flooding each year.

It is assumed that development proposals will be in perpetuity, and it is therefore likely that development will be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of fluvial flooding.

Where development proposals coincide with Flood Zone 2, a minor negative impact would be expected. Where development proposals coincide with Flood Zone 3 (either Flood Zone 3a or 3b), a major negative impact would be expected.

Where development proposals are located within Flood Zone 1, a minor positive impact would be expected for climate change adaptation.

Surface water (Pluvial) Flooding

According to Environment Agency data²⁸, areas determined to be at high risk of pluvial flooding have more than a 3.3% chance of flooding each year, medium risk between 1% and 3.3%, and low risk between 0.1% and 1% chance. Areas determined to be at very low risk of flooding (less than 0.1% chance) would be expected to result in a negligible impact on pluvial flooding for the purposes of this assessment.

Development proposals located in areas at low and medium risk of surface water flooding would be expected to have a minor negative impact on pluvial flooding. Development proposals located within areas at high risk of surface water flooding would be expected to have a major negative impact on pluvial flooding.

Where development proposals are not located in areas determined to be at risk of pluvial flooding, or where the level of flood risk is considered to be insignificant in proportion to the total site area, a negligible impact would be expected for climate change adaptation.

It is assumed that development proposals will be in perpetuity, and it is therefore likely that development would be subject to the impacts of flooding at some point in the future, should it be situated on land at risk of surface water flooding.

²⁷ Environment Agency (2021) Flood Map for Planning Risk. Available at: <https://flood-map-for-planning.service.gov.uk> [Date Accessed: 28/09/22]

²⁸ Environment Agency (2013) Risk of flooding from surface water – understanding and using the map. Available at: <https://www.gov.uk/government/publications/flood-risk-maps-for-surface-water-how-to-use-the-map> [Date Accessed: 28/09/22]

2.15 SA Objective 6 – Natural resources

Box 2.6: SA Objective 6. Natural resources: - Assessment methodologies and assumptions

6. Natural resources: 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.

Previously Developed Land:

In accordance with the core planning principles of the NPPF²⁹, development on previously developed land is recognised as an efficient use of land. Development of previously undeveloped land and greenfield sites is not considered to be an efficient use of land.

Development of an existing brownfield site would be expected to contribute positively to safeguarding greenfield land in Mid-Sussex, and therefore, have a minor positive impact on this objective.

Development proposals situated wholly or partially on previously undeveloped land would be expected to pose a threat to soil within the site perimeter due to excavation, compaction, erosion and an increased risk of pollution and contamination during construction.

In addition, development proposals which would result in the loss of greenfield land would be expected to contribute towards a cumulative loss of ecological habitat. This would be expected to lead to greater levels of habitat fragmentation and isolation for the local ecological network restricting the ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land has therefore been considered to have an adverse effect under this objective.

Agricultural Land Classification:

The Agricultural Land Classification (ALC) system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as the Best and Most Versatile (BMV) land³⁰. In the absence of site-specific surveys to identify Grades 3a and 3b, and in line with the precautionary principle, ALC Grade 3 is considered as BMV land.

Adverse impacts are expected for development proposals which would result in a net loss of agriculturally valuable soils. Development proposals which are situated on Grade 1, 2 or 3 ALC land, and would therefore risk the loss of some of the Plan area's BMV land, would be expected to have a negative impact for this objective.

For the purpose of this report, a 20ha threshold has been used based on available guidance³¹. Development proposals which would result in the loss of less than 20ha of greenfield land, of which is classed as ALC Grades 1, 2 and/or 3, would be expected to have a minor negative impact on this objective. Development proposals which would result in the loss of 20ha or more of greenfield land, of which is classed as ALC Grades 1, 2 and/or 3, would be expected to have a major negative impact on this objective.

Development proposals which are situated on Grade 4 and 5 ALC land would be expected to have a negligible impact on natural resources. Development proposals on land classified

²⁹ Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 28/09/22]

³⁰ Natural England (1988) Agricultural Land Classification of England And Wales: Revised criteria for grading the quality of agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date Accessed: 28/09/22]

³¹ Natural England (2009) Agricultural Land Classification: protecting the best and most versatile agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/35012> [Date Accessed: 28/09/22]

Box 2.6: SA Objective 6. Natural resources: - Assessment methodologies and assumptions

as 'urban' or 'non-agricultural' would help prevent the loss of the Plan area's BMV land, and therefore would be expected to have a minor positive impact for this objective.

Water Consumption:

It is assumed that development proposals will be in accordance with the higher optional water efficiency standard of 110 litres per person per day, as set out in the Building Regulations 2010³², in accordance with the current adopted District Plan policy.

It is assumed that all housing proposals in the MSDPR will be subject to appropriate approvals and licensing for sustainable water supply from the Environment Agency.

Minerals:

Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. Nationally and locally important mineral resources are identified in Mineral Safeguarding Areas (MSA)³³. Identified MSAs within Mid Sussex include the following minerals resources: brick clay; chalk; consolidated bedrock; unconsolidated gravel; and unconsolidated sand.

Where a development proposal coincides with an identified MSA, there is potential for sterilisation of the mineral resource as a result of the proposed development, meaning the minerals will be inaccessible for potential extraction in the future. For the purposes of this assessment, this would result in a minor negative impact under the natural resources SA objective.

³² The Building Regulations 2010. Available at: <http://www.legislation.gov.uk/uksi/2010/2214/contents/made> [Date Accessed: 28/09/22]

³³ West Sussex County Council (2018) 'West Sussex Joint Minerals Local Plan' Available at <https://www.westsussex.gov.uk/about-the-council/policies-and-reports/environment-planning-and-waste-policy-and-reports/minerals-and-waste-policy/joint-minerals-local-plan/> [Date accessed 31/01/22]

2.16 SA Objective 7 - Biodiversity and geodiversity

Box 2.7: SA Objective 7. Biodiversity and geodiversity - Assessment methodologies and assumptions

7. Biodiversity and geodiversity: To conserve and enhance the district's biodiversity and geodiversity.

The biodiversity objective considers adverse impacts of the proposed development at a landscape-scale. It focuses on an assessment of proposed development on a network of designated and undesignated sites, wildlife corridors and individual habitats within the Plan area. Receptors include the following:

Designated Sites:

- Habitats sites: (Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites).
- Sites of Special Scientific Interest (SSSI).
- National Nature Reserves (NNR).
- Local Nature Reserves (LNR).
- Local Wildlife Sites (LWS).

Habitats and Species:

- Ancient woodland.
- Priority habitats.
- Open mosaic habitats.
- Veteran trees.

Where a development proposal is coincident with, adjacent to or located in close proximity of an ecological receptor, it is assumed that negative effects associated with development will arise to some extent. These negative effects include those that occur during the construction phase and are associated with the construction process and construction vehicles (e.g. habitat loss, habitat fragmentation, habitat degradation, noise, air, water and light pollution) and those that are associated with the operation/occupation phases of development (e.g. public access associated disturbances, increases in local congestion resulting in a reduction in air quality, changes in noise levels, visual disturbance, light pollution, impacts on water levels and quality etc.).

Negative impacts would be expected where the following ecological designations may be harmed or lost as a result of proposals: SPAs, SACs, Ramsar sites, SSSIs, ancient woodlands, NNRs, LNRs and LWSs as well as priority habitats³⁴ protected under the 2006 NERC Act³⁵. The assessment is largely based on a consideration of the proximity of a site to these ecological receptors.

For the purposes of this assessment, impacts on priority habitats have been considered in the context of Natural England's publicly available Priority Habitat Inventory database³⁶. It is acknowledged that this may not reflect current local site conditions in all instances.

It is assumed that construction and occupation of previously undeveloped greenfield land would result in a net reduction in vegetation cover in the Plan area. This would also be expected to lead to greater levels of fragmentation and isolation for the wider ecological network, such as due to the loss of stepping-stones and corridors. This will restrict the

³⁴ Source Natural England Priority Habitat Inventory April 2012

³⁵ Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date Accessed: 28/09/22]

³⁶ Natural England (2021) Priority Habitat Inventory (England). Available at: <https://data.gov.uk/dataset/4b6ddb7-6c0f-4407-946e-d6499f19fcde/priority-habitat-inventory-england> [Date Accessed: 28/09/22]

Box 2.7: SA Objective 7. Biodiversity and geodiversity - Assessment methodologies and assumptions

ability of ecological receptors to adapt to the effects of climate change. The loss of greenfield land is considered under the Natural Resources objective (SA Objective 6) in this assessment.

It should be noted that no detailed ecological surveys have been completed by Lepus to inform the assessments made in this report.

Protected species survey information is not available for the sites within the Plan area. It is acknowledged that data is available from the local biological records centre. However, it is noted that this data may be under recorded in certain areas. This under recording does not imply species absence. As a consequence, consideration of this data on a site-by-site basis within this assessment would have the potential to skew results – favouring well recorded areas of the Plan area. As such impacts on protected species have not been assessed on a site-by-site basis.

It is anticipated that MSDC will require detailed ecological surveys and assessments to accompany future planning applications. Such surveys will determine on a site-by-site basis the presence of Priority Species and Priority Habitats protected under the NERC Act.

It is assumed that mature trees and hedgerows will be retained where possible.

Natural England has developed Impact Risk Zones (IRZs) for each SSSI unit in the country. IRZs are a Geographical Information System (GIS) tool which allow a rapid initial assessment of the potential risks posed by development proposals to: SSSIs, SACs, SPAs and Ramsar sites. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts³⁷. Where a site falls within more than one SSSI IRZ, the worst-case risk zone is reported upon in the assessment. The IRZ attribute data draws a distinction between rural and non-rural development. For the purposes of this assessment non-rural sites are considered to be those that are located within an existing built-up area. Sites at greenfield locations at the edge of a settlement or those that are more rural in nature have been considered to be rural.

A 7km zone of influence (Zoi) has been identified around Ashdown Forest SAC/SPA within which planning applications for residential development will need to mitigate the potential impacts of the development to ensure the effects of any increase in visitors to Ashdown Forest are addressed³⁸. For the purposes of this assessment, it is assumed that development within this 7km zone could potentially result in a minor negative impact on the designation.

A HRA is being prepared alongside the development of the Plan to provide an in-depth assessment of the potential threats and pressures to Habitats sites and analysis of potential impact pathways. The final report to inform the HRA has not been completed at the time of preparing this SA. No Habitats sites other than Ashdown Forest SPA/SAC currently have an identified Zone of Influence (Zoi) within Mid Sussex District. The emerging Regulation 18 HRA³⁹ explored the potential for Likely Significant Effects (LSEs) at Ashdown Forest SPA/SAC and Castle Hill SAC, and found that an Appropriate Assessment was required regarding LSEs at Ashdown Forest arising from atmospheric pollution and

³⁷ Natural England (2022) Natural England's Impact Risk Zones for Sites of Special Scientific Interest. Available at: <https://data.gov.uk/dataset/5ae2af0c-1363-4d40-9d1a-e5a1381449f8/ssi-impact-risk-zones> [Date Accessed: 28/09/22]

³⁸ Mid Sussex District Council (2022) Protecting Ashdown Forest. Available at: <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/> [Date Accessed: 28/09/22]

³⁹ AECOM (2022) Habitats Regulations Assessment of the Mid Sussex District Plan Review, Regulation 18. Draft – July 2022.

Box 2.7: SA Objective 7. Biodiversity and geodiversity - Assessment methodologies and assumptions

recreational pressure. The final results of the HRA process will be used to inform and update the SA, when available, at the Regulation 19 Stage.

Where development proposals coincide with a Habitats site, a SSSI, NNR, ancient woodland, or are adjacent to a Habitats site or SSSI it is assumed that development would have a permanent and irreversible impact on these nationally important biodiversity assets, and a major negative impact would be expected.

Where development proposals coincide with LNRs, LWSs, priority habitats, open mosaic habitats, are located within a SSSI IRZ which states to consult Natural England or are located within a defined ZoI of a Habitats site, NNR, LNR, LWS or stand of ancient woodland, a minor negative impact would be expected.

An assessment of potential impacts on veteran trees has been informed by comments from the Tree Officer on SHELAA sites. Development proposals which coincide with a veteran tree could potentially result in the irreversible loss of the asset, and therefore have a major negative impact. Development proposals which are located adjacent to a veteran tree could potentially result in a minor negative impact.

Where a site proposal would not be anticipated to impact a biodiversity asset, a negligible impact would be expected for this objective.

2.17 SA Objective 8 - Landscape

Box 2.8: SA Objective 8. Landscape - Assessment methodologies and assumptions

8. Landscape: To protect, enhance and make accessible for enjoyment, the district's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place.

Impacts on landscape will be largely determined by the specific layout and design of development proposals, as well as the site-specific landscape circumstances, as experienced on the ground. Detailed proposals for each development proposal are uncertain at this stage of the assessment. Furthermore, this assessment comprises a desk-based exercise which has not been verified in the field. Therefore, the nature of the potential impacts on the landscape are, to an extent, uncertain. However, there is a risk of negative effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is located in close proximity to sensitive landscape receptors. The level of impact has been assessed based on the nature and value of, and proximity to, the landscape receptor in question.

Where a development proposal would not be anticipated to impact a designated or local landscape, a negligible impact would be expected for this objective.

The High Weald AONB

The High Weald Area of Outstanding Natural Beauty (AONB) is a nationally designated landscape. The High Weald AONB is partially located within Mid-Sussex District to the north, covering almost half of the district area.

Objective OQ3 of the High Weald AONB Management Plan 2019 – 2024⁴⁰ aims to “*develop and manage access to opportunities for everyone to enjoy, appreciate and understand the character of the AONB while conserving its natural beauty*”.

The assessment of potential impacts on the AONB arising from development has been informed by comments from specialist landscape officers (provided by the Council) and the Landscape Capacity Study⁴¹. Development proposals which are coincident with and have been identified as likely to cause a ‘high’ impact to this AONB would be likely to alter the character of the nationally designated landscape and therefore, a major negative impact would be expected. Development proposals within the AONB with identified ‘moderate’ impacts are assessed as having the potential for major negative impacts on the setting of the AONB. Development proposals which are located in close proximity to the AONB and are identified as having ‘low’ to ‘low/medium’ capacity could potentially result in a minor negative impact on the setting of the nationally designated landscape.

In some instances where proposed sites coincide with areas of ‘high’ impact on the AONB, the site has been concluded as likely ‘major development’ as described in the NPPF paragraph 177⁴².

South Downs National Park:

⁴⁰ The High Weald Area of Outstanding Natural Beauty Management Plan 2019 – 2024. Available at: <https://www.highweald.org/downloads/publications/high-weald-aonb-management-plan-documents/2291-high-weald-managment-plan-4th-edition-2019-2024/file.html> [Date accessed: 28/09/22]

⁴¹ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

⁴² MHCLG (2021) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf [Date accessed: 04/10/22]

Box 2.8: SA Objective 8. Landscape - Assessment methodologies and assumptions

Development proposals which coincide with or are located adjacent or in close proximity to the South Downs National Park, and therefore could potentially adversely affect views from the National Park and/or alter its setting, would be expected to have a minor negative impact on the landscape objective.

Country Park:

Development proposals which are located adjacent to or in close proximity to Country Parks, and therefore could potentially adversely affect views from Country Parks, would be expected to have a minor negative impact on the landscape objective.

Views:

Development proposals which may alter views of a predominantly rural or countryside landscape experienced by users of the Public Rights of Way (PRoW) network or National Trails would be expected to have a minor negative impact on the landscape objective.

In order to consider potential visual effects of development, it has been assumed that the proposals would broadly reflect the character of nearby development of the same type.

Potential views from residential properties are identified through reference to aerial mapping and the use of Google Maps⁴³.

It is anticipated that MSDC will require developers to undertake Landscape and Visual Impact Assessments (LVIAs) to accompany any future proposals, where relevant. The LVIAs should seek to provide greater detail in relation to the landscape character of the site and its surroundings, the views available towards the site, the character of those views and the sensitivity and value of the relevant landscape and visual receptors.

Urbanisation of the Countryside/ Coalescence:

Development proposals which are considered to increase the risk of future development spreading further into the wider landscape would be expected to have a minor negative impact on the landscape objective.

Development proposals which are considered to reduce the separation between existing settlements and increase the risk of the coalescence of settlements would be expected to have a potential minor negative impact on the landscape objective.

Multi-Functional Greenspace

Development proposals located within 300m of areas designated as multi-functional greenspace (MFGS) and open playspace are likely to provide good access to natural open space for future residents and therefore a minor positive impact on the landscape objective would be expected.

Tree Preservation Orders

It is anticipated that development proposals which coincide with trees which are registered under Tree Preservation Orders (TPOs) could have adverse impacts on these trees and their protected status, resulting in a minor negative impact for this objective due to potential impacts on landscape settings.

⁴³ Google Maps (no date) Available at: <https://www.google.co.uk/maps> [Date Accessed: 28/09/22]

2.18 SA Objective 9 – Cultural heritage

Box 2.9: SA Objective 9. Cultural heritage - Assessment methodologies and assumptions

9. Cultural heritage: To protect, enhance and make accessible for enjoyment, the district's historic environment.

Impacts on heritage assets will be largely determined by the specific layout and design of development proposals, as well as the nature and significance of the heritage asset. There is a risk of adverse effects occurring, some of which may be unavoidable. As such, this risk has been reflected in the assessment as a negative impact where a site is in close proximity to heritage assets.

Adverse impacts are recorded for options which have the potential to have an adverse impact on sensitive heritage designations, including Listed Buildings, Scheduled Monuments (SM), Registered Parks and Gardens (RPG), and Conservation Areas.

It is assumed that where a designated heritage asset coincides with a site proposal, the heritage asset will not be lost as a result of development (unless otherwise specified in the MSDPR). Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset.

Setting:

Development which could potentially be discordant with the local character or setting, for example, due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets that are important components of the local area. Views of, or from, the heritage asset are considered as part of the assessment of potential impacts on the setting of the asset.

Heritage Assets:

The site assessments for Listed Buildings and Conservation Areas are based on the levels of harm which the developments may have on these assets, as identified within the SHELAA assessments provided by the Council. Where a site coincides with or is in close proximity to a Listed Building or Conservation Area, and is identified as having the potential to have 'substantial' levels of harm and a 'harmful impact', a major negative impact on the historic environment would be expected.

Where a site coincides with or is in close proximity to a Listed Building or Conservation Area, and is identified as having the potential to have 'less than substantial' levels of harm, and a 'high' or 'medium' impact, a minor negative impact on the historic environment would be expected.

Where a site coincides with or is in close proximity to a Listed Building or Conservation Area, and is assessed as having the potential to have 'less than substantial' levels of harm and a 'low' impact, or where development proposals are not located in close proximity to any heritage asset / the nature of development is determined not to affect the setting or character of the nearby heritage asset, a negligible impact on the historic environment would be expected.

Where an SM or RPG coincides with a site proposal, it is assumed that the setting of these features will be permanently altered, and a major negative impact would be expected.

Where the site lies adjacent to, or in close proximity to, an SM or an RPG, an adverse impact on the setting of the asset would be likely, to some extent, and a minor negative impact would therefore be expected.

Archaeological Notification Areas (ANAs) have been identified within Mid Sussex. The assessment of RA sites has been informed through reference to the SHELAA and

Box 2.9: SA Objective 9. Cultural heritage - Assessment methodologies and assumptions

comments from a Mid Sussex County Archaeologist. Where development has been identified as resulting in 'severe' impacts on archaeological features, a major negative impact on the historic environment would be expected. Where the site is identified as having the potential to have a 'moderate' impact on archaeological features, a minor negative impact on the historic environment would be expected. A site deemed to have no impact on these assets, or where no objection has been raised, would be likely to have a negligible impact.

Heritage assets identified on Historic England's Heritage at Risk Register may be identified as being at risk for a number of reasons, for example, due to dilapidation of the building fabric or other sources of risk such as coastal erosion, cultivation or scrub encroachment⁴⁴. Where Heritage at Risk assets could potentially be impacted by the proposed development at a site, this has been stated.

It is anticipated that MSDC will require a Heritage Statement to be prepared to accompany future planning applications, where appropriate. The Heritage Statement should describe the significance of any heritage assets affected by the proposals, including any contribution made by their settings.

⁴⁴ Historic England Heritage at Risk Register. Available at: <https://historicengland.org.uk/advice/heritage-at-risk/search-register> [Date Accessed: 05/01/22]

2.19 SA Objective 10 – Climate change and transport

Box 2.10: SA Objective 10. Climate change and transport- Assessment methodologies and assumptions

10. Climate change and transport: To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.

Carbon Emissions

Development proposals which would be likely to increase greenhouse gas (GHG) emissions in the local area would make it more difficult for MSDC to reduce the Plan area's contribution towards the causes of climate change. This includes developments which increase housing numbers or non-residential developments which could increase GHGs within the Plan area.

The Mid Sussex District Council Sustainability Strategy 2018 - 2023⁴⁵ sets out the Council's approach to delivering sustainable development. The Strategy includes a Sustainability Action Plan which includes themes of energy efficiency, climate change and sustainable travel. The Strategy also sets out statutory sustainability responsibilities as set out in legislation, including the Paris Climate Change Agreement (2015), The Climate Change Act (2008) and the National Cycling and Walking Investment Strategy (2017).

AQMA

Exposure of new residents to air pollution has been considered in the context of the development proposal location in relation to established Air Quality Management Areas (AQMAs) and main roads. It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution i.e. the road carriageway. The Department for Transport (DfT) in their Transport Analysis Guidance (TAG) consider that, "*beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant*"⁴⁶. This statement is supported by Highways England and Natural England based on evidence presented in a number of research papers^{47 48}. A buffer distance of 200m has therefore been applied in this assessment.

Main Road

The proximity of a site in relation to a main road determines the exposure level of site end users to road related air and noise emissions⁴⁹. In line with the DMRB guidance, it is assumed that site end users would be most vulnerable to these impacts within 200m of a main road.

Development proposals located within 200m of a main road would be expected to have a minor negative impact on site end users' exposure to air and/ or noise pollution.

⁴⁵ Mid Sussex District Council (2018) Mid Sussex District Council Sustainability Strategy 2018 – 2023. Available at: <https://www.midsussex.gov.uk/media/3469/msdc-sustainability-strategy.pdf> [Date Accessed: 05/01/22]

⁴⁶ Department for Transport (2021) TAG unit A3 Environmental Impact Appraisal. Available at: <https://www.gov.uk/government/publications/webtag-tag-unit-a3-environmental-impact-appraisal-december-2015> [Date Accessed: 05/01/22]

⁴⁷ Bignal, K., Ashmore, M & Power, S. 2004. The ecological effects of diffuse air pollution from road transport. English Nature Research Report No. 580, Peterborough.

⁴⁸ Ricardo-AEA, 2016. The ecological effects of air pollution from road transport: an updated review. Natural England Commissioned Report No. 199.

⁴⁹ Design Manual for Roads and Bridges, Volume 11: Environmental Assessment, Section 3: Environmental Assessment Techniques, Part 1: Air Quality, Annex D2: Road Type. Available at: <http://www.semmms.info/wp-content/uploads/2016/06/Design-Manual-for-Roads-and-Bridges-Volume-11-Section-3-Part-1.-PDF-981Kb.pdf> [Date Accessed: 05/01/22]

Box 2.10: SA Objective 10. Climate change and transport- Assessment methodologies and assumptions

Development proposals located over 200m from a main road would be expected to have a minor positive impact on site end users' exposure to air and/or noise pollution.

Public Transport

Access to public transport via bus link has been assessed on the basis of distance to a bus stop and its frequency, resulting in either excellent (major positive impact), good (minor positive impact), fair (negligible impact) or poor access to bus services.

Development proposals located within 15 minutes (approximately 1.2km) walk from a train station are expected to have a major positive impact on access to public transport to these services. Development proposals located outside of this distance are expected to have a minor negative impact on access to public transport via train.

Additionally, development proposals located in areas with sustainable access to local facilities such as those within town centres, (e.g. superstores, high streets and shopping centres) have been identified by MSDC as those within a 15 minute walk, and are expected to have a major positive impact on access to these facilities. Development proposals located within a 30 minute journey via public transport are assessed as having a minor positive impact on access to these facilities. Proposals located outside of these thresholds would be expected to have a minor negative impact on site-end users' access to these facilities.

Similarly, development proposals located within a 15 minute walk to a convenience store would be likely to have a major positive impact on access to these facilities, and development outside this distance could have a minor negative impact on site-end users' access to the benefits of a local convenience store.

2.20 SA Objective 11 – Energy and Waste

Box 2.11: SA Objective 11. Energy and Waste - Assessment methodologies and assumptions

11. Energy and waste: To increase energy efficiency and the proportion of energy generated from renewable sources in the district to help mitigate climate change and reduce waste generation and disposal.

Household Waste

For the purpose of this assessment, it is assumed that new residents in Mid Sussex will have an annual waste production of 399kg per person, in line with the England average⁵⁰.

Between 2020 and 2021, the total waste collected by Mid Sussex Council was 52,161 tonnes⁵¹.

A minor negative impact would be expected for development proposals which would be likely to increase household waste generation by between 0.1% and 0.99% in comparison to 2021 levels. A major negative impact would be expected for development proposals which would be likely to increase household waste generation by 1% or more in comparison to 2021 levels.

Energy consumption

In 2016, 40% of UK emissions came from households through use of heating, electricity, transport, aviation and waste⁵². For the purpose of this assessment, it is assumed that larger developments within the Plan area will lead to greater energy consumption and related GHG emissions. Therefore, as a means of deducing smaller developments from larger ones, residential sites proposed for 100 units or more are assessed as having a major negative impact on energy consumption and related GHG emissions. Residential sites proposed for 10 units or more are assessed as having a minor negative impact on this receptor, and less than 10 residential units will have a negligible impact.

⁵⁰ Department for Environment and Rural Affairs (2021) Local authority collected waste generation from April 2000 to March 2021 (England and regions) and local authority data April 2018 to March 2019. Available at: <https://www.gov.uk/government/statistical-data-sets/env18-local-authority-collected-waste-annual-results-tables> [Date Accessed: 05/01/22]

⁵¹ Ibid

⁵² Committee on Climate Change (2016) The Fifth Carbon Budget. Available at: <https://www.theccc.org.uk/wp-content/uploads/2016/07/5CB-Infographic-FINAL-.pdf> [Date Accessed: 05/01/22]

2.21 SA Objective 12 – Water resources

Box 2.12: SA Objective 12. Water resources - Assessment methodologies and assumptions

12. Water resources: To maintain and improve the water quality of the district's watercourses and aquifers, and to achieve sustainable water resources management.

Groundwater:

The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. As such, any site that is located within a groundwater SPZ could potentially have an adverse impact on groundwater quality.

Development proposals located within the total catchment (Zone III), outer zone (Zone II) or inner zone (Zone I) of an SPZ would be likely to have a minor negative impact on groundwater quality.

Watercourses:

Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact on the quality of the water⁵³. An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage or run-off should be permitted⁵⁴. However, it is considered that development further away than this has the potential to lead to adverse impacts such as those resulting from runoff. In this assessment, a 200m buffer zone was deemed appropriate.

Development proposals located within 200m of a watercourse could potentially have a minor negative impact on water quality.

⁵³ World Health Organisation (1996) Water Quality Monitoring - A Practical Guide to the Design and Implementation of Freshwater Quality Studies and Monitoring Programmes: Chapter 2 – Water Quality. Available at: https://www.who.int/water_sanitation_health/resourcesquality/wgmchap2.pdf [Date Accessed: 05/01/22]

⁵⁴ Department of Agriculture, Environment and Rural Affairs (no date) Advice and Information for planning approval on land which is of nature conservation value. Available at: <https://www.daera-ni.gov.uk/articles/advice-and-information-planning-approval-land-which-nature-conservation-value> [Date Accessed: 05/01/22]

2.22 SA Objective 13 – Economic regeneration

Box 2.13: SA Objective 13. Economic regeneration- Assessment methodologies and assumptions

13. Economic regeneration: To encourage the regeneration and prosperity of the district's existing Town Centres and support the viability and vitality of village and neighbourhood centres.

Economic regeneration:

New residents, in line with Council calculated sustainable distances, should be situated within 15 minutes walking distance or 30 minutes by public transport from a superstore, town centre, high street or shopping centre to ensure that they have access to a range of facilities. Good sustainable access to these services and facilities will likely lead to economic stimulation and regeneration, where an increase in footfall could positively impact the local economy and provide new job opportunities.

Development proposals located within a 15 minute walk from these areas can expect a major positive impact on this objective, and those located within a 30 minute public transport journey have been assessed as having a minor positive impact on economic regeneration. Development proposals located outside of these target distances would be expected to have a minor negative impact for this objective.

2.23 SA Objective 14 – Economic growth

Box 2.14: SA Objective 14. Economic growth- Assessment methodologies and assumptions

14. Economic growth: To promote and sustain economic growth and competitiveness across the district to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.

Employment Opportunities:

It is assumed that, in line with Barton et al.'s sustainable distances⁵⁵, new residents should be situated within 5km of key employment areas to ensure they have access to a range of employment opportunities capable of meeting their needs. Key employment areas are defined as locations which would provide a range of employment opportunities from a variety of employment sectors, including retail parks, industrial estates and major local employers. These existing employment areas have been identified by MSDC.

Development proposals which would locate new residents within the target distance of a key employment area would be expected to have a minor positive impact for this objective. Development proposals which would locate new residents outside the target distance to a key employment area would be expected to have a minor negative impact for this objective.

Employment Floorspace:

An assessment of current land use at all sites has been made through reference to aerial mapping and the use of Google Maps⁵⁶.

All identified RA sites are proposed for residential or mixed use. The sites proposed for mixed use are proposed for over 1,000 dwellings, and propose the development of varying extents of employment land, as well as leisure centres, primary schools and GPs, for example, which may provide further local employment.

Development proposals which could result in a net increase in employment floorspace would be expected to have a major positive impact on the local economy. Development proposals which could result in a net decrease in employment floorspace would be expected to have a minor negative impact on the local economy.

⁵⁵ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

⁵⁶ Google Maps (no date) Available at: <https://www.google.co.uk/maps> [Date Accessed: 05/01/22]

3 Spatial Options

3.1 Summary of the SA of Spatial Options

3.1.1 MSDC has identified two reasonable alternative Spatial Options in relation to the distribution of the development proposed in the DPR. **Table 3.1** provides a summary description of the Spatial Options.

Table 3.1: Mid Sussex Spatial Options

Spatial Option	Description of Spatial Option
Option 1	Maintain the existing spatial strategy set out in Policies DP4 and DP6 of the Adopted District Plan, with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.
Option 2	Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools and health care, while recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.

3.1.2 Lepus Consulting has assessed the sustainability performance of each of the Spatial Options, as identified by MSDC. A summary of the assessment scores and findings are provided in **Table 3.2** and summarised below. The full assessment narrative is provided in **Appendix B**.

3.1.3 In order to identify the best performing option, no attempt should be made to sum the different SA ‘scores’ across each SA Objective since they are intrinsically different and not directly comparable.

Table 3.2: Summary assessments of potential impacts of the spatial options

Spatial Option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and crime	Flooding and surface water	Natural Resources	Biodiversity and geodiversity	Landscape	Cultural Heritage	Climate change and transport	Energy and waste	Water resources	Economic regeneration	Economic growth
1	+/-	+	++	++	0	--	-	--	-	+	+	0	++	++
2	++	+/-	+/-	+/-	0	--	-	-	0	-	+	0	+	+

- 3.1.4 The SA assesses the potential social, environmental and economic effects of the plan or proposal, when considered against other reasonable alternative options. It should be noted that whilst every effort has been made to predict likely effects, the potential sustainability impacts of each Spatial Option have been assessed at a high level and are reliant upon the current understanding of the baseline. Furthermore, the Spatial Options provide broad indications of where growth could be delivered, and do not define specific land parcels or locations for development. The assessments consider the likely overall impacts of development in these growth areas. The assessments have been informed by baseline information provided by MSDC, as well as professional judgement.
- 3.1.5 SA Objectives 1 to 4 summarise the predicted effects of the Spatial Options in relation to social sustainability issues. Spatial Option 2 performs well, and gives greater certainty, in relation to the delivery of housing to meet the identified need. As the locations of the proposed growth points or urban extensions is unknown at this stage of the assessment, there is greater uncertainty in relation to some aspects of the assessments including new residents' access to some healthcare services, access to secondary schools and impacts on community cohesion. Spatial Option 1 would be more likely to locate new residents in proximity to existing services and community facilities, however, MSDC has expressed uncertainty as to whether there are sufficient suitable sites (when assessing overall performance against all criteria) to meet this Spatial Option. Where housing needs cannot be met in the local area, there can be longer term, indirect social impacts, such as increasing house prices and rental prices, lack of affordable housing, impacts on community cohesion and quality of life.
- 3.1.6 SA Objectives 5 to 12 summarise the predicted effects of the Spatial Options in relation to environmental sustainability issues. Allowing for the limitations of this high level assessment, both Spatial Options are likely to perform similarly against SA Objectives relating to flooding and surface water, natural resources, biodiversity, energy and waste and water resources. Spatial Option 2 performs marginally better in relation to potential impacts on cultural heritage, as heritage assets in the district are often associated within existing settlements; a growth point in a more rural location may create the opportunity to minimise adverse impacts on heritage. The impacts of development on cultural heritage assets can be positive or adverse and are highly dependent on the design and layout of development and, therefore, there is uncertainty in the assessment of these effects. Spatial Option 2 also seeks to limit growth in designated landscapes, including the High Weald AONB and the setting to the South Downs National Park, and may serve to reduce impacts on these designated landscapes in comparison to Option 1. Spatial Option 2 performs less well against the climate change and transport objective as new residents are more likely to be located greater distances existing services, facilities and sustainable transport choices and are more likely to be dependent on private car use, with associated increases in GHG emissions. However, dependent on the sites selected for allocation, there is potential to provide new services and facilities alongside housing development which would benefit existing residents, particularly in areas which currently have limited access to such facilities within walking distance.

- 3.1.7 Spatial Option 1 would be more likely to deliver housing growth in locations which would help to support existing businesses located in the main centres, supporting the vitality and viability of these town and village centres and supporting town centre regeneration. While Spatial Option 2 does not specify the location of the growth point/s, this Spatial Option is more likely to deliver development in a more rural location, such development may support the businesses in the associated nearby settlement/s, potentially reducing footfall in the main centres.
- 3.1.8 Overall, Spatial Option 1 performs better in relation to some aspects of social and economic sustainability; however, there is uncertainty in the deliverability of identified housing need and this may lead to adverse social impacts in the long term. Spatial Option 2 provides greater certainty in relation to the delivery of the identified housing need. This Option also performs better in relation to some aspects of environmental sustainability, however, there is the potential for a new point/s to lead to greater need to travel to meet daily needs and fewer sustainable travel choices, with associated increases in GHG emissions and impacts on climate change. Further, detailed site assessment work would be required to define the likely nature and level of these impacts and the potential strategies to mitigate adverse effects. The conclusions at this stage are therefore uncertain and will be dependent on the sites proposed for allocation, the associated infrastructure and other policy mitigation or requirements

4 Site Assessments

4.1 Preface

- 4.1.1 MSDC has identified 42 reasonable alternative sites where residential or mixed-use development may be considered for allocation in the DPR, and two reasonable alternative sites for C2 use. The 44 reasonable alternatives have been identified by the Council following assessment of approximately 260 sites against a Site Selection methodology which rejects sites that the Council deems unsuitable based on evidence.
- 4.1.2 The SA assessments of the sustainability performance of the 44 reasonable alternative sites are provided in **Appendix C**.
- 4.1.3 Each appraisal includes an SA impact matrix which provides an indication of the nature and magnitude of impacts pre-mitigation. Pre-mitigation assessments consider the potential impacts of the allocation of the site without the mitigating influence of the draft District Plan policies. Assessment narratives follow the impact matrices for each site, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- 4.1.4 The 44 reasonable alternative sites identified by MSDC and assessed in this SA are set out in **Table 4.1**.

Table 4.1: Reasonable alternative site references and addresses

Site Reference	Site Address	Settlement
13	Land west of Kemps, Hurstpierpoint	Hurstpierpoint
18	Crabbet Park, Old Hollow, Near Crawley	Copthorne
19	Land east of College Lane, Hurstpierpoint	Hurstpierpoint
198	Land off West Hoathly Road, East Grinstead	East Grinstead
210	Land rear of 2 Hurst Road (Land opposite Stanford Avenue) Hassocks	Hassocks
503	Haywards Heath Golf Course, High Beech Lane, Haywards Heath	Lindfield
508	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath	Haywards Heath
526	Land east of Paynesfield, Bolney	Bolney
543	Land West of London Road (north), Bolney	Bolney
556	Land east of Borde Hill Lane, Haywards Heath	Haywards Heath
573	Batchelors Farm, Keymer Road, Burgess Hill	Burgess Hill
575	Land north east of Hurstpierpoint	Hurstpierpoint
601	Land at Coombe Farm, London Road, Sayers Common	Sayers Common
617	Land at Foxhole Farm, Bolney	Bolney
631	Challoners, Cuckfield Road, Ansty	Ansty
678	Broad location West of A23	Twineham
686	Land to the rear of The Martins (south of Hophurst Lane), Crawley Down	Crawley Down
688	Land to west of Turners Hill Road, Crawley Down	Crawley Down
736	Land at Ansty Farm, Cuckfield Road, Ansty	Ansty
740	Broad location to the West of Burgess Hill	Burgess Hill
743	Hurst Farm, Turners Hill Road, Crawley Down	Crawley Down

Site Reference	Site Address	Settlement
784	Extension to allocated Land at Bolney Road, Ansty	Ansty
789	Phase 1 Swallows Yard, London Road, Albourne	Albourne
799	Land south of Reeds Lane, Sayers Common	Sayers Common
830	Land to the west of Kings Business Centre, Reeds Lane, Sayers Common	Sayers Common
844	Land at North Colwell Farm, Lewes Road, Haywards Heath	Haywards Heath
858	Land at Hurstwood Lane, Haywards Heath	Haywards Heath
984	The Paddocks Lewes Road Ashurst Wood	Ashurst Wood
986	Land to the West of Albourne Primary School Henfield Road Albourne	Albourne
1003	Land to South of LVS Hassocks, London Road, Sayers Common	Sayers Common
1018	Extension south west of Meadow View, Sayers Common	Sayers Common
1020	Ham Lane Farm House, Ham Lane Scaynes Hill	Scaynes Hill
1022	Former Hassocks Golf Club, London Road, Hassocks	Hassocks
1026	Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common	Sayers Common
1030	Land at Hillbrow, Janes Lane, Burgess Hill	Burgess Hill
1063	Phase 2 Swallows Yard, London Road Albourne	Albourne
1075	Land north of Willow way and Talbort Mead, Cuckfield Road Road Hurstpierpoint	Hurstpierpoint
1095	Land at West Town Farm Hurstpierpoint	Hurstpierpoint
1101	Land at Byanda, Hassocks	Hassocks
1105	Land east and west of Malthouse Lane	Burgess Hill
1106	Land at Hyde Lodge, Handcross	Handcross
1120	Land east of Foxhole Lane	Bolney
1121	Orchards Shopping Centre	Haywards Heath
1123	Burgess Hill Station	Burgess Hill

4.2 Overview of site assessments pre-mitigation

4.2.1 The impact matrices for all reasonable alternative site assessments pre-mitigation are presented in **Table 4.2**. This table summarises the ‘worst case scenario’ impact per SA Objective, as explained within **paragraph 2.6.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix C**, which are presented with impacts per receptor within each SA Objective, as well as the topic specific methodologies and assumptions presented in **Boxes 2.1 to 2.14**.

Table 4.2: Impact matrix of the 44 reasonable alternative sites pre-mitigation

Site Reference	1 Housing	2 Health and Wellbeing	3 Education	4 Community and Crime	5 Flooding	6 Natural Resources	7 Biodiversity	8 Landscape	9 Cultural Heritage	10 Transport	11 Energy and Waste	12 Water Resources	13 Economic Regeneration	14 Economic Growth
13	+	-	-	++	-	-	0	-	-	-	-	0	++	+
18	++	-	--	-	--	--	--	-	-	-	--	-	-	++
19	+	-	--	-	--	-	0	-	-	-	-	0	-	+
198	+	-	-	-	+	-	-	--	0	-	-	-	-	+
210	+	-	++	+	+	-	0	-	0	-	-	0	+	+
503	++	-	--	-	-	--	--	-	-	-	--	0	-	-
508	+	-	--	-	-	-	0	-	0	-	-	0	-	+
526	+	-	-	-	+	-	0	-	-	-	-	0	-	+
543	+	-	-	-	+	-	0	-	0	-	-	0	-	+
556	+	-	-	-	--	-	-	-	-	-	-	-	-	+
573	+	-	++	-	+	-	0	-	0	-	-	0	-	+
575	++	-	--	-	--	--	--	-	-	-	--	-	-	+
601	++	-	--	-	--	-	--	-	-	-	--	0	-	+
617	++	-	-	-	-	-	0	-	-	-	--	0	-	+
631	+	-	--	-	+	-	0	-	0	-	-	0	-	+
678	++	-	--	-	--	--	--	-	-	-	--	-	-	+
686	++	-	-	-	--	-	-	-	-	-	--	0	-	+
688	++	-	-	-	--	-	--	-	-	-	--	-	-	+
736	++	-	--	-	--	--	--	-	-	-	--	-	-	++
740	++	-	0	-	--	--	--	-	0	-	--	-	-	++
743	+	-	-	-	--	-	-	-	0	-	-	0	-	-
784	+	-	--	-	+	-	0	-	0	-	-	0	-	+
789	+	-	-	-	+	-	0	-	-	-	-	0	-	+
799	++	-	-	-	--	--	0	-	-	-	--	0	-	++
830	++	-	--	-	--	-	0	--	0	-	--	-	-	+
844	++	-	-	-	-	-	-	-	-	-	--	0	-	+
858	+	-	--	-	+	-	-	-	0	-	-	0	-	+
984	+	-	-	-	+	-	-	-	0	-	0	0	-	+
986	++	-	-	-	--	-	-	-	-	-	--	0	-	+
1003	++	-	--	-	--	-	0	-	0	-	--	-	-	+
1018	++	-	-	-	--	-	0	-	0	-	--	0	-	+
1020	+	-	-	-	-	-	-	-	0	-	-	0	-	+
1022	++	-	--	-	--	--	--	-	-	-	--	-	-	-
1026	+	-	-	-	--	-	0	-	0	-	-	0	-	+
1030	+	-	-	-	+	-	-	-	0	-	-	-	-	+
1063	+	-	-	-	+	-	0	-	-	-	-	0	-	+
1075	++	-	-	-	--	-	-	-	-	-	--	-	-	+
1095	++	-	-	-	--	--	-	-	-	-	--	-	-	+

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
1101	+	-	0	++	--	-	0	-	-	-	+/-	0	++	++
1105	++	-	--	-	--	--	-	-	-	-	--	-	-	+
1106	+	-	0	-	-	-	-	--	0	-	+/-	0	-	++
1120	++	-	-	-	-	-	0	-	-	-	--	0	-	+
1121	++	+	++	++	-	+	-	+/-	0	++	--	0	+	-
1123	++	-	++	++	-	-	-	+/-	0	++	--	0	+	-

5 Policy Assessments

5.1 Preface

5.1.1 **Table 5.1** lists the 85 Mid Sussex DPR draft policies. This includes 26 site allocation policies, and 59 development management policies. The sustainability performance of these policies is set out in **Appendix D**.

Table 5.1: The 85 draft MSDPR policies

Policy number	Policy Name
Sustainability	
DPS1	Climate Change
DPS2	Sustainable Design and Construction
DPS3	Renewable and Low Carbon Energy Schemes
DPS4	Flood Risk and Drainage
DPS5	Water Infrastructure and the Water Environment
DPS6	Health and Wellbeing
Natural Environment and Green Infrastructure	
DPN1	Biodiversity, Geodiversity and Nature Recovery
DPN2	Biodiversity Net Gain
DPN3	Green infrastructure
DPN4	Trees, Woodland and Hedgerows
DPN5	Historic Parks and Gardens
DPN6	Pollution
DPN7	Noise Impacts
DPN8	Light Impacts and Dark Skies
DPN9	Air Quality
DPN10	Land Stability and Contaminated Land
Countryside	
DPC1	Protection and Enhancement of Countryside
DPC2	Preventing Coalescence
DPC3	New Homes in the Countryside
DPC4	High Weald Area of Outstanding Natural Beauty
DPC5	Setting of the South Downs National Park
DPC6	Ashdown Forest SPA and SAC
Built Environment	
DPB1	Character and Design
DPB2	Listed Buildings and Other Heritage Assets
DPB3	Conservation Areas
Transport	
DPT1	Placemaking and Connectivity
DPT2	Rights of Way and Other Recreational Routes
DPT3	Active Travel
DPT4	Parking and Electric Vehicle Charging Infrastructure
DPT5	Off-Airport Car Parking

Policy number	Policy Name
Economy	
DPE1	Sustainable Economic Development
DPE2	Existing Employment Sites
DPE3	Employment Allocations
DPE4	Town and Village Centres
DPE5	Within Town and Village Centre Boundaries
DPE6	Within Primary Shopping Areas
DPE7	Smaller Village and Neighbourhood Centres
DPE8	Sustainable Rural Development and the Rural Economy
DPE9	Sustainable Tourism and the Visitor Economy
Sustainable Communities	
DPSC1	Land to the West of Burgess Hill
DPSC2	Land to the South of Reeds Lane, Sayers Common
DPSC3	Land at Crabbet Park
Housing	
DPH1	Housing
DPH2	Sustainable Development - Outside the Built Up Area
DPH3	Sustainable Development - Inside Built Up Area
DPH4	General Principles for Housing Allocations
DPH5	Batchelors Farm, Keymer Road, Burgess Hill
DPH6	Land at Brow Hill, Janes Lane, Burgess Hill
DPH7	Burgess Hill Station, Burgess Hill
DPH8	Land off West Hoathly Road, East Grinstead
DPH9	Land at Hurstwood Lane, Haywards Heath
DPH10	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath
DPH11	Land east of Borde Hill Lane Haywards Heath
DPH12	Orchards Shopping Centre, Haywards Heath
DPH13	Land to west of Turners Hill Road, Crawley Down
DPH14	Hurst Farm, Turners Hill Road, Crawley Down
DPH15	Land rear of 2 Hurst Road, Hassocks
DPH16	Land west of Kemps, Hurstpierpoint
DPH17	The Paddocks, Lewes Road, Ashurst Wood
DPH18	Land at Foxhole Farm, Bolney
DPH19	Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common
DPH20	Land at Coombe Farm, London Road, Sayers Common
DPH21	Land to the West of Kings Business Centre, Reeds Lane, Sayers Common
DPH22	Land at LVS Hassocks, London Road, Sayers Common
DPH23	Ham Lane Farm House, Ham Lane, Scaynes Hill
DPH24	Challoners, Cuckfield Road, Ansty
DPH25	Land to the west of Marwick Close, Bolney Road, Ansty
DPH26	Older Persons Housing and Specialist Accommodation
DPH27	Land at Byanda, Hassocks
DPH28	Land at Hyde Lodge, Handcross
DPH29	Gypsies, Travellers and Travelling Showpeople
DPH30	Self and Custom Build

Policy number	Policy Name
DPH31	Housing Mix
DPH32	Affordable Housing
DPH33	First Homes
DPH34	Rural Exception Sites
DPH35	Dwelling Space Standards
DPH36	Accessibility
Infrastructure	
DPI1	Securing Infrastructure
DPI2	Planning Obligations
DPI3	Major Infrastructure Projects
DPI4	Communications Infrastructure
DPI5	Open Space, Sport and Recreational Facilities
DPI6	Community and Cultural Facilities and Local Services
DPI7	Viability

5.2 Overview of policy assessments

5.2.1 The impact matrices for all policy assessments are presented in **Table 5.2**. These impacts should be read in conjunction with the assessment text narratives in **Appendix D**, as well as the topic specific methodologies and assumptions presented in **Boxes 2.1 to 2.14**.

Table 5.2: Impact matrix of the 85 draft MSDPR policies

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
Sustainability														
DPS1	0	+	0	0	+	+	+	0	0	++	+	+	0	0
DPS2	0	+	0	0	+	+	+	0	0	+	++	++	0	0
DPS3	0	0	0	0	0	+	-	-	0	0	++	0	0	0
DPS4	0	0	0	0	++	0	+	+	0	0	0	+	0	0
DPS5	0	+	0	0	0	0	+	0	0	0	0	++	0	0
DPS6	0	++	+	++	+	0	+	+	0	+	0	0	+	+
Natural Environment and Green Infrastructure														
DPN1	0	+	0	0	+	+	++	+	0	+	0	+	0	0
DPN2	0	+	0	0	+	+	++	0	0	+	0	+	0	0
DPN3	0	+	0	+	+	0	+	+	0	+	0	+	0	0
DPN4	-	+	0	0	+	+	++	+	+	+	0	+	0	0
DPN5	0	0	0	0	0	0	+	+	+	0	0	0	0	0
DPN6	0	+	0	0	0	+	+	0	0	0	0	+	0	0
DPN7	0	+	0	0	0	0	+	+	+	0	0	0	0	0
DPN8	0	+	0	0	0	0	+	+	+	0	0	0	0	0
DPN9	0	+	0	0	0	0	+	0	0	+	0	0	0	0
DPN10	0	+	0	0	0	+	+	0	0	0	0	+	0	0
Countryside														
DPC1	0	+	0	0	0	+	+	+	+	0	0	0	0	0
DPC2	0	0	0	+	0	+	0	++	+	0	0	0	0	0
DPC3	+	0	0	0	0	0	0	+	+	0	0	0	0	+
DPC4	-	0	0	+	0	0	+	++	+	0	0	0	0	+
DPC5	-	0	0	0	0	0	+	++	0	0	0	0	0	0
DPC6	0	+	0	0	0	0	+	+	0	+	0	0	0	0
Built Environment														
DPB1	0	+	0	++	+	+	+	+	+	+	+	0	0	0
DPB2	0	0	0	0	0	0	0	+	++	0	0	0	0	0
DPB3	0	0	0	0	0	0	0	+	+	0	0	0	0	0
Transport														
DPT1	0	+	0	+	0	0	0	0	0	+	0	0	0	+
DPT2	0	+	0	0	0	0	0	+	0	+	0	0	0	0

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
DPT3	0	+	0	+	0	0	0	0	0	+	0	0	0	0
DPT4	0	0	0	0	0	0	0	0	0	+	0	0	0	0
DPT5	0	0	0	0	0	0	0	0	0	+	0	0	0	0
Economy														
DPE1	0	0	0	+	-	-	-	-	-	0	-	-	++	++
DPE2	0	0	0	0	-	-	-	-	-	0	-	-	++	++
DPE3	0	+	0	+	0	--	-	-	-	0	-	0	+	+
DPE4	0	+	0	+	0	0	0	0	0	0	0	0	+	+
DPE5	0	0	0	+	0	0	0	0	0	0	0	0	+	0
DPE6	+	+	0	+	0	0	0	+	0	0	0	0	+	0
DPE7	0	0	0	+	0	0	0	0	0	+	0	0	+	+
DPE8	0	+	0	0	0	0	0	0	0	+	0	0	+	0
DPE9	0	+	0	0	0	0	0	0	+	+	0	0	+	+
Sustainable Communities														
DPSC1	++	+	++	++	0	--	-	-	0	0	-	0	0	++
DPSC2	++	+	++	++	+	--	0	-	-	0	-	0	+	++
DPSC3	++	+	++	++	0	--	-	-	-	0	-	0	+	++
Housing														
DPH1	++	+/-	0	+/-	-	--	+/-	--	-	-	-	0	0	0
DPH2	+	0	0	+	0	-	0	+	0	0	0	0	+	+
DPH3	+	0	0	+	0	+	0	+	0	+	0	0	+	+
DPH4	++	++	+	++	++	+	++	++	++	++	++	++	+	+
DPH5	+	+	++	+	+	-	0	0	0	0	0	0	0	+
DPH6	++	+	+	+	+	-	0	0	0	0	0	0	0	+
DPH7	++	++	++	++	+	+	0	+	0	++	-	0	++	+
DPH8	+	+	+	+	+	-	0	-	0	0	0	0	0	+
DPH9	+	+	+	0	+	-	0	0	0	0	0	0	0	+
DPH10	+	+	+	+	+	-	0	0	0	0	0	0	+	+
DPH11	+	+	+	+	0	-	-	-	0	0	0	0	0	+
DPH12	++	++	++	++	+	+	0	+	0	++	-	0	++	+
DPH13	++	+	+	+	+	-	-	-	0	-	-	0	0	+
DPH14	+	+	+	0	+	-	0	0	0	0	0	0	0	+
DPH15	+	0	++	++	+	-	0	0	0	0	0	0	++	+
DPH16	+	+	+	++	+	-	0	-	-	++	0	0	++	+
DPH17	+	0	+	+	+	-	0	0	0	0	0	0	-	+
DPH18	++	0	+	+	+	-	0	-	0	-	-	0	0	+
DPH19	+	+	+	+	+	-	0	0	0	0	0	0	0	+
DPH20	++	0	0	+	+	-	0	-	-	0	-	0	0	+
DPH21	++	+	0	+	+	-	0	0	0	0	-	0	0	+

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
DPH22	++	+	0	0	+	-	0	-	0	0	-	0	0	+
DPH23	+	+	+	+	+	-	0	0	0	0	0	0	0	+
DPH24	+	0	0	+	+	-	0	0	0	0	0	0	0	+
DPH25	+	0	0	+	+	-	0	0	0	0	0	0	0	+
DPH26	+	+	0	+	0	0	0	+	0	+	0	0	0	0
DPH27	+	0	0	++	+	-	0	0	0	0	+/-	0	++	++
DPH28	+	+	0	+	+	-	0	-	0	0	+/-	0	0	++
DPH29	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH30	+	0	0	0	0	0	0	+	0	0	0	0	0	0
DPH31	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH32	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH33	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH34	+	0	+	0	0	-	0	+	0	+	0	0	0	0
DPH35	0	+	0	0	0	0	0	0	0	0	0	0	0	0
DPH36	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Infrastructure														
DPI1	0	+	+	+	+	0	0	+	0	+	+	+	+	+
DPI2	0	+	+	+	+	0	+	+	0	+	+	0	0	0
DPI3	0	+	+	0	+	0	0	0	0	+	+	0	+	+
DPI4	0	0	0	0	0	+	0	0	0	+	0	0	+	+
DPI5	0	+	0	+	0	0	+	+	0	0	0	0	0	0
DPI6	0	+	0	+	0	0	0	0	0	0	0	0	0	+
DPI7	+/-	+/-	+/-	+/-	0	0	0	0	0	+/-	+/-	+/-	+/-	+/-

5.3 Summary of policy assessments

- 5.3.1 Many of the policy assessments which focus on development management aspects have identified minor positive or negligible impacts in relation to sustainability.
- 5.3.2 A greater range of potential effects have been identified with regard to the site allocation policies (DPSC1-3, DPH5-25 and DPH27-28). The site allocation policies generally perform well in terms of providing social and community infrastructure, active travel and sustainable transport measures, and supporting economic regeneration. Minor negative effects have been identified for some site allocation policies, where the development could potentially give rise to adverse effects on biodiversity assets, landscape and cultural heritage features, although the policy provisions would be likely to reduce these effects to some degree.
- 5.3.3 Policies DPH1 and DPE3, as well as ‘Sustainable Communities’ site allocation policies DPSC1, DPSC2 and DPSC3 are the only policies where the assessment has identified major negative impacts. DPH1 is a strategic policy setting out the total level of housing need anticipated to be delivered both during the plan period as well as the element delivered as part of the DPR. The identified adverse impacts are associated with a significant loss of soil resources and potential adverse impacts on landscape character as a result of the development overall. DPE3 sets out the employment land provisions, referring to Policies DPSC2 and DPSC3. The Sustainable Community Sites are large-scale allocations, where adverse impacts are associated with the significant loss of soil resources.
- 5.3.4 Policy DPH1 also identifies a range of uncertain impacts, due to the varying scale and location of the proposed development which would be expected to result in a mixture of positive and negative impacts under SA Objectives ‘Health and Wellbeing’ (SA Objective 2) and ‘Community and Crime’ (SA Objective 4).
- 5.3.5 At the time of writing, the potential impact of the proposed development on Habitats sites, such as Ashdown Forest SAC and SPA, is uncertain. The HRA will provide analysis of the likely impact pathways and mitigation measures. The emerging Regulation 18 HRA⁵⁷ explored the potential for LSEs and found that an Appropriate Assessment was required at Ashdown Forest arising from atmospheric pollution and recreational pressure. The preliminary findings indicate that through implementing appropriate mitigation (in liaison with Natural England) it will be possible to conclude that the DPR will not cause any adverse impacts on site integrity. The final conclusions of the HRA process will be used to inform and update the SA, when available, at the Regulation 19 Stage.
- 5.3.6 The majority of the other policies set out requirements for development proposals which ultimately seek to protect the natural and built environment and ensure there is sufficient social infrastructure to support new residents. This includes ensuring the delivery of an appropriate housing mix, protecting designated sites, such as the High Weald AONB, the setting to the South Downs National Park and sites designated for their biodiversity interest. As these policies seek to protect existing assets or enhance the provision of these features, minor positive impacts have largely been identified.

⁵⁷ AECOM (2022) Habitats Regulations Assessment of the Mid Sussex District Plan Review, Regulation 18. Draft – July 2022.

5.3.7 Overall, the policies set out a suite of requirements which would be likely to help avoid potential impacts, and where necessary, mitigate adverse effects. The likely mitigating effects of the 59 draft policies (excluding the 26 site allocation policies which do not relate to all reasonable alternatives) are set out in **Appendix E** and recommendations to further improve the performance of the policies is set out **section 5.4**.

5.4 Recommendations

5.4.1 Recommendations to help improve the sustainability performance of the draft MSDPR policies have been listed in **Table 5.3**.

Table 5.3: Recommendations for improvements to the draft Mid Sussex DPR policies

SA Objective	Recommendations	Council comments
1. Housing	<ul style="list-style-type: none"> Support proposals that facilitate remote/home working. For example, in relation to ensuring suitable broadband connections and in relation to the internal layout of dwellings. Greater home working reduces the need to travel, reduces congestion and traffic-related emission of GHGs and other pollutants. 	<p>Policy DPI4: Communications Infrastructure encourages high quality digital infrastructure including fibre to new housing. This will ensure new homes support home working and reduce the need to travel.</p> <p>Policy DPT1: Placemaking and Connectivity ensures that new streets are designed to incorporate advanced digital infrastructure, including fibre, to improve digital connectivity and facilitate home working. This reflects the aims of the Council's adopted Sustainable Economy Strategy to develop digital infrastructure.</p> <p>Policy DPE1: Sustainable Economic Development also seeks appropriate infrastructure to support business growth, including advanced digital infrastructure.</p>
2. Health and Wellbeing	<ul style="list-style-type: none"> Consider commissioning a Green Infrastructure Strategy as part of the Evidence Base to inform the protection and provision of a network of green and blue infrastructure and the multiple benefits it can deliver, including in relation to mental and physical health. Consider using policy tools to set out the quantitative and qualitative requirements for informal/natural green space/green infrastructure in new developments, for example, using Natural England's Accessible Natural Greenspace Standard. 	<p>Policy DPN3: Green Infrastructure protects and enhances Green Infrastructure (including blue infrastructure) assets. The policy safeguards existing assets. Policy DPS6: Health and Wellbeing and DPS1: Climate Change emphasise the importance of green infrastructure and require development to incorporate green infrastructure in order to secure the multiple benefits of green infrastructure.</p> <p>The draft Play & Amenity Green Space Study considers quantitative and qualitative standards for green space.</p> <p>Policy DPN9: Air Quality builds upon existing air quality policy and refers to the Council's air quality guidance and related Air Quality Action Plan.</p>

SA Objective	Recommendations	Council comments
	<ul style="list-style-type: none"> Consider enhancing polices relating to air pollution to seek to improve air quality across the district. 	<p>Site proposals within the District Plan are tested through Air Quality modelling to ensure no adverse impacts on the existing AQMA and Ashdown Forest SAC in adjoining Wealden district.</p>
<p>3. Education</p>	<ul style="list-style-type: none"> Provide policy support for the need to deliver sustainable transport choices to access primary and secondary schools. 	<p>The District Plan strategy is based around the 20-minute neighbourhood principle, selecting growth locations based on the ability for communities to access facilities (such as schools) by active travel rather than by private car. This includes provision of new educational facilities on significant sites (over 1,000 dwellings).</p> <p>Policy DPT3: Active Travel provides the requirement for development to create healthy environments in which people choose to walk and wheel. This includes provision of active travel infrastructure and facilities such as cycle parking.</p>
<p>4. Community and Crime</p>	<ul style="list-style-type: none"> No further recommendations. 	
<p>5. Flooding</p>	<ul style="list-style-type: none"> No further recommendations. 	
<p>6. Natural Resources</p>	<ul style="list-style-type: none"> To protect the soil resource, where possible provide open space or green infrastructure, such as community orchards and allotments, in areas of BMV land within a site boundary. 	<p>Several policies seek to protect soil including DPS1: Climate Change; DPS2: Sustainable Design and Construction; DPN1: Biodiversity, Geodiversity and Nature Recovery; DPN3: Green Infrastructure; DPN6: Pollution; DPN10: Land Stability and Contaminated Land; DPC1: Protection and Enhancement of the Countryside; and DPC4: High Weald Area of Outstanding Natural Beauty.</p> <p>The policies seek to protect soil health and prevent its degradation through the results of development. BMV land will be protected and soil is also valued for its contribution to carbon storage, biodiversity and nature recovery.</p>
<p>7. Biodiversity</p>	<ul style="list-style-type: none"> Consider commissioning a Green Infrastructure Strategy as part of the Evidence Base to inform the protection and provision of a network of green and blue infrastructure and the multiple benefits it can deliver, including in relation to enhancing biodiversity 	<p>Policy DPN3: Green Infrastructure protects and enhances Green Infrastructure (including blue infrastructure) assets. The policy safeguards existing assets.</p> <p>Policy DPS1: Climate Change emphasises the importance of green infrastructure in contributing to mitigating the effects of climate change.</p>

SA Objective	Recommendations	Council comments
	<p>and facilitating resilience and adaptation to a changing climate.</p> <ul style="list-style-type: none"> • Improve the resilience of the ecological network through increased quantity of habitat and enhanced habitat connectivity, through an evidenced landscape scale approach, for example, through preparation of an ecological network map or cross referencing to the evidence provided in the Local Nature Recovery Map. • Ensure policy recognises the multiple benefits of natural capital and ecosystem services, such as health and wellbeing, mitigation of extreme weather, water management, improvements to air quality, amongst others. 	<p>Policies DPS1: Climate Change; DPS6: Health and Wellbeing; and DPN1: Biodiversity, Geodiversity and Nature Recovery emphasise the importance of biodiversity, green infrastructure and nature-based solutions requiring development to incorporate such features in order to secure the multiple benefits of natural capital and ecosystem services.</p> <p>Policy DPN1: Biodiversity, Geodiversity and Nature Recovery and Policy DPN2: Biodiversity Net Gain refer to nature recovery. Proposals should align with the forthcoming Local Nature Recovery Strategy and other relevant strategies. Work is ongoing to map the ecological network and habitats in Mid Sussex District.</p>
<p>8. Landscape</p>	<ul style="list-style-type: none"> • Policies should aim to protect areas identified as tranquil. An example method for identifying tranquillity include ‘Mapping Tranquillity’⁵⁸. 	<p>Policy DPN7: Noise Impacts protects areas valued for tranquillity, including designated landscapes.</p> <p>Policies DPC4: High Weald Area of Outstanding Natural Beauty and DPC5: Setting of the South Downs National Park identify tranquillity as a key characteristic of protected landscapes.</p>
<p>9. Cultural Heritage</p>	<ul style="list-style-type: none"> • DPB2: Listed Buildings and Other Heritage Assets. Consider amending wording relating to ‘Other Heritage Assets’ to be “conserve or enhance” heritage assets” rather than “conserve”. • Consider amending wording to bring out the opportunity to enhance the public understanding and enjoyment of heritage assets. 	
<p>10. Climate Change and Transport</p>	<ul style="list-style-type: none"> • Consider commissioning a Green Infrastructure Strategy to inform the protection and provision of a range of multifunctional green and blue infrastructure types alongside 	<p>Policy DPN3: Green Infrastructure protects and enhances Green Infrastructure (including blue infrastructure) assets. The policy safeguards existing assets.</p>

⁵⁸ CPRE (2005) Mapping Tranquillity. Available at: <https://www.cpre.org.uk/resources/mapping-tranquillity/> [Date Accessed: 28/09/22]

SA Objective	Recommendations	Council comments
	development throughout the Plan period.	
11. Energy and Waste	<ul style="list-style-type: none"> The requirement to meet BREEAM ‘excellent’ or ‘outstanding’ for residential and non-residential development should lead to greater energy efficiency and reductions in construction and operational waste generation. Consider also explicitly setting higher standards than required by the Building Regulations⁵⁹ to work towards achieving zero carbon development. Publish evidence on and respond to the relevant recommendations in the future report on reducing GHG emissions across the plan area. Consider local partnerships to establish locally appropriate solutions to the climate adaption and mitigation. 	<p>DPS2: Sustainable Design and Construction seeks development to achieve Home Quality Mark and BREEAM standards (minimum dependant on size). Seeking tighter standards than Building Regulations will need significant evidence and viability testing but will be investigated as the plan progresses.</p> <p>Evidence on reducing GHG emissions is being prepared as part of the Council’s overall strategy for achieving Net Zero.</p>
12. Water Resources	<ul style="list-style-type: none"> No further recommendations. 	
13. Economic Regeneration	<ul style="list-style-type: none"> No further recommendations. 	
14. Economic Growth	<ul style="list-style-type: none"> No further recommendations. 	

⁵⁹ MHCLG (2016) Building Regulations: Approved Document. Available at: <https://www.gov.uk/government/collections/approved-documents> [Date Accessed: 31/01/22]

6 Site assessments post-mitigation

6.1 Overview

6.1.1 The impact matrices for all reasonable alternative site assessments post-mitigation are presented in **Table 6.1**. These impacts should be read in conjunction with **Appendix E**, as well as the topic specific methodologies and assumptions presented in **Boxes 2.1 to 2.14**.

Table 6.1: Impact matrix of the 44 reasonable alternative sites post-mitigation

Site Reference	1 Housing	2 Health and Wellbeing	3 Education	4 Community & Crime	5 Flooding	6 Natural Resources	7 Biodiversity	8 Landscape	9 Cultural Heritage	10 Climate Change and Transport	11 Energy and Waste	12 Water Resources	13 Economic Regeneration	14 Economic Growth
13	+	-	0	++	+	-	+/-	-	-	++	0	0	++	+
18	++	-	-	-	0	--	-	-	-	-	-	0	-	++
19	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
198	+	0	0	0	+	-	-	--	0	-	0	0	-	+
210	+	-	++	++	+	-	+/-	-	0	-	0	0	++	+
503	++	0	-	-	+	--	-	-	0	-	-	0	-	+
508	+	0	-	0	+	-	+/-	-	0	-	0	0	+	+
526	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
543	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
556	+	0	0	+	0	-	-	-	0	-	0	0	-	+
573	+	-	++	0	+	-	+/-	-	0	-	0	0	-	+
575	++	-	-	-	+	--	-	-	-	-	-	0	-	+
601	++	-	-	-	+	-	-	-	0	-	-	0	-	+
617	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
631	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
678	++	-	-	-	0	--	-	-	0	-	-	0	-	+
686	++	0	0	0	+	-	-	-	0	-	-	0	-	+
688	++	-	0	-	+	-	-	-	0	-	-	0	-	+
736	++	-	-	-	0	--	-	-	0	-	-	0	-	++
740	++	-	0	-	0	--	-	-	0	-	-	0	-	++
743	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
784	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
789	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
799	++	-	0	-	+	--	+/-	-	-	-	-	0	-	++
830	++	-	-	-	+	-	+/-	-	0	-	-	0	-	+
844	++	-	0	0	+	-	+/-	-	0	-	-	0	-	+
858	+	0	-	-	+	-	-	-	0	-	0	0	-	+
984	+	-	0	+	+	-	-	--	0	-	0	0	-	+
986	++	-	0	-	+	-	-	-	0	-	-	0	-	+

Site Reference	1 Housing	2 Health and Wellbeing	3 Education	4 Community & Crime	5 Flooding	6 Natural Resources	7 Biodiversity	8 Landscape	9 Cultural Heritage	10 Climate Change and Transport	11 Energy and Waste	12 Water Resources	13 Economic Regeneration	14 Economic Growth
1003	++	-	-	-	+	-	+/-	-	0	-	-	0	-	+
1018	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
1020	+	0	0	0	+	-	+/-	-	0	-	0	0	-	+
1022	++	-	-	-	+	--	-	-	0	-	-	0	-	+
1026	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
1030	++	0	0	+	+	-	0	-	0	-	0	0	-	+
1063	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
1075	++	-	0	++	+	-	-	-	0	-	-	0	-	+
1095	++	-	0	-	+	--	-	-	0	-	-	0	-	+
1101	+	-	0	++	+	-	+/-	-	0	-	+/-	0	++	++
1105	++	-	-	-	0	--	-	-	0	-	-	0	-	+
1106	+	-	0	-	+	-	-	--	0	-	+/-	0	-	++
1120	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
1121	++	++	++	++	+	+	0	+/-	0	++	-	0	++	+
1123	++	++	++	++	+	+	0	+/-	0	++	-	0	++	+

7 Next steps

7.1 Consultation on the Regulation 18 SA Report

7.1.1 This Regulation 18 SA Report will be subject to consultation alongside the consultation draft (Regulation 18) Mid Sussex District Plan Review 2021 – 2039.

7.1.2 This report represents the latest stage of the SA process to accompany the Mid Sussex DPR. The SA process will take on board any comments on this report and use them to inform the next stage in the SA process, as appropriate.

7.2 Responding to the consultation

7.2.1 This Regulation 18 SA Report will be published by the MSDC for consultation. Consultation findings will be used to inform subsequent stages of the SA process.

7.2.2 All responses on this consultation exercise should be sent to:

Mid Sussex District Council

Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Tel: 01444 477053

Email: PolicyConsultation@midsussex.gov.uk

Habitat Regulations Assessments
Sustainability Appraisals
Strategic Environmental Assessments
Landscape Character Assessments
Landscape and Visual Impact Assessments
Green Belt Reviews
Expert Witness
Ecological Impact Assessments
Habitat and Ecology Surveys



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CHELtenham

Appendix A: Mid Sussex Local Plan Regulation 19 SA Framework

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
1	Housing To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	1.1. Meet the housing requirement of the whole community, including of older people? 1.2. Deliver a range of type, tenures and mix of homes the District needs over the plan period? 1.3. Increase the supply of affordable homes? 1.4. Provide for the housing need of an ageing population? 1.5. Meet Gypsy and Traveller accommodation needs?	<ul style="list-style-type: none"> • Housing completions (net) • Affordable housing completions (gross) • Affordable housing contributions received • Number of households on the housing needs register • Number of households accepted as full homeless • House price to earnings ratio • Net additional Gypsy and Traveller pitches • Number of C2 provision
2	Health and wellbeing To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.	2.1. Provide for additional facilities to support the need of new and growing communities? 2.2. Improve access to health care facilities and social care services? 2.3. Promote health and encourage healthy lifestyle by maintaining, connecting, creating and enhancing multifunctional open spaces, green infrastructure, and recreation and sport facilities? 2.4. Promote healthy lifestyle choices by encouraging and facilitating walking and cycling? 2.5. Support special needs and an ageing population? 2.6. Increase access to leisure and open space facilities including in the countryside? 2.7. Provide a range of play space for children and young people?	<ul style="list-style-type: none"> • Number of applications resulting in new, extended or improved health facilities • Number of households within a 15 minute walk (approx. 1.2km) from GP surgery/health centre/hospital • Number of households within 300m of leisure and open space facilities (as defined in the Open Space study) • Hectares of accessible open space per 1,000 population • Financial contributions towards leisure facilities received • Financial contributions towards health received • Amount of additional community facilities delivered • Percentage of population not in good health
3	Education 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.	3.1. Improve qualifications and skills of young people and adults? 3.2. Provide an adequate range of education and childcare facilities? 3.3. Contribute to meeting primary, secondary and post 19 education needs?	<ul style="list-style-type: none"> • Percentage of population of working age qualified to at least NVQ level 3 (or equivalent) • Percentage of adults with poor literacy and numeracy skills • Number of households within a 15 minute walk (approx. 1.2km) from a Primary School

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
4	Community and crime To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities.	4.1. Reduce crime/fear of crime and anti-social activity? 4.2. Promote design that discourages crime? 4.3. Promote sustainable mixed use environments? 4.4. Improve access to community facilities? 4.5. Maintain existing community facilities and encourage the delivery of new ones?	<ul style="list-style-type: none"> All crime – number of crimes per 1000 residents per annum Number of domestic burglaries per 1,000 households Number of dwellings permitted more than 150m from a built-up area boundary Number of households within a 15 minute walk (approx. 1.2km) from community facilities (e.g. community hall, place of worship, library) Number of applications resulting in a loss of community facilities (e.g. shop, pub, place of worship, etc.)
5	Flooding and surface water To reduce the risk to people, properties, the economy and the environment of flooding from all sources	5.1. Minimise inappropriate development in areas prone to flood risk and areas prone to increasing flood risk elsewhere, taking into account the impacts of climate change? 5.2. Promote the use of Natural Flood Management schemes, SuDS and flood resilient design? 5.3. Incorporate sustainable design and construction techniques?	<ul style="list-style-type: none"> Percentage of the District that is within Flood Zone 2/Flood Zone 3 Number of properties at risk from flooding, as defined by the Environment Agency Number of planning applications approved contrary to advice given by the Lead Local Flood Authority/EA on flood risk/flood defence grounds Number of developments with sustainable drainage systems
6	Natural resources 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.	6.1. Support the redevelopment of previously developed land? 6.2. Make best use of land? 6.3. Encourage the construction of more sustainable homes? 6.4. Minimise the loss of open countryside to development? 6.5. Minimise the loss of the best and most versatile agricultural land to development? 6.6. Maintain and enhance soil quality?	<ul style="list-style-type: none"> Percentage of new and converted homes developed on brownfield land Percentage of new employment floorspace on previously developed land Average density of new housing developments Amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development Amount of empty homes

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
7	<p>Biodiversity and geodiversity To conserve and enhance the District's biodiversity and geodiversity</p>	<p>7.1. Avoid adverse effects on internationally and nationally designated biodiversity and geodiversity assets within and outside the District?</p> <p>7.2. Avoid adverse effects on locally designated biodiversity and geodiversity assets within and outside the District, including ancient woodland? 7.3. Seek to protect and enhance ecological networks, promoting the achievement of net gain where possible, whilst taking into account the impacts of climate change?</p> <p>7.4. Provide and manage the opportunities for people to come into contact with wildlife whilst encouraging respect for and raising awareness of the sensitivity of biodiversity?</p>	<ul style="list-style-type: none"> • Number and area of Local Wildlife Site (LWS) and Local Nature Reserve (LNR) within the District • Area of ancient woodland within the District • Condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC & Ramsar) • Number of planning applications approved contrary to advice given by Natural England on biodiversity issues • Number of dwellings permitted within the 7km Zone of Influence (SPA) • Capacity of Suitable Accessible Natural Greenspace (SANG) • Net gain in biodiversity
8	<p>Landscape To protect, enhance and make accessible for enjoyment, the District's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place.</p>	<p>8.1. Conserve and enhance the High Weald AONB?</p> <p>8.2. Conserve and enhance the settings of the South Downs National Park?</p> <p>8.3. Protect and enhance settlements and their settings within the landscape across the district?</p> <p>8.4. Protect and enhance landscape character?</p> <p>8.5. Promote high quality design in context with its rural and urban landscape?</p> <p>8.6. Maintain and where possible increase accessibility to the countryside and more generally to open spaces?</p>	<ul style="list-style-type: none"> • Open spaces managed to green flag standard • Number of applications approved contrary to advice from the High Weald AONB unit or the South Downs National Park Authority • Amount of new development (units) within the High Weald AONB • Number of households within 300m of multi- functional green space (as defined in the Mid Sussex Assessment of Open Space) • Hectares of accessible open space per 1000 population. • Amount of rights of way • Number of new dwellings approved on low/negligible sites in the Plan Area as identified in the Landscape Capacity Study
9	<p>Cultural heritage To protect, enhance and make accessible for enjoyment, the District's historic environment.</p>	<p>9.1. Protect, enhance and restore buildings, monuments, sites, places, areas and landscape of heritage interest or cultural value (including their setting) meriting consideration in planning decisions?</p> <p>9.2. Protect and enhance sites, features and areas of archaeological value in both urban and rural areas?</p> <p>9.3. Reduce the number of buildings at risk?</p> <p>9.4. Support the undertaking of archaeological investigations and where appropriate recommend mitigation strategies?</p> <p>9.5. Enhance accessibility to cultural heritage assets?</p>	<ul style="list-style-type: none"> • Number of Listed Buildings in the District • Number of Conservation Areas in the District • Number of Conservation Areas with appraisals and management proposal • Number of heritage assets recorded as 'at risk'

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
10	<p>Climate change and transport The reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.</p>	<p>10.1. Develop more efficient land use patterns that minimise the need to travel by car through the location and design of new development and place which provide more opportunities for active travel for the provision and link to public transport infrastructure?</p> <p>10.2. Reduce CO2 emissions to contribute to identified national targets?</p> <p>10.3. Improve accessibility to work and services by public transport, walking and cycling?</p> <p>10.4. Protect and improve air quality?</p> <p>10.5. Avoid exacerbating existing air quality issues in designated AQMAs?</p> <p>10.6. Achieve a healthy living environment?</p>	<ul style="list-style-type: none"> • Car ownership • Number of households within a 5 minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour) • Number of households within a 10 minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour) • Number of households within a 15 minute walk (approx. 1.2km) of a train station • Proportion of journeys to work other than by car • Percentage of residents living and working within Mid Sussex • Monetary investment in sustainable transport schemes (value of s.106 agreements) • Number of Air Quality Management Areas (AQMAs) within the District • Change in CO2 emissions from transport • Number of households within 30min by public transport, or 15min by walking or cycling journey time from services from a superstore/town centre/high street shopping facilities) • Number of households within 30min by public transport, or 15min by walking or cycling journey time from a convenience store
11	<p>Energy and waste To increase energy efficiency and the proportion of energy generated from renewable sources in the District to help mitigate climate change and reduce waste generation and disposal.</p>	<p>11.1. Reduce energy consumption?</p> <p>11.2. Reduce wate generated per head of population?</p> <p>11.3. Increase rate per head of population of waste reuse and recycling?</p> <p>11.4. Encourage recycling (including building materials)?</p> <p>11.5. Incorporate sustainable design and construction techniques?</p>	<ul style="list-style-type: none"> • Domestic energy consumption per household • Number of renewable energy installations within Mid Sussex • Installed capacity of renewable energy installations within Mid Sussex • Domestic waste produced per head of population • Percentage of domestic waste that has been recycled

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
12	Water resources To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.	12.1. Protect and enhance water resources? 12.2. Support the achievement of Water Framework Directive targets? 12.3. Promote sustainable use of water? 12.4. Maintain water availability or water dependant habitats? 12.5. Support the provision of sufficient water supply and treatment infrastructure? 12.6. Incorporate sustainable design and construction techniques?	<ul style="list-style-type: none"> • Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate" • Stretches of watercourse with no deterioration in Water Framework Directive status • Incidents of major and significant water pollution within the District • Number of planning applications approved contrary to advice given by the EA on water quality issues • Number of developments that minimise water consumption
13	Economic regeneration To encourage the regeneration and prosperity of the District's existing Town Centres and support the viability and vitality of village and neighbourhood centres.	13.1. Protect key retail areas? 13.2. Encourage rural diversification? 13.3. Make land available for business development? 13.4. Increase the range of employment opportunities, shops and services available in the town centres across the district? 13.5. Decrease the number of vacant units in town centres? 13.6. Enhance the viability and vitality of the District's town centres? 13.7. Improve access to the District's town centres and services? 13.8. Enhance the local distinctiveness in the town centres? 13.9. Provide new or improved leisure, recreational or cultural activities? 13.10. Maintain or increase the amount of floorspace provided for town centre uses within the town centres?	<ul style="list-style-type: none"> • Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2) • Number of households within a 15 minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities) • Retail unit vacancy rate • Total amount of new commercial/business floorspace in rural areas • Number of vacant sites brought back into use in Town Centres • number of households within 30min by public transport, or 15min by walking or cycling journey time from services from a superstore/town centre/high street shopping facilities)

	SA Objective	Appraisal questions: Will the approach/proposal help to...	Indicators include (but are not limited to)
14	<p>Economic growth To promote and sustain economic growth and competitiveness across the District to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.</p>	14.1. Improve business development and enhance competitiveness? 14.2. Improve the resilience of business and the economy? 14.3. Promote growth in key sectors? 14.4. Reduce out commuting? 14.5. At least maintain and possibly improve employment rate across the District? 14.6. Increase the range of employment opportunities? 14.7. Facilitate the provision of good quality infrastructure to promote economic growth?	<ul style="list-style-type: none"> • Net increase/decrease in commercial (Use Classes E, B2, B8) and office (E) floorspace • Number of businesses within the District • Number of new businesses setting up in the District • Percentage of Mid Sussex residents who are employed • Percentage of Mid Sussex residents who are economically active • Average weekly income (gross) for those who are employed in the District • Percentage of residents living and working within Mid Sussex • Job density (ratio of jobs to working age population)

Appendix B: Reasonable Alternative Spatial Option Assessments

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B.1 SA of Spatial Options

B.1.1 Refining reasonable alternative spatial options

- B.1.1.1** Policies DP4 and DP6 of the adopted District Plan set out the current spatial strategy which informed the preparation of the Local Plan and the distribution of development. The strategy focused development towards the three main towns (Burgess Hill, East Grinstead and Haywards Heath, also called Category 1 settlements) and encouraged proportionate growth across the hierarchy of other settlements to meet local needs and support the provision of local services. One spatial option for the DPR would be to maintain the existing spatial strategy, referred to as Option 1.
- B.1.1.2** MSDC has considered a range of other options relating to the distribution of development across the district in order to meet the identified housing need in the DPR. Option 2 would be to support growth in more sustainable locations, including supporting development at existing settlements and seeking opportunities for urban extensions to improve the sustainability of existing settlements while also protecting designated landscapes, such as the High Weald AONB and the setting to the South Downs National Park.
- B.1.1.3** This spatial option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools and health care, while recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.
- B.1.1.4** An alternative approach to help to meet the identified housing need would be to support the development of a standalone new settlement. Whilst this may constitute a reasonable alternative option to consider, no deliverable site or sites have been presented to the Council. One potential location has been considered that would meet this spatial approach, known as ‘Mayfield Market Town’, which has been proposed for a 10,000 home mixed-use development with the majority (8,000 dwellings) within Horsham District. However, this site has been ruled out during the site selection process and is not considered to be deliverable, owing in part to a historic lack of support from Horsham District Council as well as water neutrality considerations.
- B.1.1.5** As such, the two identified Reasonable Alternative Spatial Options considered within this SA are set out in **Table B.1.1**.

Table B.1.1: Mid Sussex Spatial Options

Spatial Option	Description of Spatial Option
Option 1	Maintain the existing spatial strategy with proportionate growth across the hierarchy of settlements, with main settlements accommodating greater levels of growth.
Option 2	Growth to support the sustainability potential of existing smaller settlements, with limited growth in protected landscapes. This spatial option seeks to support growth in settlements with existing facilities, such as retail opportunities, schools and health care, while recognising that urban extensions of a strategic size bring opportunities to support the development of new facilities.

- B.1.1.6** Each option has been assessed for its likely sustainability impacts, a summary of which is presented in **Table B.1.2**. Full explanations and reasonings behind each overall ‘score’ outlined in **Table B.1.2** are set out by SA Objective in the following sections.
- B.1.1.7** It should be noted that whilst every effort has been made to predict effects, the potential sustainability impacts of each Spatial Option have been assessed at a high level and are reliant upon the current understanding of the baseline. These assessments have been based on information provided by MSDC, as well as professional judgement.
- B.1.1.8** MSDC has prepared a Scoping Report¹, which provides an overview of the baseline social, environmental and economic conditions in the district and identifies key sustainability issues. The issues identified in the Scoping Report have been used to inform this assessment, alongside further baseline data collated at this stage of the SA process, as described in the SA Main Report.

Table B.1.2: Summary assessments of potential impacts of the spatial options

Spatial option	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and crime	Flooding and surface water	Natural Resources	Biodiversity and geodiversity	Landscape	Cultural Heritage	Climate change and transport	Energy and waste	Water resources	Economic regeneration	Economic growth
1	+/-	+	++	++	0	--	-	--	-	+	+	0	++	++
2	++	+/-	+/-	+/-	0	--	-	-	0	-	+	0	+	+

B.1.2 SA Objective 1: Housing

- B.1.2.1** Both of the alternative spatial strategies have the potential to meet identified housing needs, including the provision of affordable housing and different types and tenures of housing. Therefore, both alternatives could result in a significant positive impact on the delivery of housing.

¹ Mid Sussex District Council (November 2021) ‘District Plan Review: Sustainability Appraisal: Scoping Report’ Available at: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review/> [Date accessed 11/01/22]

B.1.2.2 Option 1 reflects the existing spatial strategy and would focus growth at the three main settlements and support proportionate growth across the other categories of settlements to meet local needs. This spatial strategy would support housing growth where the need arises. The Option could support the delivery of housing on a dispersed range of sites across the district and may be less dependent on the delivery of large strategic sites, where delivery may have a longer lead in times due to the complex nature of bringing forward strategic sites. However, much growth in the previous iteration of the Local Plan was focused around the three main towns and larger villages, and MSDC is aware that there is now less potential for additional growth in these locations. There is, therefore, substantial uncertainty in the availability of sites and therefore substantial uncertainty in meeting the identified housing needs, should this strategy be taken forward into the DPR.

B.1.2.3 Where housing need cannot be met within the local authority area, there is the potential for long term indirect impacts to occur in relation to other social sustainability criteria. The lack of housing delivery may lead to increasing house prices and reduced quality of life as a greater proportion of household income is spent meeting accommodation needs. Lower levels of housing delivery overall may lead to lower delivery of affordable housing, as well as types of housing adapted to meet the changing needs of the population, including the elderly. This, in turn, may lead to some sectors of the community looking to meet their accommodation needs in other authority areas and may lead to adverse impacts on community cohesion. Higher house prices and lower levels of affordable housing may also lead to greater levels of commuting and greater social inequality as some types of employment needs are met outside the authority area and lower income job opportunities in the district are taken up by those living outside the area.

B.1.2.4 Option 2 would support housing growth in settlement locations where there is greater potential to improve the sustainability of the settlement by delivering new local facilities and services to meet daily needs as part of the new development. This option would support the delivery of larger strategic sites in some locations as well as supporting some growth to meet local needs across the other categories of settlements. While this option may be more dependent on bringing forward larger strategic sites, there is a greater level of certainty in the availability of sites and the deliverability of this strategy in comparison to Option 1.

B.1.3 SA Objective 2: Health and wellbeing

B.1.3.1 In relation to access to health services, existing GP surgeries are associated with the medium size and larger settlements across the district, with occasional practices within the High Weald AONB. Existing hospitals are located in Haywards Heath, which has an A&E department, and East Grinstead, which has a Minor Injuries Unit.

B.1.3.2 As set out in the Scoping Report², 82.2% of existing households are within a 15 minute walk (approximately 1.2km) from a GP Surgery, Health Centre or Hospital. This figure reflects the proportion of households in proximity to facilities within the three towns, and there are large rural areas of the district that are not within a reasonable walking distance from health facilities.

² Mid Sussex District Council (November 2021) 'District Plan Review: Sustainability Appraisal: Scoping Report' Available at: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review/> [Date accessed: 11/01/22]

- B.1.3.3 The additional growth in housing proposed under both spatial options would be expected to facilitate an increase in the provision of GP healthcare facilities to meet the increase in local demand. MSDC will engage with the West Sussex Clinical Commissioning Group through the district Plan Review process to ensure that there is sufficient overall health capacity to support development proposals.
- B.1.3.4 In relation to the spatial location of development, increasing growth at the main settlements would be likely to locate residents in proximity to a range of existing healthcare services which would be expected to increase capacity to meet the increase in demand from new households. Spatial Option 2 seeks to identify growth areas in proximity to an existing settlement with healthcare, and other, facilities where possible. Larger scale new developments may support the delivery of new healthcare facilities, such as a new GP practice, although such new facilities are planned by the West Sussex Clinical Commissioning Group and there is some uncertainty about the future delivery of new healthcare practices.
- B.1.3.5 In both spatial options, delivering lower levels of development in smaller settlements may lead to some residents being located at less sustainable distances from healthcare facilities.
- B.1.3.6 Both spatial options are, therefore, likely to perform in a similar way in relation to access to GP services, with some uncertainty in the location of healthcare provision for a new growth area.
- B.1.3.7 It is recognised that, in rural areas, residents' access to healthcare can be improved through alternative provision, such as outreach clinics and remote access consultations. These types of services can be adapted and varied to meet local needs and are not included in this high level spatial assessment of access to health services.
- B.1.3.8 In this largely rural district, sustainable access to hospitals which have an A&E department is often limited for many residents. The main A&E department is located in Haywards Health. Option 1, which would support development in proximity to the three main settlements, including Haywards Heath and parts of Burgess Hill and East Grinstead would be likely to locate some residents in sustainable distances of hospital services. Growth located in medium and smaller settlements may locate new residents at greater distances from hospital services. The performance of Option 2 would be dependent on the location of the main areas of housing growth in relation to hospital services. As for Option 1, proportionate housing growth in smaller settlements may locate some residents at greater, less sustainable, distances from hospital services.
- B.1.3.9 Promoting health and wellbeing also seeks to encourage active healthy lifestyles and social interaction, including: active travel such as walking and cycling; ensuring access to high quality green infrastructure and opportunities for play, sport and recreation; avoiding potential pollution or other environmental hazards; and, creating spaces and places to meet.

- B.1.3.10** Supporting active travel, such as walking and cycling, to meet daily needs is likely to be easier to achieve where development is well-related to a range of existing or new services, facilities, employment opportunities and sustainable transport options. Such areas are typically in or near existing main settlements, such as Burgess Hill, Haywards Health, East Grinstead, Hassocks and Hurstpierpoint, as well as locations at the fringe of other main towns, such as Crawley. Encouraging social interaction would also be more likely to be achieved where there are existing community facilities and activities such as primary schools, community halls, libraries, public open spaces and parks and active community groups. Such facilities are typically located in existing towns or other built-up areas. However, larger scale development may bring forward the opportunity to deliver new primary schools, open spaces and potentially other community facilities alongside the opportunity to plan new routes for active/sustainable travel. Option 1 and Option 2 are likely to perform similarly in relation to this aspect of this SA Objective.
- B.1.3.11** As set out in the Scoping Report, Mid Sussex has a high level of club membership and sports participation and this need is likely to increase alongside future development. The availability of natural green space and other green infrastructure can also benefit resident's physical health and mental wellbeing. The availability of sports facilities, publicly accessible open spaces and other types of green infrastructure is likely to be more variable between different types of location. Spatial Option 1 would be likely to support development in proportion to the existing settlement hierarchy where there is likely to be greater access to public open space and sports facilities. In more rural locations there is likely to be greater access to the countryside by the rights of way network. A larger growth area, as supported in Spatial Option 2, is likely to incorporate public open space, play space and green infrastructure in accordance with emerging policy and, as such, are likely to provide some types of open space in proximity to new residents. Both options are likely to perform in a similar way against this aspect.
- B.1.3.12** Overall, both options perform similarly in relation to access to community facilities and public open space and green infrastructure, which may encourage active, healthy lifestyles. Options which locate a greater number of new residents in closer proximity to hospital services would perform better under this objective; this would be more likely under Option 1. Under Option 2, where there is uncertainty about the location of the growth area, the assessment of access to hospital services is therefore uncertain. There is also some uncertainty in relation to Spatial Option 2 in relation to the delivery of and access to GP practices.

B.1.4 SA Objective 3: Education

- B.1.4.1** As set out in the Scoping Report³, there are 42 primary schools and seven secondary schools serving the district. In terms of access to education, 89.8% of households within Mid Sussex are within a 15 minute walk (approximately 1.2km) from a primary school, and 64.9% of households are within 20 minute walk from a secondary school. This figure reflects the proportion of households close to schools within the three towns, and there are large rural areas of the district that are not within a reasonable walking distance from educational facilities. MSDC will engage with West Sussex County Council through the district Plan Review process to ensure that there is sufficient school capacity to support development proposals.
- B.1.4.2** In relation to the spatial location of growth, Option 1 would locate greater levels of housing growth proportionately across the existing settlements and would be more likely to locate new residents in sustainable distances to existing primary schools. Option 2 would be likely to lead to the delivery of a larger growth area of over 1,000 homes and is anticipated to be of sufficient scale to support an additional new primary school within the site, as well as plan sustainable access routes to this school for many new residents. Both options are likely to perform in a similar way in relation to sustainable access to primary schools.
- B.1.4.3** It is recognised that existing primary schools may be operating at, or close to, pupil capacity in some locations. It is assumed in this assessment that existing primary schools may be able to be extended or adapted to meet the predicted increase in school places as a consequence of the increase in housing growth. MSDC will engage with West Sussex District Council to plan for an increase in capacity to meet the predicted increase in school places required.
- B.1.4.4** Existing secondary schools are located in Burgess Hill (Oakmeads Community College and St Paul's Catholic College), East Grinstead (Sackville Community College and Imberhorne School), Haywards Heath (Oathall Community College), Hassocks (Downlands Community School) and Cuckfield (Warden Park School).
- B.1.4.5** Option 1 is likely to locate greater levels of new development in proximity to existing main settlements and is more likely to lead to new residents having sustainable access to secondary education. Option 2 would be unlikely to lead to levels of growth which would support the development of a new secondary and would instead rely on providing sustainable access to existing secondary schools. The options for the provision of sustainable access to secondary schools could include school bus services or the identification of cycling routes, depending on the location of the growth area in relation to existing secondary schools. There is a greater level of uncertainty in the provision of sustainable access to secondary schools in relation to Spatial Option 2.

³ Mid Sussex District Council (November 2021) 'District Plan Review: Sustainability Appraisal: Scoping Report' Available at: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review/> [Date accessed 11/01/22]

B.1.5 SA Objective 4: Community and crime

B.1.5.1 Mid Sussex has low levels of crime with only 36.98 crimes per 1000 residents in 2012/13. Sussex Police support the recommendations set out in 'Secured by Design' which seeks to reduce opportunities for criminal activities through design measures to help create safe and sustainable communities. Such measures can be implemented through local plan policies.

B.1.5.2 The spatial location and design of new development can support opportunities for social interaction and community cohesion by providing spaces and places for communities to meet or locating new development in proximity to existing community facilities, such as primary schools, community halls, libraries, public open spaces, parks and active community groups. Such facilities are typically located in existing towns or other built-up areas. However, larger scale development may bring forward the opportunity to deliver new primary schools, open spaces and potentially other community facilities. Option 1 would be likely to locate new residents in proximity to existing community facilities and groups located within the main towns and other settlements. Option 2 supports a greater level of growth in proximity to an existing settlement in order to support the delivery of new community facilities, which could include a new primary school, local shops to meet daily needs and new public open space. While Option 2 would be likely to deliver some new community facilities, the location of the growth area in relation to existing settlements is unknown at this stage and there is some uncertainty regarding new resident's access to a wider range of community facilities, such as libraries, community halls and community run groups.

B.1.5.3 Spatial Options which support the separate identities of communities and reduce the likelihood of settlement coalescence would help to support community cohesion. The assessment of this criteria is dependent on the location of new development in relation to existing settlements and the character of the landscape between settlements, which may influence the perception of separation between settlements. While many existing settlements across the district appear to be distinct and separate, there are some locations where there is greater potential for settlement coalescence, for example, between Hassocks, Hurst Wickham and Hurstpierpoint and between Albourne and Sayers Common. Option 1 would be likely to support to the separate identities of communities as the three main settlements are geographically distinct. Proportionate growth across the settlement hierarchy could also be distributed to maintain settlement separation. The growth location or urban extension proposed under Spatial Option 2 could be delivered to maintain settlement separation, although there is greater uncertainty in the assessment as the location is unknown at this stage.

B.1.6 SA Objective 5: Flooding and surface water

B.1.6.1 This SA Objective primarily considers the impact that each spatial option could have in relation to flood risk, as well as green infrastructure coverage across the Plan area. Soils and vegetation play key roles in attenuating flood risk, by intercepting surface water and storing water that could otherwise lead to flooding, causing harm to people and property within urban areas.

- B.1.6.2** As set out in the Scoping Report, there are areas of high and medium flood risk associated with the district’s rivers which comprise the River Ouse, River Adur and Herrings Stream. The River Ouse rises in the High Weald and flows, broadly, south east towards Haywards Heath. The River Adur lies to the east and north of Burgess Hill then flows westwards out of the district. Herrings Stream flows northwards between Hurstpierpoint and Sayers Common, before turning west and joining the River Adur.
- B.1.6.3** The Council’s Strategic Flood Risk Assessment (SFRA) has identified that a relatively small area of the district (2.7% of the total land area) is at a high risk of flooding. Additionally, approximately 1.6km² of the district is affected by drainage problems, groundwater flooding and overland flows. Parts of Mid Sussex are also at a high risk of flooding from surface water. The SFRA (2015) shows that the areas at risk of flooding are likely to increase as a result of climate change.
- B.1.6.4** The management of fluvial and surface water flood risk is a key issue in the planning and design of new development. However, the SFRA shows that the areas of high and medium flood risk are distributed throughout the district and affect a relatively small proportion of the land area in comparison to other authority areas. The River Adur lies to the east and north of Burgess Hill and associated flood zones may present a constraint to development in some locations. There are also some zones of high and medium flood risk through Hassocks and to the north of Hurstpierpoint. However, other locations around these settlements are not shown to have a known flood risk. There are areas of high and medium risk of surface water flooding dispersed throughout most settlements within the district.
- B.1.6.5** Due to the dispersed nature of areas of high and medium flood risk and the relatively small proportion of land in the district constrained by flood risk both Spatial Options are likely to perform in a similar way in relation to this aspect of this SA Objective. The assessment and mitigation of potential flood risk associated with new development is set out in national planning policy and guidance and local plan policies. Future planning applications for development sites would need to provide site-based Flood Risk Assessments and mitigation proposals, where required, to ensure flood risk is managed in accordance with national and local requirements.
- B.1.6.6** Vegetation, soils and other green infrastructure play a key role in the management of surface water flooding, facilitating the infiltration and attenuation of surface water runoff. Both spatial options are likely to require the development of greenfield sites, as opposed to the reuse of previously developed land, and may result in some loss of associated vegetation and soils. Both Spatial Options are likely to perform in a similar way in relation to this aspect of this SA Objective. As described above, all future planning applications for development would be required to provide site-specific assessments of flood risk and the mitigation of flood risk in accordance with national planning policy and guidance as well as Local Plan policies in relation to flood risk and surface water management. Such requirements seek to mitigate end users’ exposure to flood risk by designing the right land uses in the right places and maintain ‘greenfield runoff rates’ using Sustainable Urban Drainage methods, wherever possible. While the management of flood risk and surface water management are key planning issues and potential development constraints, both Spatial Options are likely to perform in a similar way against this SA Objective.

B.1.7 SA Objective 6: Natural resources

- B.1.7.1** The Agricultural Land Classification system grades land based on its suitability for and limitations to growing crops. Grade 1 is classed as the best quality and most versatile while Grade 5 is the poorest land in relation to agricultural uses. Grades 1, 2 and 3a comprise the Best and Most Versatile (BMV) Agricultural Land, however, the data available does not divide Grade 3 into categories 3a and 3b.
- B.1.7.2** There is no Grade 1 agricultural land within the district. 1.4% of the district is classified as Grade 2. Much of this Grade 2 land lies in the South Downs National Park (and therefore, not in the Plan area) with some areas lying to the south and west of Albourne. The majority of the district (63.7%) is classified as Grade 3. It is likely that some of this land would be classified as Grade 3a and therefore BMV land. Grade 3 land surrounds the majority of settlements, including main settlements as well as the lower order settlements. There are ribbons of Grade 4 land, not classed as BMV, across the district possibly associated with watercourses or steeply sloping topography. Due to the distribution of potential BMV land across the district, it is likely that the delivery of new development in proximity to any of the settlements would lead to the loss of BMV land. Spatial Options 1 and 2 would perform in a similar way in respect to this aspect of this SA Objective.
- B.1.7.3** Minerals are a finite, non-renewable resource and as such, their conservation and safeguarding for future generations is important. Nationally and locally important mineral resources are identified in Mineral Safeguarding Areas (MSA).
- B.1.7.4** Where a proposal for non-minerals development coincides with an identified MSA, there is potential for sterilisation of the mineral resource as a result of the proposed development, meaning the minerals may be inaccessible for potential extraction in the future. This could therefore result in a potential adverse impact under the natural resources SA Objective.
- B.1.7.5** MSA apply to much of land within the district, particularly in those areas lying outside nationally designated landscapes. There are areas lying outside MSAs to the north of the district around Copthorne and Crawley Down, some areas surrounding Haywards Heath and small pockets near Bolney and Ansty. There are a number of smaller settlements lying within the High Weald AONB which lie outside the MSA, such as Handcross, Horsted Keynes, Slaugham and Staplefield.
- B.1.7.6** Spatial Option 1 supports growth at the three main settlements and with proportionate growth across the other lower order settlements, potentially including some growth to support local needs in settlements in the AONB. Spatial Option 2 supports the development of a growth point or an urban extension to support the sustainability of an existing lower order settlement. The majority of land in proximity to the three main settlements and many of the lower order settlements lie within identified MSAs. In relation to the potential effects of Spatial Option 1, there are some locations surrounding East Grinstead and Haywards Heath as well as some land surrounding lower order settlements which lie outside the MSAs. In relation to Spatial Option 2, there are some locations adjacent to lower order settlements which, if chosen as a growth point for other sustainability reasons, lie outside the MSA. However, it is likely that both Spatial Options would lead to the allocation of land within MSAs and potential minor negative impacts on this aspect of this SA Objective.

B.1.7.7 For development proposals within MSAs, consultation is required with West Sussex County Council (WSCC) and a Minerals Resource Assessment may be required. WSCC would need to be satisfied that either minerals sterilisation will not occur (because the mineral resources are not economically viable or that an appropriate level of prior extraction can take place) or that there is an overriding need for the development.

B.1.7.8 Both Spatial Options are likely to lead to the allocation of development sites on greenfield land, with relatively few opportunities for the redevelopment of previously development land. The development of greenfield sites is likely to lead to the loss of soils, which is considered to be a finite natural resource. Both Spatial Options would be likely to lead to a minor negative impact on this aspect of this SA Objective.

B.1.8 SA Objective 7: Biodiversity and geodiversity

B.1.8.1 There are no Habitats sites within the district, however, the Ashdown Forest SPA/ SAC lies adjacent to the north-east boundary of Mid Sussex and within Wealden District. Potential adverse impacts on Habitats sites as a consequence of the proposals set out in the Local Plan will be considered in a Habitats Regulations Assessment (HRA).

B.1.8.2 Some development proposals could potentially increase threats and pressures which could result in detrimental impacts at these sites and their qualifying features. At this stage of Plan preparation, any proposal that would lead to a net increase in dwellings within a 7km Zone of Influence (ZoI) has the potential to have adverse recreational impacts on the Ashdown Forest SPA/SAC. Development proposed within this zone, for example near East Grinstead, Crawley Down or other lower order settlements, such as Ashurst Wood, Turners Hill, West Hoathly, Sharpthorne, Ardingly and Horsted Keynes, have the potential to have adverse impacts on this Habitats site, without mitigation. Adverse impacts on Habitats sites can occur as a result of other threats and pressures, such as changes to air quality, amongst others. The emerging HRA will identify the potential range of impacts on Habitats sites as a consequence of proposals in the DPR. At the time of writing, the conclusions of the HRA are not available, and as such there is uncertainty in relation to the assessment of the potential impacts of each Spatial Option on this aspect of the SA Objective. Therefore, this aspect has not be included in the overall assessment of this SA Objective at this stage.

B.1.8.3 There are numerous SSSIs within the district, predominately located within the High Weald AONB or in the South Downs National Park. Spatial Option 2, which seeks to limit growth in the settlements within the High Weald AONB would also be likely to have fewer adverse impacts on SSSIs within the AONB. Ditchling Common SSSI is located in close proximity to the eastern edge of Burgess Hill. Spatial Option 1, which supports development at the three main towns, including Burgess Hill, has the potential to have greater adverse impacts on this SSSI. Spatial Option 2, therefore, has the potential to support growth in locations which may have fewer adverse impacts on SSSIs.

- B.1.8.4** There are approximately 1,443 areas of ancient woodland, covering 5,282ha, widely spread across the district. Many areas of ancient woodland are associated with the High Weald AONB. Outside the High Weald AONB, there are numerous areas of ancient woodland to the north of the district, in proximity to Crawley and Crawley Down and also between Burgess Hill and Haywards Heath. At this high level of assessment, Spatial Option 2, which seeks to limit growth in the High Weald AONB and supports a new growth point at a sustainable location, has the potential to have fewer adverse impacts on ancient woodland than Spatial Option 1, which supports growth at the three main towns and proportional growth across the settlement hierarchy to meet local needs. However, given the quality and dispersed nature of areas of ancient woodland across the district, there is the potential for both Spatial Options to lead to adverse impacts on ancient woodland.
- B.1.8.5** There are six Local Nature Reserves and 50 Local Wildlife Sites across the district. There are numerous LWS and LNRs located in proximity to Haywards Heath, with fewer to the north of the district and few sites located to central areas and west of the district. Spatial Option 1 would support development in proximity to the three main towns, including Haywards Heath which may lead to adverse impacts on these locally designated sites, however, there are fewer locally designated sites located in proximity to Burgess Hill and East Grinstead. Spatial Option 2 supports development in a sustainable location and has the potential to have fewer impacts on locally designated biodiversity sites, although the location of the growth point is unknown and the potential impacts on this aspect of the SA Objective are uncertain at this stage.
- B.1.8.6** Both Spatial Options are likely to require the development of greenfield sites (as opposed to the use of previously developed land) which may lead to the loss of, and adverse impacts on, priority habitats. At this high level of assessment, both Spatial Options are likely to perform in a similar way when assessed against this aspect of this SA Objective.

B.1.9 SA Objective 8: Landscape

- B.1.9.1** Approximately 60% of the district is protected by national landscape designations; approximately 50% lies within the High Weald AONB and over 10% is within the South Downs National Park (the latter lying outside the area the subject of this DPR). Land lying outside of these designated areas but assessed as contributing to its special qualities may be considered to form the ‘setting’ to the designated landscape, and development within such areas would be required to conserve and enhance the special qualities of the landscape.
- B.1.9.2** Spatial Option 1 supports development at the three main towns and proportional growth across the other settlements in the hierarchy. Spatial Option 2 supports new growth points at lower category settlements and seeks to limit growth in the settlements located in protected landscapes. Spatial Option 1 has the potential to lead to greater levels of development coming forward in protected landscapes and potentially adverse impacts on these nationally designated areas. Spatial Option 2 seeks to limit development at settlements in protected landscapes. It is recognised that residential development can be integrated into the landscape and designed to conserve and enhance landscape character and quality, however, at this high level of assessment it assumed that a lower quantum of development in these nationally designated landscapes would lead to lower levels of adverse impacts.

B.1.9.3 MDSC commissioned a Landscape Capacity Study⁴ which assessed the capacity of the landscape to accommodate development without an unacceptable impact on landscape character. In this study, some areas of land identified as having high, medium/high or medium capacity to accommodate development can be found surrounding all three main settlements and south of Crawley Down, as well as land in proximity to West Hoathly and Ardingly in the High Weald AONB. Much of the landscape surrounding many settlements is identified as having medium/low, low, low/negligible or negligible capacity to accommodate development, reflecting the qualities and strength of landscape character across the district.

B.1.9.4 Spatial Option 1 may lead to lower levels of adverse impacts on the character of the landscape, based on the findings of the Landscape Capacity Study, although the nature of the impacts would depend on the detailed location and design of development. Given the limited locations and extents of medium and higher capacity areas, Spatial Option 2 is more likely to lead to development in an area identified as having a lower capacity to accommodate change, although this may provide a stronger protection for the AONB. Both Spatial Options are likely to lead to the development of greenfield sites and adverse impacts on local landscape character, to some extent.

B.1.10 SA Objective 9: Cultural heritage

B.1.10.1 The towns and villages of Mid Sussex are often attractive, and the historic environment is of a high quality and strong character.

B.1.10.2 There are 1,064 Listed Buildings within the district, often associated with historic settlements. However, there are numerous Listed Buildings widely dispersed across the district, such that both Spatial Options are likely to perform in a similar way in relation to potential impacts on Listed Buildings.

B.1.10.3 Conservation Areas are designated for their special architectural or historic interest and are associated with the historic cores of a number of settlements across the district, including the three main settlements as well as many of the Category 2 settlements, with the exception of Copthorne, Crawley Down and Hassocks. Many of the Category 3 and 4 settlements in the High Weald AONB have associated Conservation Areas, reflecting the historic character of the environment. Spatial Option 2 supports a new growth point at a sustainable location and seeks to limit growth in the settlements in the AONB. This option provides the opportunity to locate development in a location which reduces potential impacts on Conservation Areas and limits growth in the settlements in the AONB, which may also reduce the potential for impacts on associated Conservation Areas. Spatial Option 1, which supports growth at the three main settlements as well as proportionate growth across the other settlements in the hierarchy has the potential to locate development in proximity to associated Conservation Areas.

⁴ Hankinson Duckett Associates (2007) 'Mid Sussex Landscape Capacity Study' Available at https://www.midsussex.gov.uk/media/3236/ep48i_landscapcapacitystudy_combined.pdf [Accessed on 07/01/22]

- B.1.10.4 There are ten Registered Parks and Gardens within the district, many of which are located within the High Weald AONB and most of which are not located in proximity to existing settlements. Both Spatial Options are likely to perform in a similar way in relation to potential impacts on this aspect of the SA Objective.
- B.1.10.5 The Scheduled Monuments within the district are predominantly located within the High Weald AONB or the South Downs National Park. Both Spatial Options are likely to perform in a similar way in relation to potential impacts on this aspect of the SA Objective.
- B.1.10.6 There are numerous Archaeological Notification Areas across the district, often located within the designated landscapes of the High Weald AONB and South Downs National Park and the areas to the north and south of these designations. There is also the potential for, as yet undiscovered, underground archaeology at any new development site. Both Spatial Options are likely to perform in a similar way in relation to potential impacts on this aspect of the SA Objective.
- B.1.10.7 The impacts of development on cultural heritage assets can be positive or adverse and are highly dependent on the design and layout of development and, therefore, there is uncertainty in the assessment of these effects.
- B.1.10.8 Overall, both Spatial Options are likely to perform in a similar way in relation to potential impacts on heritage assets, although Spatial Option 2 is likely to have fewer adverse effects on Conservation Areas than Spatial Option 1.

B.1.11 SA Objective 10: Climate change and transport

- B.1.11.1 This SA Objective assesses the potential impacts of each Spatial Option in relation to reducing the need for residents to undertake journeys by private car, increasing the use of public transport, such as buses and trains, and increasing opportunities for the use of sustainable active transport, such as walking and cycling. These changes to travel modes and patterns have the potential to reduce GHG emissions and air pollution associated with transport. Energy efficiency and generation is considered under SA Objective 11.
- B.1.11.2 The Scoping Report states that air quality in Mid Sussex is generally good. There is one Air Quality Management Area (AQMA) in the district in Hassocks, designated due to levels of nitrogen dioxide being above the target at Stonepound Crossroads. Development which locates new residents in proximity to the AQMA or leads to increases in concentrations of pollutants within the AQMA would be assessed as having adverse impacts on this objective. At this stage of the assessment, there is limited data available regarding changes to traffic flows as a consequence of development set out in the DPR. Both Spatial Options could lead to some new development locations in proximity to Hassocks and would perform in a similar way in relation to this aspect.

B.1.11.3 The majority of community, education and retail facilities are located in existing town centres. The three main towns and Hassocks are also serviced by existing train stations. Spatial Option 1, which supports growth in the main centres and proportionally across the other settlements in the hierarchy, may reduce the need to travel by private car and support opportunities for the use of public transport and active travel. Spatial Option 2 supports new growth points in proximity to existing lower category settlements. It is likely that these growth areas would support some mixed uses, retail, education and community facilities as part of the new development and would be likely to require a new public transport link. It is anticipated that private car usage overall, however, may be greater than for Spatial Option 1. The nature of the impact would depend on the location of the growth point in relation to existing public transport services and the types of facilities and services proposed as part of the development.

B.1.12 SA Objective 11: Energy and waste

B.1.12.1 The proposed development of at least an additional 8,169 dwellings not already planned for would be expected to lead to an increase in carbon emissions associated with the construction and occupation of development. The proposals would also be likely to result in the loss of greenfield land and vegetation cover, which have carbon storage capabilities.

B.1.12.2 The DPR seeks to increase the energy efficiency of new development and the proportion of energy generated from renewable sources to help mitigate climate change as well as reduce waste generation and disposal. These objectives would be achieved through the implementation of national and local planning policies for all development proposals.

B.1.12.3 Both Spatial Options are likely to perform in a similar way against this SA Objective.

B.1.13 SA Objective 12: Water resources

B.1.13.1 The District lies within the South East River Basin. The South East river basin district river basin management plan⁵ identifies the pressures faced by the water environment and actions required to address them. The main pressures are point source pollution from sewage treatment works, the physical modification of water bodies, diffuse pollutions from agricultural activities, diffuse pollution from urban sources and water abstraction. South East Water, Thames Water and Sutton and East Surrey Water are the water companies providing services for the Mid Sussex District.

B.1.13.2 Water quality targets are set in River Basin Management Plans. The majority of water bodies in the district are failing to meet the Good Status objective, and it is recognised that both ground and surface waters face threats from abstraction and pollution.

⁵ Environment Agency (2015) 'South East River District River Basin Management Plan' Available at <https://www.gov.uk/government/publications/south-east-river-basin-district-river-basin-management-plan> [Date accessed 10/01/22]

- B.1.13.3 Mid Sussex District is served by seven wastewater treatment works. Some of the existing sewerage infrastructure within the district is operating at or near capacity and unless significant investment is made, water quality within the watercourses in the district may be at risk. In particular, Goddards Green Wastewater Treatment Works (near Burgess Hill) has been identified as having constraints with regards to capacity and odour,
- B.1.13.4 Residents in Mid Sussex use approximately 181 litres of water a day. This is higher than the UK average of 154.1 litres. Most of the district is within an area identified as having a deficit in water supply and, therefore, during a year with low rainfall the demand for water will be more than the water available for use.
- B.1.13.5 This SA Objective seeks to maintain and improve the water quality of the district's watercourses and aquifers and support sustainable water resources management in relation to the development and change proposed in the DRP. These objectives seek to maintain water dependent habitats and associated water quality and promote water efficiency through the use of sustainable design and construction techniques.
- B.1.13.6 There are numerous watercourses dispersed across the district, including in proximity to the three main settlements and many of the Category 2 settlements. Both Spatial Options are likely to perform in a similar way in relation to potential impacts of diffuse urban pollution on the water quality of these watercourses.
- B.1.13.7 Extensive areas of Source Protection Zones are located within the South Downs National Park and a smaller zone in the High Weald AONB, near Horsted Keynes. Given the small area of land constrained by the SPZ within the High Weald, both Spatial Options are likely to have negligible impacts on this aspect of this SA Objective.
- B.1.13.8 Spatial Options which support larger growth areas have the potential to facilitate the delivery of development which incorporates greater water efficiency measures, such as grey water recycling. For smaller development sites such measures may not be deliverable due to the impact on the financial viability of the development scheme. Both Spatial Options could support the delivery of larger development sites and could perform in a similar way in relation to the delivery of this aspect of this SA Objective.

B.1.14 SA Objective 13: Economic regeneration

- B.1.14.1 This SA Objective seeks to encourage the regeneration and prosperity of the district's existing town centres and support the viability and vitality of village and neighbourhood centres.

B.1.14.2 In seeking to deliver development proportionally across the settlement hierarchy, Spatial Option 1 would be likely to support business in the three main towns and the village centres, as well as supporting any local retail needs in the lower category settlements. Spatial Option 2 seeks to deliver a new growth point, which is likely to lie in proximity to a lower order settlement, and limit development within the settlements located within the High Weald AONB. The level of growth proposed at the growth point seeks to be able to support new retail opportunities as part of the development and, in turn, support the vitality of the associated settlement. By limiting growth in the lower category settlements within the High Weald AONB, Spatial Option 2 may limit the viability of delivering new business opportunities associated with these settlements and have a negligible impact on village centre regeneration.

B.1.15 SA Objective 14: Economic growth

B.1.15.1 The Scoping Report sets out the key sustainability issues in relation to economic growth and employment. Just over half of the Mid Sussex workforce live and work in the district, with 45.6% being employed outside of the district. The relatively high level of out-commuting can lead to congestion on the road network and overcrowded trains. The most common places for residents to work, outside the district, are Crawley, Brighton and Hove, Westminster and the City of London and Tandridge. The Scoping Report describes existing residents as being employed across a variety of sectors, challenging the delivery of meeting employment needs locally.

B.1.15.2 As described in the Mid Sussex District Plan 2021–2039 Consultation Draft, the Economic Growth Assessment Update (December 2021) identifies employment need over the plan period based. This study identifies no outstanding residual employment need, as there is sufficient committed supply.

B.1.15.3 The Consultation Draft Plan goes on to state:

“The strategy for achieving sustainable economic prosperity and resilience...will focus on; supporting successful delivery of committed development, helping to secure timely delivery of key supporting infrastructure, encouraging inward investment and providing support for existing businesses”.

B.1.15.4 This SA Objective seeks to promote and sustain economic growth and competitiveness across the district to ensure high and stable levels of employment including the opportunity for people to live and work within their communities.

B.1.15.5 Spatial Option 1 would be likely to support business in the three main town centres and the village centres, as well as supporting any local retail needs in the lower category settlements. This option may also serve to support the allocations for employment uses at Burgess Hill as well as allocations for employment at Handcross and Pease Pottage.

B.1.15.6 Spatial Option 2 seeks to deliver new growth points, which are likely to lie in proximity to lower order settlements, and limit development within the settlements located within the High Weald AONB. The level of development proposed at the growth points seeks to be able to support mixed use development and new local retail opportunities as part of the development and, in turn, support the vitality of the associated settlement. ‘Significant sites’ may also provide some element of local employment space. The location of the growth point is unknown and, therefore, it is uncertain if this option would serve to support existing employment areas and local businesses. By delivering a greater level of growth as part of a growth point there is likely to be lower levels of development in some of the main settlements. Spatial Option 2 may limit the viability of delivering new business opportunities associated with these settlements.

Appendix C: Pre-Mitigation Site Assessments

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C.1 Overview

- C.1.1.1 This report comprises **Appendix C** of the Regulation 18 SA Environmental Report (ER) and should be read alongside this report.
- C.1.1.2 The following sections of this appendix provide an appraisal of each of the 42 reasonable alternative sites for residential development and two reasonable alternative sites for C2 use (see **Figure C.1.1**) identified by Mid Sussex District Council, in accordance with the SA methodology set out in **Chapter 2** of the main SA report.
- C.1.1.3 Each appraisal includes an SA scoring matrix that provides an indication of the nature and magnitude of effects, at the pre-mitigation stage (see **Tables C.2.1 – C.15.1**). Assessment narratives are presented alongside the scoring matrices for each site, within which the findings of the appraisal and the rationale for the recorded impacts are described.
- C.1.1.4 Each site is assessed against the SA Framework (**Appendix A**), which is comprised of the following objectives:
- **SA Objective 1** - To ensure that everyone has the opportunity to live in a home for their need and which they can afford (housing)
 - **SA Objective 2** - To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health (health and wellbeing)
 - **SA Objective 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 (education)
 - **SA Objective 4** - To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration within existing town/village and retain their separate identities (community and crime)
 - **SA Objective 5** - To reduce the risk to people, properties, the economy and the environment of flooding from all sources (flooding and surface water)
 - **SA Objective 6** - 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 (natural resources)
 - **SA Objective 7** - To conserve and enhance the district's biodiversity and geodiversity (biodiversity and geodiversity)
 - **SA Objective 8** - To protect, enhance and make accessible for enjoyment, the district's countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place (landscape)
 - **SA Objective 9** - To protect, enhance and make accessible for enjoyment, the district's historic environment (cultural heritage)
 - **SA Objective 10** - To reduce road congestion and pollution levels by encouraging efficient patterns of movements, the use of sustainable travel modes and securing good access to services across the district, thereby

reducing the level of greenhouse gases from private cars and their impact on climate change (climate change and transport)

- **SA Objective 11** - To increase energy efficiency and the proportion of energy generated from renewable sources in the district to help mitigate climate change and reduce waste generation and disposal (energy and waste)
- **SA Objective 12** - To maintain and improve the water quality of the district's watercourses and aquifers, and to achieve sustainable water resources management (water resources)
- **SA Objective 13** - To encourage the regeneration and prosperity of the district's existing Town Centres and support the viability and vitality of village and neighbourhood centres (economic regeneration)
- **SA Objective 14** - To promote and sustain economic growth and competitiveness across the district to ensure high and stable levels of employment including the opportunity for people to live and work within their communities (economic growth)

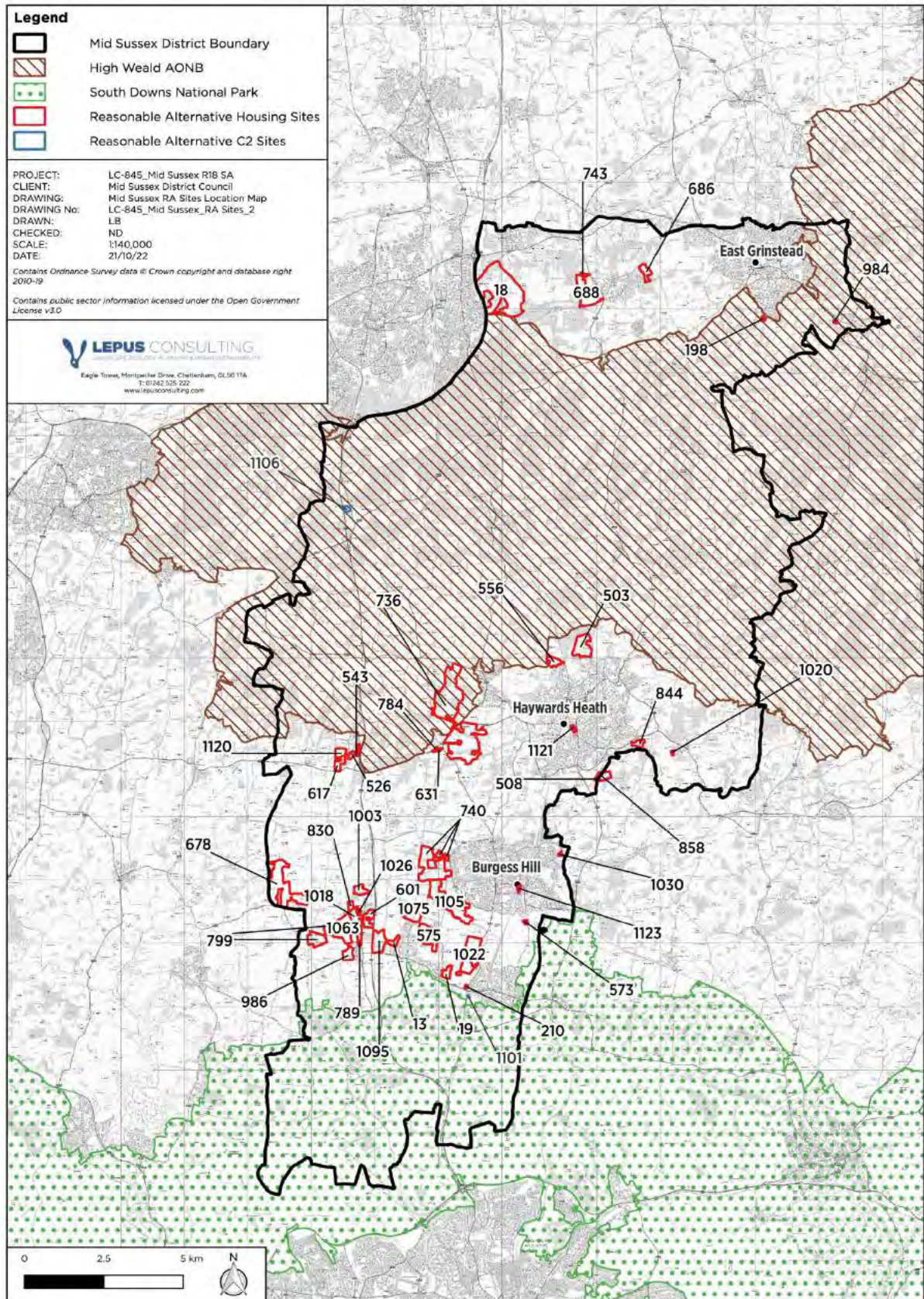


Figure C.1.1: Location map of the reasonable alternative sites within Mid Sussex

C.2 SA Objective 1 - Housing

C.2.1 Net Gain in Housing

- C.2.1.1 Residential-led development would be expected to result in an overall net gain in housing. Since the reasonable alternative sites in Mid Sussex are proposed for residential and/or mixed use development, it would be expected that all sites would have a positive impact on housing provision within the Plan area. Sites which have been identified as having capacity for 100 or more dwellings would be expected to make a significant contribution towards meeting housing needs upon development and are therefore considered to have major positive impacts on housing provision. Sites which have been identified as having capacity of 99 dwellings or less are expected to have a minor positive impact on housing provision.
- C.2.1.2 The site assessments concluded that 23 sites have been identified as having capacity for 100 dwellings or more and have therefore been categorised as having the potential to have a major positive impact on housing provision. Some sites within this category were identified as having capacity for a significantly higher number of residential dwellings such as Site 503 (700 dwellings) and Site 678 (900 dwellings).
- C.2.1.3 On the other hand, some sites were identified as having capacity for significantly less dwellings such as Site 984 (8 dwellings) and Site 1030 (25 dwellings). Development of these sites could have a minor positive impact on housing provision within the Plan area.
- C.2.1.4 Sites 18, 736, 740, 799 and 1105 are proposed for residential or mixed-use developments and were identified as having capacity for 1,000 dwellings or more.
- C.2.1.5 Sites 1101 and 1106 are proposed for C2 use class development, which includes provision of accommodation for people in need of care. The proposed development at these two sites would be expected to have a minor positive impact on housing provision.

Table C.2.1: Sites impact matrix for SA Objective 1 - Housing

Site Ref	Net Gain in Housing
13	+
18	++
19	+
198	+
503	++
508	+
210	+
526	+
543	+
556	+
573	+
575	++
601	++
617	++
631	+
678	++
686	++
688	++
736	++
740	++
743	+
784	+
789	+
799	++
830	++
844	++
858	+
984	+
986	++
1003	++
1018	++
1020	+
1022	++
1026	+
1030	+
1063	+
1075	++
1095	++
1101	+
1105	++
1106	+
1120	++
1121	++
1123	++

C.3 SA Objective 2 – Health and Wellbeing

C.3.1 NHS hospital with A&E Department

C.3.1.1 The target distance for sustainable access to an NHS hospital with A&E department is 5km. 31 sites are located outside of this target distance, and therefore proposed developments at these sites are expected to have a minor negative impact on access to essential healthcare.

C.3.1.2 Sites 198, 503, 508, 556, 686, 736, 844, 858, 984, 1020, 1030, 1121 and 1123 are within 5km of either Queen Victoria Hospital in East Grinstead or Princess Royal Hospital in Haywards Heath; therefore, the proposed development at these 13 sites is considered to have the potential for a minor positive impact on access to essential healthcare.

C.3.2 Pedestrian Access to GP Surgery

C.3.2.1 The target distance for a proposed development is to be within approximately 1.2km or a 15-minute walk from a GP surgery or a health centre.

C.3.2.2 Sites 1106, 1121 and 1123 are located within a 10-minute walk from healthcare facilities and proposed development at these three sites would therefore be expected to have a major positive impact on sustainable access to healthcare.

C.3.2.3 Sites 13, 210, 556 and 743 are located within a 15-minute walking distance and therefore proposed development at these four sites would be expected to have a minor positive impact on access to healthcare.

C.3.2.4 All other sites are located further than the sustainable 15-minute walk threshold from healthcare facilities. However, Sites 198, 573, 575, 686, 688, 740, 844, 1075, 1095 and 1101 are located within a 20-minute walk from healthcare facilities, and the potential impact on access to healthcare of a proposed development at these ten sites is expected to be negligible.

C.3.2.5 The remaining 27 sites are located over the sustainable target distance of a 20-minute walk from these facilities. It would be expected that the proposed development at these remaining sites would have a minor negative impact on access to healthcare.

C.3.3 Leisure Centres

C.3.3.1 Proposed development located within the sustainable target distance of 1.5km to a leisure centre is expected to have positive impacts on access to these facilities.

C.3.3.2 Site 740 is located within 1.5km from The Triangle Leisure Centre in Burgess Hill, and Sites 556 and 1121 are located within 1.5km from The Dolphin Leisure Centre in Haywards Heath. It

is therefore expected that the proposed development at these three sites would have a minor positive impact on access to leisure facilities and the resulting health and wellbeing of residents.

- C.3.3.3 The remaining 41 reasonable alternative sites are further than the target distance from the nearest leisure centre and would therefore be expected to have a minor negative impact on access to these facilities.

C.3.4 AQMA

- C.3.4.1 The majority of reasonable alternative sites (42 out of 44) are located at least 200m from an Air Quality Management Area (AQMA) and therefore a minor positive impact on human health would be expected for site end users at these 42 sites.

- C.3.4.2 Sites 210 and 1101 are located within 200m of 'Mid Sussex AQMA No 1'. The proposed development at these two sites could potentially expose site end users to poor air quality associated with this AQMA, and therefore, have a minor negative impact on health.

C.3.5 Main Road

- C.3.5.1 Sites located within 200m from a main road would be expected to have a minor negative impact on the health and wellbeing of site-end users. The proposed development at these sites could potentially expose site end users to higher levels of transport associated air and noise pollution.

- C.3.5.2 Sites 18, 210, 526, 543, 601, 617, 631, 736, 740, 784, 844, 984, 1022, 1095, 1101, 1105, 1106 and 1120 are located less than 200m from one or more main roads including the A22, A23 and A272. The proposed development at these 18 sites is therefore considered to have a minor negative impact on site end users.

- C.3.5.3 The remaining 26 sites are located over 200m from a main road and are therefore expected to have a minor positive impact on site end user health and wellbeing through being less likely to expose site end users to potentially poor air quality and noise pollution associated with traffic using main roads.

C.3.6 Access to Greenspace

- C.3.6.1 Access to outdoor space and a diverse range of natural habitats is known to have mental and physical health benefits. A minor positive impact on residents' health and wellbeing can

therefore be expected if a site is within the target distance of 300m from an OS Green space¹, a leisure facility or an open space facility.

C.3.6.2 Sites 198, 508, 526, 543, 573, 631, 784, 789, 830, 858, 984, 986, 1003, 1020, 1026, 1030, 1075, 1105, 1121 and 1123 are within the target distance of these facilities and are therefore expected to potentially have a minor positive impact on the health and wellbeing of site end users at these locations.

C.3.6.3 The remaining 24 sites are located outside of the target distance of 300m from greenspaces which could potentially lead to a minor negative impact on access to these facilities and subsequently the health and wellbeing of site end users at these locations.

C.3.7 Net Loss of Greenspace

C.3.7.1 Site 1105 coincides with two areas of publicly accessible greenspace identified on the Council's dataset, including a large proportion of 'Maltings Farm', and a small proportion of 'Hammond Ridge Meadows'. The proposed development at this site could potentially result in the net loss of greenspace, and therefore, have a minor negative impact on the provision of greenspace across the Plan area.

C.3.8 PRow/Cycle Paths

C.3.8.1 Proposed development sites that provide good accessibility to the PRow and/or cycle path network would likely encourage residents' engagement in physical activity and active travel which could have a resulting minor positive impact on the health and wellbeing of site end users.

C.3.8.2 All reasonable alternative sites, with the exception of Site 1106, are expected to provide access to Mid Sussex's PRow and/or cycle path network and therefore are likely to have a minor positive impact on access to these facilities with subsequent health benefits.

C.3.8.3 Site 1106 is located outside of the sustainable target distance to the PRow and cycle network. The proposed development at this site could potentially restrict the access of site end users to these active travel networks (i.e. for potential employees of the proposed C2 development), resulting in a minor negative impact for this receptor.

¹ Ordnance Survey (2022) OS Greenspace – A More Active, Greener, Healthier Nation. Available at: <https://getoutside.ordnancesurvey.co.uk/greenspaces/> [Accessed 27/09/2022]

Table C.3.1: Sites impact matrix for SA Objective 2 - Health and Wellbeing

Site Reference	NHS hospital with A&E Department	Pedestrian Access to GP Surgery	Leisure Centres	AQMA	Main Road	Access to Greenspace	Net Loss of Greenspace	PRow/Cycle Paths
13	-	+	-	+	+	-	0	+
18	-	-	-	+	-	-	0	+
19	-	-	-	+	+	-	0	+
198	+	0	-	+	+	+	0	+
210	-	+	-	-	-	-	0	+
503	+	-	-	+	+	-	0	+
508	+	-	-	+	+	+	0	+
526	-	-	-	+	-	+	0	+
543	-	-	-	+	-	+	0	+
556	+	+	+	+	+	-	0	+
573	-	0	-	+	+	+	0	+
575	-	0	-	+	+	-	0	+
601	-	-	-	+	-	-	0	+
617	-	-	-	+	-	-	0	+
631	-	-	-	+	-	+	0	+
678	-	-	-	+	+	-	0	+
686	+	0	-	+	+	-	0	+
688	-	0	-	+	+	-	0	+
736	+	-	-	+	-	-	0	+
740	-	0	+	+	-	-	0	+
743	-	+	-	+	+	-	0	+
784	-	-	-	+	-	+	0	+
789	-	-	-	+	+	+	0	+
799	-	-	-	+	+	-	0	+
830	-	-	-	+	+	+	0	+
844	+	0	-	+	-	-	0	+
858	+	-	-	+	+	+	0	+
984	+	-	-	+	-	+	0	+
986	-	-	-	+	+	+	0	+
1003	-	-	-	+	+	+	0	+
1018	-	-	-	+	+	-	0	+
1020	+	-	-	+	+	+	0	+
1022	-	-	-	+	-	-	0	+
1026	-	-	-	+	+	+	0	+
1030	+	-	-	+	+	+	0	+
1063	-	-	-	+	+	-	0	+
1075	-	0	-	+	+	+	0	+
1095	-	0	-	+	-	-	0	+
1101	-	0	-	-	-	-	0	+
1105	-	-	-	+	-	+	-	+
1106	-	++	-	+	-	-	0	-
1120	-	-	-	+	-	-	0	+
1121	+	++	+	+	+	+	0	+
1123	+	++	-	+	+	+	0	+

C.4 SA Objective 3 – Education

C.4.1 Pedestrian Access to Primary Schools

- C.4.1.1 The sustainable target distance for a residential site to be located to a primary school is within a 15-minute walk (approximately 1.2km) or less to the school which would provide site end users with good access to primary education. Sites 13, 198, 526, 617, 789, 986, 1020, 1063, 1120 and 1121 are located within a 10-minute walk from a primary school which is expected to have a major positive impact on the access to primary schools for site end users.
- C.4.1.2 Sites 210, 543, 556, 573, 743, 799, 984 and 1123 are located within 15 minutes' walk from a primary school which is expected to have a minor positive impact on access to primary education.
- C.4.1.3 Sites 686, 688, 740, 844, 1018, 1026, 1030, 1075 and 1095 are located within a 20-minute walk from a primary school. It is expected that the proposed development at these nine sites would have a negligible impact on access to primary education facilities.
- C.4.1.4 The remaining residential sites are located over a 20-minute walk from primary schools and therefore the proposed development at these 15 sites would be likely to have a minor negative impact on access to primary education for site end users.

C.4.2 Pedestrian Access to Secondary Schools

- C.4.2.1 To have sustainable access to secondary education, a proposed residential site should be located within 1.5km of these facilities. The following sites are located within this target distance to a secondary school: 210 (Downlands Community School); 1123 and 573 (Oakmeeds Community College); 740 (St Paul's Catholic College); and 1121 (Oathill Community College). These five sites are therefore likely to have a minor positive impact on access to secondary education for site end users.
- C.4.2.2 The remaining 37 residential sites are located outside of the target distance from the nearest secondary school, and it is therefore expected that the proposed development at these sites will likely have a minor negative impact on access to secondary education for site end users.
- C.4.2.3 Residential sites which have been assessed as being within target distance for both primary and secondary schools would likely have an overall major positive impact on access to education (Sites 210, 573, 1121 and 1123) (see **Table 4.2** within the main SA Report).
- C.4.2.4 Sites 1101 and 1106 are proposed for C2 development, and as such, have not been assessed for their access to education. A negligible impact would be expected for these two sites.

C.4.3 Further Education

C.4.3.1 Residential sites which are located within 3km from a further education facility are likely to have good access to these facilities and therefore a minor positive impact on access to education for site end users could be expected. Eight reasonable alternative sites meet this criteria; Sites 503, 556, 736 and 1121 are located within the target distance to Central Sussex College, and Sites 736, 740, 1075, 1105 and 1123 are located within the target distance to St Paul's Catholic College.

Table C.4.1: Sites impact matrix for SA Objective 3 - Education

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Further Education
13	++	-	0
18	-	-	0
19	-	-	0
198	++	-	0
210	+	+	0
503	-	-	+
508	-	-	0
526	++	-	0
543	+	-	0
556	+	-	+
573	+	+	0
575	-	-	0
601	-	-	0
617	++	-	0
631	-	-	0
678	-	-	0
686	0	-	0
688	0	-	0
736	-	-	+
740	0	+	+
743	+	-	0
784	-	-	0
789	++	-	0
799	+	-	0
830	-	-	0
844	0	-	0
858	-	-	0
984	+	-	0
986	++	-	0
1003	-	-	0
1018	0	-	0
1020	++	-	0
1022	-	-	0
1026	0	-	0
1030	0	-	0
1063	++	-	0
1075	0	-	+
1095	0	-	0
1101	0	0	0
1105	-	+	+
1106	0	0	0

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Further Education
1120	++	-	0
1121	++	+	+
1123	+		+

C.5 SA Objective 4 – Community and Crime

C.5.1 IMD

C.5.1.1 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 32,844 Lower Super Output Areas (LSOAs) in England². Deprivation levels within Mid Sussex varies from area to area, however, the district on a whole is relatively affluent, and none of the RA sites fall within of the 10% most deprived areas within England as identified by the study.

C.5.2 Pedestrian Access to Community Facilities

C.5.2.1 The target distance a proposed site should be within to have sustainable access to community facilities such as shops, community halls, places of worship and libraries is within a 15-minute walk.

C.5.2.2 Sites 1121 and 1123 are located within a 10-minute walk from community facilities and therefore the proposed development at these two sites would be expected to have a major positive impact on access to community facilities.

C.5.2.3 Sites 13, 210 and 1101 are located within a 15-minute walk from community facilities and therefore proposed development at these three sites would be expected to have a minor positive impact for site end users.

C.5.2.4 Sites 198, 573 and 1095 are located within a 20-minute walk from community facilities. The proposed development at these three sites would be likely to have a negligible impact on access to community facilities.

C.5.2.5 The remaining sites are located over a 20-minute walk from community facilities and therefore the proposed development on these 36 sites would be likely to have a minor negative impact on access to community facilities for site end users.

C.5.3 Public Transport Access to Community Facilities

C.5.3.1 Sites that are located within a 30-minute journey or less using public transport to access community facilities such as a shop, a community hall, a place of worship or a library would be expected to have minor positive impacts for site end users relating to the accessibility to these facilities.

² Ministry of Housing, Communities and Local Government (2019) English indices of deprivation 2019. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019> [Date Accessed: 26/01/22]

- C.5.3.2 Sites 13, 210, 1075, 1101, 1121 and 1123 are located within less than 10-minutes via public transport from community facilities and are therefore expected to have a major positive impact on accessibility to community facilities.
- C.5.3.3 Sites 556, 508, 858, 984 and 1030 are located within a 30-minute public transport journey from community services and it is therefore expected that the proposed development at these sites would result in a minor positive impact on accessibility to these facilities.
- C.5.3.4 The remaining 33 sites are further than a 30-minute public transport journey away from community facilities and it is therefore expected that the proposed development at those sites would have a minor negative impact for the accessibility to those facilities.

C.5.4 Loss of Community Facilities

- C.5.4.1 Site 1121 coincides with The Orchards Shopping Centre in Haywards Heath, which includes a range of local shops and services including Tesco Express and Marks and Spencer Food. The proposed residential development at this site could potentially result in the loss of these shops, and subsequently reduce the range of community facilities available in Haywards Heath. A minor negative impact on the provision of community facilities could occur.

C.5.5 Built Up Area Boundary

- C.5.5.1 Proposed sites which are located over 150m from a built-up area boundary, attributed to 23 of the 44 reasonable alternative sites, are identified as having the potential to have a minor negative impact on cohesion and integration with existing local communities due to being physically separated from these communities.

Table C.5.1: Sites impact matrix for SA Objective 4 - Equality and Crime

Site Ref	IMD	Pedestrian Access to Community Facilities	Public Transport Access to Community Facilities	Loss of Community Facilities	Built Up Area Boundary
13	0	+	++	0	0
18	0	-	-	0	-
19	0	-	-	0	0
198	0	0	-	0	0
210	0	+	++	0	0
503	0	-	-	0	-
508	0	-	+	0	0
526	0	-	-	0	0
543	0	-	-	0	0
556	0	-	+	0	0
573	0	0	-	0	0
575	0	-	-	0	-
601	0	-	-	0	-
617	0	-	-	0	-
631	0	-	-	0	0
678	0	-	-	0	-
686	0	-	-	0	0
688	0	-	-	0	-
736	0	-	-	0	-
740	0	-	-	0	-
743	0	-	-	0	-
784	0	-	-	0	0
789	0	-	-	0	-
799	0	-	-	0	-
830	0	-	-	0	-
844	0	-	-	0	0
858	0	-	+	0	-
984	0	-	+	0	0
986	0	-	-	0	-
1003	0	-	-	0	-
1018	0	-	-	0	-
1020	0	-	-	0	0
1022	0	-	-	0	-
1026	0	-	-	0	0
1030	0	-	+	0	0
1063	0	-	-	0	-
1075	0	-	++	0	0
1095	0	0	-	0	-
1101	0	+	++	0	0
1105	0	-	-	0	-
1106	0	-	-	0	-
1120	0	-	-	0	-
1121	0	++	++	-	0
1123	0	++	++	0	0

C.6 SA Objective 5 – Flooding

C.6.1 Fluvial Flood Risk

- C.6.1.1 Sites 556, 678, 740 and 1105 are partially located within Flood Zone 3, associated with watercourses such as the River Adur and minor watercourse ‘Pooke Bourne’, meaning that there is a flood risk of 1% or more annually in the affected areas. The proposed development at these four sites could locate site-end users in areas of high flood risk and therefore a major negative impact on flooding at these sites could be expected.
- C.6.1.2 Sites 18 and 736 are located within Flood Zone 2, meaning that there is a flood risk of between 0.1% and <1% annually within the affected area. The proposed development at these two sites is therefore likely to have a minor negative impact on flooding.
- C.6.1.3 The remaining 38 reasonable alternative sites are located within Flood Zone 1 where there is less than 0.1% chance of flooding in any year. The proposed development at these sites is likely to locate site-end users in areas at low risk of flooding and therefore a minor positive impact could be expected.

C.6.2 Surface Water Flood Risk

- C.6.2.1 Surface Water Flood Risk (SWFR) is categorised into low (1/1000), medium (1/100) and high (1/30) risk relating to the probability of surface water flooding occurring in a given area.
- C.6.2.2 The proposed development at 22 of the 44 reasonable alternative sites (Sites 18, 19, 556, 575, 601, 678, 686, 688, 736, 740, 743, 799, 830, 986, 1003, 1018, 1022, 1026, 1075, 1095, 1101 and 1105) coincide with areas of high SWFR and therefore development of these sites could locate site end users within areas at high risk of surface flooding, potentially leading to major negative impacts.
- C.6.2.3 The proposed development at Sites 13, 503, 508, 617, 844, 1020, 1106, 1120, 1121 and 1123 coincide with areas of low and medium SWFR and could therefore have a minor negative impact on flooding by potentially locating site end users within these affected areas.
- C.6.2.4 The remaining 12 reasonable alternative sites do not coincide with areas of SWFR and therefore the proposed development would be expected to have a minor positive impact on flooding by locating site end users in areas not prone to surface water flooding.

Table C.6.1: Sites impact matrix for SA Objective 5 – Flooding

Site Ref	Fluvial Flood Risk	Surface Water Flood Risk
13	+	-
18	-	--
19	+	--
198	+	+
210	+	+
503	+	-
508	+	-
526	+	+
543	+	+
556	--	--
573	+	+
575	+	--
601	+	--
617	+	-
631	+	+
678	--	--
686	+	--
688	+	--
736	-	--
740	--	--
743	+	--
784	+	+
789	+	+
799	+	--
830	+	--
844	+	-
858	+	+
984	+	+
986	+	--
1003	+	--
1018	+	--
1020	+	-
1022	+	--
1026	+	--
1030	+	+
1063	+	+
1075	+	--
1095	+	--
1101	+	--
1105	--	--
1106	+	-
1120	+	-
1121	+	-
1123	+	-

C.7 SA Objective 6 – Natural Resources

C.7.1 Previously Developed Land

- C.7.1.1 42 of the 44 proposed development sites wholly or partially compromise undeveloped land which could lead to minor negative impacts on natural resources associated with an inefficient use of land and the permanent and irreversible loss of ecologically valuable soils.
- C.7.1.2 Sites 1121 and 1123 largely comprise previously developed land, and so development at these locations would be likely to have minor positive impacts on natural resources through the potential for efficient use of land.

C.7.2 Agricultural Land Classification

- C.7.2.1 Sites 18, 503, 575, 678, 736, 740, 799, 1022, 1095 and 1105 are classified as ALC Grade 1, 2 or 3 and are over 20ha in area. Therefore, due to the large nature of these sites and the potential for irreversible loss of these valuable soil resources, it is expected that the proposed development at these 10 sites would have major negative impacts on natural resources.
- C.7.2.2 Sites 13, 19, 210, 508, 526, 543, 556, 573, 601, 617, 631, 686, 688, 784, 789, 830, 844, 858, 984, 986, 1003, 1018, 1020, 1026, 1030, 1063, 1075, 1101 and 1106 and 1120 are less than 20ha in area and are located either wholly or partially upon land classified as ALC Grade 1, 2 or 3. The proposed development at these 30 sites would be likely to have a minor negative impact on agricultural land through the potential irreversible loss of BMV soil resources.
- C.7.2.3 Sites 198 and 743 are located upon land which is classified as ALC Grades 4 and 5 and therefore the proposed development at these sites is likely to result in negligible impacts on natural resources.

C.7.3 Mineral Safeguarding Area

- C.7.3.1 Nationally and locally important mineral resources which should be protected from unnecessary sterilisation are identified within Mineral Safeguarding Areas (MSAs).
- C.7.3.2 34 of the 44 proposed development sites coincide with MSAs that contain brick clay, consolidated bedrock or unconsolidated sand. The development of these sites could potentially lead to sterilisation of these mineral resources where the minerals would be inaccessible for potential extraction in the future. Therefore, the proposed development at these sites would be likely to have a minor negative impact on natural resources.
- C.7.3.3 Sites 18, 508, 631, 688, 743, 784, 858, 984, 1106 and 1121 do not coincide with MSAs and therefore proposed development at these sites is therefore expected to have a negligible impact on mineral resources.

Table C.7.1: Sites impact matrix for SA Objective 6 - Natural Resources

Site Ref	Previously Developed Land	Agricultural Land Classification	Mineral Safeguarding Area
13	-	-	-
18	-	--	0
19	-	-	-
198	-	0	-
210	-	-	-
503	-	--	-
508	-	-	0
526	-	-	-
543	-	-	-
556	-	-	-
573	-	-	-
575	-	--	-
601	-	-	-
617	-	-	-
631	-	-	0
678	-	--	-
686	-	-	-
688	-	-	0
736	-	--	-
740	-	-	-
743	-	0	0
784	-	-	0
789	-	-	-
799	-	--	-
830	-	-	-
844	-	-	-
858	-	-	0
984	-	-	0
986	-	-	-
1003	-	-	-
1018	-	-	-
1020	-	-	-
1022	-	--	-
1026	-	-	-
1030	-	-	-
1063	-	-	-
1075	-	-	-
1095	-	--	-
1101	-	-	-
1105	-	--	-
1106	-	-	0
1120	-	-	-
1121	+	0	0
1123	+	0	-

C.8 SA Objective 7 – Biodiversity

C.8.1 Habitats Sites

C.8.1.1 Habitats sites are a network of nature protection areas which include Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites. Sites 198, 556, 686, 688, 984, 1030, 1121 and 1123 are located within the established 7km Zone of Influence³ for Ashdown Forest SPA and SAC which is located to the north east of the district boundary. The proposed development could increase recreational pressure on this Habitats site and therefore potentially have minor negative impacts on biodiversity upon development of these sites.

C.8.1.2 36 of the 44 reasonable alternative sites are not located within 7km of Ashdown Forest SPA and SAC and are therefore expected to have negligible impacts on biodiversity associated with this Habitats site. Potential effects of development on other Habitats sites will be explored fully in the Habitats Regulations Assessment.

C.8.2 Sites of Special Scientific Interest

C.8.2.1 Site 686 is located within an SSSI IRZ which states that “*Any residential development of 100 or more houses outside existing settlements/urban areas*” should be consulted on with Natural England. The proposed development of 125 dwellings at this site could therefore have potentially minor negative impact on SSSIs related to this IRZ (including ‘Hedgecourt’ SSSI and ‘Weir Wood Reservoir’ SSSI).

C.8.2.2 Site 1106 is located within an SSSI IRZ which states that “*Any residential development of 50 or more houses outside existing settlements/urban areas*” should be consulted on with Natural England. This site is proposed for C2 use, with an unknown number of beds. The potential effects of the development at this site on nearby SSSIs is uncertain.

C.8.3 Ancient Woodlands

C.8.3.1 Mid Sussex District contains large areas of ancient woodland, especially concentrated within the northern area of the district including ‘Worth Forest’ and ‘Wakehurst Park’. Sites 18, 575, 601, 678, 688, 736, 740 and 1022 coincide with areas of ancient woodland and development at these locations could result in a direct loss of these important biodiversity assets.

C.8.3.2 Sites 198, 503, 686, 743, 844, 858 and 1020 are located adjacent to or within 15m of ancient woodlands. The proposed development at these seven sites would therefore be likely to

³ Mid Sussex District Council (2022) Protecting Ashdown Forest. Available at: <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/> [Accessed on 27/09/22]

have a minor negative impact on ancient woodland by increasing development related pressures or threats.

C.8.4 Veteran Trees

C.8.4.1 Being a heavily wooded district, Mid Sussex has large quantities of veteran trees scattered throughout the area. Sites 18, 503, 688 and 740 have been identified as coinciding with one or more veteran trees. The proposed development at these sites could potentially lead to major negative impacts including the damage or loss of these important biodiversity assets.

C.8.5 Local Nature Reserves

C.8.5.1 There are eight Local Nature Reserves (LNRs) within Mid Sussex including 'Eastern Road Nature Reserve', 'Blunts and Paiges Wood' and 'Ardingly Reservoir'. None of the reasonable alternative sites are located in close proximity to these LNRs such that adverse impacts would be likely to occur as a result of the development. A negligible impact has been identified for all sites.

C.8.6 Local Wildlife Sites

C.8.6.1 There are various Local Wildlife Sites (LWSs) located throughout Mid Sussex including 'Oaken Wood, Stony Plays and High Lines' LWS, 'Wickham Woods' LWS and 'Great Wood and Copyhold Hanger'. Sites 503, 556, 686, 736 and 1033 are located adjacent to or within close proximity to LWSs. The proposed development at these five sites may result in minor negative impacts on these LWSs due to increased development related threats and pressures.

C.8.7 Priority Habitats

C.8.7.1 Priority habitats can be found throughout Mid Sussex and include deciduous woodland, grass moorland and traditional orchard. Sites 18, 198, 503, 556, 575, 601, 678, 688, 736, 740, 858, 984, 986, 1022, 1075, 1095, 1105 and 1106 coincide with areas of priority habitat. The proposed development at these sites could potentially result in the loss or degradation of these habitats and result in a minor negative impact on the overall presence of priority habitats across the Plan area.

Table C.8.1: Sites impact matrix for SA Objective 7 - Biodiversity

Site Ref	Habitats Sites	SSSI	National Nature Reserves	Ancient Woodland	Veteran Trees	Local Nature Reserves	Local Wildlife Sites	Priority Habitat	Open Mosaic Habitat
13	0	0	0	0	0	0	0	0	0
18	0	0	0	--	--	0	0	-	0
19	0	0	0	0	0	0	0	0	0
198	-	0	0	-	0	0	0	-	0
210	0	0	0	0	0	0	0	0	0
503	0	0	0	-	--	0	-	-	0
508	0	0	0	0	0	0	0	0	0
526	0	0	0	0	0	0	0	0	0
543	0	0	0	0	0	0	0	0	0
556	-	0	0	0	0	0	-	-	0
573	0	0	0	0	0	0	0	0	0
575	0	0	0	--	0	0	0	-	0
601	0	0	0	--	0	0	0	-	0
617	0	0	0	0	0	0	0	0	0
631	0	0	0	0	0	0	0	0	0
678	0	0	0	--	0	0	0	-	0
686	-	-	0	-	0	0	-	0	0
688	-	0	0	--	--	0	0	-	0
736	0	0	0	--	0	0	-	-	0
740	0	0	0	--	--	0	0	-	0
743	0	0	0	-	0	0	0	0	0
784	0	0	0	0	0	0	0	0	0
789	0	0	0	0	0	0	0	0	0
799	0	0	0	0	0	0	0	0	0
830	0	0	0	0	0	0	0	0	0
844	0	0	0	-	0	0	0	0	0
858	0	0	0	-	0	0	0	-	0
984	-	0	0	0	0	0	0	-	0
986	0	0	0	0	0	0	0	-	0
1003	0	0	0	0	0	0	0	0	0
1018	0	0	0	0	0	0	0	0	0
1020	0	0	0	-	0	0	0	0	0
1022	0	0	0	--	0	0	0	-	0
1026	0	0	0	0	0	0	0	0	0
1030	-	0	0	0	0	0	0	0	0
1063	0	0	0	0	0	0	0	0	0
1075	0	0	0	0	0	0	0	-	0
1095	0	0	0	0	0	0	0	-	0
1101	0	0	0	0	0	0	0	0	0
1105	0	0	0	0	0	0	0	-	0
1106	0	+/-	0	0	0	0	0	-	0
1120	0	0	0	0	0	0	0	0	0
1121	-	0	0	0	0	0	0	0	0
1123	-	0	0	0	0	0	0	0	0

C.9 SA Objective 8 - Landscape

C.9.1 High Weald AONB

C.9.1.1 High Weald AONB comprises a large proportion of the northern area of Mid Sussex District. Sites 198, 984 and 1106 are located within the High Weald AONB and have been identified as having the potential to have a ‘moderate impact’ on the AONB upon development. A major negative impact on this designated landscape could therefore be expected for these sites.

C.9.2 South Downs National Park

C.9.2.1 South Downs National Park comprises a large proportion of the southern area of Mid Sussex. Sites 13, 19, 575, 799, 986, 1022, 1095 and 1105 are located in close proximity to the National Park and are identified to be within areas where there is potential for new development to alter the setting of the landscape. A minor negative impact on the setting of this landscape could therefore be expected at these sites.

C.9.3 Landscape Capacity

C.9.3.1 Landscape capacity is defined as “*the degree to which a particular landscape character type or area is able to accommodate change without significant effects on its character, or overall change of landscape character type*”⁴.

C.9.3.2 Site 503 is located in an area identified as having ‘medium/high’ landscape capacity, and therefore a minor positive impact on the local landscape could occur, owing to the land parcel being able to accommodate change without significant impacts on the landscape quality and characteristics.

C.9.3.3 Site 574 is located within an area identified as having ‘medium’ landscape capacity, which is deemed to likely have a negligible impact on the landscape setting upon development.

C.9.3.4 36 of the 44 reasonable alternative sites are located in areas of ‘negligible-low’, ‘low’ or ‘low/medium’ landscape capacity where development within these areas could have the potential to significantly impact landscape character and setting. The proposed development at these sites could therefore be expected to have a minor negative impact on the landscape.

C.9.3.5 Sites 210, 631, 678, 784, 1121 and 1123 are located outside of the landscape capacity study area and therefore, the landscape capacity is unknown at these sites.

⁴ Natural England (2013) The Countryside Agency Topic Paper 6: Techniques and Criteria for judging capacity and sensitivity. Available at: <http://publications.naturalengland.org.uk/publication/5146500464115712> [Date Accessed: 27/01/22]

C.9.4 Country Park

C.9.4.1 There are various Country Parks within Mid Sussex including ‘Worth Way’, ‘Forest Way’ and a small proportion of Country Parks ‘Tilgate Park’ and ‘Ditchling Common’. Sites 18, 686 and 688 are located adjacent to or in close proximity to ‘Worth Way’ Country Park, where there is potential for the proposed development to have a minor negative impact on the setting of the country park.

C.9.5 Alter Views for PRow Network Users

C.9.5.1 The development proposed at 33 of the 44 reasonable alternative sites are located in the vicinity of Mid Sussex’s PRow network, and the development of such sites could potentially alter the views of countryside or open space currently experienced by the users of these footpaths. Therefore, a minor negative impact on the local landscape could be expected at these 33 sites.

C.9.5.2 Sites 210, 508, 556, 573, 617, 686, 984, 1101, 1106, 1121 and 1123 are separated from PRow by existing built form, and their development would therefore be unlikely to significantly alter views experienced by PRow users.

C.9.6 Increased Risk of Coalescence

C.9.6.1 Sites 18, 575, 736, 799, 1018, 1022, 1063, 1095 and 1105 are situated between the existing communities of Mid Sussex such as Sayers Common and Albourne. Development of these sites could potentially lead to a loss of separation between settlements, and therefore potentially have minor negative impacts in relation to coalescence.

C.9.7 Urban Sprawl

C.9.7.1 32 of the 44 reasonable alternative sites lie outside of existing settlements within Mid Sussex. Development of these sites could increase the risk of urban sprawl and therefore a minor negative impact on landscape could be expected.

C.9.8 Multi-functional Greenspace

C.9.8.1 19 of the 44 reasonable alternative sites are located within 300m of multi-functional greenspace which would improve accessibility to the countryside and open spaces for site end users. Therefore, a minor positive impact on landscape could be expected at these sites.

C.9.9 Tree Preservation Order

C.9.9.1 A Tree Preservation Order (TPO) is an order made by local authorities in England to protect certain trees, groups of trees or areas of woodland. Sites 18, 210 and 740 coincide with areas of TPOs and/or individual trees designated as TPO protected. Therefore, these sites could

potentially directly harm these protected trees through development related threats and pressures and result in a minor negative impact on landscape setting.

Table C.9.1: Sites impact matrix for SA Objective 8 - Landscape

Site Ref	High Weald AONB	South Downs National Park	Landscape Capacity	Country Park	Alter Views for PRoW Network Users	Increased Risk of Coalescence/ Encroachment	Multi-functional Greenspace	Tree Preservation Order
13	0	-	-	0	-	-	0	0
18	0	0	-	-	-	-	0	-
19	0	-	-	0	-	-	0	0
198	--	0	0	0	-	-	+	0
210	0	0	+/-	0	0	0	0	-
503	0	0	+	0	-	-	0	0
508	0	0	-	0	0	0	+	0
526	0	0	-	0	-	0	+	0
543	0	0	-	0	-	0	+	0
556	0	0	-	0	0	-	0	0
573	0	0	0	0	0	-	+	0
575	0	-	-	0	-	-	0	0
601	0	0	-	0	-	-	0	0
617	0	0	-	0	0	-	0	0
631	0	0	+/-	0	-	-	+	0
678	0	0	+/-	0	-	-	0	0
686	0	0	-	-	0	-	0	0
688	0	0	-	-	-	-	0	0
736	0	0	-	0	-	-	0	0
740	0	0	-	0	-	-	0	-
743	0	0	-	0	-	0	0	0
784	0	0	+/-	0	-	-	+	0
789	0	0	-	0	-	-	+	0
799	0	-	-	0	-	-	0	0
830	0	0	-	0	-	-	+	0
844	0	0	-	0	-	-	0	0
858	0	0	-	0	-	-	+	0
984	--	0	0	0	0	0	+	0
986	0	-	-	0	-	-	+	0
1003	0	0	-	0	-	-	+	0
1018	0	0	-	0	-	-	0	0
1020	0	0	-	0	-	0	+	0
1022	0	-	-	0	-	-	0	0
1026	0	0	-	0	-	0	+	0
1030	0	0	-	0	-	-	0	0
1063	0	0	-	0	-	-	0	0
1075	0	0	-	0	-	-	+	0
1095	0	-	-	0	-	-	0	0
1101	0	0	-	0	0	0	0	0
1105	0	-	-	0	-	-	+	0
1106	--	0	-	0	0	0	0	0
1120	0	0	-	0	-	-	0	0
1121	0	0	+/-	0	0	0	+	0
1123	0	0	+/-	0	0	0	+	0

C.10 SA Objective 9 – Cultural Heritage

C.10.1 Listed Buildings (Grades I, II* and II)

C.10.1.1 There are many Listed Buildings scattered throughout Mid Sussex. The proposed development at Sites 13, 18, 19, 526, 575, 601, 678, 789, 736, 799, 844, 1063 and 1120 are located within close proximity to a Listed Building (Grades I, II* and II) and have been identified to have the potential to cause ‘medium’ or ‘high’ impact on these heritage assets including ‘Langton Grange’, ‘Wickham Farmhouse’ and ‘Hurstpierpoint College’.

C.10.1.2 The remaining 31 sites are identified as being unlikely to have significant impacts on the setting of any Listed Building.

C.10.2 Conservation Area

C.10.2.1 Mid Sussex contains 36 Conservation Areas (CAs). Sites 13, 19, 526, 575, 844, 986, 1095 and 1120 are located in close proximity to these CAs and have been identified to have the potential to cause ‘high’ impact on their settings. Therefore, minor negative impacts on CAs could be expected upon development of these sites.

C.10.2.2 The remaining 36 sites are identified as being unlikely to have significant impacts on any CA.

C.10.3 Scheduled Monument

C.10.3.1 The 44 reasonable alternative sites are not located in close proximity to any Scheduled Monument (SM). The proposed development at all of the reasonable alternative sites are likely to have negligible impacts on SMs.

C.10.4 Registered Park and Gardens

C.10.4.1 There are nine Registered Parks and Gardens (RPGs) within the Mid Sussex district, including ‘The High Beeches’, ‘Stonehurst’ and ‘Heaselands’ RPGs. Site 736 is located approximately 500m from ‘Heaselands’ RPG and, being a significantly large site, the proposed development at this site could potentially have a minor negative impact on the setting of this RPG. Site 556 is located approximately 15m (across the road) from ‘Borde Hill’ RPG. The proposed development at this site could potentially have a minor negative impact on the setting of this RPG.

C.10.4.2 The remaining reasonable alternative sites are deemed unlikely to have a significant impact on the setting of any RPG.

C.10.5 Archaeology

C.10.5.1 Sites 19, 503, 556, 617, 686, 688, 736, 1022, 1075, 1101, 1105 and 1120 have been identified as having the potential to have moderate impacts on archaeological assets, and therefore, for the purposes of this assessment a minor negative impact is recorded.

C.10.5.2 The remaining 32 sites are deemed unlikely to have a significant impact on archaeological sites and have therefore been assessed as negligible. However, archaeological impact assessments and other desk studies would provide further information regarding potential archaeological assets on a site-by-site basis.

Table C.10.1: Sites impact matrix for SA Objective 9 - Cultural Heritage

Site Ref	Listed Buildings (Grades I, II* and II)	Conservation Area	Scheduled Monument	Registered Park and Gardens	Archaeology
13	-	-	0	0	0
18	-	0	0	0	0
19	-	-	0	0	-
198	0	0	0	0	0
210	0	0	0	0	0
503	0	0	0	0	-
508	0	0	0	0	0
526	-	-	0	0	0
543	0	0	0	0	0
556	0	0	0	-	-
573	0	0	0	0	0
575	-	-	0	0	0
601	-	0	0	0	0
617	0	0	0	0	-
631	0	0	0	0	0
678	-	0	0	0	0
686	0	0	0	0	-
688	0	0	0	0	-
736	-	0	0	-	-
740	0	0	0	0	0
743	0	0	0	0	0
784	0	0	0	0	0
789	-	0	0	0	0
799	-	0	0	0	0
830	0	0	0	0	0
844	-	-	0	0	0
858	0	0	0	0	0
984	0	0	0	0	0
986	0	-	0	0	0
1003	0	0	0	0	0
1018	0	0	0	0	0
1020	0	0	0	0	0
1022	0	0	0	0	-
1026	0	0	0	0	0
1030	0	0	0	0	0
1063	-	0	0	0	0
1075	0	0	0	0	-
1095	0	-	0	0	0

Site Ref	Listed Buildings (Grades I, II* and II)	Conservation Area	Scheduled Monument	Registered Park and Gardens	Archaeology
1101	0	0	0	0	-
1105	0	0	0	0	-
1106	0	0	0	0	0
1120	-	-	0	0	-
1121	0	0	0	0	0
1123	0	0	0	0	0

C.11 SA Objective 10 – Climate Change and Transport

C.11.1 AQMA

C.11.1.1 There is only one AQMA located within the Plan area, 'Mid Sussex AQMA No. 1'. All reasonable alternative sites, with the exception of Site 210, are located over 200m from any AQMA and therefore are located away from major sources of traffic related air pollution. Minor positive impacts on climate change and transport could be expected as these 41 sites are not expected to contribute further to areas generally associated with traffic congestion.

C.11.1.2 Sites 210 and 1101 are located within 200m of 'Mid Sussex AQMA No 1'. The proposed development at these two sites would be likely to locate site end users in areas of existing poor air quality and may exacerbate existing air quality issues within the AQMA. A minor negative impact on local air quality would be expected.

C.11.2 Main Road

C.11.2.1 Various main roads pass through the Mid Sussex District, including the A272, A23 and A264. Sites 18, 210, 526, 543, 601, 617, 631, 740, 784, 736, 844, 984, 1022, 1095, 1101, 1105, 1106 and 1120 are located within 200m of a main road. The proposed development at these sites could potentially have a minor negative impact on transport related emissions, through potentially increasing traffic congestion in the local areas surrounding the sites.

C.11.2.2 The remaining reasonable alternative sites are located over 200m from a main road and therefore, the proposed development at these sites would be expected to have a minor positive impact on traffic and subsequent emissions.

C.11.3 Bus Services

C.11.3.1 Mid Sussex is a largely rural district where settlements experience varying levels of public transport provision. Sites 789, 1003, 1020, 1030, 1105, 1120, 1121 and 1123 have been identified as having the potential for 'excellent' bus transport access, and it is therefore expected that the proposed development at these sites will have a major positive impact on access to sustainable transport via bus services.

C.11.3.2 Sites 210, 573, 601, 631, 686, 688, 743, 784, 830, 984, 986, 1018, 1022, 1026, 1063, 1075, 1095, 1101 and 1106 are identified as having the potential for 'good' bus transport access. The proposed development at these sites would therefore be expected to have a minor positive impact on a on access to sustainable transport via bus services.

C.11.3.3 Sites 13, 18, 19, 198, 503, 508, 526, 543, 556, 575, 617, 740, 799, 844 and 858 are identified as having the potential to have 'fair' bus transport access. The proposed development is

therefore expected to have a negligible impact on access to sustainable transport via bus services.

- C.11.3.4 Sites 678 and 736 are deemed have the potential for ‘poor’ bus transport access. The proposed development at these two sites could therefore expected to have a minor negative impact on access to sustainable transport via bus services.

C.11.4 Railway Station

- C.11.4.1 There are two railway lines running through Mid Sussex from north to south, with various train stations along them including Haywards Heath and Burgess Hill with links to major cities such as London and Brighton, as well as smaller towns. 37 of the 44 reasonable alternative sites are located outside of the sustainable target distance of a 15-minute walk or cycle (1.2km) from a railway station, and therefore the proposed development at these sites will potentially have a minor negative impact on the site end users’ access to rail services.

- C.11.4.2 Sites 210, 573, 1022, 1030, 1106, 1121 and 1123 are located within this target distance and are therefore expected to have a major positive impact on sustainable access to rail services.

C.11.5 Public Transport Access to Local Services

- C.11.5.1 Local services include superstores, services and facilities provided by town centres and high street shopping centres. Sites 13, 210, 508, 556, 858, 984, 1030, 1075, 1101, 1121 and 1123 are located within the sustainable target distance of a 30-minute journey on public transport therefore the proposed development at these sites is expected to have a minor positive impact on transport and accessibility.

- C.11.5.2 The remaining sites are not located within this target distance to local services and are therefore expected to have minor negative impacts on transport and accessibility.

C.11.6 Pedestrian Access to Local Services

- C.11.6.1 Sites 13, 210, 1101, 1121 and 1123 are located within the sustainable target distance of a 15-minute walk/cycle from local services. The proposed development at these sites would therefore be expected to have a major positive impact on accessibility to these services.

- C.11.6.2 The remaining 39 reasonable alternative sites are not located within this target distance to local services and therefore the proposed development at these sites are expected to potentially have a major negative impact on accessibility to these vital services.

C.11.7 Pedestrian Access to Convenience Store

C.11.7.1 Sites 13, 198, 210, 526, 617, 631, 784, 736, 984, 1020, 1030, 1095, 1101, 1105, 1106, 1120, 1121 and 1123 are within the sustainable target distance of a 15-minute walk from a convenience store and therefore the proposed development at these sites are expected to have a major positive impact on accessibility to these facilities.

C.11.7.2 The remaining 26 reasonable alternative sites are located outside of this target distance to a convenience store and therefore the proposed development at these sites would be expected to have a minor negative impact on future residents' accessibility to these facilities.

Table C.11.1: Sites impact matrix for SA Objective 10 - Climate Change and Transport

Site Ref	AQMA	Main Road	Public Transport Access via bus services	Railway Station	Public Transport Access to Local Services	Pedestrian Access to Local Services	Pedestrian Access to Convenience Store
13	+	+	0	-	+	++	++
18	+	-	0	-	-	-	-
19	+	+	0	-	-	-	-
198	+	+	0	-	-	-	++
210	-	-	+	++	+	++	++
503	+	+	0	-	-	-	-
508	+	+	0	-	+	-	-
526	+	-	0	-	-	-	++
543	+	-	0	-	-	-	-
556	+	+	0	-	+	-	-
573	+	+	+	++	-	-	-
575	+	+	0	-	-	-	-
601	+	-	+	-	-	-	-
617	+	-	0	-	-	-	++
631	+	-	+	-	-	-	++
678	+	+	-	-	-	-	-
686	+	+	+	-	-	-	-
688	+	+	+	-	-	-	-
736	+	-	-	-	-	-	++
740	+	-	0	-	-	-	-
743	+	+	+	-	-	-	-
784	+	-	+	-	-	-	++
789	+	+	++	-	-	-	-
799	+	+	0	-	-	-	-
830	+	+	+	-	-	-	-
844	+	-	0	-	-	-	-
858	+	+	0	-	+	-	-
984	+	-	+	-	+	-	++
986	+	+	+	-	-	-	-
1003	+	+	++	-	-	-	-
1018	+	+	+	-	-	-	-
1020	+	+	++	-	-	-	++
1022	+	-	+	++	-	-	-
1026	+	+	+	-	-	-	-
1030	+	+	++	++	+	-	++
1063	+	+	+	-	-	-	-

Site Ref	AQMA	Main Road	Public Transport Access via bus services	Railway Station	Public Transport Access to Local Services	Pedestrian Access to Local Services	Pedestrian Access to Convenience Store
1075	+	+	+	-	+	-	-
1095	+	-	+	-	-	-	++
1101	-	-	+	++	+	++	++
1105	+	-	++	-	-	-	++
1106	+	-	+	-	-	-	++
1120	+	-	0	-	-	-	++
1121	+	+	++	++	+	++	++
1123	+	+	++	++	+	++	++

C.12 SA Objective 11 – Energy and Waste

C.12.1 Increase in Household Waste Generation

- C.12.1.1 Residential-led development is likely to result in an increase in household waste generation, to some extent.
- C.12.1.2 Sites 736, 740, 799 and 1105 are proposed for the development of more than 1,307 dwellings. The proposed development at these four sites could potentially result in a significant increase household waste generation, by more than 1% in comparison to current levels, which could lead to major negative impacts on waste generation within the Plan area.
- C.12.1.3 Sites 19, 503, 575, 601, 678, 686, 688, 986, 1018, 1022, 1075, 1095, 1120 and 1123 are proposed for the development of between 131 and 1,307 dwellings. The proposed development at these sites would be expected to increase household waste generation by more than 0.1% in comparison to current levels. Therefore, the proposed development at these sites could potentially result in a minor negative impact on household waste generation.
- C.12.1.4 24 of the reasonable alternative sites are proposed for the development of 131 dwellings or less. The proposed development at these sites would be expected to have negligible impacts on household waste generation in comparison to current levels.
- C.12.1.5 Sites 1101 and 1106 are proposed for C2 use class development, which includes provision of accommodation for people in need of care. The potential increase in waste production as a result of the proposed development at these two sites is uncertain.

C.12.2 Increase in Energy Consumption Related GHG Emissions

- C.12.2.1 Residential-led development is likely to result in an increase in energy related GHG emissions through use of fossil fuel produced electricity, to some extent.
- C.12.2.2 Sites 18, 503, 575, 601, 617, 678, 686, 688, 736, 740, 799, 830, 844, 986, 1003, 1018, 1022, 1075, 1095, 1105, 1120, 1121 and 1123 are proposed for the development of 100 dwellings or more. The proposed development at these sites could have major negative impacts on GHG emissions relating to energy consumption.
- C.12.2.3 Site 984 is proposed for development of eight dwellings, which would be expected to result in a negligible impact on GHG emissions relating to energy consumption.
- C.12.2.4 The remaining 18 reasonable alternative sites are proposed for the development of 10 dwellings or more. It is therefore expected that the proposed development at these sites would likely have a minor negative impact on GHG emissions relating to energy consumption.

C.12.2.5 Sites 1101 and 1106 are proposed for C2 use class development, which includes provision of accommodation for people in need of care. The potential increase in GHG emissions as a result of the proposed development at these two sites is uncertain.

Table C.12.1: Sites impact matrix for SA Objective 11 - Energy and Waste

Site Ref	Increase in Household Waste	Increase in Energy Consumption
13	0	-
18	-	--
19	0	-
198	0	-
210	0	-
503	-	--
508	0	-
526	0	-
543	0	-
556	0	-
573	0	-
575	-	--
601	-	--
617	0	--
631	0	-
678	-	--
686	-	--
688	-	--
736	--	--
740	--	--
743	0	-
784	0	-
789	0	-
799	--	--
830	0	--
844	0	--
858	0	-
984	0	0
986	-	--
1003	0	--
1018	-	--
1020	0	-
1022	-	--
1026	0	-
1030	0	-
1063	0	-
1075	-	--
1095	-	--
1101	+/-	+/-
1105	--	--
1106	+/-	+/-
1120	-	--
1121	0	--
1123	-	--

C.13 SA Objective 12 – Water Resources

C.13.1 Watercourse

C.13.1.1 There are various major and minor watercourses within the Plan area, including the River Ouse and River Medway and related tributaries. Sites 18, 198, 556, 575, 678, 688, 736, 740, 830, 1003, 1022, 1030, 1075, 1095 and 1105 are located within 200m of a watercourse and therefore the proposed development at these sites could potentially increase the risk of contamination of these watercourses during construction and occupation. A minor negative impact on watercourse quality could therefore be expected at these sites upon development.

C.13.2 Groundwater SPZ

C.13.2.1 Within Mid Sussex, SPZs are located to the south and the north east of the district. The 44 reasonable alternative sites do not coincide with any groundwater SPZ and are therefore not expected to increase the risk of groundwater contamination within these protected areas. The proposed development these sites could therefore be expected to have a negligible impact on protected groundwater resources.

Table C.13.1: Sites impact matrix for SA Objective 12 - Water Resources

Site Ref	Watercourse	SPZ
13	0	0
18	-	0
19	0	0
198	-	0
210	0	0
503	0	0
508	0	0
526	0	0
543	0	0
556	-	0
573	0	0
575	-	0
601	0	0
617	0	0
631	0	0
678	-	0
686	0	0
688	-	0
736	-	0
740	-	0
743	0	0
784	0	0
789	0	0
799	0	0
830	-	0
844	0	0
858	0	0
984	0	0
986	0	0
1003	-	0
1018	0	0
1020	0	0
1022	-	0
1026	0	0
1030	-	0
1063	0	0
1075	-	0
1095	-	0
1101	0	0
1105	-	0
1106	0	0
1120	0	0
1121	0	0
1123	0	0

C.14 SA Objective 13 – Economic Regeneration

C.14.1 Pedestrian Access to Local Services

C.14.1.1 Good and sustainable access to local services such as a superstore, a town centre or a high street shopping centre, will likely lead to economic stimulation and regeneration where an increase in footfall could positively impact the local economy and provide new job opportunities for local residents. Sites 13, 210, 1101, 1121 and 1123 are located within the target distance of a 15-minute walk/cycle from local services and therefore the proposed development at this site is expected to have a major positive impact on accessibility.

C.14.1.2 The remaining 39 reasonable alternative sites are not located within this sustainable target distance to local services, and therefore the proposed development at these sites would be expected to have a minor negative impact on accessibility.

C.14.2 Public Transport Access to Local Services

C.14.2.1 Sites 13, 210, 508, 556, 858, 984, 1030, 1075, 1101, 1121 and 1123 are located within the sustainable target distance of a 30-minute journey on public transport and therefore the proposed development at these sites is expected to have a minor positive impact on transport and accessibility.

C.14.2.2 The remaining 33 sites are not located within this sustainable target distance from local services and are therefore expected to potentially have a minor negative impact on transport and accessibility.

Table C.14.1: Sites impact matrix for SA Objective 13 - Economic Regeneration

Site Ref	Pedestrian access to local services	Public transport access to local services
13	++	+
18	-	-
19	-	-
198	-	-
210	++	+
503	-	-
508	-	+
526	-	-
543	-	-
556	-	+
573	-	-
575	-	-
601	-	-
617	-	-
631	-	-
678	-	-
686	-	-
688	-	-
736	-	-
740	-	-
743	-	-
784	-	-
789	-	-
799	-	-
830	-	-
844	-	-
858	-	+
984	-	+
986	-	-
1003	-	-
1018	-	-
1020	-	-
1022	-	-
1026	-	-
1030	-	+
1063	-	-
1075	-	+
1095	-	-
1101	++	+
1105	-	-
1106	-	-
1120	-	-
1121	++	+
1123	++	+

C.15 SA Objective 14 – Economic Growth

C.15.1 Employment Floorspace

C.15.1.1 The provision of employment floorspace within Mid Sussex would provide various benefits to the local economy. Sites 18, 736, 740 and 799 are proposed for mixed-use developments where some land would be safeguarded for provision of employment floorspace which could help to provide site end users with local business and employment opportunities. Sites 1101 and 1106 are proposed for C2 use class development, which could provide some local employment opportunities. Therefore, a major positive impact on the local economy would be expected as a result of the proposed development at these six sites.

C.15.1.2 Sites 503, 743, 1022, 1121 and 1123 coincide with areas of current employment floorspace, such as agricultural businesses or golf courses. The proposed development at these sites could potentially result in the loss of these businesses, and consequently the employment opportunities they provide. Therefore, a minor negative impact could be expected following the proposed development at these sites.

C.15.1.3 The remaining reasonable alternative sites are proposed for residential use only and therefore are likely to have a negligible impact on economic growth through employment floorspace provision.

C.15.2 Access to Primary Employment Locations

C.15.2.1 There are a range of employment locations within the Plan area within or in proximity to settlements such as Burgess Hill, Haywards Heath and East Grinstead. The 42 reasonable alternative locations for residential use are located within the sustainable target distance of 5km to key employment areas which would provide site end users with sustainable access to a range of employment opportunities capable of meeting their needs. Therefore, a minor positive impact on the local economy could be expected following the development of these sites.

C.15.2.2 Sites 1101 and 1106 are proposed for C2 development, and as such, have not been assessed for their access to employment. A negligible impact would be expected for these two sites.

Table C.15.1: Sites impact matrix for SA Objective 14 - Economic Growth

Site Ref	Employment Floorspace Provision	Access to Primary Employment Location
13	0	+
18	++	+
19	0	+
198	0	+
210	0	+
503	-	+
508	0	+
526	0	+
543	0	+
556	0	+
573	0	+
575	0	+
601	0	+
617	0	+
631	0	+
678	0	+
686	0	+
688	0	+
736	++	+
740	++	+
743	-	+
784	0	+
789	0	+
799	++	+
830	0	+
844	0	+
858	0	+
984	0	+
986	0	+
1003	0	+
1018	0	+
1020	0	+
1022	-	+
1026	0	+
1030	0	+
1063	0	+
1075	0	+
1095	0	+
1101	++	0
1105	0	+
1106	++	0
1120	0	+
1121	-	+
1123	-	+

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D.1 Sustainability

D.1.1 Policy DPS1: Climate Change

DPS1: Climate Change

The Council will take an integrated and holistic approach to address the causes of climate change and to increase resilience to the effects of climate change. This will be achieved by:

Reducing carbon emissions

- a) Development will be expected to take measures to reduce carbon emissions, including improvements in energy efficiency, in the design and construction of buildings. This includes new buildings and the conversions of existing buildings. Detailed requirements are set out in Policies DPS2: Sustainable Design and Construction, DPS3: Renewable and Low Carbon Energy Schemes, and the Design Guide SPD.
- b) The Council will support renewable and low carbon energy schemes in line with the requirements set out in Policy DPS3: Renewable and Low Carbon Energy Schemes.
- c) Development should adopt the principles of the 20-minute neighbourhood and prioritise active travel such as walking and cycling and sustainable transport such as public transport to reduce reliance on private modes of transport and to facilitate healthy lifestyles. Detailed requirements are set out in Policies DPT3: Placemaking and Connectivity; DPT4: Cycling; and DPB1: Character and Design.
- d) Development likely to be sources of other greenhouse gas emissions (methane, nitrous oxide and fluorinated gases) will be expected to take opportunities to reduce these emissions. This includes proposals that may use these other greenhouse gases in their design and operation, for example, refrigerants and air conditioning systems.

Maximising carbon sequestration

- e) Development should protect existing trees, woodland and hedgerows and seek opportunities to plant appropriate species of trees in appropriate places. Detailed policy requirements are set out in Policy DPN4: Trees, Woodland and Hedgerows.
- f) Development will be expected to protect existing carbon sinks and take opportunities to provide nature-based solutions for carbon capture.
- g) Development will be expected to take opportunities to improve soil health and minimise disturbance to soils in order to protect soil biodiversity and carbon storage. Detailed policy requirements are set out in Policies DPN1: Biodiversity, Geodiversity and Nature Recovery, and DPS2: Sustainable Design and Construction.

Climate change adaptation and mitigation

- h) Development must be designed to minimise vulnerability from the effects of climate change particularly in terms of overheating, flood risk and water supply. Detailed policy requirements are set out in Policies DPS2: Sustainable Design and Construction; DPS4: Flood Risk and Drainage; and DPS5: Water Infrastructure and the Water Environment.
- i) Development will be expected to incorporate green infrastructure and nature-based solutions to moderate surface and air temperatures, increase biodiversity and as part of sustainable

DPS1: Climate Change

drainage systems. Detailed requirements are set out in Policies DPB1: Character and Design; DPS4: Flood Risk and Drainage; and DPN3: Green Infrastructure.

- j) Development will be expected to achieve a net gain in biodiversity and contribute to ecological networks. Detailed policy requirements are set out in Policies DPN1: Biodiversity, Geodiversity and Nature Recovery, and DPN2: Biodiversity Net Gain.
- k) The Council will seek adaptation and mitigation measures that improve resilience to climate change and allow communities, businesses, buildings, infrastructure and ecology to adapt to the impacts of climate change.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS1	0	+	0	0	+	+	+	0	0	++	+	+	0	0

D.1.1.1 Policy DPS1 seeks to ensure that future development in the Plan area contributes to the mitigation of, and adaption to, climate change. The policy refers to other policies within the MSDPR which relate to achieving the Council's climate change goals. The policy sets out the Council's approach to climate change, covering topics such as reducing carbon emissions and maximising carbon sequestration within the Plan area.

D.1.1.2 The policy covers a wide range of themes to provide support and guidance for development proposals. This includes stating that new developments “*will be expected to take measures to reduce carbon emissions, including improvements in energy efficiency, in the design and construction of buildings*” whilst supporting renewable and low carbon schemes. Additionally, active travel is supported within the policy whereby new developments “*should prioritise active travel such as walking and cycling and sustainable transport such as public transport to reduce reliance on private modes of transport and to facilitate healthy lifestyles*”. This could help to encourage physical exercise and reduce emission of harmful air pollutants. Major positive impacts on climate change and transport within the Plan area would be expected through the criteria outlined within this policy (SA Objective 10), as well as minor positive impacts on energy and waste and human health (SA Objectives 2 and 11).

D.1.1.3 Policy DPS1 requires all development to be designed to “*minimise vulnerability from the effects of climate change particularly in terms of overheating, flood risk and water supply*”. Additionally, the incorporation of requirements for biodiversity net gain, nature-based solutions to flood risk, tree protection, and the protection and provision of green infrastructure (GI) throughout the Plan area as a result of this policy, and other related policies within the MSDPR, would be likely to have positive impacts on flood management and habitat creation and protection. Therefore, a minor positive impact on flooding and

biodiversity could be expected (SA Objectives 5 and 7). By aiming to protect water supplies within the Plan area from the effects of climate change, which could include prolonged periods of drought or water scarcity, a minor positive impact on water resources could result (SA Objective 12) by improving infrastructure preparedness to these events.

D.1.1.4 The policy outlines that “*development will be expected to take opportunities to improve soil health and minimise disturbance to soils in order to protect soil biodiversity and carbon storage*”, which could help to promote efficient use of land and the conservation of finite soil resources and ecosystem services they provide. The policy could therefore lead to a minor positive impact on natural resources through protection of ecologically and agriculturally important soils, potentially including BMV land, within the Plan area (SA Objective 6).

D.1.2 Policy DPS2: Sustainable Design and Construction

DPS2: Sustainable Design and Construction

All developments are required to submit a Sustainability Statement to demonstrate how through its design, construction, operation and use it will contribute to the reduction of carbon emissions, increase resilience to the impacts of climate change and improve sustainability.

Prioritise retention and retrofit of existing buildings or structures to capture the embodied energy associated with the building’s original construction unless it can be demonstrated to be unviable to do so.

Development, as defined below, will be required to meet the relevant minimum standards until they are superseded by higher national standards. Sustainable Settlement Allocations DPSC1 – DPSC3 will need to meet higher standards where specified in DPH4.

Towards zero carbon development

Unless it can be demonstrated that doing so is not technically feasible or unviable, development will be required to achieve the minimum standards below:

Development Type	Scale of Development	Minimum Standard
Residential new build	Up to 150 dwellings	HQM 3 Star*
Residential new build	> 150 dwellings	HQM 3.5 Star*
Residential Refurbishment	Major	HQM 3 Star*
Non-residential new build	All	BREEAM Excellent**
Non-residential Refurbishment	Over 500m ²	BREEAM Excellent – Refurbishment and Fit-Out Technical Standards**
Sustainable Settlement allocations – Residential new build – DPSC1-DPSC3	1000+	Refer to DPH4

* Developments must achieve a minimum score of 50 credits in the energy category and 12 credits in the water category.

**Developments must achieve an ‘Outstanding’ rating in energy and water categories and demonstrate reasonable endeavours to achieve an ‘Outstanding’ rating overall.

Assessment frameworks

DPS2: Sustainable Design and Construction

Planning applications should be accompanied by a pre-assessment, demonstrating how the BREEAM Technical Standards and/or Home Quality Mark (HQM) Star rating, or any future replacement standards, will be met. Evidence demonstrating the project has been registered with BRE during the design stage shall be submitted with any application and conditions will be imposed to secure appropriate certification to demonstrate compliance with this policy.

Householder development

Proposals for householder development are encouraged to be as energy efficient and sustainable as possible incorporating the principles of both this policy and Policy DPS1: Climate Change.

Energy use

All new developments should follow the energy hierarchy to contribute to reducing carbon emissions: being lean (using less energy), being clean (supplying energy efficiently) and being green (using renewable energy).

Demonstrate how opportunities for incorporating decentralised, renewable and low carbon energy schemes have been taken into all new development in line with Policy DPS3: Renewable and Low Energy Carbon Schemes.

Prevent overheating

All new development should incorporate design measures have been incorporated to:

- minimise potential overheating such as through the layout, orientation and design of buildings;
- maximise passive cooling through natural ventilation and other passive means. Reliance on air conditioning systems should be avoided. Green and blue infrastructure should be incorporated in line with Policy DPN3: Green Infrastructure to provide natural cooling and shading.

Water resources and water efficiency

New development proposals must accord with the findings of the Gatwick Sub Region Water Cycle Study with respect to water resources, water quality, water supply and wastewater treatment.

To achieve the sustainable water consumption rates above all development must demonstrate that opportunities have been taken to incorporate measures to reduce water use and reuse water including:

- Water efficient fittings and appliances; and
- Rainwater harvesting;
- Greywater recycling; and
- Sustainable drainage systems in accordance with Policy DPS4: Flood Risk and Drainage.

All development will be required to meet the relevant minimum standards set out above until they are superseded by higher national standards.

Soil

DPS2: Sustainable Design and Construction

Best practice should be complied with to protect soils during construction from compaction, pollution and erosion. Undisturbed soils should be protected and measures should be taken to minimise sterilisation of soils by permanent impermeable surfaces.

Minimise waste

In accordance with relevant policies in the West Sussex Waste Local Plan, all development will be required to support the circular economy by minimising construction, demolition and excavation waste disposed of in landfill and follow the waste hierarchy to maximise recycling and re-use of material.

New development shall be designed with adequate and easily accessible storage space that supports separate collection of dry recyclables and food waste, as well as residual waste taking account of guidance in the Mid Sussex Design Guide SPD.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS2	0	+	0	0	+	+	+	0	0	+	++	++	0	0

D.1.2.1 Climate change is both an international and national concern and has many social and environmental implications. Policy DPS2 seeks to ensure that all development proposals will be expected to “*contribute to the reduction of carbon emissions, increase resilience to the impacts of climate change and improve sustainability*” within every phase of a project. Additionally, the policy sets out various BREEAM standards targets for future development proposals to achieve, amongst relevant national standards and other MSDPR policies, in order to combat climate change and its potential impacts.

D.1.2.2 This policy includes criteria for development proposals to meet which would help ensure that they are contributing to the mitigation of climate change. All developments are expected to be energy efficient and follow the energy hierarchy through this policy to help reduce carbon emissions, as well as supporting opportunities “*for incorporating decentralised, renewable and low carbon energy schemes*” (in line with Policy DPS3). Additionally, through this policy all development should follow the waste hierarchy to minimise the amount of waste produced, as well as providing facilities which would encourage residents to recycle and re-use materials. Through this policy, recycling facilities for new developments will be sought in line with Policy DPI2. Overall, a major positive impact on energy and waste within the Plan area would be expected (SA Objective 11).

- D.1.2.3 Policy DPS2 also regards water resource management within the Plan area and sets out various criteria for proposals to meet in order to be supported by the Council, including ensuring that development proposals are in accordance with the findings of the Gatwick Sub Region Water Cycle Study. Further criteria include water consumption and efficiency standards to ensure a low impact on water resources, which may help to provide resilience against the impacts of climate change and improve water security. Additionally, this policy states that new developments are to incorporate designs which maximise efficient use of water resources through rainwater harvesting, greywater recycling and SuDS, for example. Therefore, a major positive impact on water resources within the Plan area could be expected through the district-wide implementation of this policy (SA Objective 12). Furthermore, the integration of SuDS into new developments, as well as implementation of GI, would be anticipated to help reduce the risk of surface water flooding, and therefore a minor positive impact on flooding could be expected (SA Objective 5).
- D.1.2.4 This policy outlines that development proposals should follow ‘best practice’ protocols to protect soils from compaction, pollution and erosion during the construction phase and to avoid unnecessary sterilisation of soil resources. Policy DPS2 is therefore expected to have a minor positive impact on natural resources within the Plan area, through seeking to protect this finite resource (SA Objective 6).
- D.1.2.5 This policy seeks to improve energy efficiency of developments which could lead to the reduction of overall carbon emissions of the Plan area and help mitigate climate change. This will likely help contribute to national carbon emission targets and therefore a minor positive impact on climate change and transport could be expected (SA Objective 10).
- D.1.2.6 Through seeking to ensure that new developments avoid designs which would lead to overheating events and by ensuring other high quality design aspects are implemented, such as greywater recycling which would reduce the chance of pollution of local watercourses and improve river ecosystems and habitats, a minor positive impact on the site end users’ health and wellbeing and biodiversity could be expected (SA Objectives 2 and 7).

D.1.3 Policy DPS3: Renewable and Low Carbon Energy Schemes

DPS3: Renewable and Low Carbon Energy Schemes

Proposals for new renewable and low carbon energy projects (other than wind energy development – see below), including community-led schemes, will be permitted provided that any adverse local impacts, including cumulative, can be made acceptable, with particular regard to:

- i. Landscape and visual impacts such as on the setting of the South Downs National Park and High Weald Area of Outstanding Natural Beauty, and the appearance of existing buildings;
- ii. Ecology and biodiversity, including protected species, and designated and non-designated wildlife sites;
- iii. Residential amenity including visual intrusion, air, dust, noise, odour, traffic generation, recreation and access.

Proposals for wind energy development involving one or more wind turbines will only be granted if:

- the development site is in an area identified as suitable for wind energy development in the 2014 Sustainability Energy Study, or as updated;
- the development is of an appropriate scale; and
- following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.

Assessment of impacts will need to be based on the best available evidence, including landscape capacity studies.

Opportunities for incorporating decentralised, renewable and low carbon energy schemes into all new development should be considered from the outset utilising the Mid Sussex Design Guide SPD.

For all new proposals, there should be appropriate plans and mechanisms in place for the removal of the installation on cessation of generation and restoration of the site to either its original use or an acceptable alternative use.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS3	0	0	0	0	0	+	-	-	0	0	++	0	0	0

D.1.3.1 Policy DPS3 sets out the Council’s support for renewable and low carbon energy projects and sets out criteria for any future wind energy developments to minimise adverse impacts on the environment.

D.1.3.2 The promotion of renewable or low carbon technologies, including small community-led schemes incorporated within new development as advocated within Policy DPS3, would help

to facilitate a decreased reliance on energy that is generated from unsustainable sources, such as fossil fuels. A reduction in the use of fossil fuels would help to reduce the volume of greenhouse gases (GHGs) that are emitted into the atmosphere. This in turn would reduce Mid Sussex's contribution towards the causes of climate change. This policy would therefore be likely to have a major positive impact on Mid Sussex's renewable energy resources by seeking opportunities to utilise renewable and low carbon energy sources (SA Objective 11).

D.1.3.3 Additionally, through ensuring appropriate plans and mechanisms are *"in place for the removal of the installation on cessation of generation and restoration of the site to either its original use or an acceptable alternative use"*, the policy will help to ensure the best use of land and support the redevelopment of previously developed land. Therefore, a minor positive impact on natural resources within the Plan area (SA Objective 6) could be expected.

D.1.3.4 Although Policy DPS3 seeks to ensure that any adverse impacts *"can be made acceptable"* on landscape settings and biodiversity assets within the Plan area, renewable energy and low carbon schemes supported by the policy could have potential adverse impacts on these receptors, particularly in the short-term. The Plan area contains several features which are notably sensitive to developments of this nature, including the High Wealds AONB and the South Downs National Park. Therefore, using the precautionary principle, a minor negative impact has been identified for SA Objectives 7 and 8.

D.1.4 Policy DPS4: Flood Risk and Drainage

DPS4: Flood Risk and Drainage

Proposals for development will need to follow a sequential risk-based approach, ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. The District Council's Strategic Flood Risk Assessment (SFRA) should be used to identify areas at present and future flood risk from a range of sources including fluvial (rivers and streams), surface water (pluvial), groundwater, infrastructure and reservoirs.

Particular attention will be paid to those areas of the District that have experienced flooding in the past and proposals for development should seek to reduce the risk of flooding by achieving a reduction from existing run-off rates.

Sustainable Drainage Systems (SuDS) should be implemented in all new developments of 10 dwellings or more, or equivalent non-residential or mixed development¹ unless demonstrated to be inappropriate, to avoid any increase in flood risk and protect surface and ground water quality.

Arrangements for the long-term maintenance and management of SuDS must also be identified through a maintenance and management plan, to be secured by condition at planning application stage..

¹ As set out in Article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2010.

DPS4: Flood Risk and Drainage

For the redevelopment of brownfield sites, any surface water draining to the foul sewer must be disconnected and managed through SuDS following the remediation of any previously contaminated land.

SuDS should be sensitively designed and located to promote improved biodiversity, an enhanced landscape and good quality spaces that improve public amenities in the area, where possible.

The preferred hierarchy of managing surface water drainage from any development is:

1. Infiltration Measures,
2. Attenuation and discharge to watercourses; and if these cannot be met,
3. Discharge to surface water only sewers.

Land that is considered to be required for current and future flood management will be safeguarded from development and proposals will have regard to relevant flood risk plans and strategies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS4	0	0	0	0	++	0	+	+	0	0	0	+	0	0

D.1.4.1 Policy DPS4 seeks to manage the risk of flooding throughout the Plan area and ensure that measures are put in place within new developments to promote resilience to flooding from a range of sources. Developments “*will need to follow a sequential risk-based approach, ensure development is safe across its lifetime and not increase the risk of flooding elsewhere*” as well as use the Council’s SFRA to inform the development. Additionally, the implementation of SuDS in developments of over ten dwellings (or equivalent mixed use) would help to reduce the risk of surface water flooding. This, and other requirements as set out in the policy, would be expected to ensure that all future development proposals would not place new residents at risk of flooding or exacerbate flood risk in areas surrounding the development. Therefore, a major positive impact on reducing flood risk would be anticipated (SA Objective 5).

D.1.4.2 Through providing criteria and a ‘preferred hierarchy’ to manage surface water drainage on development sites and by ensuring any SuDS implemented do not adversely affect ground and surface water quality, a minor positive impact on water resources (SA Objective 12) could be expected.

D.1.4.3 Policy DPS4 states that “*SuDS should be sensitively designed and located to promote improved biodiversity, an enhanced landscape and good quality spaces that improve public amenities in the area, where possible*”. By seeking to ensure that site proposals consider

opportunities to deliver multi-functional benefits to tackle flood risk whilst improving local biodiversity and landscape quality through sensitively designed SuDS, a minor positive impact on SA Objectives 7 and 8 could be expected where habitats for wildlife could be created or protected and local landscapes enhanced.

D.1.5 Policy DPS5: Water Infrastructure and the Water Environment

DPS5: Water Infrastructure and the Water Environment

Development should protect and enhance water resources and water quality and take measures to control pollution of the water environment. Development will only be permitted where it can be demonstrated that it would not result in an unacceptable risk to or adversely affect the quality, quantity, levels and ecology of surface water and groundwater resources including reservoirs.

Water infrastructure

Development proposals which increase the demand for off-site water service infrastructure will be permitted where the applicant can demonstrate;

- that sufficient capacity already exists off-site for foul and surface water provision. Where capacity off-site is not available, proposals must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development's occupation; and
- that there is adequate water supply infrastructure to serve the development. Where water supply infrastructure is not sufficient or available, proposals must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development's occupation.

Planning conditions and/ or obligations will be used to secure necessary infrastructure provision.

Development should connect to a public sewage treatment works. If this is not feasible, proposals should be supported by sufficient information to understand the potential implications for the water environment.

The development or expansion of water supply or sewerage/ sewage treatment facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long-term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impacts and that any such adverse impact is minimised.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS5	0	+	0	0	0	0	+	0	0	0	0	++	0	0

- D.1.5.1 Policy DPS5 outlines the standards which development proposals must meet in order to be supported, in relation to water infrastructure and the water environment, and covers topics such as water resources, pollution, quantity and foul water/sewage facilities. The policy seeks to only support development proposals “*where it can be demonstrated that it would not result in an unacceptable risk to or adversely affect the quality, quantity, levels and ecology of surface water and groundwater resources including reservoirs*” as well as those which would result in a net increase in water supply or sewage treatment facilities to serve development. This policy would be likely to help provide for future increased demand on water resources and wastewater infrastructure from an increasing population, as well as protecting the water environment from pollution. Overall, a major positive impact on water resources (SA Objective 12) can be expected as a result of this policy.
- D.1.5.2 This policy aims to ensure that development proposals will not result in adverse impacts on water resources or quality. The protection and enhancement of these assets within the Plan area would be likely to have a positive impact on the local ecological network and the health of residents. Good water quality is an essential health requirement for local residents, as well as local fauna and flora associated with river ecosystems. As such, Policy DPS5 would be expected to have a minor positive impact on human health and biodiversity (SA Objectives 2 and 7).

D.1.6 Policy DPS6: Health and Wellbeing

DPS6: Health and Wellbeing

All new development must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address health and wellbeing needs in Mid Sussex, as identified in the Joint Strategic Needs Assessment and West Sussex Joint Health and Wellbeing Strategy.

In order to maximise opportunities to enable healthy lifestyles, all new development must (where applicable for the type of development proposed):

- i. Be of high quality in its design and construction and be set within an attractive environment;
- ii. Be well-designed to ensure legibility of layout and the public realm including through the use of materials;
- iii. Meet the needs of the community through accessible, inclusive and safe design including incorporating measures to reduce opportunities for crime;
- iv. Prioritise active travel such as walking and cycling and sustainable transport such as public transport;
- v. Incorporate green infrastructure and biodiversity;
- vi. Provide opportunities for both high quality private outdoor space and publicly accessible open and green space;
- vii. Support and facilitate healthy eating including through the provision, where possible, of local and domestic food production such as allotments, community growing spaces and community orchards;
- viii. Be supported by the necessary infrastructure;

DPS6: Health and Wellbeing

- ix. Take opportunities to increase community connectivity and social inclusion such as by providing spaces for the community to gather, socialise and interact;
- x. Take opportunities to improve the factors that can contribute to poor health and social inequalities such as noise, air quality, crime, access to education and employment, and local amenity; and
- xi. Incorporate measures to provide resilience against the effects of climate change including overheating, flood risk and drought.

Detailed policy requirements are set out elsewhere in this Plan.

Proposals for major residential and major commercial developments* must set out how they address the requirements of this policy as part of a planning application. In order to satisfy this policy requirement, applicants will need to undertake a screening for a Health Impact Assessment (HIA). If necessary, a full HIA proportionate to the development proposed, will need to be prepared to demonstrate the health outcomes on the health and wellbeing of communities.

*As defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015 or as amended.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPS6	0	++	+	++	+	0	+	+	0	+	0	0	+	+

D.1.6.1 Policy DPS6 aims to help the Council plan for the future needs of the evolving population, including provisions for reducing health inequalities and crime, improving access to education and employment, and incorporating GI into all new development.

D.1.6.2 This policy requires a Health Impact Assessment (HIA) to be carried out for all major residential and commercial developments, as defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015² or as amended. This would be likely to ensure potential adverse effects of development on human health and health inequalities are considered and addressed. By promoting a high quality and attractive public realm, this policy would also be expected to encourage physical exercise through active travel, which would benefit physical and mental health, as well as encouraging access to outdoor space and increasing social interaction. The increased provision of open space and GI, as well a focus on tackling noise and air quality issues, would also be expected to improve

² Available at: <https://www.legislation.gov.uk/uksi/2010/2184/contents/made> [Date Accessed: 25/01/22]

- human health. Overall, a major positive impact on current and future residents' health and wellbeing can be expected (SA Objective 2).
- D.1.6.3 The policy states that all new development “*must be designed to achieve healthy, inclusive and safe places*”. Additionally, development proposals should take opportunities “*to increase community connectivity and social inclusion*”, and the policy supports development of new community services such as allotments and public spaces. Therefore, the policy could lead to better social cohesion within the Plan area through inclusive and community-centred design. A major positive impact on community and crime within communities is expected from this policy (SA Objective 4).
- D.1.6.4 Through seeking to ensure that development proposals “*incorporate green infrastructure and biodiversity*” into the plans, the policy could result in positive impacts on flood risk and biodiversity. Enhanced GI and vegetation coverage would allow for slower water infiltration and runoff, as well as promoting or conserving habitats for wildlife. Policy DPS6 also seeks to ensure developments “*incorporate measures to provide resilience against the effects of climate change including ... flood risk*”. Therefore, a minor positive impact on flooding and biodiversity could result (SA Objectives 5 and 7).
- D.1.6.5 Furthermore, through incorporating enhancements to GI and public open spaces, and delivering high quality well-designed neighbourhoods, the policy could potentially result in a minor positive impact on the character and quality of, and accessibility to, the local landscape (SA Objective 8).
- D.1.6.6 Policy DPS6 seeks to ensure that development proposals prioritise “*active travel such as walking and cycling and sustainable transport such as public transport*”, and therefore through striving to reduce reliance on private vehicles within the Plan area and subsequent GHG emissions, a minor positive impact on climate change and transport (SA Objective 10) could be expected. Additionally, through increasing active travel provisions, accessibility across the Plan area to essential services including employment opportunities and education could be improved. Therefore, a minor positive impact on education, economic regeneration and economic growth could be expected (SA Objectives 3, 13 and 14).

D.2 Natural Environment and Green Infrastructure

D.2.1 Policy DPN1: Biodiversity, Geodiversity and Nature Recovery

DPN1: Biodiversity, Geodiversity and Nature Recovery

Biodiversity and geodiversity are important natural capital assets and provide benefits as part of ecosystem services. Nature recovery is important for delivering improvements to nature, ecological networks and green infrastructure.

Development proposals will also need to be in accordance with DPN2: Biodiversity Net Gain.

Biodiversity will be protected and enhanced by ensuring development:

- Protects existing biodiversity by retaining features of interest, including connecting routes as part of wider ecological networks, and ensuring the long-term management of those features;
- Appropriate measures should be taken to avoid and reduce disturbance to sensitive habitats and species in accordance with the mitigation hierarchy set out in national policy. Unavoidable damage to biodiversity must be offset through ecological enhancements and mitigation measures (or compensation measures in exceptional circumstances and as a last resort);
- Contributes and takes opportunities to improve, enhance, manage and restore biodiversity and green infrastructure, so that there is a net gain in biodiversity, including through creating new designated sites and locally relevant habitats, and incorporating biodiversity features within developments;
- Minimises habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats and increase coherence and resilience;
- Promotes the restoration, management and expansion of priority habitats in the District; and
- Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated Local Wildlife Sites, Local Nature Reserves and irreplaceable habitats such as Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including wildlife corridors, ancient, aged or veteran trees, Biodiversity Opportunity Areas, areas identified for nature recovery, and Nature Improvement Areas.

Designated sites will be given protection and appropriate weight according to their importance and the contribution they make to wider ecological networks and nature recovery.

Soils are important for biodiversity and carbon storage. Soils will be protected and enhanced, including the best and most versatile agricultural land, by development avoiding soil disturbance, compaction and erosion. Development should not result in soil pollution.

Geodiversity will be protected by ensuring development prevents harm to geological conservation interests, and where possible, enhances such interests. Geological conservation interests include Regionally Important Geological and Geomorphological Sites.

DPN1: Biodiversity, Geodiversity and Nature Recovery

Development should seek to meet the objectives of the Local Nature Recovery Strategy, taking opportunities to deliver ecological networks and green infrastructure. Development will need to demonstrate that it will not harm or adversely affect an area or areas identified as opportunities for nature recovery.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN1	0	+	0	0	+	+	++	+	0	+	0	+	0	0

D.2.1.1 Nationally and locally designated biodiversity assets within Mid Sussex include numerous SSSIs and LWSs, and many non-designated biodiversity assets such as priority habitats, hedgerows and veteran trees. Additionally, Ashdown Forest SPA and SAC is located to the north east of the district boundary. Together, these biodiversity and geodiversity assets form a complex ecological network which supports a wide range of flora and fauna. Policy DPN1 would be expected to support development proposals which safeguard biodiversity and geodiversity assets within the Plan area and meet the outlined criteria within the policy, including ‘last resort’ mitigation and compensation measures in line with the mitigation hierarchy. Additionally, through implementation of this policy and Policy DPN2, development proposals will also need to be in accordance with relevant biodiversity net gain standards and guidelines. Achieving biodiversity net gain is a requirement that relies on long term, effective and well-funded strategies. It is anticipated that this policy would have a major positive impact on biodiversity and geodiversity (SA Objective 7) within the Plan area.

D.2.1.2 The protection of biodiversity assets would also be expected to have positive impacts in relation to human health. Access to a diverse range of natural habitats is known to have benefits for mental wellbeing and could potentially encourage residents to engage in a more active lifestyle. This policy would therefore be likely to have minor positive impacts on human health (SA Objective 2), through encouraging habitat restoration and incorporating biodiversity features within developments and supporting green infrastructure initiatives.

D.2.1.3 Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants, the protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses and groundwater receptors. The protection and enhancement of biodiversity features provided by this policy would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.

- D.2.1.4 Furthermore, in regard to natural resources (SA Objective 6), the policy also seeks to minimise adverse impacts on soils including BMV agricultural land resulting from development.
- D.2.1.5 Policy DPN1 supports development proposals which “*avoids damage to, protects and enhances the special characteristics*” of nationally protected areas, such as the High Weald AONB. Additionally, by protecting and enhancing biodiversity assets, it would be likely that some key landscape features would also be protected and enhanced. Therefore, this policy would be likely to have a minor positive impact on the local landscape and cultural heritage (SA Objective 8).

D.2.2 Policy DPN2: Biodiversity Net Gain

DPN2: Biodiversity Net Gain

Development (as defined in the Environment Act 2021 or its secondary legislation or as amended by the government) will need to deliver a net gain in biodiversity which will contribute to the delivery of ecological networks, green infrastructure and nature recovery.

Development will need to demonstrate through a Biodiversity Gain Plan that measurable and meaningful net gains for biodiversity will be achieved and will be secured and managed appropriately.

Principles of Biodiversity Net Gain

Development will need to demonstrate that good practice principles for biodiversity net gain have been followed.

Development will need to demonstrate that the mitigation hierarchy has been followed.

Proposals for biodiversity net gain will also need to be in accordance with Policies DPN1: Biodiversity, Geodiversity and Nature Recovery; DPN3: Green Infrastructure; and DPN4: Trees, Woodland and Hedgerows, and avoid harm to irreplaceable habitats, protected sites and priority habitats.

Biodiversity net gain, including off-site biodiversity net gain, should align with the objectives and priorities of the Nature Recovery Network, Local Nature Recovery Strategy and other relevant local strategies, contributing and connecting to wider ecological networks and green infrastructure. Consideration should be given to landscape character when developing proposals for biodiversity net gain.

It is expected that development proposals will enhance existing biodiversity and incorporate features to encourage biodiversity and pollination within and around the development.

Level of Biodiversity Net Gain

DPN2: Biodiversity Net Gain

Biodiversity net gain will be calculated and assessed using the Government’s published biodiversity metric. The biodiversity net gain calculation and assessment should be completed by a suitably experienced and qualified ecologist and submitted in full with the application for development.

The minimum percentage of biodiversity net gain required will be 10% as set out in legislation (or as amended by the government) or greater where it is required in another policy or a Supplementary Planning Document. The Council will encourage a higher level of biodiversity net gain and developments should seek to maximise opportunities, especially where development is located in or in proximity to the Biodiversity Opportunity Areas or priority habitats.

A minimum percentage of biodiversity net gain of 20% will be required on Significant Sites DPSC1 – DPSC3.

The Council will publish further guidance on delivering biodiversity net gain on its website. This guidance will be reviewed periodically to ensure it reflects local priorities and opportunities.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN2	0	+	0	0	+	+	++	0	0	+	0	+	0	0

D.2.2.1 Biodiversity net gain is an approach to development where a site’s biodiversity is left in a better state than it was originally and is currently required at a 10% threshold as specified within the recently enacted Environment Act 2021. Policy DPN2 supports developments which “*demonstrate through a Biodiversity Gain Plan that measurable and meaningful net gains for biodiversity will be achieved and will be secured and managed appropriately*” and proposals which demonstrate adherence to the mitigation hierarchy in relation to firstly protecting biodiversity of the site in question rather than off-site or compensatory gains.

D.2.2.2 Policy DPN2 will likely enhance biodiversity through provision of “*features to encourage biodiversity and pollination within and around the development*”. The policy also seeks to maximise opportunities for biodiversity net gains associated with Biodiversity Opportunity Areas and in accordance with the Local Nature Recovery Strategy, helping to create more abundant and resilient GI and ecological networks. Policy DPN2 also seeks to ensure that ‘significant sites’ within the MSDPR, outlined in Policies DPSC1, DPSC2 and DPSC3, will provide for a 20% biodiversity net gain. Therefore, through these provisions, Policy DPN2 could be expected to have a major positive impact on biodiversity (SA Objective 7).

D.2.2.3 By potentially improving the quality of natural surroundings through biodiversity net gain within the Plan area, including access to, and views of, nature, Policy DPN2 could have a minor positive impact on site end user’s physical and mental health (SA Objective 2).

D.2.2.4 Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction (climate change adaptation), filtration of air pollutants, the protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses and groundwater receptors. The protection and enhancement of biodiversity features provided by biodiversity net gain requirements as outlined within Policy DPN2 would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore, this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.

D.2.3 Policy DPN3: Green Infrastructure

DPN3: Green Infrastructure

Green infrastructure (including blue infrastructure) delivers a range of environmental, social and economic benefits including resilience to climate change, positive health and wellbeing effects, nature-based solutions and supporting nature recovery.

Green infrastructure assets, links and the overall multi-functional network will be protected and enhanced by ensuring development:

- Responds to and incorporates existing on-site and off-site green infrastructure into the development design; and
- Provides new green infrastructure integrated into the development design; and
- Contributes to the wider green infrastructure network by taking opportunities to improve, enhance, manage and restore green infrastructure, and providing links to existing green infrastructure including outside the development’s boundaries.

Applicants should consider from the outset the landscape assets of the site and how they may be used to create part of a coherent landscape structure that links to existing and proposed landscapes to form open space networks whenever possible, revealing existing landscape features.

Green infrastructure proposals will be expected to demonstrate that opportunities have been taken to:

- Strengthen connectivity and resilience of ecological networks;
- Improve resilience to the effects of climate change; and
- Support health and wellbeing by providing access to green space, nature and rights of way.

Green infrastructure proposals should be informed by and respond to existing evidence and guidance on the multi-functional green infrastructure network including Biodiversity Opportunity Area statements, priority habitats, green infrastructure mapping, ecological surveys and landscape character assessments.

Arrangements and funding for the future long-term management and maintenance of green infrastructure should be identified and implemented. Where appropriate, the Council will seek to secure this via planning conditions and/or planning obligations.

DPN3: Green Infrastructure

To help deliver a multi-functional green infrastructure network and to protect existing green infrastructure assets and links, the Council has identified land to be safeguarded from development as shown on the Policies Map.

Land which will be required to create and deliver a multi-functional ‘Green Circle’ around Burgess Hill will be safeguarded from development and the ‘Green Circle’ will be allocated for informal open space as shown on the Policies Map.

Important green infrastructure assets and links will be safeguarded and allocated for informal open space or linear open space as shown on the Policies Maps.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN3	0	+	0	+	+	0	+	+	0	+	0	+	0	0

D.2.3.1 Paragraph 20 of the NPPF³ states that “*Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for ... conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation*”.

D.2.3.2 Green Infrastructure (GI) contributes significantly towards high quality natural and built environments. GI is a multi-functional feature with wide-ranging benefits including: helping to mitigate extreme temperatures and flooding; habitat protection and creation; pollution reduction; and providing open land for recreation and breathing space to benefit residents’ physical and mental health.

D.2.3.3 Policy DPN3 aims to ensure the provision and safeguarding of GI and aims to ensure that all development proposals contribute positively to the improvement and connectivity of GI across the Plan area. The policy would be likely to provide additional habitats and improve connectivity for flora and fauna, including potential for ecological corridors and stepping-stone habitats which provide opportunities for the movement of species and adaptation to climate change. Therefore, this policy would be expected to have a minor positive impact on biodiversity (SA Objective 7).

³MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 12/01/22]

- D.2.3.4 This policy would be likely to have a positive impact on residents' wellbeing through providing increased access to a diverse range of natural habitats, which is known to be beneficial for mental and physical health. Additionally, the policy seeks to ensure that developments provide GI which may include integrated green space, providing mixed use environments for site end users, which could potentially provide space for socialisation and community cohesion. A minor positive impact on human health (SA Objective 2) and community and crime (SA Objective 4) can therefore be expected.
- D.2.3.5 Increased GI provision and connectivity would be expected to contribute towards improving air quality due to the increased uptake of CO₂ and filtration of pollutants, including those associated with road transport, which could potentially help to reduce residents' exposure to air pollution. Due to this enhanced carbon storage capacity, this policy could potentially help to reduce exposure of human and ecological receptors to transport related GHG emissions within the Plan area and would therefore be expected to have a minor positive impact on climate change and transport (SA Objective 10).
- D.2.3.6 The incorporation of GI into development would be likely to help reduce water runoff rates, and as such, reduce the risk of both fluvial and pluvial flooding. GI provision, including blue infrastructure, will also potentially improve water quality of local watercourses and enhance natural storage and flow functions. A minor positive impact on flooding (SA Objective 5) and water resources (SA Objective 12) would therefore be expected.
- D.2.3.7 The provision, maintenance and improvement of GI networks would be likely to provide the opportunities to retain and improve the character and appearance of the local landscape and townscape. Additionally, Policy DPN3 states that "*Applicants should consider from the outset the landscape assets of the site and how they may be used to create part of a coherent landscape structure that links to existing and proposed landscapes to form open space networks whenever possible, revealing existing landscape features*". Therefore, a minor positive impact on landscape can be expected from this policy (SA Objective 8).

D.2.4 Policy DPN4: Trees, Woodland and Hedgerows

DPN4: Trees, Woodland and Hedgerows

Trees, woodland and hedgerows are valuable natural capital assets including for biodiversity, nature recovery, green infrastructure and increasing resilience to the effects of climate change.

Protection of trees, woodland and hedgerows

The District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. In particular, ancient woodland and ancient, aged or veteran trees will be protected.

Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance, will not normally be permitted.

Development (including construction and operational activities) resulting in the direct or indirect deterioration or loss of irreplaceable habitats including ancient woodland and ancient, aged or veteran trees will not be permitted unless there are wholly exceptional reasons and in such circumstances, appropriate compensatory measures will be provided.

New trees, woodland and hedgerows

Proposals for new trees, woodland and hedgerows should be of suitable species, usually native, and where required for visual, noise or light screening purposes, trees, woodland and hedgerows should be of a size and species that will achieve this purpose.

Proposals for new woodland creation will need to follow best practice guidance and take into account a range of considerations including:

- The biodiversity and amenity value of the existing habitat; and
- The landscape and its character; and
- Heritage and archaeology features; and
- Protected species; and
- Opportunities for natural regeneration; and
- Opportunities to connect to and extend existing woodland; and
- The long-term management arrangements for new woodland planting; and
- Resilience to the effects of pests, disease and climate change.

Development and trees, woodland and hedgerows

Trees, woodland and hedgerows will be protected and enhanced by ensuring development:

- incorporates existing important trees, woodland and hedgerows into the design of new development and its landscape scheme;
- prevents damage to root systems and takes account of expected future growth; and where possible, incorporates retained trees, woodland and hedgerows within public open space rather than private space to safeguard their long-term management;
- has appropriate protection measures throughout the development process;
- secures appropriate long-term management arrangements;

DPN4: Trees, Woodland and Hedgerows

- takes opportunities to plant new trees, woodland and hedgerows within the new development to enhance on-site green infrastructure and increase resilience to the effects of climate change; and
- does not sever ecological corridors created by these assets.

Works to trees

Proposals for works to trees, including felling, will be considered taking into account:

- the condition and health of the trees; and
- the contribution of the trees to the character and visual amenity of the local area; and
- the amenity and nature conservation value of the trees; and
- the extent and impact of the works; and
- any replanting proposals.

Inappropriate or excessive works to trees that will damage their health and/or amenity value will be resisted.

Proposals for works to trees, including felling, may be refused if sufficient information is not provided to justify why works are necessary.

The felling of protected trees will only be permitted if there is no appropriate alternative. Where a protected tree or group of trees is felled, a replacement tree or group of trees, on a minimum of a 1:1 basis and of an appropriate size and type, will normally be required. The replanting should take place as close to the felled tree or trees as possible having regard to the proximity of adjacent properties.

Use of buffer zones

Development should be positioned as far as possible from ancient woodland with a minimum buffer of 15 metres maintained between ancient woodland and the development boundary. A buffer will also be required for ancient, aged and veteran trees and should be at least 15 times larger than the diameter of the tree or 5m from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. The size of a required buffer zone may vary according to the nature of the site and the proposed development, and if there are other impacts likely to extend beyond the minimum buffer zone distance. Buffer zones should contribute to green infrastructure and wider ecological networks and consist of a semi-natural habitat with appropriate planting. These requirements for an ancient woodland or tree buffer will apply unless superseded by a more environmentally favourable national standard set out in legislation or guidance.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Reference	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN4	-	+	0	0	+	+	++	+	+	+	0	+	0	0

- D.2.4.1 Mid Sussex has a large abundance of woodland, with two thirds of the district’s woodland resources occupied by areas of ancient woodland⁴, with particularly large stands of ancient woodland located in the north west of the district. Trees, woodland and hedgerows form a main component of the district’s GI and have important biodiversity and human health benefits, as well as helping to increase resilience against climate change such as through removing carbon dioxide from the air, carbon storage and flood alleviation.
- D.2.4.2 By aiming to protect and enhance the abundance of trees, woodland and hedgerows within the Plan area from development related pressures, Policy DPN4 would be likely to protect and improve existing habitats for wildlife and ecological networks. Additionally, the policy supports proposals where developers secure “*appropriate long-term management arrangements*” of these ecological assets and provides exemptions where, as a last resort, developers must compensate for any ecological assets lost. Therefore, a major positive impact on local biodiversity (SA Objective 7) can be expected.
- D.2.4.3 The policy restricts development on areas which are currently occupied by woodland and seeks to locate development “*as far as possible from ancient woodland*”, which may reduce the number of potential sites, and their yield, within the district. Therefore, a minor negative impact on housing provision (SA Objective 1) could be expected from this policy.
- D.2.4.4 Policy DPN4 supports “*the protection and enhancement of trees, woodland and hedgerows*” and encourages the planting of new trees. By protecting and enhancing these natural assets which currently make up a large proportion of the district’s area and therefore contribute towards the experience of residential life within the district, the policy would likely enhance residents’ access to, and views of, a diverse range of habitats and potentially lead to improvements in mental and physical health. Policy DPN4 therefore is expected to have a minor positive impact on health and wellbeing within the Plan area (SA Objective 2).
- D.2.4.5 Vegetation provides several ecosystem services, including carbon storage (climate change mitigation), flood risk reduction, filtration of air pollutants, the protection of ecologically valuable soil resources from erosion and a pollution buffer which could protect surrounding watercourses. The potential protection and enhancement of biodiversity features as outlined within Policy DPN4 would be likely to help protect and enhance these essential ecosystem services within the Plan area, and therefore this policy could potentially result in a minor positive impact on SA Objectives 5, 6, 10 and 12.
- D.2.4.6 Policy DPN4 will not support development that “*will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance*”, such as the High Weald AONB. By protecting and enhancing biodiversity

⁴Mid Sussex District Council (2021) Nature Conservation and Landscape. Available at: <https://www.midsussex.gov.uk/environment/nature-conservation-and-landscape/> [Date Accessed: 31/01/22]

assets, it would be likely that the character and/or setting of some key landscape features, and cultural heritage features, would also be protected and enhanced. Therefore, this policy would be likely to have a minor positive impact on the local landscape and cultural heritage (SA Objectives 8 and 9).

D.2.5 Policy DPN5: Historic Parks and Gardens

DPN5: Historic Parks and Gardens

The character, appearance and setting of a registered park or garden, or park or garden of special local historic interest will be protected. This will be achieved by ensuring that any development within or adjacent to a registered park or garden, or park or garden of special local historic interest will only be permitted where it protects and enhances its special features, setting and views into and out of the park or garden.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN5	0	0	0	0	0	0	+	+	+	0	0	0	0	0

D.2.5.1 This policy would be expected to help ensure that *"the character, appearance and setting of historic parks and gardens, or park or garden of special local historic interest"* within the Plan area are protected from development related threats and pressures. Policy DPN5 outlines that development which is located within or adjacent to the asset will be permitted only where it *"protects and enhances its special features, setting and views into and out of the park or garden"*. Therefore, this policy would be expected to have minor positive impacts on cultural heritage within Mid Sussex (SA Objective 9). Additionally, through protecting these parks and gardens, which would likely have some biodiversity and landscape value, a minor positive impact on local biodiversity and landscape settings would be expected (SA Objectives 7 and 8).

D.2.6 Policy DPN6: Pollution

DPN6: Pollution

Development should not result in pollution or hazards, including air, noise, vibration, light, water, soil, odour, dust or other pollutants, which negatively impact on people, including health and quality of life, and the natural environment, including nature conservation sites.

Mitigation measures may need to be implemented for development that is likely to increase levels of pollution, taking into account any cumulative impacts.

Development proposals will need to take into account the Council’s published guidance⁵.

Detailed policy requirements are set out in Policies:

- DPN7: Noise Impacts
- DPN8: Light Impacts and Dark Skies
- DPN9: Air Quality
- DPN10: Land Stability and Contaminated Land

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN6	0	+	0	0	0	+	+	0	0	0	0	+	0	0

D.2.6.1 Policy DPN6 states that development proposals within the Plan area which are likely to lead to various pollution impacts and hazards will not be supported, and that mitigation measures must be undertaken for development proposals likely to lead to air, noise, vibration, light, water, soil, odour, dust or any other pollutants. The policy refers to adherence to other related policies within the Plan, and requires that all development proposals should consider the Council’s published guidance on the topic of avoiding and mitigating pollution.

D.2.6.2 Through seeking to ensure that development proposals adhere to pollution guidance and regulations, Policy DPN6 is likely to have many benefits relating to human health and the protection of natural resources, wildlife and watercourses. A minor positive impact on SA Objectives 2, 6, 7 and 12 is therefore expected from this policy.

⁵ Such as the [Air Quality and emissions mitigation guidance for Sussex \(2020\)](#)

D.2.7 Policy DPN7: Noise Impacts

DPN7: Noise Impacts

The natural environment and people’s health and quality of life will be protected from unacceptable levels of noise.

Areas valued for tranquillity for recreation and amenity reasons, including protected landscapes and their setting and nature conservation sites, will be protected from unacceptable levels of noise.

Development will only be permitted where it:

- avoids significant adverse impacts on health and quality of life; and
- mitigates and minimises adverse impacts on health and quality of life; and
- where possible, contributes to the improvement of health and quality of life.

Development will be expected to be located, designed and controlled to avoid or minimise any potential impacts from noise. Development should have good acoustic design including orientating or organising buildings (including consideration of the internal layout of buildings) to locate more noise sensitive areas, such as the principal habitable rooms, away from potential sources of noise. Parking arrangements should be carefully considered to avoid noise and headlight nuisance.

Noise sensitive development, such as residential, will not be permitted in close proximity to existing or proposed development generating high levels of noise, or other sources of high levels of noise such as commercial/ industrial sites or transport sources, unless adequate sound insulation measures, as supported by a noise assessment, are incorporated within the development.

Noise generating development will be permitted where it can be demonstrated that nearby noise sensitive uses (existing or planned) will not be exposed to noise impact that will adversely affect the amenity of existing and future users.

If required by the local planning authority, the applicant will be required to provide:

- an assessment of the impact of noise generated by a proposed development; or
- an assessment of the effect of noise by an existing noise source upon a proposed development.

Development proposals will need to take into account the Council's noise guidance.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN7	0	+	0	0	0	0	+	+	+	0	0	0	0	0

D.2.7.1 Mid Sussex is a largely rural district where high standards of amenity and tranquillity are a key part of life for residents. Policy DPN7 seeks to protect amenity by supporting developments which follow the various criteria within the policy for minimising any noise

impacts, including being of “*good acoustic design*”. The policy would be likely to ensure that local residents are not exposed to, and that developments do not result in, unacceptable levels of noise pollution. This would be expected to have benefits on mental health and wellbeing of residents, and therefore have a minor positive impact on SA Objective 2.

D.2.7.2 By ensuring new development proposals would not result in adverse impacts on local tranquillity, this policy would be expected to have benefits to local habitats and species which may be sensitive to noise. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 7).

D.2.7.3 Policy DPN7 seeks to protect areas that are “*valued for tranquillity for recreation and amenity reasons, including protected landscapes and their setting*”, such as the High Weald AONB. The policy therefore could have a minor positive impact on local landscape and cultural heritage settings (SA Objectives 8 and 9).

D.2.8 Policy DPN8: Light Impacts and Dark Skies

DPN8: Light Impacts and Dark Skies

The natural environment and people’s health and quality of life will be protected from unacceptable levels of light pollution.

Development proposals must demonstrate that all opportunities to reduce light pollution (including sky glow, glare and light spillage) have been taken including minimising impacts on local amenity, intrinsically dark landscapes including protected landscapes and areas important for nature conservation and nature recovery.

Artificial lighting proposals (including outdoor lighting, floodlighting and new street lighting) should be minimised in terms of intensity and number of fittings. The applicant should demonstrate that:

- the minimum amount of lighting necessary to achieve its purpose is specified or otherwise justified on safety or security grounds; and
- the design and specification of the lighting would minimise sky glow, glare and light spillage in relation to the visibility of the night sky, local amenity and local character; and
- the means of lighting would be unobtrusively sited and well-screened by landscaping; and
- low energy lighting is used; and
- there would not be an adverse impact on wildlife such as through consideration of the appropriate colour of lighting.

Where lighting of a landmark or heritage feature is proposed, the level and type of illumination would enhance the feature itself.

Development proposals will need to take into account the Institute of Lighting Professionals guidance and other relevant guidance.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN8	0	+	0	0	0	0	+	+	+	0	0	0	0	0

- D.2.8.1 Policy DPN8 seeks to protect amenity by supporting developments which follow the various criteria within the policy for minimising any light pollution impacts, where development proposals are required to ensure that *“the design and specification of the lighting would minimise sky glow, glare and light spillage in relation to the visibility of the night sky, local amenity and local character”*, for example. The policy would be likely to ensure that local residents are not exposed to, and that developments do not result in, unacceptable levels of illumination. This would help ensure day to day life is not impacted (for example local residents’ sleep routine) and will be expected to have benefits on mental health and wellbeing of residents, and therefore result in a minor positive impact on SA Objective 2.
- D.2.8.2 By ensuring new development proposals would not result in adverse impacts on local tranquillity, this policy would be expected to have benefits to local habitats and species which may be sensitive to light pollution, such as nocturnal species. Therefore, this policy could potentially have a minor positive impact on biodiversity (SA Objective 7).
- D.2.8.3 Policy DPN7 seeks to protect intrinsically dark landscapes, including areas within the High Weald AONB. Additionally, the policy supports illuminations of landmarks or heritage features, where the level and type of illumination enhances these features. Policy DPN7 therefore could have a minor positive impact on local landscape and cultural heritage settings (SA Objectives 8 and 9).

D.2.9 Policy DPN9: Air Quality

DPN9: Air Quality

The natural environment and people's health and quality of life will be protected from unacceptable levels of poor air quality.

The use of active and sustainable travel measures and green infrastructure to reduce pollution concentrations and exposure is encouraged.

Development proposals will need to take into account the Council's air quality guidance.

The Council will require applicants to demonstrate that there is not unacceptable impact on air quality. The development should minimise any air quality impacts, including cumulative impacts from committed developments, both during the construction process and lifetime of the completed development, either through a redesign of the development proposal or, where this is not possible or sufficient, through appropriate mitigation.

Where sensitive development is proposed in areas of existing poor air quality and/ or where major development is proposed, including the development types set out in the Council's current guidance (Air Quality and Emissions Mitigation Guidance for Sussex (2021 or as updated)) an air quality assessment will be required.

Development proposals that are likely to have an impact on local air quality, including those in or within relevant proximity to existing or candidate Air Quality Management Areas (AQMAs) or designated nature conservation areas sensitive to changes in air quality, will need to demonstrate measures/ mitigation that are incorporated into the design to minimise any impacts associated with air quality.

Mitigation measures will need to demonstrate how the proposal would make a positive contribution towards the aims of the Council's Air Quality Action Plan where it is relevant and be consistent with the Council's current guidance as stated above.

Mitigation measures will be secured either through a negotiation on a scheme, or via the use of planning condition and/ or planning obligation depending on the scale and nature of the development and its associated impacts on air quality.

In order to prevent adverse effects on the Ashdown Forest SPA and SAC, new development likely to result in increased traffic may be expected to demonstrate how any air quality impacts, including in combination impacts, have been considered in relation to the Ashdown Forest SAC. Any development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate for any potential adverse effects.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN9	0	+	0	0	0	0	+	0	0	+	0	0	0	0

D.2.9.1 Air pollution is a significant international and local concern. Policy DPN9 seeks to ensure that development proposals specified within the policy, including those “*within relevant proximity to existing or candidate Air Quality Management Areas (AQMAs) or designated nature conservation areas sensitive to changes in air quality*”, would not result in a significant increase in air pollution. The policy sets out criteria for development proposals to meet, including mitigation measures, to be supported by the Plan. Policy DPN9 would be likely to help prevent significant reductions in air quality across the Plan area, and as such, have a minor positive impact on the health and wellbeing (SA Objective 2) of future and current residents through ensuring residents are not exposed to unacceptable levels of air pollution, and supporting GI proposals.

D.2.9.2 Some habitats, including Ashdown Forest SPA and SAC situated in close proximity to Mid Sussex District, are sensitive to air pollution in the form of atmospheric nitrogen deposition. This policy would help to reduce the rate of air pollution and thereby help to protect sensitive habitats from elevated rates of atmospheric nitrogen deposition. The policy also encourages the use of GI to reduce airborne pollution concentrations, which may further benefit sensitive biodiversity receptors in the area. The implications of air quality impacts associated with development proposed within Mid Sussex on Ashdown Forest and other Habitats sites will be considered in greater detail in the accompanying Habitats Regulations Assessment (HRA). Overall, this policy would likely have a negligible impact on sensitive habitats through seeking to mitigate potential air quality impacts rather than aiming to improve air quality within the district (SA Objective 7).

D.2.9.3 Additionally, by supporting sustainable travel and other measures to manage air quality within the Plan area, Policy DPN9 will likely contribute towards reduced levels of transport related GHGs and may therefore have a minor positive impact on climate change and transport (SA Objective 10).

D.2.10 Policy DPN10: Land Stability and Contaminated Land

DPN10: Land Stability and Contaminated Land

Development proposals should consider if a site is suitable for its proposed use taking into account ground conditions and any risks from land instability or contamination.

Investigations and assessments of sites located in or in close proximity to potentially unstable or contaminated land will be required to be submitted as part of a planning application. The investigations and assessment work should consider the nature and extent of the risk, and potential impacts to human health, adjacent land uses and the natural environment.

Adequate and effective measures will be required to protect land stability and land quality, including measures to protect the natural environment. In particular, measures should be taken to avoid:

- unacceptable risks to the health of future users and occupiers of the development or people in the locality;
- risks to the structural integrity of buildings or structures on or adjoining the site;
- contamination to soil, watercourses, water bodies, groundwater or aquifers;
- harm to wildlife and the natural environment.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPN10	0	+	0	0	0	+	+	0	0	0	0	+	0	0

D.2.10.1 Contaminated land could lead to adverse biodiversity and human health impacts through the spread of toxins once ‘locked’ within the ground. Additionally, development on unstable land could lead to erosion of material, polluting nearby watercourses and has the potential to damage infrastructure and adversely affect human health. This policy aims to ensure that remediation and mitigation measures are carried out before development on contaminated or unstable land can be supported. This would be likely to have a minor positive impact on human health, biodiversity and water resources (SA Objectives 2, 7 and 12).

D.2.10.2 Additionally, the use of remediated contaminated land for development could potentially help prevent development on previously undeveloped land (for example, greenfield land), and therefore, this policy could potentially help prevent the loss of ecologically or agriculturally valuable soil resources and encourage efficient use of land. This would be expected to have a minor positive impact on natural resources (SA Objective 6).

D.3 Countryside

D.3.1 Policy DPC1: Protection and Enhancement of Countryside

DPC1: Protection and Enhancement of Countryside

The countryside will be protected in recognition of its intrinsic character and beauty. Development will be permitted in the countryside, defined as the area outside of built-up area boundaries on the Policies Map, provided it maintains or where possible enhances the quality of the rural and landscape character of the District, and:

- it is necessary for the purposes of agriculture; or
- it is supported by a specific policy reference either elsewhere in the Plan, a Development Plan Document or relevant Neighbourhood Plan.

The best and most versatile agricultural land (Grades 1, 2 and 3a) will be protected from non-agricultural development proposals and will be protected from being covered by artificial surfaces that will prevent future use of soils. Where significant development of any grade of agricultural land is demonstrated to be necessary, detailed field surveys should be undertaken and proposals should seek to use areas of poorer quality land in preference to that of higher quality.

Development proposals should demonstrate they are informed by landscape character. The Mid Sussex Landscape Character Assessment, the West Sussex County Council Strategy for the West Sussex Landscape, the Capacity of Mid Sussex District to Accommodate Development Study and other available landscape evidence (including that gathered to support Neighbourhood Plans) will be used to assess the impact of development proposals on the rural and landscape character.

Built-up area boundaries are subject to review by Neighbourhood Plans or through a Development Plan Document produced by the District Council.

Economically viable mineral reserves within the district will be safeguarded.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC1	0	+	0	0	0	+	+	+	+	0	0	0	0	0

D.3.1.1 Large areas of Mid Sussex coincide with the South Downs National Park or the High Weald AONB. Outside of these designations, the district remains largely rural with areas of open countryside separating the settlements. Policy DPC1 seeks to protect and enhance the countryside, defined as the area outside of Built-up Area Boundaries (BUABs), and supports development in the countryside providing it “*maintains or where possible enhances the quality of the rural and landscape character of the District*”. This would be expected to limit

urbanisation of the countryside and help to prevent coalescence of settlements, maintaining their distinct characters and landscape settings and which could also indirectly protect the settings of heritage assets located within these areas. Therefore, a minor positive impact on local landscape and cultural heritage settings could be expected (SA Objectives 8 and 9).

D.3.1.2 The policy seeks to protect best and most versatile land (Grades 1, 2 and 3a) from non-agricultural related development, and where this development is deemed necessary, field surveys are required and the lowest quality land within the site should be used. Additionally, Policy DPC1 states that “*economically viable mineral reserves within the district*” are to be protected from unnecessary sterilisation. Therefore, a minor positive impact on natural resources can be expected from this policy (SA Objective 6).

D.3.1.3 Through protecting and enhancing countryside features, the policy will likely have a minor positive impact on health and wellbeing (SA Objective 2) and biodiversity (SA Objective 7), by helping to maintain the open space nature of the countryside and residents’ access to its features and qualities, leading to mental and physical health benefits whilst protecting the habitats within.

D.3.2 Policy DPC2: Preventing Coalescence

DPC2: Preventing Coalescence

The individual towns and villages in the District each have their own unique characteristics. It is important that their separate identity is maintained. When travelling between settlements people should have a sense that they have left one before arriving at the next.

Provided it is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside, development will be permitted if it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements, and would not have an unacceptably urbanising effect on the area between settlements.

Local Gaps can be identified in Neighbourhood Plans or a Development Plan Document produced by the District Council, where there is robust evidence that development within the Gap would individually or cumulatively result in coalescence and the loss of the separate identity and amenity of nearby settlements. Evidence must demonstrate that existing local and national policies cannot provide the necessary protection.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC2	0	0	0	+	0	+	0	++	+	0	0	0	0	0

- D.3.2.1 Policy DPC2 aims to ensure that future development would not result in adverse impacts on the existing landscape settings within the Plan area, by not supporting development proposals which may lead to the coalescence of settlements which would harm their “*unique characteristics*”. By protecting settlements, largely located within the countryside, within the Plan area from the effects of urbanisation and resulting coalescence, a major positive impact on the protection of the local landscape would be expected (SA Objective 8). Through protecting local landscape settings of rural settlements, a minor positive impact on protecting the settings of cultural heritage assets within these locations could also be expected (SA Objective 9).
- D.3.2.2 The policy seeks to protect the unique characteristics of settlements within the Plan area and will permit development “*if it does not result in the coalescence of settlements which harms the separate identity and amenity of settlements, and would not have an unacceptably urbanising effect on the area between settlements.*” Policy DPC2 is likely to protect social cohesion and promote integration of communities; therefore, a minor positive impact on community and crime (SA Objective 4) is expected.
- D.3.2.3 By preventing development which would lead to coalescence, Policy DPC2 could indirectly reduce the quantity of undeveloped land lost to development and therefore could have a minor positive impact on natural resources, including through protecting best and most versatile land, within the Plan area (SA Objective 6).

D.3.3 Policy DPC3: New Homes in the Countryside

DPC3: New Homes in the Countryside

1. New homes in the countryside, defined as areas outside the built-up area boundaries, will be permitted in specific circumstances, as set out below:
 - i. Accommodation is essential to enable the operation of an agricultural, forestry or similar rural enterprises requiring full time rural workers to live at, or near, their place of work;
 - ii. In the case of new isolated homes in the countryside, where the design of the dwelling is of exceptional quality, is truly outstanding and would significantly enhance its immediate setting and is sensitive to the character of the local area;
 - iii. Development would involve the subdivision of an existing residential building;
 - iv. The proposed development meets the requirements of Policy DPH2: Sustainable Development – Outside Built-Up Area;
 - v. The proposed development is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside; or
 - vi. Affordable housing in accordance with Policy DPH38: Rural Exception Sites.
2. Permanent agricultural (includes forestry and similar land-based rural enterprise requiring full time rural workers) dwellings will only be permitted to support existing agricultural activities on well-established agricultural units where:
 - i. The need cannot be fulfilled by another existing dwelling on, or any other existing accommodation near to, the agricultural unit; and

DPC3: New Homes in the Countryside

- ii. It can be proven that it is essential for the proper functioning of the enterprise for one or more workers to be readily available at most times; and
- iii. It can be proven that the rural enterprise is economically viable. This should include demonstrating that the enterprise has been established continuously for the previous three years and profitable for at least one of them; and
- iv. It can be proven that the size and location of the dwelling is commensurate with the established functional requirement of the agricultural unit.

Temporary agricultural dwellings essential to support a new rural enterprise either on a newly created agricultural unit or on an established one will be subject to the criteria above and should normally be provided by temporary accommodation.

Applications for the removal of agricultural occupancy conditions will only be permitted where it can be proven that there is no longer any need for the dwelling for someone solely, mainly or last working in agriculture or forestry or other rural based enterprise. This will be based on an up-to-date assessment of the demand for farm (or other occupational) dwellings in the area as a whole, and not just on a particular holding.

New ‘granny annexes’ that are physically separate to the dwelling are defined as a new home and are subject to the same requirements as above.

3. Re-use of rural buildings for residential use

The re-use and adaptation of rural buildings for residential use in the countryside will be permitted where it is not a recently constructed⁶ agricultural building which has not been or has been little used for its original purpose and:

- i. the re-use would secure the future of a heritage asset; or
- ii. the re-use would lead to an enhancement of the immediate setting and the quality of the rural and landscape character of the area is maintained.

4. Replacement dwellings in the countryside

Replacement dwellings in the countryside will be permitted where:

- i. The residential use has not been abandoned;
- ii. Highway, access and parking requirements can be met;
- iii. The replacement dwelling is of equivalent size, scale and massing and within the same or similar position of the existing dwelling, unless there are demonstrable benefits in relocating the dwelling; and
- iv. The scale, size and massing of the replacement dwelling should maintain or where possible enhance the quality of the natural and/or built landscape, particularly in the High Weald Area of Outstanding Natural Beauty.

New dwellings, including conversions, located within the Ashdown Forest 7km Zone, will be required to comply with Policy DPC6: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).

⁶ The term ‘recently constructed’ will generally be held to apply to buildings constructed within five years of a planning application for their re-use or adaptation.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC3	+	0	0	0	0	0	0	+	+	0	0	0	0	+

D.3.3.1 Policy DPC3 sets out criteria for residential development to meet if located within the countryside (outside of defined BUABs). The policy supports proposals where special justification exists, and allows for the re-use and adaptation of rural buildings to meet the diverse housing need. This policy could therefore potentially contribute towards a minor positive impact on housing provision (SA Objective 1).

D.3.3.2 Through permitting the “*re-use and adaptation of rural buildings*” where proposals secure the future of a heritage asset and enhance the landscape setting of the area, the policy could potentially help to rejuvenate old or dilapidated buildings and restore their historic significance. A minor positive impact on the local landscape and cultural heritage assets could be expected (SA Objectives 8 and 9).

D.3.3.3 Policy DPC3 sets out guidelines for permitting agricultural dwellings and sets out the exceptional circumstances in which they would be supported. This policy would be anticipated to have a minor positive impact by helping to ensure that rural workers are able to live in a location that permits access into their place of work, reducing time spent commuting, and thereby supporting the rural economy (SA Objective 14).

D.3.4 Policy DPC4: High Weald Area of Outstanding Natural Beauty

DPC4: High Weald Area of Outstanding Natural Beauty

Development within the High Weald Area of Outstanding Natural Beauty (AONB), as shown on the Policies Maps, will only be permitted where it conserves and enhances natural beauty and has regard to the High Weald AONB Management Plan, in particular;

- the identified landscape features or components of natural beauty and to their setting;
- the traditional interaction of people with the landscape and nature, and appropriate land management;
- the historic landscape, character and local distinctiveness, historic settlement pattern, sense of place and setting of the AONB; and
- the conservation of wildlife and cultural heritage.

Development should demonstrate a positive contribution to the objectives of the High Weald AONB Management Plan and take account of the High Weald Housing Design Guide including applying a landscape-led design approach that reflects High Weald character; using high quality architecture; responding to the historic pattern and character of settlements; and protecting dark skies.

DPC4: High Weald Area of Outstanding Natural Beauty

Proposals which support the land-based economy and social well-being of local communities within the AONB that are compatible with the conservation and enhancement of natural beauty will be supported.

Development on land that contributes to the setting of the AONB will only be permitted where it does not detract from the visual qualities and essential characteristics of the AONB, and in particular should not adversely affect the landscape character and views into and out of the AONB by virtue of its location or design.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC4	-	0	0	+	0	0	+	++	+	0	0	0	0	+

D.3.4.1 This policy would be expected to support development within the High Weald AONB “*where it conserves and enhances natural beauty and has regard to the High Weald AONB Management Plan*”, including landscape features and their setting, applying a landscape-led design approach. Additionally, development proposals located within the AONB should be located and designed to ensure there is no significant adverse impact on landscape character and views into and out of the AONB. This policy would be likely to help protect the distinctiveness of the nationally important landscape of the AONB for future generations, and therefore, major positive impacts on the landscape character of the High Weald AONB would be expected (SA Objective 8).

D.3.4.2 The High Weald AONB is an ancient landscape comprised of small and irregular shaped fields, scattered farmsteads and ancient routeways. Policy DPC4 aims to support development proposals that conserve and enhance the historic landscape and historic settlement pattern. The protection afforded to the AONB under this policy would therefore be anticipated to have a minor positive impact on cultural heritage (SA Objective 9), by helping to provide protection to the character and setting of locally and nationally important heritage assets within the AONB.

D.3.4.3 This policy would support development within the High Weald AONB which “*support the land-based economy and social well-being of local communities within the AONB*”, whilst being compatible with conservation aims, which could lead to minor positive impacts on community cohesion (SA Objective 4) and the local economy (SA Objective 14), through localised developments for community use.

D.3.4.4 Policy DPC4 seeks to support development which conserves and enhances natural beauty, including the conservation of wildlife. By protecting areas of high biodiversity value, and incorporating measures such as the protection of dark skies within the AONB with likely benefits for nocturnal species, a minor positive impact on biodiversity would be expected (SA Objective 7).

D.3.4.5 However, as the purpose of this policy is to help protect the landscape and characteristics, and other features, within the High Weald AONB, some housing development may be restricted where a need may exist. Therefore, a minor negative impact on housing provision could result from this policy (SA Objective 1).

D.3.5 Policy DPC5: Setting of the South Downs National Park

DPC5: Setting of the South Downs National Park

Development within land that contributes to the setting of the South Downs National Park will only be permitted where it does not detract from, or cause detriment to, the visual and special qualities (including dark skies), tranquillity and essential characteristics of the National Park, and in particular should not adversely affect transitional open green spaces between the site and the boundary of the South Downs National Park, and the views, outlook and aspect, into and out of the National Park by virtue of its location, scale, form or design.

Development should be consistent with National Park purposes and must not significantly harm the National Park or its setting. Assessment of such development proposals will also have regard to the South Downs Partnership Management Plan and South Downs Local Plan and other adopted planning documents and strategies.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC5	-	0	0	0	0	0	+	++	0	0	0	0	0	0

D.3.5.1 Policy DPC5 regards the protection of the visual and special qualities, tranquillity and essential characteristics of South Downs National Park from development that goes against the criteria identified within the Policy. The National Park comprises large swathes of primarily open countryside, and therefore this policy would be likely to have a major positive impact on protecting the setting and characteristics of this important landscape (SA Objective 8).

D.3.5.2 By supporting development which is consistent with the purposes of the South Downs National Park, which includes current aims of increasing land managed for nature from 25%

to 33% by 20307, this policy would be likely to contribute towards the protection and enhancement of ecological networks. Special qualities of the park include areas which possess high value biodiversity, and by protecting these assets, a minor positive impact on biodiversity is expected (SA Objective 7).

D.3.5.3 However, as the purpose of this policy is to help protect the landscape and characteristics, and other features, within the South Downs National Park, some housing development may be restricted where a need may exist. Therefore, a minor negative impact on housing provision could result from this policy (SA Objective 1).

D.3.6 Policy DPC6: Ashdown Forest SPA and SAC

DPC6: Ashdown Forest SPA and SAC

In order to prevent adverse effects on the Ashdown Forest SPA and SAC, new development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.

Recreational pressure

Mitigation requirements for recreational pressure impacts will be sought in accordance with the strategic solution for the Ashdown Forest SPA and SAC in force at the time of the application. The zone of influence and mitigation requirements may be subject to revision to take account of new evidence on visitor patterns or monitoring.

Within a 400 metres buffer zone around Ashdown Forest, mitigation measures are unlikely to be capable of protecting the integrity of the SPA and, therefore, residential development will not be permitted.

Within a 7km zone of influence around the Ashdown Forest SPA, residential development leading to a net increase in units will be required to contribute to mitigation through:

- 1) The provision of Suitable Alternative Natural Greenspace (SANG) to the minimum level of 8Ha per 1,000 net increase in population; or a financial contribution to a strategic SANG; and
- 2) A financial contribution to the Ashdown Forest Strategic Access Management and Monitoring (SAMM) Strategy.

Development proposed adjacent or close to the boundary of the 7km zone of influence may require mitigation for the SPA. Such proposals for development will be dealt with on a case-by-case basis and assessed through a site-specific Habitats Regulations Assessment at the application stage.

Air quality

⁷ South Downs National Park Authority (2022) Call for Nature Sites. Available at: <https://www.southdowns.gov.uk/nature-recovery-information-for-delivery-partners/call-for-nature-sites/> [Date Accessed: 14/01/21]

DPC6: Ashdown Forest SPA and SAC

New development likely to result in increased traffic will need to be assessed through a site-specific Habitats Regulations Assessment at the application stage to consider any air quality impacts and to prevent adverse effects on the Ashdown Forest SAC.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPC6	0	+	0	0	0	0	+	+	0	+	0	0	0	0

D.3.6.1 Ashdown Forest SPA and SAC is located on the outskirts of the Mid Sussex District boundary to the north east, within the High Weald AONB. Policy DPC6 aims to protect this designated Habitats site from development related impacts through providing distance thresholds and criteria for development proposals to adhere to, in accordance with the SANG and SAMM schemes⁸.

D.3.6.2 This policy sets out that development proposals within 400m of Ashdown Forest SPA and SAC will not be permitted, and development proposals which would lead to a net increase in dwellings within a 7km zone of influence around the designation will be required to contribute to physical and financial mitigation as outlined within the policy. It is expected that this policy would help to protect important biodiversity assets within the designated Habitats site from adverse impacts caused by development. Through protecting the qualifying features of Ashdown Forest, as well as other important biodiversity assets within the area, a minor positive impact on biodiversity and geodiversity (SA Objective 7) would be expected. The implications of air quality impacts associated with development proposed within Mid Sussex on Ashdown Forest and other Habitats sites will be considered in greater detail in the accompanying HRA.

D.3.6.3 Additionally, through aiming to protect Ashdown Forest SPA and SAC within the identified distance thresholds, a minor positive impact on the surrounding landscape, such as the High Weald AONB, could be expected (SA Objective 8).

D.3.6.4 The protection of these biodiversity assets would also be expected to have positive impacts in relation to human health. Access to a diverse range of natural habitats, as provided by Ashdown Forest, is known to have benefits for mental wellbeing and could potentially encourage residents to engage in a more active lifestyle. Through protecting this area from

⁸ Mid Sussex District Council (2022) Protecting Ashdown Forest. Available at: <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/> [Date Accessed: 27/01/22]

development related threats and pressures, current and future residents can continue to enjoy these benefits and therefore the policy would be likely to have a minor positive impact on human health (SA Objective 8).

- D.3.6.5 Development proposals for housing within the identified 7km zone of influence will be required to provide “*Suitable Alternative Natural Greenspace (SANG) to the minimum level of 8Ha per 1,000 net increase in population; or a financial contribution to a strategic SANG*” as part of the mitigation as set out within the policy. By providing alternative accessible greenspace to Ashdown Forest, Policy DPC6 could potentially result in an indirect minor positive impact on climate change and transport (SA Objective 10) where road traffic and potential congestion around Ashdown Forest is reduced through visitors deciding to use other greenspace instead for recreation.

D.4 Built Environment

D.4.1 Policy DPB1: Character and Design

DPB1: Character and Design

All new development should be of high quality and must respond appropriately to its context, be inclusive and prioritise sustainability. This includes the design and layout of new buildings, alterations to existing buildings and the design of surrounding spaces.

All applicants will be required to demonstrate that development takes the following into account:

Understanding the Context

- i. reflects the distinctive character of the towns and villages and protects their separate identity and valued townscapes;
- ii. is sensitive to the countryside including the topography;

Layout, Streets and Spaces

- iii. includes appropriate landscaping and greenspace;
- iv. contributes positively to, and clearly defines, public and private realms and designed with active building frontages facing streets and public open spaces to animate and provide natural surveillance;
- v. incorporates a green infrastructure plan that maximises opportunities to retain existing trees and incorporate new trees (i.e. in parks and community orchards), including delivering tree-lined streets and protects open spaces and gardens that contribute to the character of the area;
- vi. incorporates well integrated parking and servicing areas that do not dominate the street environment, particularly where high density housing is proposed;

Establishing the Structure

- vii. is organised around green transport principles and creates a pedestrian and cyclist-friendly layout that is safe, well connected, legible and accessible;
- viii. optimises the potential of the site to accommodate development especially on brownfield sites and in locations close to facilities or with good public transport links.
- ix. take the opportunity to encourage community interaction by creating layouts with a strong neighbourhood focus/centre; larger (500+ dwellings) schemes will also normally be expected to incorporate a mixed use element;

High Quality Building Design

- x. creates a sense of place while addressing the character and scale of the surrounding buildings and landscape through the consideration of the scheme's design, layout, size, scale, massing and views;
- xi. incorporates sustainable construction principles and is designed for adaptation and future weather events; and

Residential Amenity

- xii. does not cause significant harm to the amenities of existing nearby residents and future occupants of new dwellings, including taking account of the impact on privacy, outlook,

DPB1: Character and Design

daylight and sunlight, and noise, air and light pollution (see Policies DPN6, DPN7, DPN8 and DPN9).

Further information and guidance on supporting the delivery of high-quality new development, including design principles, can be found in the Mid Sussex Design Guide SPD.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Reference	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPB1	0	+	0	++	+	+	+	+	+	+	+	0	0	0

D.4.1.1 Effective design can help to ensure new developments are well integrated into the surrounding landscape, reinforcing local distinctiveness and conserving cultural and heritage assets. Good design can enhance quality of life for residents, strengthen sense of place, improve the attractiveness of a location and create safer places to live and work.

D.4.1.2 Building for Life ⁹ is a government endorsed design quality indicator for well-designed developments. This guidance should be used by local authorities to help guide design codes within the Plan area. Policy DPB1, alongside the guidance provided within this document, would help to ensure all new development within the Plan period is of high quality and design.

D.4.1.3 Policy DPB1 seeks to ensure development designs incorporate various features including open areas to “*animate and provide natural surveillance*”, which would potentially help to discourage crime and reduce the fear of crime within the community. Additionally, the policy seeks to encourage community interaction through supporting proposals with layouts to exhibit a strong neighbourhood focus/centre, with larger (500+ dwellings) residential schemes being expected to incorporate a ‘mixed-use’ element, for example including leisure centres and schools. The policy is likely to encourage community cohesion and interaction and promote community-based provisions through well planned design, therefore, a major positive impact on aspects of community and crime within the Plan area is expected (SA Objective 4).

D.4.1.4 Under this policy, improvements to pedestrian and cycle network and opens spaces would be required, which, in addition to encouraging physical exercise, would be expected to provide alternative sustainable modes of transport and pleasant spaces which could

⁹ D. Birkbeck and S. Kruczowski (2015) Building for Life 12. Available at: <https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition> [Date Accessed: 17/01/22]

- potentially benefit mental wellbeing. An appropriate mix and density of housing would also be expected to have benefits in relation to health and wellbeing, by providing spacious places for people to live. This policy would be likely to make a positive contribution to reducing crime and the fear of crime in the local area. This would be expected to create safe and cohesive communities and help to improve quality of life for residents, and as such, have benefits to the local community. Overall, this would be expected to result in a minor positive impact on health (SA Objective 2).
- D.4.1.5 The policy supports development which *“incorporates sustainable construction principles and is designed for adaptation and future weather events”*, additionally, proposals which incorporate a green infrastructure plan that *“maximises opportunities to retain existing trees and incorporate new trees”* where vegetation would help absorb excess water during flood events. Through encouraging the incorporation of these aspects into future developments, the policy is likely to have a minor positive impact on reducing flood risk (SA Objective 5) within the Plan area. Additionally, the policy may create new habitats and improve connectivity for wildlife through the provisioning of trees and GI, which may have a minor positive impact on biodiversity (SA Objective 7).
- D.4.1.6 Policy DPB1 seeks to *“optimise the potential”* of a site, especially where a site is previously developed, promoting an efficient use of land, which could reduce the amount of best most versatile land lost to development in other areas of the district. Therefore, a minor positive impact on natural resources (SA Objective 6) could be expected.
- D.4.1.7 High quality design would help to ensure that new development does not have an adverse effect on the local landscape. Policy DPB1 seeks to ensure that new development reflects *“the distinctive character of the towns and villages and protects their separate identity and valued townscapes”*, as well as being sensitive to countryside surroundings. Therefore, a minor positive impact on landscape is expected (SA Objective 8). Additionally, through ensuring that future developments reflect the distinctive character of the local surroundings and consider views onto the development, the settings of local heritage assets (such as Listed Buildings) could be conserved or enhanced and therefore a minor positive impact on cultural heritage (SA Objective 9) could result.
- D.4.1.8 The policy sets out that development proposals should be *“organised around green transport principles”* and should *“create a pedestrian and cyclist friendly layout that is safe, well connective, legible and accessible”*, whilst being in a location with good public transport links, as well as considering amenity issues such as air pollution. Therefore, the policy is likely to improve access to work and services by public transport, walking or cycling, as well as helping to protect air quality. A minor positive impact on climate change and transport (SA Objective 10) could be expected.
- D.4.1.9 The criteria of high-quality design set out by Policy DPB1 includes the incorporation of *“sustainable construction principles”* into development proposals, which could include use of

local materials, recycling or aims of net-zero emissions during the construction phase of development. A minor positive impact on energy and waste (SA Objective 11) could be expected from this aspect of the policy.

D.4.2 Policy DPB2: Listed Buildings and Other Heritage Assets

DPB2: Listed Buildings and Other Heritage Assets

Listed Buildings

Development will be required to protect listed buildings and their settings. This will be achieved by ensuring that:

- A thorough understanding of the significance of the listed building and its setting has been demonstrated. This will be proportionate to the importance of the building and potential impact of the proposal;
- Alterations or extensions to a listed building respect its historic form, scale, setting, significance and fabric. Proposals for the conversion or change of use of a listed building retain its significance and character whilst ensuring that the building remains in a viable use;
- Traditional building materials and construction techniques are normally used. The installation of uPVC windows and doors will not be acceptable;
- Satellite antennae, solar panels or other renewable energy installations are not sited in a prominent location, and where possible within the curtilage rather than on the building itself;
- Special regard is given to protecting the setting of a listed building;
- Where the historic fabric of a building may be affected by alterations or other proposals, the applicant is expected to fund the recording or exploratory opening up of historic fabric.

Other Heritage Assets

Development that retains buildings which are not listed but are of architectural or historic merit, or which make a significant and positive contribution to the street scene will be permitted in preference to their demolition and redevelopment.

The Council will seek to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the character and quality of life of the District. Significance can be defined as the special interest of a heritage asset, which may be archaeological, architectural, artistic or historic.

Proposals affecting such heritage assets will be considered in accordance with the policies in the National Planning Policy Framework (NPPF) and current Government guidance.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Reference	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPB2	0	0	0	0	0	0	0	+	++	0	0	0	0	0

- D.4.2.1 The diverse range of heritage assets throughout the Plan area provides a strong sense of place and character to their surroundings. This policy requires new development to “*protect listed buildings and their settings*” and “*conserve heritage assets in a manner appropriate to their significance*”, including archaeological, architectural, artistic or historic significance, for the enjoyment of future generations in the district and contribution to residents’ quality of life.
- D.4.2.2 This policy sets out criteria for which development proposals should adhere to in regard to protecting historic assets. Therefore, a major positive impact on the historic environment would be anticipated (SA Objective 9).
- D.4.2.3 Through protecting heritage assets within the Plan area, this policy would be likely to have a minor positive impact on the local landscape character (SA Objective 8), for example through the requirement to use traditional construction materials and techniques, which may also help to conserve the setting of high quality landscapes such as the High Weald AONB.

D.4.3 Policy DPB3: Conservation Areas

DPB3: Conservation Areas

Development in a conservation area will be required to conserve or enhance its special character, appearance and the range of activities which contribute to it. This will be achieved by ensuring that:

- New buildings and extensions are sensitively designed to reflect the special characteristics and appearance of the area in terms of their scale, density, design and through the use of complementary materials;
- Open spaces, gardens, landscaping and boundary features that contribute to the special character and appearance of the area are protected. Any new landscaping or boundary features are designed to reflect that character;
- Traditional shop fronts that are a key feature of the conservation area are protected. Any alterations to shopfronts in a conservation area will only be permitted where they do not result in the loss of a traditional shopfront and the new design is sympathetic to the character of the existing building and street scene in which it is located;
- Existing buildings that contribute to the character of the conservation area are protected. Where demolition is permitted, the replacement buildings are of a design that reflects the special characteristics and appearance of the area;
- Activities such as markets, crafts or other activities which contribute to the special character and appearance of the conservation area are supported;
- New pavements, roads and other surfaces reflect the materials and scale of the existing streets and surfaces in the conservation area.

Development will also protect the setting of the conservation area and in particular views into and out of the area.

New buildings of outstanding or innovative design may be acceptable in conservation areas provided that their impact would not cause material harm to the area.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPB3	0	0	0	0	0	0	0	+	+	0	0	0	0	0

D.4.3.1 There are 36 Conservation Areas (CAs) located within the Mid Sussex District, concentrated in various settlement areas such as East Grinstead, Haywards Heath and Burgess Hill. Policy DPB3 seeks to ensure, through various criteria, that development within each of these CAs “conserve or enhance its special character, appearance and the range of activities which contribute to it” and that development “will also protect the setting of the conservation area and in particular views into and out of the area”. Therefore, where heritage assets within CAs are conserved and/or enhanced through this policy, a minor positive impact on cultural heritage (SA Objective 9) can be expected.

D.4.3.2 Through aiming to protect and conserve CAs and their settings, a minor positive impact on the local landscape within the Plan area can be expected, where the special characteristics and qualities of affected landscapes and townscapes will benefit from this policy (SA Objective 8).

D.5 Transport

D.5.1 Policy DPT1: Placemaking and Connectivity

DPT1: Placemaking and Connectivity

Development shall be delivered sustainably and provide appropriate infrastructure to support the objectives of the West Sussex Transport Plan 2022-2036 and the requirements of the NPPF.

To meet these objectives:

- a) Development that is likely to generate significant amounts of movement and/or have a significant impact on the transport network shall provide a Transport Assessment / Statement, Sustainable Transport Strategy and Travel Plan to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it and to accord with the requirements of the NPPF.
- b) Demonstrate how all relevant sustainable travel interventions (for the relevant local network) will be maximised and taken into account in terms of their level of mitigation before considering highway infrastructure mitigation.
- c) Development shall integrate relevant requirements of Chapter 4 of the Mid Sussex Design Guide SPD and be designed to prioritise sustainable and active modes of travel, providing safe and convenient routes for walking and cycling through the development and linking with existing and enhanced networks beyond; before the highway layout is planned.
- d) Create liveable communities which strive to embody the 20-minute neighbourhood concept and deliver attractive, healthy places that have a permeable street network within the site with clearly defined route hierarchies that are safe and designed for all users and supporting desirable opportunities for people to choose not to travel by car.
- e) New streets shall be designed to adoptable standard which can easily incorporate advanced digital infrastructure, including fibre.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPT1	0	+	0	+	0	0	0	0	0	+	0	0	0	+

D.5.1.1 Mid Sussex is a largely rural district where a large proportion of residents currently rely on private vehicles to access community services and facilities. Policy DPT1 seeks to ensure that future development meets the objectives as set out within the emerging West Sussex Transport Plan 2022-2036¹⁰, by providing relevant criteria for proposals to achieve in order

¹⁰ West Sussex County Council (2021) West Sussex Transport Plan 2022 to 2036. Available at: <https://www.westsussex.gov.uk/about-the-council/policies-and-reports/roads-and-travel-policy-and-reports/west-sussex-transport-plan/> [Date Accessed: 27/01/22]

to attain sustainable transport focused infrastructure within the Plan area. The policy outlines support for implementing sustainable transport options, such as active transport, as a priority before any highway plans are undertaken. By striving to provide residents with well-linked sustainable transport methods as an alternative to private vehicles, a minor positive impact on climate change and transport (SA Objective 10) could result, as vehicle related emissions and pollution could reduce during the Plan period.

D.5.1.2 Policy DPT1 supports active transport measures where developments are expected to improve walking and cycle routes and links within the Plan area, which would likely have mental and physical health benefits for site end users. Additionally, enhanced active and transport links could improve residents' access to community facilities, for example shops, libraries and GP services. Therefore, a minor positive impact on health and wellbeing and community, community and crime could result (SA Objectives 2 and 4).

D.5.1.3 The policy states that new streets within developments “*shall be designed to adoptable standard which can easily incorporate advanced digital infrastructure, including fibre*”. This aspect could enhance the home working experience and lead to positive impacts on economic growth, by increasing the range of employment opportunities within the Plan area, as well as benefitting local businesses with faster internet connectivity. A minor positive impact on economic growth could therefore be expected (SA Objective 14).

D.5.2 Policy DPT2: Rights of Way and Other Recreational Routes

DPT2: Rights of Way and Other Recreational Routes

Rights of way, Sustrans national cycle routes and recreational routes will be protected by ensuring development does not result in the loss of or does not adversely affect a right of way or other recreational routes unless a new route is provided which is of at least an equivalent value and which does not sever important routes.

Access to the countryside will be encouraged by:

- Ensuring that (where appropriate) development provides safe and convenient links to rights of way and other recreational routes;
- Supporting the provision of additional routes within and between settlements that contribute to providing a joined up network of routes where possible;
- Where appropriate, encouraging making new or existing rights of way multi-functional to allow for benefits for a range of users. (*Note: ‘multi-functional will generally mean able to be used by walkers, cyclists and horse-riders*).

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPT2	0	+	0	0	0	0	0	+	0	+	0	0	0	0

D.5.2.1 Policy DPT2 seeks to protect existing Public Rights of Way and other recreational routes from development related threats and pressures by ensuring development “*does not result in the loss of or does not adversely affect a right of way or other recreational routes unless a new route is provided which is of at least an equivalent value and which does not sever important routes*”. The policy also provides criteria to ensure that development proposals encourage access to the countryside for site end users.

D.5.2.2 Access to a diverse range of natural habitats is known to have benefits for mental and physical wellbeing and could potentially encourage residents to engage in a more active lifestyle, as well as facilitating better access to the surrounding landscape. By helping to protect these important recreational and active transport assets for future generations, a minor positive impact on human health and wellbeing, landscape and climate change and transport could be expected (SA Objectives 2, 8 and 10).

D.5.3 Policy DPT3: Active Travel

DPT3: Active Travel

Development will be required to help remove barriers to active travel and create a healthy environment in which people chose to walk and wheel; facilitated by:

- a) Where appropriate, providing high quality, fit for purpose active travel infrastructure, within the development which links to the existing networks and builds on the schemes identified in the Mid Sussex Local Cycling and Walking Infrastructure Plan (LCWIP).
- b) Providing appropriate levels of cycle parking facilities (taking account of WSCC Guidance on Parking at New Developments 2020 and subsequent iterations), well designed and laid out to be under cover, secure, conveniently located and easily accessible, close to the main entrance of the premises and in accordance with the guidance in the Mid Sussex Design Guide SPD.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPT3	0	+	0	+	0	0	0	0	0	+	0	0	0	0

D.5.3.1 This policy seeks to improve access to active travel facilities by requiring developments to provide “*high quality, fit for purpose active travel infrastructure, within the development which links to existing networks*” and to build upon various cycling and walking infrastructure schemes. By also ensuring that new developments provide cycle parking facilities, positive impacts on health and wellbeing could result where more people are likely to take up cycling as a form of recreation or active transport. Additionally, by providing cycleways and linking these to the existing cycle network, better access to community facilities could result as well as a reduction of the reliance on private vehicles for transport. Therefore, a minor positive impact on health and wellbeing, community and equality and climate change and transport could result (SA Objectives 2, 4 and 10).

D.5.4 Policy DPT4: Parking and Electric Vehicle Charging Infrastructure

DPT4: Parking and Electric Vehicle Charging Infrastructure

Development will be required to:

- a) Provide adequate and well-integrated car parking, taking account of the guidance in the Mid Sussex Design Guide SPD and the WSCC Guidance on Parking at New Developments¹¹ (2020 and subsequent iterations) and the accessibility of the site to services and sustainable travel infrastructure, along with the type, mix and use of development.
- b) Parking associated with all new residential development shall be laid out to ensure the relevant requirements of Schedule 1 Part S of the Building Regulations regarding Electric Vehicle Charging are met.
- c) All new non-residential buildings with more than 10 associated parking spaces within the site boundary shall provide a minimum of 2 ‘Fast’ (7kW) or faster, Electric Vehicle Charging points; cable routes shall be provided for 50% of the remaining total number of spaces.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPT4	0	0	0	0	0	0	0	0	0	+	0	0	0	0

D.5.4.1 Policy DPT4 seeks to ensure that all new developments provide “*adequate and well-integrated car parking*”, good “*accessibility of the site to services and sustainable travel infrastructure*” (depending on type, mix and use of the development) and that Electric Vehicle Charging points are provided in car parking for non-residential developments. The policy would be expected to facilitate an increased number of residents using more

¹¹ **West Sussex Guidance on Parking in New Developments:** referenced in respect of the number and type of parking spaces required to support a development and not to Electric Vehicle Charging standards on the basis policy DPT4 requirements exceed those of the WSCC Guidance.

sustainable modes of transport, such as electric vehicles, which may ultimately reduce the level of GHGs emitted from private cars and subsequently their impact on climate change. Therefore, a minor positive impact on climate change and transport within the Plan area could be expected (SA Objective 10).

D.5.5 Policy DPT5: Off-Airport Car Parking

DPT5: Off-Airport Car Parking

Proposals for additional off-airport car parking facilities or extensions to existing airport related car parking site will not be permitted.

Proposals for the relocation of existing off-airport parking that result in a net increase in parking will not be permitted.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPT5	0	0	0	0	0	0	0	0	0	+	0	0	0	0

D.5.5.1 Policy DPT5 aims to resist additional car parking developments at Gatwick Airport, associated with the Northern Runway Project. The policy could potentially help to encourage use of public transport to reach the airport rather than private cars, resulting in a minor positive impact on climate change and transport (SA Objective 10).

D.6 Economy

D.6.1 Policy DPE1: Sustainable Economic Development

DPE1: Sustainable Economic Development

Sustainable Economic Development will be achieved by:

- Ensuring major development proposals (including sustainable settlements allocated within this District Plan) demonstrate how they will contribute to addressing identified local skills shortages and support local employment, skills development and training.
- Encouraging high value employment development of appropriate land and premises to meet the needs of 21st century businesses which embody sustainable practices, support a circular economy and the achievement of Carbon Net Zero by 2050;
- Supporting existing businesses, and allowing them room to expand;
- Encouraging inward investment opportunities, promotion and expansion of clusters or networks of knowledge and data driven, creative or high technology industries; and
- Seeking the appropriate infrastructure to support business growth – in particular high speed digital infrastructure including fibre.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE1	0	0	0	+	-	-	-	-	-	0	-	-	++	++

D.6.1.1 Policy DPE1 sets out the Council’s criteria to achieve sustainable economic development throughout the Plan area in relation to business growth and infrastructure. Through supporting existing businesses and allowing them to expand if required, as well as ensuring infrastructure within the district can provide for future business growth, further employment opportunities could be provided, and economic growth encouraged. The policy also seeks to ensure that major development proposals (for example the Sustainable Settlements as identified within the plan, can demonstrate “*how they will contribute to addressing identified local skills shortages and support local employment, skills development and training*”. The policy supports employment for local residents and their development of skills through means such as training, which could improve accessibility into the local jobs market. A major positive impact on the economic objectives would therefore be expected through this policy (SA Objectives 13 and 14).

D.6.1.2 Through supporting business expansion, the policy could allow for smaller community-based businesses to grow and potentially increase residents’ access to community facilities such as pubs, shops and hairdressers, which may also lead to better community cohesion through

use of these businesses. Therefore, a minor positive impact on the community focused objective (SA Objective 4) could be expected.

- D.6.1.3 Policy DPE1 supports the general expansion of businesses which could lead to impacts on various environmental constraints such as flood risk, soil and water resources, biodiversity and heritage assets, landscape settings and waste production, without further information. The assessment of sites has identified a range of sustainability impacts regarding SA Objectives 5, 6, 7, 8, 9, 11 and 12, and therefore, for the purposes of this policy assessment the overall impact is minor negative, using the precautionary principle.

D.6.2 Policy DPE2: Existing Employment Sites

DPE2: Existing Employment Sites

Existing Employment Sites – Protection, Intensification and Redevelopment

Protection:

Existing Employment Sites, classified as those in use classes E(g)(i)-(iii) B2: General Industrial or B8: Storage or Distribution (as shown on the Policies Map) are protected; proposals that would involve their loss will be resisted. Proposals on Existing Employment Sites that would involve the loss of employment land or premises will only be supported where it can be clearly demonstrated by the applicant that the site/premises are no longer needed and/or viable for employment use.

Development proposals outside the traditional employment use classes (E(g), B2 and B8) 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:

- (i) Details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing marketing conditions; and
- (ii) A financial appraisal that demonstrates that the development of any employment generating use is unviable.

Similarly, support will also be given 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 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.

Intensification and redevelopment:

Proposals for intensification within the boundary of Existing Employment Sites will be supported providing it is in accordance with other development plan and national policies.

Redevelopment for employment use within the boundary of Existing Employment Sites (as shown on the Policies Map) will be supported where it does not result in the overall loss of employment floorspace or where any loss can be fully justified.

Proposals for *alternative uses*, with the exception of residential use, within Existing Employment Sites will only be supported where it can be demonstrated that the sequential approach has been

DPE2: Existing Employment Sites

applied to the redevelopment of the site, and the proposals support their integrity and function as centres of employment.

Existing Employment Areas – Expansion

Within the built-up area, expansion of Existing Employment Sites and premises for E(g)/B2/B8 uses will be supported where the business requirements cannot be met within the existing site/premises through acceptable on-site expansion or intensification; and that relocation to existing stock is not preferable.

Outside the built-up area, expansion of Existing Employment Sites for E(g)/B2/B8 uses will only be supported where:

- Detailed layout and design are in keeping with its countryside location; and
- The expansion is contiguous with the boundary of an existing employment site; and
- Where the impacts of expansion are assessed in-combination with the existing site, and the overall impact of existing plus expansion is considered acceptable.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE2	0	0	0	0	-	-	-	-	-	0	-	-	++	++

D.6.2.1 Policy DPE2 supports the protection and expansion of existing employment areas and provides criteria for these development proposals to meet in order to be supported by the Council. The policy would protect existing employment sites allocated for ‘general industrial’ or ‘storage and distribution’ uses, and proposals which would lead to a loss in these employment areas would be resisted, unless it can be “*clearly demonstrated by the applicant that the site/premises are no longer needed and/or viable for employment use*”.

D.6.2.2 Additionally, the policy supports proposals for intensification within the boundary of Existing Employment Sites, provided it is in accordance with other development plan and national policies. By protecting these key employment areas from non-employment related re-development (for example residential developments), local jobs are protected. Policy DPE2 supports in-principle the expansion of Existing Employment Sites within the identified built-up areas, and also supports expansion of Existing Employment Sites outside of built-up areas where certain criteria are met. Overall, major positive impacts can be expected relating to economic regeneration and economic growth through the protection and enhancement of key employment areas (SA Objectives 13 and 14).

D.6.2.3 Policy DPE1 supports the expansion of Existing Employment Areas, and although proposals are required to meet criteria to help avoid negative impacts, impacts on various environmental constraints such as flood risk, soil and water resources, biodiversity and heritage assets, landscape settings and waste production, cannot be ruled out without further information. The assessment of sites has identified a range of sustainability impacts in regard to SA Objectives 5, 6, 7, 8, 9, 11 and 12, and therefore, for the purposes of this policy assessment the overall impact is minor negative, using the precautionary principle.

D.6.3 Policy DPE3: Employment Allocations

DPE3: Employment Allocations

To support balanced communities and to provide opportunities for people to work close to where they live, employment land will be required to be provided on Significant Sites:

- DPSC2: Land to South of Reeds, Sayers Common
- DPSC3: Land at Crabbet Park, Cropthorne

Development must be in accordance with the site-specific requirements set out in the policies above.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE3	0	+	0	+	0	--	-	-	-	0	-	0	+	+

D.6.3.1 Policy DPE3 sets out the ‘Significant Sites’ allocated within the draft Plan, and the requirement for these sites to include provision of employment land to help cater for the needs associated with the proposed housing growth, by providing employment and local business opportunities. The proposed employment areas within these sites will include retail and commercial opportunities as well as services (as defined within Class E). Mid Sussex is a largely rural district and through providing the local area surrounding these three sites with greater accessibility to employment opportunities, facilities and services, a minor positive impact on residents’ health and wellbeing, access to community and local economic regeneration and growth could be expected (SA Objectives 2, 4, 13 and 14).

D.6.3.2 Policy DPSC1 relates to Site 740, and DPSC2 relates to Site 18, both of which were assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation).

- D.6.3.3 The pre-mitigation assessments of the sites (see **Appendix C**) have identified potential negative impacts resulting from the development of the employment areas within these sites. These constraints relate to flood risk, natural resources (including mineral safeguarding areas), biodiversity, landscape settings, cultural heritage settings and assets, traffic related emissions, waste production and water resources (including nearby watercourses).
- D.6.3.4 As discussed in **Chapter D.7**, site-specific requirements provided within the site policies DPSC2 and DPSC3, as referred to within Policy DPE3, would be likely to address some of these adverse impacts, by avoiding development in areas of flood risk and providing multi-functional SUDS, providing active travel and sustainable transport options and mitigating impacts on water resources. A negligible impact would be expected overall for SA Objectives 5, 10 and 12.
- D.6.3.5 A minor negative impact would be likely to remain in regard to biodiversity (SA Objective 7), due to potential for disturbance or degradation of ancient woodland and priority habitat within the sites. Furthermore, the large scale of the sites situated on previously undeveloped land means that despite proposed masterplanning measures and incorporation of open space, the development is likely to change the landscape character and setting to nearby heritage assets, with a minor negative impact on landscape (SA Objective 8) and cultural heritage (SA Objective 9).
- D.6.3.6 A major negative impact would be likely in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) as a result of the development, and potential sterilisation of mineral resources within the MSA.

D.6.4 Policy DPE4: Town and Village Centres

DPE4: Town and Village Centres

Development within a defined Town or Village Centre will be supported where a proposal is proportionate to the status of that centre within the hierarchy as set out in the table below:

Town Centres	Burgess Hill
	East Grinstead
	Haywards Heath
Village Centres	Crawley Down
	Cuckfield
	Hassocks
	Hurstpierpoint
	Lindfield

Town and Village Centre Boundaries

Town and Village Centre Boundaries for each settlement in the hierarchy are defined on the Policies Maps and are illustrated in Appendix 2.

DPE4: Town and Village Centres

Sequential Test for Town Centre Uses

A sequential test must be applied to planning applications for main town centre uses that are not in an existing defined Town or Village Centre and are not in accordance with the District Plan and the relevant Neighbourhood Plan. The sequential test will require:

- Applications for main town centre uses to be located in town centres; or, if suitable sites are not available,
- In edge of centre locations where the site is accessible and well connected to the town centre; or, if suitable sites are not available,
- At accessible out of centre sites that are well connected to the town centre.

Where an application fails to satisfy the sequential test, or fails to meet other requirements of this policy, it should be refused.

For the purposes of the sequential test, Neighbourhood Centres do not perform the same function as Town and Village Centres. Proposals in Neighbourhoods should reflect their role in meeting the day to day needs of the local community in accordance with policy DPE7.

Local Threshold for Retail Impact Assessments

Planning applications proposing the construction of 500m² or more gross floorspace for the sale of convenience or comparison goods outside a town centre must be accompanied by a Retail Impact Assessment in order to demonstrate that they would not have a significant adverse impact on a town centre, either on their own or cumulatively in the area.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE4	0	+	0	+	0	0	0	0	0	0	0	0	+	+

D.6.4.1 Policy DPE4 sets out the hierarchy of centres within Mid Sussex including town centres and village centres, and proposed ‘sequential test’, to help ensure that development proposals are of appropriate use and scale depending on the needs and capacity of the area.

D.6.4.2 This policy aims to support and strengthen the identified hierarchy of centres. This would be expected to provide benefits at the local community scale, in terms of residents’ access to local services and facilities, and well as strengthening the local economy. In addition, this policy would be expected to support and protect key retail areas through ensuring that development proposals of “500m² or more gross floorspace for the sale of convenience or comparison goods outside a town centre must be accompanied by a Retail Impact Assessment in order to demonstrate that they would not have a significant adverse impact on a town centre, either on their own or cumulatively in the area”. Therefore, a minor positive

impact on economic regeneration and growth within the Plan area could be expected (SA Objectives 13 and 14).

D.6.4.3 Through supporting development within a town or village centre, as defined within the table within the policy, residents are more likely to have greater access to facilities and services within their local area. Additionally, by supporting local businesses and the local economy, this policy would be expected to have positive impacts on the health and wellbeing of residents. Therefore, minor positive impacts on SA Objectives 2 and 4 could be expected.

D.6.5 Policy DPE5: Within Town and Village Centre Boundaries

DPE5: Within Town and Village Centre Boundaries

Within Town and Village Centre Boundaries as defined on the Policies Map, development of ‘main town centre uses’, as defined by the NPPF, will be supported, having regard to relevant Town Centre Masterplans. Support will also be given for:

- a) The amalgamation or subdivision of units, subject to meeting the requirements of policies DPB2 and DPB3 relating to heritage impacts.
- b) Temporary ‘meanwhile’ uses where they deliver community benefits, do not harm amenity and do not compromise the future redevelopment of the site.
- c) Delivery lockers where it can be demonstrated that their installation would enhance the vitality and viability of the centre and would not restrict accessibility.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE5	0	0	0	+	0	0	0	0	0	0	0	0	+	0

D.6.5.1 Policy DPE5 seeks to support development of main town centre uses, as defined by the NPPF, and covers other forms of development such as temporary ‘meanwhile’ uses and delivery lockers. By outlining support for appropriate developments within defined Town and Village Centre Boundaries, the policy would likely improve residents’ accessibility to facilities and services which fall within the categories outlined within the policy, and also enhance the viability and vitality of the town centres within the Plan area. Therefore, a minor positive impact on community accessibility and economic regeneration and growth could be expected (SA Objectives 4, 13 and 14).

D.6.6 Policy DPE6: Development within Primary Shopping Areas

DPE6: Development within Primary Shopping Areas

Primary Shopping Areas (PSAs) are defined on the Policies Map and are illustrated at Appendix 2. For Town Centres, this is a smaller area within the Town Centre boundary. For Village and Local Centres, the PSA corresponds with the Village Centre Boundary.

(1) In order to support thriving Centres in the district, development proposals within defined Primary Shopping Areas, (as shown on the Policies Map), involving the loss of Class E uses will be supported where:

- a) a main town centre use is proposed,
- b) it can be demonstrated that the proposed use will sustain and enhance the vitality and viability of the centre,
- c) neighbouring amenity is protected,
- d) an active frontage is maintained at ground floor level, and;
- e) it does not result in a concentration of uses that harm the vitality and viability of the centre.

Residential uses will be supported at upper storeys. Residential at ground floor level will be resisted unless it can be demonstrated that:

- a) the vitality and viability of the centre is not harmed;
- b) an attractive and active frontage to the public realm is maintained, and;
- c) no harm would be caused to the character of the streetscene.

2) New developments for retail, food and beverage, and associated services uses (Use Class E(a), (b), (c)) within the Primary Shopping Area will be supported with the implementation of restrictions to maintain the mix of uses as permitted to ensure the vitality and viability of the centre is not harmed.

3) The loss of Class E and/or main Town Centre Uses to alternative non-town centre uses will only be supported where evidence can be provided that demonstrates:

- a) the existing and any alternative Class E use is no longer viable; this must be demonstrated through evidence of vacancy and proactive marketing for an appropriate period of time;
- b) the proposed use would enhance the vitality and viability of the centre, and
- c) it would not result in adverse impacts on neighbouring amenity

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE6	+	+	0	+	0	0	0	+	0	0	0	0	+	0

D.6.6.1 Policy DPE6 aims to support development within designated Primary Shopping Areas which would retain and enhance Class E uses (commercial, business and service), as defined within the policy, provided the vitality and viability of the centre is not harmed from such proposed

development. The policy sets out criteria which development proposals should adhere to for them to be supported, including resisting the loss of Class E uses to alternative non-town centre uses. This policy would likely help to maintain and increase the range of employment opportunities, shops and services available in the town centres across the district and therefore a minor positive impact on economic regeneration is expected (SA Objective 13).

D.6.6.2 This policy supports residential uses in upper storeys of town centre buildings, and in some specific circumstances the policy supports ground floor residential units. This would likely help to ensure delivery of a range of types, tenures and mix of homes required over the Plan period, and therefore a minor positive impact on housing provision could be expected (SA Objective 1).

D.6.6.3 Additionally, through responsibly supporting the need of growing communities within town centres, accessibility to services including healthcare and recreation facilities, such as pharmacies and gyms, could be improved. This could result in a positive impact on health and wellbeing and community access (SA Objectives 2 and 4).

D.6.6.4 The policy also sets out the Council’s support for town centre developments where they maintain an attractive and active frontage to the public realm. Through resisting development which would harm the vitality and viability of the centre or the character of the streetscene, this policy could potentially result in a minor positive impact on the local landscape character (SA Objective 8).

D.6.7 Policy DPE7: Smaller Village and Neighbourhood Centres

DPE7: Smaller Village and Neighbourhood Centres

Outside of defined Town and Village Centre boundaries:
 Smaller villages, neighbourhood centres and parades of five or more main town centre uses should be protected to meet the needs of their own communities and countryside areas, except where the existing use is no longer viable, and the proposed use is appropriate in scale and function, will not result in adverse amenity impacts, or is in accordance with a relevant Neighbourhood Plan.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE7	0	0	0	+	0	0	0	0	0	+	0	0	+	+

D.6.7.1 Policy DPE7 recognises the important role that Mid Sussex’s smaller villages and neighbourhood centres can play in regard to supporting the needs of the local community. Through seeking to protect “*Smaller villages, neighbourhood centres and parades of five or*

more main town centre uses”, this policy could potentially help to retain local residents’ sustainable access to facilities and services, maintaining the viability and vitality of the smaller centres. Therefore, a minor positive impact on community accessibility, climate change and transport, and economic regeneration and growth could be expected (SA Objectives 4, 10, 13 and 14).

D.6.8 Policy DPE8: Sustainable Rural Development and the Rural Economy

DPE8: Sustainable Rural Development and the Rural Economy

Provided a development is not in conflict with Policy DPC1: Protection and Enhancement of Countryside and DPC2: Preventing Coalescence, and the rural location (outside the built-up area boundaries on the Policies Maps) of the enterprise is justifiable to support a prosperous rural economy in accordance with national policy in the NPPF:

- 1) new small-scale* economic development, and extensions to existing facilities, including leisure and tourism-related development, within the countryside will be permitted provided:
 - it supports sustainable growth and the vitality of all types of businesses in the rural economy; and
 - it involves conversion of existing buildings and/or well-designed new buildings, where possible on previously developed sites; and
 - it maintains or where possible enhances the quality of the rural setting.
- 2) diversification of activities on existing farm units and other land-based rural businesses will be permitted provided:
 - they are of a scale which is consistent to the location of the farm holding; and
 - they would not prejudice the agricultural use of a farm unit.
- 3) the re-use and adaptation of agricultural and forestry buildings for business or sustainable rural tourism and leisure use in the countryside will be permitted provided:
 - the building is genuinely redundant for agricultural or forestry use; and
 - it is not a recently constructed** agricultural building which has not been or has been little used for its original purpose;
 - the building is demonstrated to be structurally sound and capable of conversion without substantial reconstruction or extension;
 - the site is served by an existing suitable access to the local road network; and
 - the appearance and setting are not adversely affected;

Development for accessible local services and community facilities will be supported in line with policy DPI16.

* Small scale defined as usually being no more than 300m² of floorspace for converted and/or new build development and/or a total site area of 350m² for change of use of land applications.

** Recently constructed is defined as being within the previous five (5) Years.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE8	0	+	0	0	0	0	0	0	0	+	0	0	+	0

D.6.8.1 Mid Sussex District is largely rural, and some of the key rural businesses within Mid Sussex include agriculture, horticulture and forestry. In addition, an increasing number of residents in rural areas are home workers. Policy DPE8 supports various types of rural development including leisure and tourism related development, farm diversification and the re-use and adaptation of farm buildings for business use or sustainable rural tourism, for example, where the policy provides criteria for development proposals to meet in order to be supported.

D.6.8.2 Overall, this policy would be expected to have a minor positive impact on the local economy regeneration and the wellbeing of local residents, by encouraging the provision of rural employment opportunities (SA Objectives 2 and 13). Additionally, by ensuring employment opportunities within the rural areas of Mid Sussex are safeguarded and promoted, this policy could potentially help reduce the need to travel for residents living in these areas, which could result in a minor positive impact on reducing transport related emissions (SA Objective 10).

D.6.9 Policy DPE9: Sustainable Tourism and the Visitor Economy

DPE9: Sustainable Tourism and the Visitor Economy

The retention of existing tourism accommodation* and attractions will be supported where it is well located and, if it is outside of the built-up area boundary, it respects the character of the countryside.

Where development proposals are brought forward for the change of use of existing tourism accommodation* and attractions, it will need to be demonstrated that there is no prospect of the continued use of the existing provision. The Council will assess such proposals having regard to the market, economy and supply of tourism accommodation* and attractions at the time of the application. Applicants may need to provide:

- evidence of marketing actively conducted for a reasonable period of time;
- evidence that alternative visitor uses have been fully explored;
- an appraisal indicating that the existing use is no longer viable;
- evidence that the site has not been made deliberately unviable;
- evidence of the suitability of the site to accommodate the alternative visitor use; and
- evidence that the reduction of floorspace or bed spaces in the case of tourism accommodation is the only way of improving the standard of the existing tourist facility.

DPE9: Sustainable Tourism and the Visitor Economy

Development proposals for new tourism accommodation* and attractions, or expansions or improvements to existing tourism accommodation* and attractions, will be supported where it is not in conflict with Policy DPE8: Sustainable Rural Development and the Rural Economy and Policy DPC1: Protection and Enhancement of the Countryside, and where it is demonstrated that:

- It increases the range and/or quality of tourist facilities;
- There would be no harm on highway safety or severe residual cumulative impacts on the road network;
- It encourages sustainable travel opportunities;
- It will not adversely affect the character, landscape, historical significance, appearance and amenity of the area;
- Opportunities are taken to use existing buildings where possible;
- The design and layout of the proposals, including ancillary facilities, are sensitive to the existing character and setting;
- It does not have an adverse effect on residential amenity in the local area;
- It will not have an adverse effect on the vitality and viability of existing facilities in the locality or relevant assets of community value; and
- It meets the requirements of other relevant development plan policies.

The route of the proposed reinstated Bluebell Railway link between East Grinstead and Haywards Heath railway stations (as shown on the Policies Map) will be safeguarded from any development which could prevent its completion.

In particular, land along the route of the railway corridor between Horsted Keynes and Haywards Heath railway stations which will be required to deliver the proposed reinstated railway link and associated facilities for the Bluebell Railway will be safeguarded from development.

* Tourism accommodation includes hotels, guesthouses, bed and breakfast establishments, self-catering accommodation and outdoor accommodation such as caravan sites, camping sites and glamping sites (including yurts, log cabins and pods).

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPE9	0	+	0	0	0	0	0	0	+	+	0	0	+	+

D.6.9.1 Policy DPE9 aims to promote sustainable tourism and the visitor economy within Mid Sussex through supporting the retainment of existing tourism accommodation as well as development proposals for new tourist accommodation and attractions, in principle, with criteria for such developments to meet in order to be supported. This policy would be likely to enhance the tourism potential of Mid Sussex and result in an increase in the number of visitors to the Plan area. Increased tourism would be expected to have benefits in relation to the local economy by potentially providing new cultural activities and promote growth in

rural areas, therefore a minor positive impact on economic regeneration and growth could be expected (SA Objectives 13 and 14). Additionally, an increase in employment opportunities and a strong local economy would also be likely to have a minor positive impact on the wellbeing of local residents (SA Objective 2).

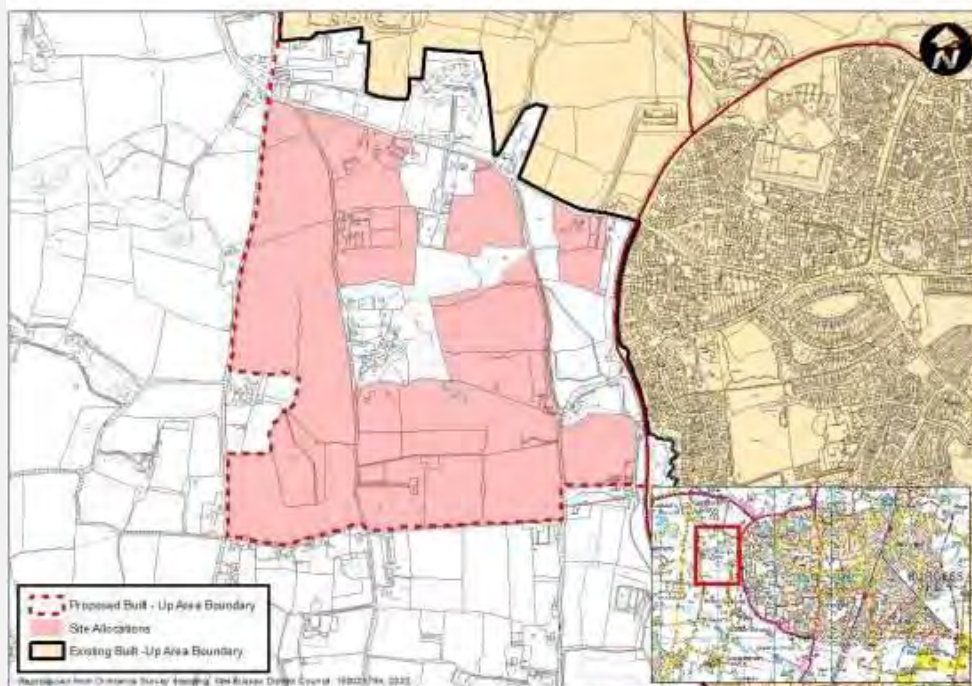
D.6.9.2 Through safeguarding heritage features such as the Bluebell Railway Link and railway corridor between Horsted Keynes and Haywards Heath, as well as potentially conserving and promoting other cultural heritage features as tourist attractions through this policy, a minor positive impact on cultural heritage within the Plan area could be expected (SA Objective 9).

D.6.9.3 The policy sets out the requirement for tourist development to encourage sustainable travel opportunities and to ensure that anticipated traffic generation would not result in “*harm on highway safety or severe residual cumulative impacts on the road network*”. Therefore, through encouraging sustainable transport there is potential for tourists to use these transport methods rather than private vehicles, and a minor positive impact on climate change and transport could be expected (SA Objective 10).

D.7 Sustainable Communities

D.7.1 Policy DPSC1: Land to the West of Burgess Hill

DPSC1: Land to the West of Burgess Hill	
SHELAA Ref:	740
Settlement:	Burgess Hill
Gross Site Area (ha):	67.7
Indicative Development Capacity	
Net Residential Dwellings	1,400
Employment	TBC
Older Persons Accommodation	Proportion TBC
Retail / Community	TBC
Gypsy and Traveller Provision	Provision of equivalent financial contribution towards off-site provision of pitches.
Infrastructure	On site: <ul style="list-style-type: none"> • Extra Care housing provision • 2FE Primary School • Playspace • Self-service Library • Leisure including sport pitches and community pavilion • Neighbourhood centre – retail, leisure and workspace • Sustainable transport measures and provision • Allotments Financial contributions towards the provision of: <ul style="list-style-type: none"> • Sport facilities where need not met on site • Community buildings where need not met on-site • Emergency services • Healthcare • Railway Station improvements Provision of: <ul style="list-style-type: none"> • Sustainable transport measures and provision • Highways works



DPSC1: Land to the West of Burgess Hill

Policy Requirements

Land to the west of Burgess Hill, as shown on the inset map, is allocated as an urban extension to Burgess Hill. Development will be in accordance with a comprehensive masterplan to be agreed with the Council and provide:

- Approximately 1,400 new homes; including provision for extra care housing
- A new primary school and play pitches
- Open space, sports pitches and village green
- Neighbourhood centre with community facilities, locate extra care housing provision and transport hub nearby
- Sustainable travel connections to Burgess Hill and links to employment centred around the A2300
- Green travel corridors for cycle and pedestrian access throughout with links to the ‘Green Circle’
- Central bus route
- Protection of setting of Grade II Listing Building at North End Farm to the west of the site.
- Retention and enhancement of historic routeways of High Hatch Lane and Pangdean Lane
- Avoid developing areas of existing flood risk and mitigate impacts through integration of multi-functional SUDS drainage network
- Provision of type 4 terminal foul pumping station

This is in addition to the General Principles for Site Allocations set out in policy DPH4.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPSC1	++	+	++	++	0	--	-	-	0	0	-	0	0	++

D.7.1.1 Policy DPSC1 relates to Site 740, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.7.1.2 The policy sets out a range of on-site infrastructure and services that will be required alongside the proposed large-scale mixed-use development including retail, leisure and workspaces, to provide a co-ordinated and sustainable community. This includes provision of a new neighbourhood centre and sustainable transport measures with a “*central bus route*” and “*Green travel corridors for cycle and pedestrian access*”. These measures would be likely to improve sustainable travel choice and provide new facilities for the local community, reducing the need to travel. This would be expected to result in a benefit to transport and accessibility; although, owing to the large scale of proposed development and introduction of 1,400 new dwellings, it is likely that not all the needs of the community would

be met on site, with some reliance on private car use and increased traffic on the surrounding road network to some extent. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

- D.7.1.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. The policy sets out a range of requirements for community infrastructure, including on-site sports pitches, leisure facilities and allotments, as well as financial contributions towards further community facilities, healthcare and emergency services. The proposed development would also include an element of extra-care housing. The policy would be likely to improve access to and provision of community and healthcare facilities, and seeks to create a new sustainable community, resulting in a major positive impact on SA Objective 4.
- D.7.1.4 However, the A273 passes the site to the east, with potential adverse implications for the health of site end users in the eastern extent. The policy requires the development to provide “*green travel corridors*” and incorporate links to the ‘Green Circle’ which is located parallel to the A273. With careful design and layout, and maintaining the tree buffer along the A273, it is anticipated that residential development would be directed away from this area and site end users would be protected from reduced air quality and noise pollution effects from the main road. Overall, a minor positive impact on health and wellbeing (SA Objective 2) would be expected, owing to the proposed emphasis on active travel and the provision of new leisure and healthcare facilities.
- D.7.1.5 The policy also requires the development of a new primary school on site. The site is also located in an area within sustainable travel times to existing schools. Therefore, the policy would be likely to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a major positive impact on education (SA Objective 3).
- D.7.1.6 The proposed sustainable travel improvements and new facilities, including active travel links, may help to reduce transport-related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 1,400 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.
- D.7.1.7 The site coincides with ‘Northend Copse’ ancient woodland, as well as sections of ‘Jackson’s Pit’ and ‘Parson’s Withes’ ancient woodland, with further extents of deciduous woodland priority habitat also within the site boundary. The policy does not make any specific provisions to conserve and enhance these habitats. Although direct loss of the ancient

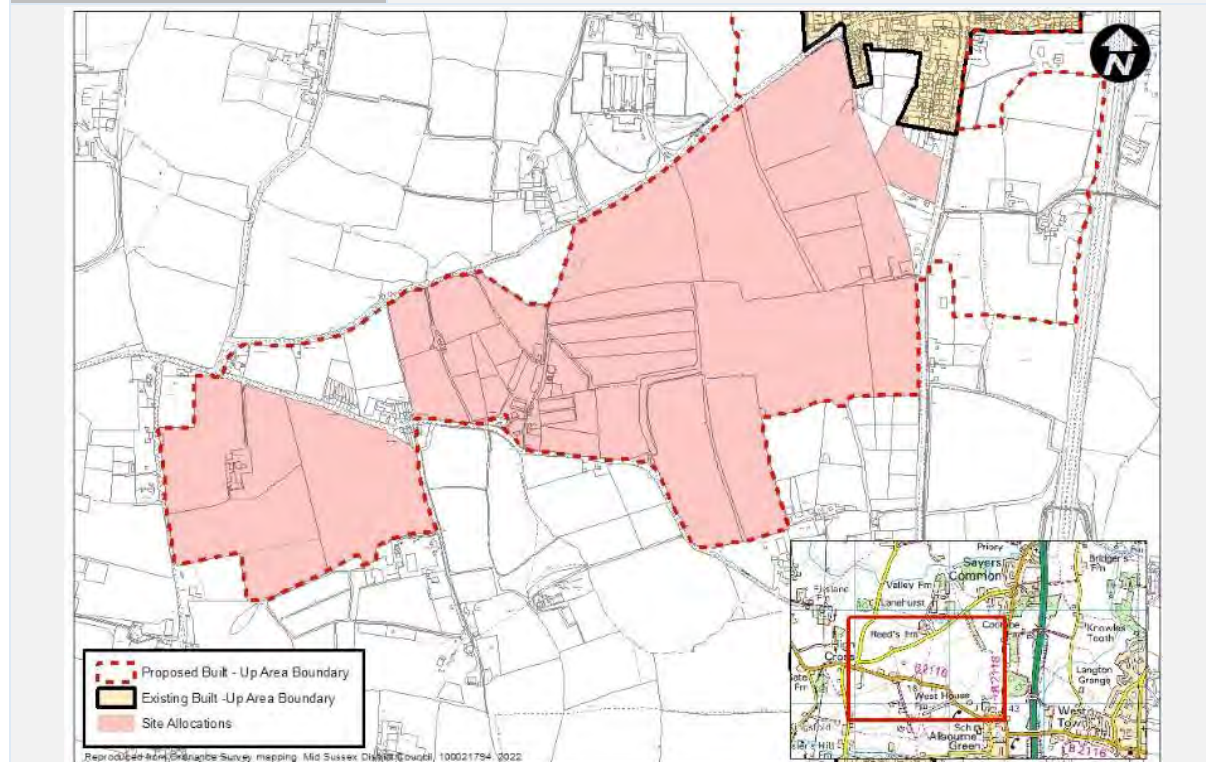
woodland would be resisted in accordance with other District Plan policies, the introduction of 1,400 new dwellings in proximity to these woodlands would be likely to introduce risks of increased disturbance or habitat degradation, with a minor negative impact on biodiversity overall (SA Objective 7).

- D.7.1.8 The east of the site is located within ‘West Burgess Hill Low Weald’ which has ‘high’ capacity, according to the Landscape Capacity Study¹²; however, the west of the site is located within ‘Cobb’s Mill Low Weald’ which has ‘low’ capacity. Policy DPSC1 seeks to incorporate “*Open space, sports pitches and village green*” within the new community, with green links and development informed by a comprehensive masterplan. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain owing to the large scale of development proposed.
- D.7.1.9 Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘low’ impact on nearby listed buildings. The policy requires “*Protection of setting of Grade II Listing Building at North End Farm to the west of the site*” which would help to inform appropriate mitigation measures, with a negligible impact expected overall for cultural heritage (SA Objective 9).
- D.7.1.10 A major negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 5, 6, 7, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

¹²Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at:
https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

D.7.2 Policy DPSC2: Land to the South of Reeds Lane, Sayers Common

DPSC1: Land to the South of Reeds Lane, Sayers Common			
SHELAA Ref:	799	Settlement:	Sayers Common
		Gross Site Area (ha):	88.5
Indicative Development Capacity			
Net Residential Dwellings	2,000 (approximately 1,850 to 2039)		
Employment	5,000 – 9,000sqm E Class		
Older Persons Accommodation	Proportion TBC		
Retail / Community	2,000 – 4,000sqm		
Gypsy and Traveller Provision	6 permanent pitches		
Infrastructure	On site:		
	<ul style="list-style-type: none"> • Extra Care housing provision • All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form • Playspace • Self-service Library • Leisure • Sustainable transport measures and provision • Healthcare provision • Community facilities 		
	Financial contributions towards the provision of:		
	<ul style="list-style-type: none"> • Sport facilities • Community buildings • Emergency services • Healthcare 		
	Provision of:		
	<ul style="list-style-type: none"> • Sustainable Transport measures and provision • Highways improvements 		



Policy Requirements

Land to the south of Reeds Lane, Sayers Common, as shown on the inset map, is allocated as an urban extension to Sayers Common. Development will be in accordance with a comprehensive masterplan to be agreed with the Council and provide:

- Approximately 2,000 new homes, 1,850 of which are within the Plan Period; including provision of extra care housing
- Neighbourhood centre with community facilities, locate extra care housing provision and transport hub nearby
- A new primary school
- Provision of land for employment uses
- Provision of new waste water treatment works on site
- Sustainable travel connections to Burgess Hill

This is in addition to the General Principles for Site Allocations set out in policy DPH4.

Opportunities to improve connectivity and masterplanning between the eastern and western parcels of the site, by inclusion of further land parcels on the southern boundary, should be investigated. Any extension to the site must ensure there is significant open space and landscaping on the southern boundary to ensure a gap between Sayers Common and Albourne, to maintain the separate identify of these settlements.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPSC2	++	+	++	++	+	--	0	-	-	0	-	0	+	++

D.7.2.1 Policy DPSC2 relates to Site 799, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.7.2.2 The policy sets out a range of on-site infrastructure and services that will be required alongside the proposed large-scale mixed-use development including a neighbourhood centre with community facilities and employment uses, to provide a co-ordinated and sustainable community. This includes provision of a new neighbourhood centre and sustainable transport measures with a new “*transport hub*” and “*Sustainable travel connections to Burgess Hill*”. These measures would be likely to improve sustainable travel choice and provide new facilities for the local community, reducing the need to travel. This would be expected to result in a benefit to transport and accessibility; although, owing to the large scale of proposed development and introduction of 2,000 new dwellings, it is likely that not all the needs of the community would be met on site, with some reliance on private car use and increased traffic on the surrounding road network to some extent. The policy

would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. A positive effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

- D.7.2.3 The policy seeks to “*improve connectivity*” which would be expected to include active travel provisions, and sets out a range of requirements for community infrastructure including on play space, leisure facilities, healthcare and community facilities, as well as financial contributions towards further community and sports facilities, healthcare and emergency services. The proposed development would also include an element of extra-care housing and seeks to create a new sustainable community. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and a major positive impact on community (SA Objective 4), through improving the provision of and access to healthcare, recreation and leisure facilities for the local community.
- D.7.2.4 The policy also states that the development should deliver an “*All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form*”. Therefore, the policy could potentially help to improve the provision of and access to primary and secondary schools in the local area to ensure that the educational needs of the development can be met, resulting in a major positive impact on education (SA Objective 3).
- D.7.2.5 The proposed sustainable travel improvements and new facilities may help to reduce transport-related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 2,000 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.
- D.7.2.6 The majority of the site is located within ‘Albourne Low Weald’ which has ‘low’ capacity. The site comprises a large area of agricultural / pastoral land situated between Sayers Common and High Cross. Policy DPSC2 states that development should be informed by a comprehensive masterplan and seeks to “*ensure there is significant open space and landscaping on the southern boundary to ensure a gap between Sayers Common and Albourne, to maintain the separate identify of these settlements*”. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain owing to the large scale of development proposed.
- D.7.2.7 There are no designated biodiversity sites or priority habitats within the site, although there are some nearby stands of ancient woodland. The provision of “*significant open space and landscaping*”, alongside requirements set out in other District Plan policies in relation to provision of ecological networks and GI, would help to minimise potential for adverse

impacts on biodiversity. Overall, and subject to no significant effects being identified in the HRA, the policy could potentially result in a negligible impact on biodiversity (SA Objective 7).

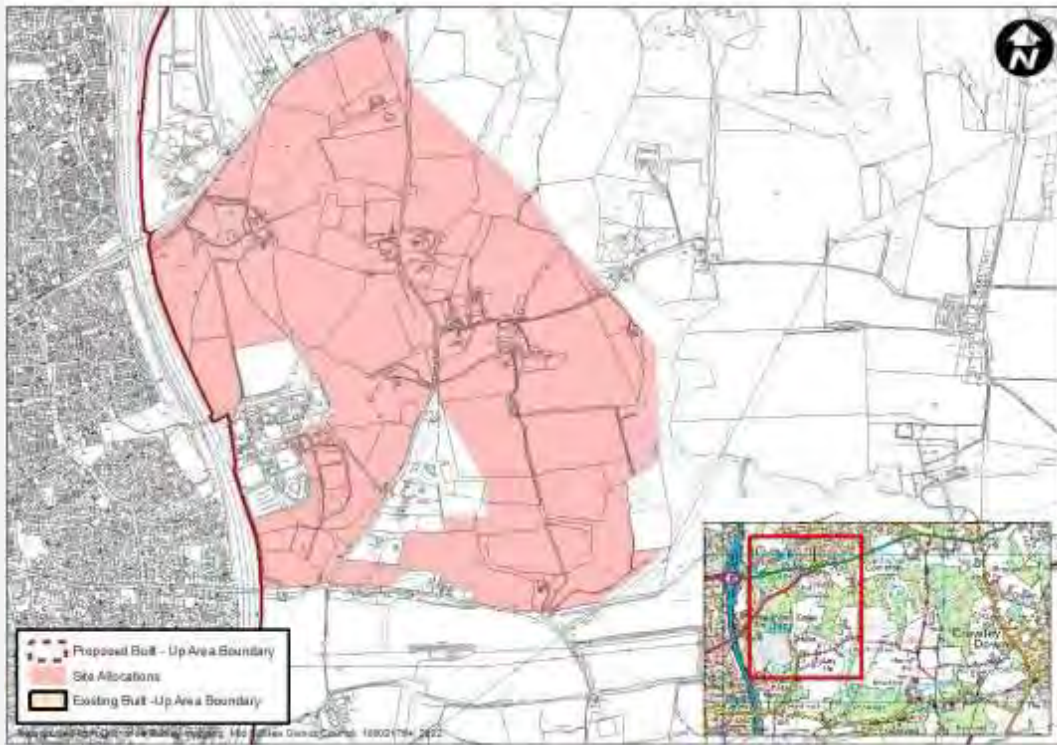
D.7.2.8 Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘high’ adverse impact on the Grade II Listed Building ‘Wellington Cottage’ and ‘mid-high’ impact on other nearby listed buildings including ‘West House Farmhouse’. The policy does not make any specific provisions in relation to these listed buildings, and, although the landscaping provisions may serve to reduce adverse effects on the historic character of the area to some extent, it is likely that the introduction of 2,000 dwellings would alter the rural setting to several listed buildings. A minor negative impact on cultural heritage would be expected (SA Objective 9).

D.7.2.9 A major negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 5, 6, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.7.3 Policy DPSC3: Land at Crabbet Park

DPSC3: Land at Crabbet Park			
SHELAA Ref:	18	Settlement:	Copthorne
		Gross Site Area (ha):	172
Indicative Development Capacity			
Net Residential Dwellings	2,300 (approximately 1,500 to 2039)		
Employment	TBC		
Older Persons Accommodation	Proportion TBC		
Retail / Community	TBC		
Gypsy and Traveller Provision	Provision of equivalent financial contribution towards off-site provision of pitches.		
Infrastructure	On site: <ul style="list-style-type: none"> • Extra Care housing provision • All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form • Playspace • Self-service Library • Leisure • Sustainable transport measures and provision • Healthcare provision • Community facilities Financial contributions towards the provision of: <ul style="list-style-type: none"> • Sport facilities • Community buildings • Emergency services • Healthcare Provision of: <ul style="list-style-type: none"> • Sustainable Transport measures and provision • Highways improvements 		

DPSC3: Land at Crabbet Park



Policy Requirements

Land at Crabbet Park, as shown on the inset map, is allocated for a mixed-use development. Development will be in accordance with a comprehensive masterplan to be agreed with the Council and provide:

- Approximately 2,300 new homes, 1,500 of which are within the Plan Period; including provision of extra care housing
- Provision of employment land to support local jobs
- Provision of a new primary school
- Neighbourhood centre with community facilities, locate extra care housing provision and transport hub nearby
- Improved linkages to cycling and walking network to improve sustainable transport routes to Three Bridges train station, Crawley Town Centre and areas of employment centre including links to the Worth Way.
- Mitigation of impact of the development on the AONB which lies to the south of the site.

This is in addition to the General Principles for Site Allocations set out in policy DPH4.

Policy Reference	1 Housing	2 Health & Wellbeing	3 Education	4 Community & Crime	5 Flooding	6 Natural Resources	7 Biodiversity	8 Landscape	9 Cultural Heritage	10 Climate Change & Transport	11 Energy & Waste	12 Water Resources	13 Economic Regeneration	14 Economic Growth
DPSC3	++	+	++	++	0	--	-	-	-	0	-	0	+	++

D.7.3.1 Policy DPSC3 relates to Site 18, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a

range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

- D.7.3.2 The policy sets out a range of on-site infrastructure and services that will be required alongside the proposed large-scale mixed-use development including community facilities and employment space, to provide a co-ordinated and sustainable community. This includes provision of a new neighbourhood centre and sustainable transport measures with a “*transport hub*” and “*Improved linkages to cycling and walking network to ... Three Bridges train station, Crawley Town Centre and areas of employment*”. These measures would be likely to improve sustainable travel choice and provide new facilities for the local community, reducing the need to travel. This would be expected to benefit transport and accessibility; although, owing to the large scale of proposed development and introduction of 2,300 new dwellings, it is likely that not all the needs of the community would be met on site, with some reliance on private car use and increased traffic on the surrounding road network to some extent. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. A positive effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.
- D.7.3.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. The policy sets out a range of requirements for community infrastructure, including on-site play space, leisure facilities and healthcare, as well as financial contributions towards further community facilities, sports, healthcare and emergency services. The proposed development would also include an element of extra-care housing. The policy would be likely to improve access to and provision of community and healthcare facilities, and seeks to create a new sustainable community, resulting in a major positive impact on SA Objective 4.
- D.7.3.4 However, the A2220 passes the site to the north, and the M23 to the west, with potential adverse implications for the health of site end users in proximity to these areas. In accordance with other District Plan policies, it is expected that the development would retain the existing tree belts alongside these roads. With careful design and layout, informed by masterplanning, and maintaining the tree buffers, it is anticipated that residential development would be directed away from this area and site end users would be protected from reduced air quality and noise pollution effects from the main roads. Overall, a minor positive impact on health and wellbeing (SA Objective 2) would be expected, owing to the proposed emphasis on active travel and the provision of new leisure and healthcare facilities.
- D.7.3.5 The policy states that the development should deliver an “*All-through school with 2FE at Primary and 4FE at Secondary, with or without Sixth Form*”. Therefore, the policy could potentially help to improve the provision of and access to primary and secondary schools in

- the local area to ensure that the educational needs of the development can be met, resulting in a major positive impact on education (SA Objective 3).
- D.7.3.6 The proposed sustainable travel improvements and new facilities, including active travel links, may help to reduce transport-related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 2,300 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.
- D.7.3.7 The site coincides with large areas of deciduous woodland priority habitat, as well as several stands of ancient woodland including: 'Drivers Wood', 'Burley's Wood', 'Old Hollow Wood', 'Brewhouse Wood', 'Hotel Wood', 'Layhouse Wood' and 'Compasses Wood'. The policy does not make any specific provisions to conserve and enhance these habitats. Although direct loss of the ancient woodland would be resisted in accordance with other District Plan policies, the introduction of 2,300 new dwellings in proximity to these woodlands would be likely to introduce risks of increased disturbance or habitat degradation, with a minor negative impact on biodiversity overall (SA Objective 7).
- D.7.3.8 The north west of the site is located within 'East Crawley-Copthorne Settled Woodland Matrix' and the south east within 'Rowfant High Weald', both of which have 'low' capacity, according to the Landscape Capacity Study¹³. Policy DPSC3 seeks to ensure "*Mitigation of impact of the development on the AONB which lies to the south of the site*" and ensure development is informed by a comprehensive masterplan. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain owing to the large scale of development proposed and potential impacts on the setting of the AONB.
- D.7.3.9 Heritage officer comments provided by the Council indicate that the development of the site could lead to a 'high' adverse impact on nearby listed buildings. This includes the Grade II Listed Building 'Ley House' within the site, and the adjacent 'Rowfant Mill' and 'Pear Tree House, Crabbet Park' as well as the Grade II* Listed Building 'Crabbet Park'. The policy does not make any specific provisions in relation to these listed buildings, and, although the masterplanning provisions may serve to reduce adverse effects on the historic character of the area to some extent, it is likely that the introduction of 2,300 dwellings would alter the rural setting to several listed buildings. A minor negative impact on cultural heritage would be expected (SA Objective 9).

¹³ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

- D.7.3.10 A major negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the large-scale loss of undeveloped land (including over 20ha of potential BMV land) as a result of the development. The findings for SA Objectives 1, 5, 6, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8 Housing

D.8.1 Policy DPH1: Housing

DPH1: Housing

The District’s Local Housing Need is 20,142 dwellings over the Plan Period.

Minimum Housing Need

The Housing Need will be met from the following sources:

Commitments (Existing allocations and Permissions)	10,786
Completions 2021/22	1,187
Sustainable Communities – Significant Sites	4,750
DPSC1: Land to West of Burgess Hill	1,400
DPSC2: Land to South of Reeds, Sayers Common	1,850
DPSC3: Land at Crabbet Park, Copthorne	1,500
Housing Sites DPH5 – DPH25	2,007
Windfall allowance	1,714
<i>Of which larger identifiable sites</i>	466
<i>Of which smaller and other non-identifiable sites</i>	1,248
Total Housing supply from 2021 - 2039	20,444
Mid Sussex Housing Need	20,142
Total under/over supply for resilience	+302

In order to minimise the pressure for additional housing development the net loss of residential dwellings will not be permitted unless there are specific circumstances that justify the loss.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH1	++	+/-	0	+/-	-	--	+/-	--	-	-	-	0	0	0

D.8.1.1 Policy DPH1 sets out the district’s local housing need over the Plan period, against the housing supply identified within the Plan, where the identified housing supply has exceeded minimum dwellings required by 302 dwellings. By surpassing the required housing need, the policy would be likely to ensure that there will be sufficient houses to meet the needs of current and future residents, and therefore a major positive impact on housing provision would be expected (SA Objective 1).

D.8.1.2 Additionally, through providing enough houses to meet the required need, the policy may help to facilitate delivery of a range of housing densities and types, offering more market choice, and residents may feel a sense of wellbeing where their needs can be met. However,

there is some uncertainty regarding the location of these sites in relation to existing healthcare and community facilities (SA Objectives 2 and 4).

D.8.1.3 At the time of writing this report, the potential impact of the proposed development on Habitats sites, such as Ashdown Forest SAC and SPA, is uncertain, and therefore uncertain impacts on biodiversity within this designated area (SA Objective 8) could be expected from the development of the sites associated with this policy. The emerging HRA will provide analysis of the likely impacts, the identification of impact pathways and mitigation measures.

D.8.1.4 The pre-mitigation assessments of the individual sites which contribute to this housing supply calculation have identified various potential constraints relating to their development, including: site end user exposure to surface water flooding; the use of large quantities of undeveloped land for construction; potential for adverse impacts on cultural heritage assets and landscape setting; increased traffic related GHG emissions and; increased energy usage. As such, potential major negative impacts have been identified for SA Objectives 6 and 8 and minor negative impacts have been identified for SA Objectives 5, 9, 10 and 11 for the housing provision stated within this policy. These findings are further outlined within **Appendix C**.

D.8.2 Policy DPH2: Sustainable Development – Outside the Built-Up Area

DPH2: Sustainable Development – Outside the Built-Up Area

Outside defined built-up area boundaries, as defined on the Policies Map, the expansion of settlements will be supported where it meets identified local housing, employment and community needs and:

1. The site is allocated in the District Plan, a Neighbourhood Plan or Development Plan Document or where the proposed development is for fewer than 10 dwellings; and
2. The site is contiguous with an existing built-up area of the settlement, as defined on Policies Maps; and
3. The development is demonstrated to be sustainable, including by reference to the settlement hierarchy, as set out in Table 2.

The developer will need to satisfy the Council that:

- The proposal does not represent an underdevelopment of the site with regard to Policy DPB1: Character and Design and Mid Sussex Design Guide SPD; or
- A large site is not brought forward in phases that individually meet the threshold but cumulatively does not.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH2	+	0	0	+	0	-	0	+	0	0	0	0	+	+

- D.8.2.1 Policy DPH2 sets out the criteria for supporting small-scale development outside of existing built-up areas where it meets identified local housing, employment and community needs. This policy will help to ensure that development within countryside areas is “*demonstrated to be sustainable*” and adheres to various other policies within the Plan, such as design specifications.
- D.8.2.2 This policy will be likely to help meet the housing requirement of the whole community, and could lead to a range of type, tenure and mix of homes within the district. Additionally, the policy will likely support requirements of smaller local developers or individuals seeking to build a house within the community, as sites must either be within the Local Plan, a Neighbourhood Plan or proposals of fewer than 10 dwellings. Therefore, a minor positive impact on housing provision could be expected (SA Objective 1). Additionally, through ensuring that sites are “*contiguous with an existing built-up area of the settlement*”, it may enhance community cohesion, and therefore a minor positive impact on community and crime (SA Objective 4) would be expected.
- D.8.2.3 Through ensuring development proposed for locations outside of built-up areas are guided by Policy DPH2, a minor positive impact on landscape (SA Objective 8) could be expected as proposals for small developments and adherence to design guides which would conserve or enhance the landscape setting would be supported.
- D.8.2.4 By supporting localised developments outside of built-up areas, a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14) could be expected where the developments themselves could provide local work for tradespeople and new residents may increase footfall for local businesses and provide more business, as well as potential for new residents to be employed locally.
- D.8.2.5 Development outside of built-up areas would likely be located on previously undeveloped land. As such, development proposals under this policy (although of a smaller scale) could potentially result in the loss of soil, to some extent; therefore, a minor negative impact on natural resources could result (SA Objective 6).

D.8.3 Policy DPH3: Sustainable Development – Inside the Built-Up Area

DPH3: Sustainable Development – Inside the Built-Up Area

With defined built-up area boundaries, as identified on Policies Maps, development will be permitted within towns and villages. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale with particular regard to DPB1: Character and Design and Mid Sussex Design Guide SPD.

In areas with good accessibility to shops and services or good public transport links that minimise the need to travel and/or reliance on private cars, there may be an opportunity to deliver a greater concentration of development.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH3	+	0	0	+	0	+	0	+	0	+	0	0	+	+

D.8.3.1 Policy DPH3 sets out the criteria for supporting development within built-up areas where it which will help to provide appropriate development within existing towns and villages and adheres to various other policies within the Plan, such as design specifications.

D.8.3.2 This policy will be likely to contribute towards meeting the housing requirement of local communities, and could lead to a range of type, tenure and mix of homes within the district due to the requirement to ensure development is of an appropriate scale and nature depending on the settlement in question. Additionally, the policy will likely support requirements of smaller local developers or individuals seeking to build a house within the community. Therefore, a minor positive impact on housing provision could be expected (SA Objective 1). Additionally, through supporting residential developments within the built-up areas, a greater sense of community cohesion could result, and it is likely that new development would be well located with respect to existing local services, and therefore a minor positive impact on the community and equality (SA Objective 4) would be expected.

D.8.3.3 Through ensuring development proposed for locations within built-up areas are guided by Policy DPB1 (Character and Design), a minor positive impact on landscape (SA Objective 8) could be expected as developments would be expected to adhere to design guides and would therefore likely conserve or enhance the landscape setting of the surroundings.

D.8.3.4 Policy DPH3 seeks to support a greater concentration of residential units within areas with “good accessibility to shops and services or good public transport links that minimise the need to travel and/or reliance on private cars”. Therefore, a minor positive impact on climate

change and transport (SA Objective 10) could be expected through potentially reducing the level of GHGs emitted from private cars and their subsequent impact on climate change.

D.8.3.5 By supporting localised developments within built-up areas, a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14) could be expected where construction of the developments themselves could provide local work for tradespeople and new residents may increase footfall for local businesses and provide more business, as well as potential for new residents to be employed locally.

D.8.3.6 Furthermore, through promoting development within existing settlements including infilling and redevelopment, Policy DPH3 could potentially help to encourage an efficient use of land and reduce the need to develop other greenfield locations. A minor positive impact on natural resources could therefore be expected (SA Objective 6).

D.8.4 Policy DPH4: General Principles for Housing Allocations

DPH4: General Principles for Housing Allocations

All housing allocations must be delivered in accordance with the development plan policies when read as a whole, and site-specific requirements set out in individual allocation policies:

- **Sustainable Communities: Significant Sites:** DPSC1 – DPSC3
- **Housing Allocations:** DPH5 – DPH25

In addition, all Significant Sites and Housing Allocations must:

Urban design principles

- Design sites in accordance with the Mid Sussex Design Guide SPD
- Design sites within the High Weald AONB in accordance with the **High Weald Housing Design Guide**.
- Provide a high degree of integration and connectivity between new and existing communities.
- Design new development at a density that is appropriate for the location.
- Make a positive contribution towards local character and distinctiveness.
- Create safe communities through appropriate design and layout that reduces the likelihood of crime and anti-social behaviour.

Landscape considerations

- Undertake Landscape and Visual Impact Assessment or Appraisal (LVIA) on any rural and edge of settlement sites. In the AONB the LVIA will utilise the AONB Management Plan components as landscape receptors. The LVIA will need to inform the site design, layout, capacity and any mitigation requirements.
- Provide a Landscape Strategy to identify how natural features on site have been retained and incorporated into the landscape structure and design of the site and informed the landscaping proposals for the site.
- Submit Arboricultural Impact Assessment and Arboricultural Method Statements for all sites where development will be within 5 metres of any trees.

Historic environment and cultural heritage

DPH4: General Principles for Housing Allocations

- Undertake pre-determination evaluation of potential archaeological features on the site prior to any planning application being submitted, unless it can be demonstrated that such an evaluation is not appropriate for this site. Appropriate mitigation may be required depending on the outcome of that evaluation.
- Respect listed buildings, conservation areas, scheduled monuments, the historic landscape, registered parks and gardens and their settings and look for opportunities to enhance or better reveal their significance. All heritage assets, including those that are undesignated, will need to be conserved and enhanced.
- Provide Heritage Impact Assessments, where appropriate, to establish the significance of heritage assets and their settings, the impact of development on this significance and, if appropriate, mitigation strategies.

Biodiversity and Green Infrastructure

- Carry out and submit habitat and species surveys at the earliest opportunity in order to inform the design and conserve important ecological assets from negative direct and indirect effects.
- Protect and enhance green infrastructure and corridors by ensuring built development avoids and integrates existing green infrastructure into the layout of the scheme, reinforcing and providing new connections to existing corridors to develop a connected network of multi-functional greenspace, including incorporating opportunities to contribute to strategic green infrastructure.
- Improve access to, and understanding of natural greenspace and nature conservation features, including recognising the importance and role of green infrastructure to the ecosystem, biodiversity, public rights of way, health and well-being, the water environment, community facilities and climate change. Green Infrastructure is to be incorporated with SuDS, where possible, to improve biodiversity and water quality.

Access and highways

- Provide a Transport Assessment and Sustainable Transport Strategy to identify appropriate mitigation and demonstrate how development will be accompanied by the necessary sustainable infrastructure to support it.
- Highway infrastructure mitigation is only considered once all relevant sustainable travel interventions (for the relevant local network) have been fully explored and have been taken into account in terms of their level of mitigation.
- Identify how the development will provide safe and convenient routes for walking and cycling through the development and linking with existing networks beyond. Create a permeable road network within the site with clearly defined route hierarchies.
- Safeguard Public Rights of Way (PRoW) and protect their amenity.

Flood risk and drainage

- Provide a site-specific Flood Risk Assessment (FRA)/surface water drainage strategy in areas at risk from fluvial or surface water flooding to inform the site layout and any appropriate mitigation measures that may be necessary. Areas at risk of flooding should be avoided in the first instance.
- Undertake a sequential approach to site layout by avoid developing areas at risk of flooding including climate change allowance.

Utilities

DPH4: General Principles for Housing Allocations

- Liaise with water, gas and electricity providers to ensure that appropriate works are carried out in a timely manner to support development, if needed.

Contaminated Land

- Investigate any potential land contamination from present or historical on site or adjacent land uses.

Minerals Safeguarding

- Consult with West Sussex County Council regarding any applications for development in a Minerals Safeguarding Zone or Consultation Area and address the requirements of Policy M9 West Sussex Joint Minerals Local Plan – 2018.

Aerodrome Safeguarding Requirements

- Ensure that proposed development on this site does not impact on the safe operation of Gatwick Airport. The following must be taken into consideration:
 - Impact of buildings & structures on navigational aids & instrument flight procedures
 - Schemes that contain large areas of landscaping, water bodies including SUDS schemes, buildings with large areas of flat/shallow pitched roofs and waste & recycling sites could attract birds in large numbers which could increase the bird strike risk to the airport
 - Large and/or coloured lighting schemes close to the airport
 - Wind turbines or large areas of solar panels

In addition, all Significant Site must:

- Deliver a development which will support a vibrant and inclusive community which embodies the 20-minute neighbourhood principles of a complete, compact, and well-connected neighbourhood, with advanced digital infrastructure, in which people can meet the majority of their daily needs within a short walk or cycle ride and opportunities to include food growing areas are taken.
- Deliver a layout which accords with Chapter 4 of the Mid Sussex Design Guide SPD and is designed from the concept stages to prioritise sustainable and active modes of travel, providing safe and convenient routes for walking and cycling through the development and linking with existing and enhanced networks beyond.
- Deliver a landscape led approach to the master planning of the development, ensuring on site green infrastructure assets are protected and enhanced, and provides connectivity to wider green infrastructure networks;
- Secure a minimum biodiversity net gain of 20% to be demonstrated through a Biodiversity Gain Plan which sets out how net gains for biodiversity will be achieved, secured and managed appropriately taking into account the Council's objectives and priorities for biodiversity net gain and nature recovery;
- Provide a suitable mix of housing including affordable housing, older persons and extra care accommodation and self-build plots;
- Provision of permanent pitches, or equivalent financial contribution towards off-site provision for Gypsies and Travellers who travel to contribute towards the total identified need within the District commensurate with the overall scale of residential development proposed by the significant site development;

DPH4: General Principles for Housing Allocations

- Provision of Use Class C2 Extra Care and older person specialist accommodation towards the total identified need within the District commensurate with the overall scale of residential development proposed by the significant site development.
- Provide land for employment uses, unless it is demonstrated that there is not demand for employment land at that location;
- Submit an Employment and Skills Plan with the planning application to secure improvements to the skills of local people and to enable them to take advantage of the resulting employment opportunities;
- Provide public transport, walking and cycling infrastructure to nearby settlements that provide higher order service and transport interchanges;
- Provide necessary transport improvements that take account of the wider impact of the development;
- Meet at least 4* rating of the BRE Home Quality Mark (HQM) with a minimum score of 55 credits in the energy category; and
- Meet a maximum water consumption standard of 85 litres per person per day (including external water use) to minimise the impact of the development on water resources and water quality. Rainwater harvesting and greywater recycling measures should be incorporated into the development as well as using water efficient fittings and appliances. Water neutral developments will be encouraged where this is possible.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH4	++	++	+	++	++	+	++	++	++	++	++	++	+	+

D.8.4.1 Policy DPH4 sets out the general principles for housing allocations and covers a wide range of topics for development proposals to adhere to in order to be supported by the Plan. The policy regards the following topics: urban design; landscape; historic environment and cultural heritage; biodiversity and GI; access and highways; flood risk and drainage; utilities; contaminated land; minerals safeguarding; and aerodrome safeguarding requirements, amongst further criteria for Significant Sites to meet.

D.8.4.2 This policy outlines requirements across a range of topics which would help to provide sustainable resolutions, through allocations of sites, to various issues faced by the district including providing the housing need for an ageing population, promoting healthy lifestyles and reducing fear of crime within the community. Additionally, the policy has a recurring theme of preparedness for the future, with climate change posing various threats regarding flood risk, water resources and human health, for example. The policy seeks to ensure new developments within Significant Sites reach 4* rating of the BRE Home Quality Mark and meet water consumption standard of 85 litres per person per day. It is expected that through this policy and the context within, major positive impacts on the following topics could be

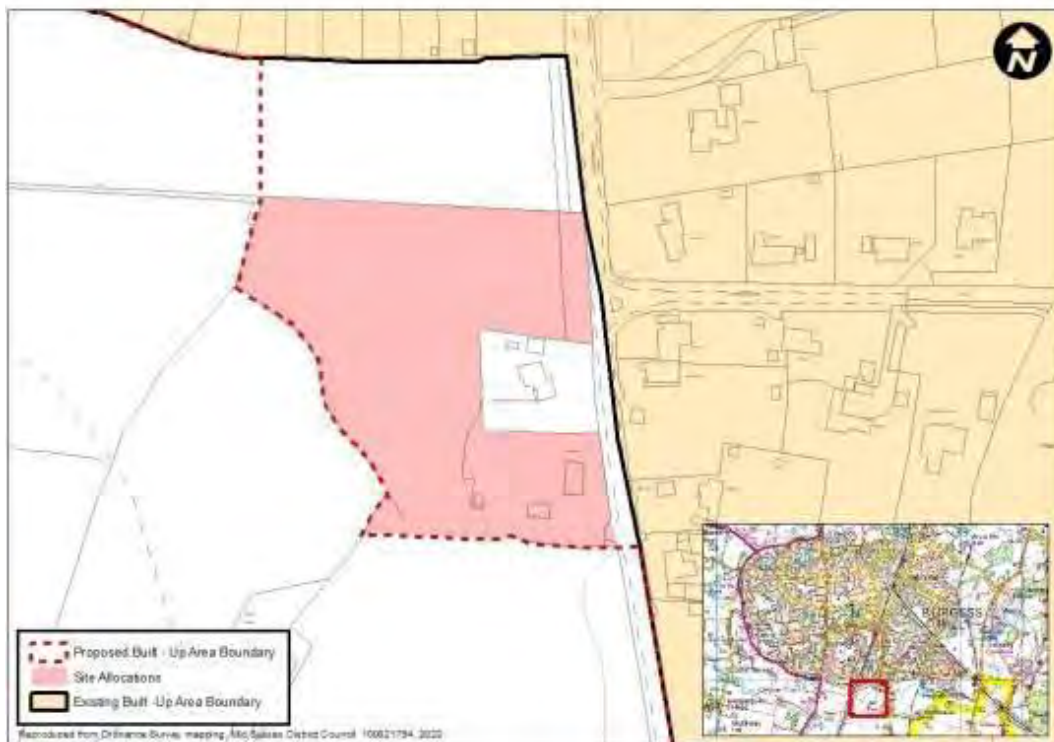
expected: housing; health and wellbeing; community and crime; flooding; biodiversity; landscape; cultural heritage; climate change and transport; energy and waste and water resources (SA Objectives 1, 2, 4, 5, 7, 8, 9, 10, 11 and 12).

D.8.4.3 The policy outlines various requirements for Significant Sites, including the requirement to provide new and/or improved educational facilities. Policy DPH4 also states that Significant Sites must provide access to sustainable infrastructure, such as public transport and active transport links, in addition to good connectivity between settlements within the Mid Sussex District. These developments must also “*submit an Employment and Skills Plan ... to secure Improvements to the skills of local people*”. Therefore, there will likely be benefits on education and the economy through improved access to employment opportunities, facilities and services located within centres throughout the district. A minor positive impact on education (SA Objective 3) and economic regeneration and growth (SA Objectives 13 and 14) could be expected.

D.8.4.4 This policy seeks to “*investigate any potential land contamination from present or historical on site or adjacent land uses*” and to ensure that any allocated development sites within Minerals Safeguarding Zones or a Consultation Areas consult with West Sussex County Council and also address requirements as set out within the West Sussex Joint Minerals Plan (2018), with likely benefits for the conservation of natural resources. A minor positive impact on natural resources could therefore be expected (SA Objective 6).

D.8.5 Policy DPH5: Batchelors Farm, Keymer Road, Burgess Hill

Policy DPH5: Batchelors Farm, Keymer Road, Burgess Hill			
SHELAA:	573	Settlement:	Burgess Hill
Gross Site Area (ha):	1.5	Number of Dwellings:	33
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Transport Provision of: <ul style="list-style-type: none"> • Highway works • Sustainable Transport measures 		



Policy Requirements

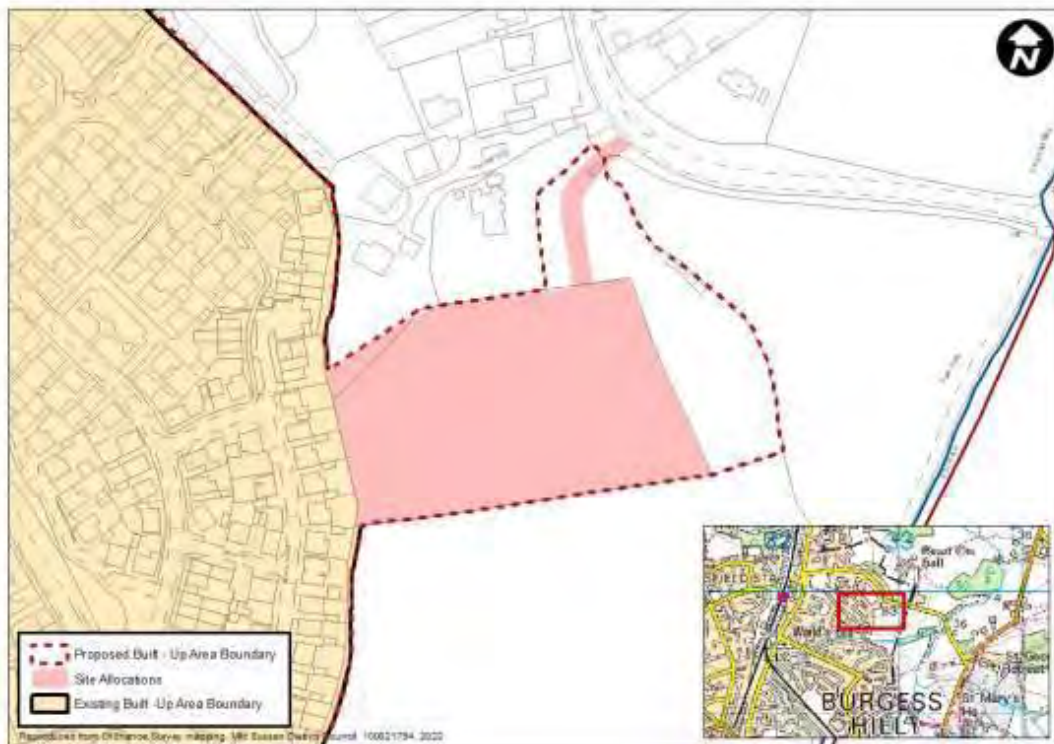
- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Prioritise cycle and pedestrian connections throughout the site with direct links to the Batchelors Farm Nature Reserve to the west.
- Provide suitable access from Keymer Road.
- Retain, protect and enhance mature trees across the whole site and hedgerows along the boundaries and ensure development provides a positive edge to these features and the wider countryside.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH5	+	+	++	+	+	-	0	0	0	0	0	0	0	+

- D.8.5.1 Policy DPH5 relates to Site 573, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.
- D.8.5.2 Provision of sustainable transport measures on site would be expected to improve travel choice, with the policy requiring development proposals to “*prioritise cycle and pedestrian connections*”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.
- D.8.5.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to recreation and leisure facilities for the local community.
- D.8.5.4 Policy DPH5 also sets out to “*Retain, protect and enhance mature trees across the whole site and hedgerows along the boundaries and ensure development provides a positive edge to these features and the wider countryside*”, which may help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.
- D.8.5.5 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 3, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8.6 Policy DPH6: Land at Brow Hill, Janes Lane, Burgess Hill

Policy DPH6: Land at Brow Hill, Janes Lane, Burgess Hill			
SHELAA:	1030	Settlement:	Burgess Hill
Gross Site Area (ha):	1.2	Number of Units:	25
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Transport Provision of: <ul style="list-style-type: none"> • Highway works • Sustainable Transport measures 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Prioritise cycle and pedestrian connections throughout the site and onto Janes Lane.
- Provide suitable access from Janes Lane which avoids loss of mature trees.
- Retain, protect and enhance mature trees across the whole site and hedgerows along the boundaries and ensure development provides a positive edge to these features and the wider countryside.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH6	++	+	+	+	+	-	0	0	0	0	0	0	0	+

D.8.6.1 Policy DPH6 relates to Site 1030, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.6.2 The policy requires financial contributions towards various community facilities and infrastructure, including education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

D.8.6.3 The site is located on the edge of Burgess Hill, which has a good range of services and public transport options, including a train station. Provision of sustainable transport measures on site would be expected to improve travel choice, with the policy requiring development proposals to “*prioritise cycle and pedestrian connections throughout the site and onto Janes Lane*”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services via walking or cycling, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

D.8.6.4 The policy seeks to encourage active travel, which may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and improve the provision of and access to recreation and leisure facilities for the local community (SA Objective 4), which is already assessed positively.

D.8.6.5 The site is located within ‘Lunce Low Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study¹⁴. Policy DPH6 sets out to “*Retain, protect and enhance mature trees across the whole site and hedgerows along the boundaries and ensure development provides a positive edge to these features and the wider countryside*”, which may help to reduce adverse effects on the surrounding landscape character. By retaining the hedgerows which surround the site, and assuming new development would be in keeping with the existing adjacent housing development, it is anticipated that there could be a negligible impact overall for landscape (SA Objective 8).

D.8.6.6 These measures could also help to retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.

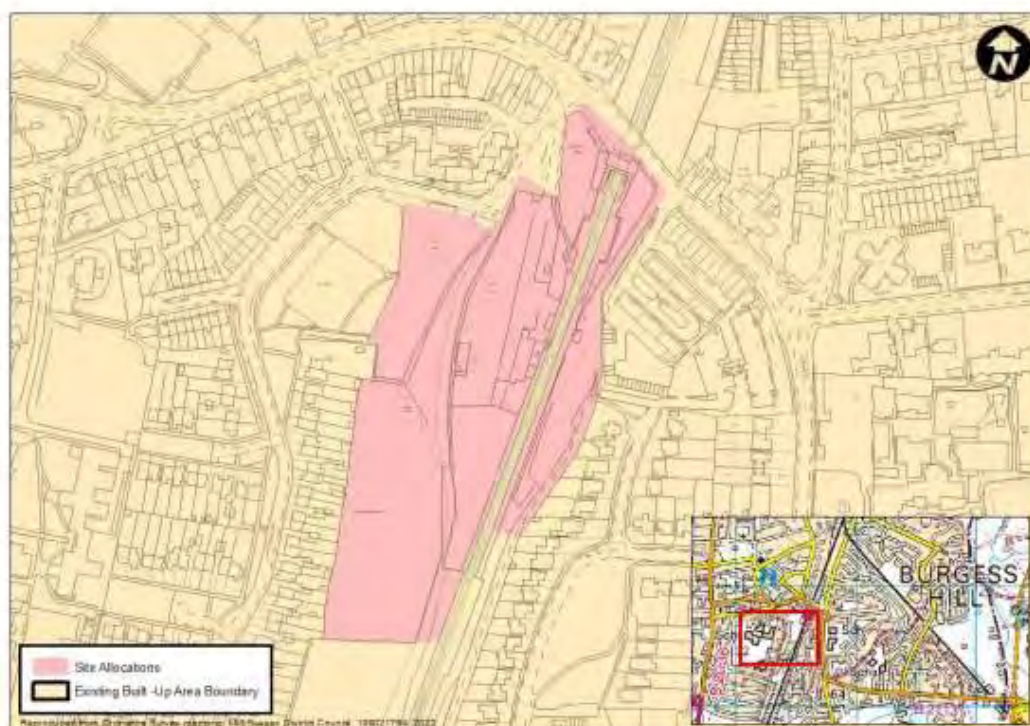
D.8.6.7 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 4, 5, 6, 7, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8.7 Policy DPH7: Burgess Hill Station, Burgess Hill

Policy DPH7: Burgess Hill Station, Burgess Hill			
SHELAA:	1123	Settlement:	Burgess Hill
Gross Site Area (ha):	3.5	Number of Units:	300
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Transport • Healthcare • Emergency services Provision of: <ul style="list-style-type: none"> • Sustainable Transport measures 		

¹⁴Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

Policy DPH7: Burgess Hill Station, Burgess Hill



Policy Requirements

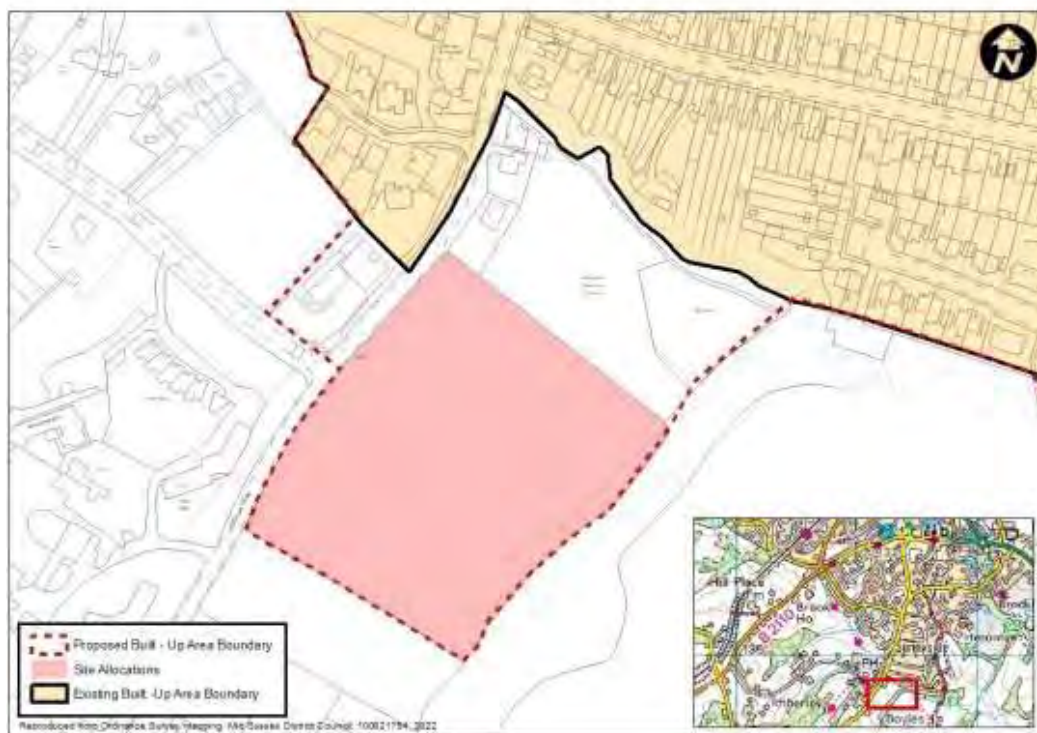
- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Masterplan a comprehensive redevelopment scheme which takes account of the principles of Neighbourhood Plan Policy TC5 The Station Quarter, delivering attractive and accessible mixed use development and transport mobility hub, creating a new gateway development to Burgess Hill.
- Optimise use of the site by delivering a high density, sustainable development which has a strong sense of place, focused on high quality open space and carefully landscaped public realm, providing an appropriate setting for the scale of development.
- Orientate development positively to address existing open space at Queens Crescent Park along with any proposed areas of open space.
- In consultation with the Local Planning Authority, address requirements for children's equipped playspace, either on-site, and/or by financial contribution to upgrade existing facilities at Queen's Crescent Playground.
- Create a mobility hub which prioritises sustainable and active travel links throughout the development establishing a permeable layout with safe links to the wider network, taking account of the Place & Connectivity Programme and LCWIP.
- Provide secure and conveniently located cycle parking facilities and ensure car parking well designed to ensure it does not dominate the streetscape.
- Support will be given for appropriately located and designed delivery lockers.
- Provide evidence of suitable re-provision of the allotment space and/or justification for any reduction in the provision to the satisfaction of the Local Planning Authority.
- Provide suitable design and necessary mitigation for noise associated with the use and operation of the railway and station.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH7	++	++	++	++	+	+	0	+	0	++	-	0	++	+

- D.8.7.1 Policy DPH7 relates to Site 1123, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.
- D.8.7.2 The policy requires consideration of new children’s equipped playspace and allotment space, as well as financial contributions towards various community facilities and infrastructure, including play space, sports facilities, education and emergency facilities, which would be likely to benefit SA Objectives 2, 3 and 4. These objectives were already assessed positively owing to the site’s location with respect to existing facilities and the effects of other policies.
- D.8.7.3 Policy DPH7 promotes the delivery of an *“attractive and accessible mixed use development and transport mobility hub, creating a new gateway development to Burgess Hill”* with use of a masterplan. These measures would be likely to improve the local townscape character and strengthen sense of place, leading to a minor positive impact on landscape (SA Objective 8).
- D.8.7.4 The policy also sets out a range of travel improvements, including the requirement to *“Create a mobility hub which prioritises sustainable and active travel links throughout the development establishing a permeable layout”*. The emphasis on sustainable travel links, in combination with the site’s location adjacent to Burgess Hill Station, provides a likelihood of reducing transport-related GHG emissions and encouraging a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 300 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.
- D.8.7.5 The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.
- D.8.7.6 The findings for SA Objectives 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13 and 14 are unchanged from the post-mitigation site assessment.

D.8.8 Policy DPH8: Land off West Hoathly Road, East Grinstead

Policy DPH8: Land off West Hoathly Road, East Grinstead			
SHELAA:	198	Settlement:	East Grinstead
Gross Site Area (ha):	1.8	Number of Dwellings:	Up to 45
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Play space • Sports facilities • Ashdown Forest SPA and SAC mitigation measures • Community buildings • Library • Education Provision of: <ul style="list-style-type: none"> • Sustainable Transport measures • Highway works 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable access from West Hoathly Road.
- Provide a footpath link to East Grinstead along West Hoathly Road.
- Take a landscape-led approach to development.
- Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB.
- Take into account the objectives of the High Weald AONB Management Plan, the High Weald Housing Design Guide and the Colour Study.
- Take account of the surrounding settlement pattern and character in the design and layout of the site in order to conserve and enhance the High Weald AONB.
- Provide an appropriate buffer for the ancient woodland to the east of the site in line with Policy DPN4.

Policy DPH8: Land off West Hoathly Road, East Grinstead

- Retain and enhance mature trees/ hedgerows on site boundaries.
- Provide parkland as part of the development and a link to Sunnyside Recreation Ground.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH8	+	+	+	+	+	-	0	-	0	0	0	0	0	+

D.8.8.1 Policy DPH8 relates to Site 198, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.8.2 The policy sets out the requirement for a new parkland and link to Sunnyside Recreation Ground, as well as a “*footpath link to East Grinstead along West Hoathly Road*”, which would be likely to improve accessibility and may encourage active travel for local journeys. Further financial contributions are required in relation to range of community and leisure facilities including sports facilities and play space. These measures would help to improve the provision of and access to community facilities, and encourage exercise and recreation, with a minor positive impact anticipated on health and wellbeing and the local community (SA Objectives 2 and 4).

D.8.8.3 The improvements to the local pedestrian network, alongside the proposed “*sustainable transport measures*” would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

D.8.8.4 Furthermore, the policy requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

D.8.8.5 Landscape officer comments provided by the Council indicate that the development of the site could lead to a ‘moderate’ adverse impact on High Weald AONB, due to the loss of a medieval field system and may have adverse impacts on the surrounding settlement pattern.

The site is also located within ‘Sunnyside High Weald’ which has ‘negligible / low’ capacity, according to the Landscape Capacity Study¹⁵. Policy DPH8 requires an LVIA to be undertaken to “*inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB*”, as well as ensuring that development proposals take into account the objectives of the High Weald AONB Management Plan, the High Weald Housing Design Guide and the Colour Study. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.

D.8.8.6 The site is located adjacent to ‘Rockingshill Wood’ ancient woodland and coincides with deciduous woodland along the south eastern site edge. The policy seeks to ensure that the development provides “*an appropriate buffer for the ancient woodland to the east of the site in line with Policy DPN4*” and states that the mature trees/ hedgerows on site boundaries should be retained and enhanced. These measures would be likely to reduce the potential for adverse effects on the ancient woodland and priority habitat. The site also lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected overall.

D.8.8.7 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8.9 Policy DPH9: Land at Hurstwood Lane, Haywards Heath

Policy DPH9: Land at Hurstwood Lane, Haywards Heath			
SHELAA:	858	Settlement:	Haywards Heath
Gross Site Area (ha):	1.8	Number of Units:	45
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Transport Provision of: <ul style="list-style-type: none"> • Sustainable transport measures • Green infrastructure to neighbouring allocated site 		

¹⁵ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

Policy DPH9: Land at Hurstwood Lane, Haywards Heath



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Integrate development with the site to the south (DPH10) and the wider Hurst Farm development (the Haywards Heath Neighbourhood Plan allocation) such as through the design of the site layout and by providing pedestrian and cycling connections between the developments, green infrastructure and ecological corridors.
- Provide access to integrate with the wider Hurst Farm development (the Haywards Heath Neighbourhood Plan allocation).
- Respect and retain the rural character of Hurstwood Lane.
- Retain the trees and ground levels along Hurstwood Lane (which forms the western boundary of the site) and in the western part of the site.
- Measures will be necessary to mitigate the impact of development on the landscape character of the surrounding area, including a landscape buffer on the eastern site boundary
- Provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west of the site, including ecological corridors.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH9	+	+	+	0	+	-	0	0	0	0	0	0	0	+

D.8.9.1 Policy DPH9 relates to a section of Site 858 (the portion of the site which lies within Mid Sussex District), which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-

- specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.
- D.8.9.2 The policy states that “*sustainable transport measures*” and improved active travel links should be provided, including “*providing pedestrian and cycling connections between the developments*” as part of the wider Neighbourhood Plan allocation. These measures would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services as well as the site’s location on the periphery of Haywards Heath, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.
- D.8.9.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) through improving the provision of and access to recreation and leisure facilities.
- D.8.9.4 Further benefits would be likely in relation to the local community through the outlined financial contributions; however, the site is located outside of sustainable travel times to existing community facilities and may restrict sustainable travel choices to facilities to some extent. The policy would be expected to reduce the potential for negative effects associated with the community, with a negligible impact recorded overall for SA Objective 4.
- D.8.9.5 The policy requires financial contributions towards education. The proposed active travel links within Policy DPH9 may also help to provide sustainable access to the proposed new school in the adjacent Hurst Farm allocation within the Haywards Heath Neighbourhood Plan¹⁶. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).
- D.8.9.6 The site is near to several stands of ancient woodland, including ‘Hursthouse Lane Wood’ to the north, and ‘Hurst Wood’ and ‘Cleave Water Wood’ to the south, across Colwell Lane. The site also coincides with a small section of deciduous woodland priority habitat, in the south eastern corner. Policy DPH9 sets out the requirement for enhanced GI, to “*Retain the trees and ground levels along Hurstwood Lane*” and to “*Provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west*”

¹⁶ Haywards Heath Town Council (2016) Haywards Heath Town Council Neighbourhood Plan 2014-2031: Our Bright Future, December 2016. Available at: <https://www.midsussex.gov.uk/media/2801/haywards-heath-neighbourhood-plan.pdf> [Date Accessed: 18/10/22]

of the site, including ecological corridors”. These measures would be likely to reduce the potential for adverse effects on the ancient woodland and priority habitat. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected overall.

D.8.9.7 The site is located within ‘Haywards Heath South-eastern Fringe’ which has ‘low’ capacity, according to the Landscape Capacity Study¹⁷. Further to the provision of an “*appropriate transition*” into the countryside, the policy states that “*Measures will be necessary to mitigate the impact of development on the landscape character of the surrounding area, including a landscape buffer on the eastern site boundary*”. Although there may be a change in the landscape character to some extent due to the proposed development, these measures would be anticipated to reduce adverse impacts on the landscape character, with a negligible impact overall for landscape (SA Objective 8).

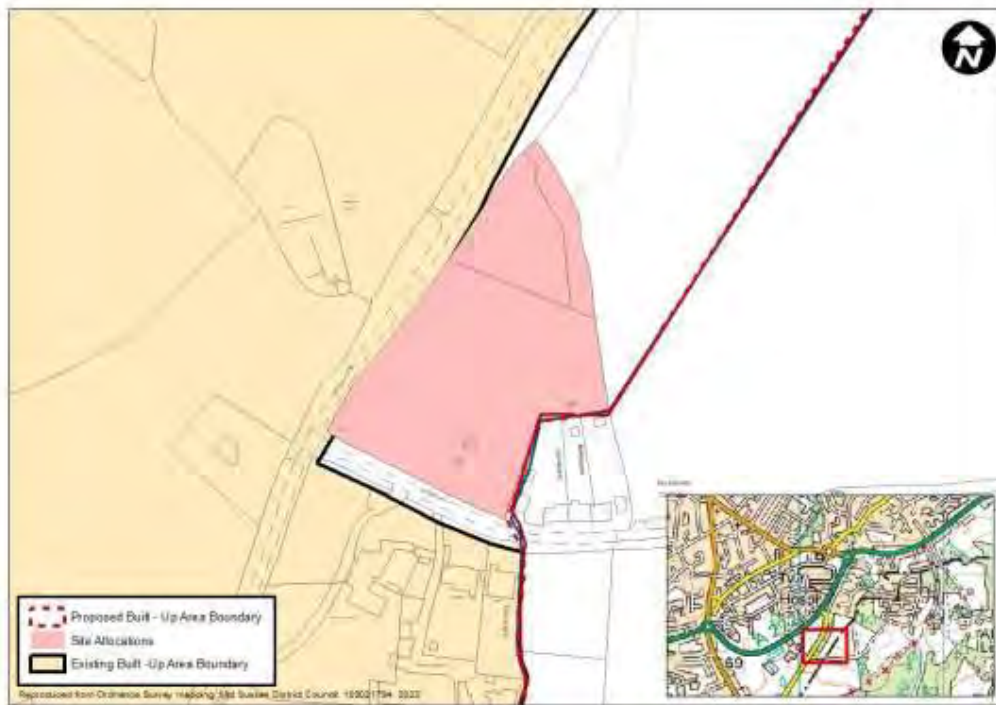
D.8.9.8 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The findings for SA Objectives 1, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8.10 Policy DPH10: Land at Junction of Hurstwood Lane and Colwell Lane

Policy DPH10: Land at Junction of Hurstwood Lane and Colwell Lane			
SHELAA:	508	Settlement:	Haywards Heath
Gross Site Area (ha):	1	Number of Units:	30
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Transport Provision of: <ul style="list-style-type: none"> • Sustainable transport measures • Green infrastructure to neighbouring allocated site 		

¹⁷ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

Policy DPH10: Land at Junction of Hurstwood Lane and Colwell Lane



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Integrate development with the site to the north (DPH9) and the wider Hurst Farm development (the Haywards Heath Neighbourhood Plan allocation) such as through the design of the site layout and by providing pedestrian and cycling connections between the developments, green infrastructure and ecological corridors.
- Provide access to integrate with the wider Hurst Farm development (the Haywards Heath Neighbourhood Plan allocation).
- Respect and retain the rural character of Hurstwood Lane.
- Retain the trees and ground levels along Hurstwood Lane which forms the western boundary of the site.
- Retain the trees on the site boundaries to provide a landscape buffer to the wider countryside.
- Measures will be necessary to mitigate the impact of development on the landscape character of the surrounding area.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH10	+	+	+	+	+	-	0	0	0	0	0	0	+	+

D.8.10.1 Policy DPH10 relates to Site 508, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further

- improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.
- D.8.10.2 The policy outlines required improvements to travel choice, including provision of pedestrian and cycling connections and “*sustainable transport measures*”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10.
- D.8.10.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to recreation and leisure facilities for the local community.
- D.8.10.4 The policy requires financial contributions towards education. The proposed active travel links within Policy DPH9 may also help to provide sustainable access to the proposed new school in the adjacent Hurst Farm allocation within the Haywards Heath Neighbourhood Plan¹⁸. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).
- D.8.10.5 Policy DPH10 states that the development should “*Retain the trees on the site boundaries to provide a landscape buffer to the wider countryside*” and incorporate green infrastructure and ecological corridors. These measures may help to retain and enhance biodiversity assets. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.
- D.8.10.6 The site is located within ‘Haywards Heath South-eastern Fringe’ which has ‘low’ capacity, according to the Landscape Capacity Study¹⁹. Policy DPH10 seeks to ensure that the development integrates well with the adjacent allocation DPH9 and states that “*Measures will be necessary to mitigate the impact of development on the landscape character of the surrounding area*”. The site is relatively small-scale and enclosed by trees, and the policy advocates to “*Retain the trees on the site boundaries to provide a landscape buffer to the wider countryside*”. Although there would be a change in the landscape character to some extent due to the proposed development, by retaining the trees which surround the site it is

¹⁸ Haywards Heath Town Council (2016) Haywards Heath Town Council Neighbourhood Plan 2014-2031: Our Bright Future, December 2016. Available at: <https://www.midsussex.gov.uk/media/2801/haywards-heath-neighbourhood-plan.pdf> [Date Accessed: 18/10/22]

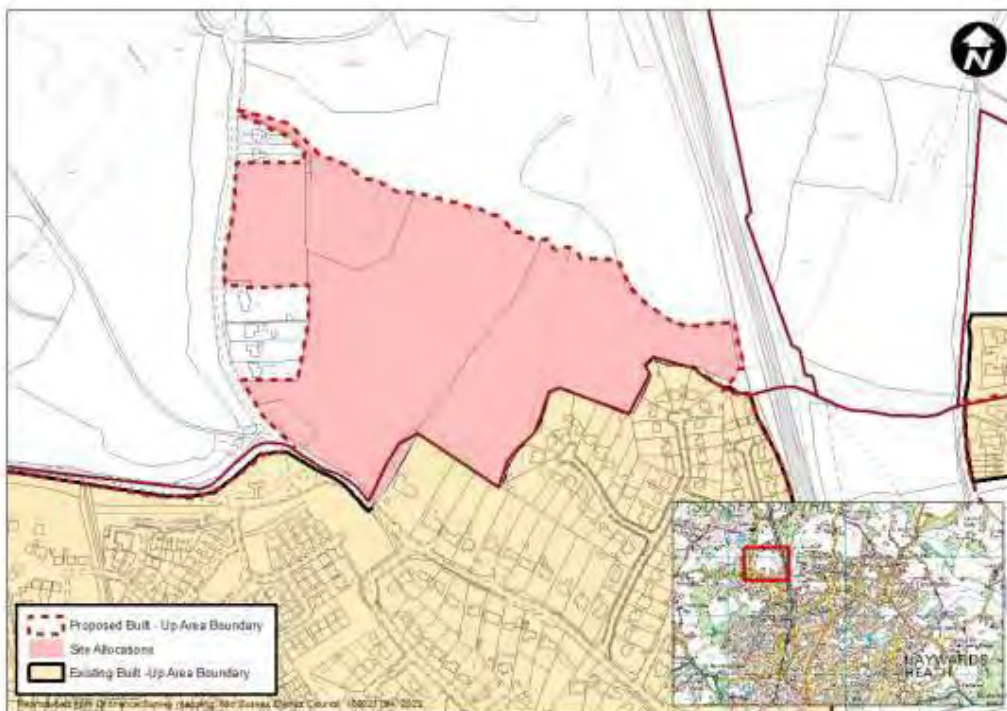
¹⁹ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).

D.8.10.7 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The findings for SA Objectives 1, 5, 6, 9, 11, 12, 13 and 14 are unchanged from the post-mitigation site assessment.

D.8.11 Policy DPH11: Land east of Borde Hill Lane, Haywards Heath

Policy DPH11: Land east of Borde Hill Lane, Haywards Heath			
SHELAA:	556	Settlement:	Haywards Heath
Gross Site Area (ha):	10.5	Number of Units:	60
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing • Playspace Financial contributions towards the provision of: <ul style="list-style-type: none"> • Sports facilities • Community buildings • Library • Education • Sustainable Travel and/or Highways Improvements • Health care • Emergency Services Provision of: <ul style="list-style-type: none"> • Highway works • Sustainable transport measures 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan

Policy DPH11: Land east of Borde Hill Lane, Haywards Heath

Housing Allocations

- Provide suitable vehicular, pedestrian and cycle access from Borde Hill Lane via fourth arm from roundabout, south west of site.
- Roundabout to be enlarged and positioned to allow safe movement of road users and provision of new dropped kerbs and tactile paving on southern approach, in agreement with the Highways Authority.
- Contain development to central and eastern parts of site to reduce potential impacts on setting on High Weald AONB (to be informed by an LVIA).
- An Archaeological Impact Assessment and mitigation will be required
- Provide appropriate mitigation to address the potential impact on nearby Grade II listed building ‘South Lodge’. The mitigation strategy should be informed by a Heritage Impact Assessment.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH11	+	+	+	+	0	-	-	-	0	0	0	0	0	+

D.8.11.1 Policy DPH11 relates to Site 556, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.11.2 Provision of sustainable transport measures would be expected to improve travel choice, with the policy requiring development proposals to “provide suitable vehicular, pedestrian and cycle access”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

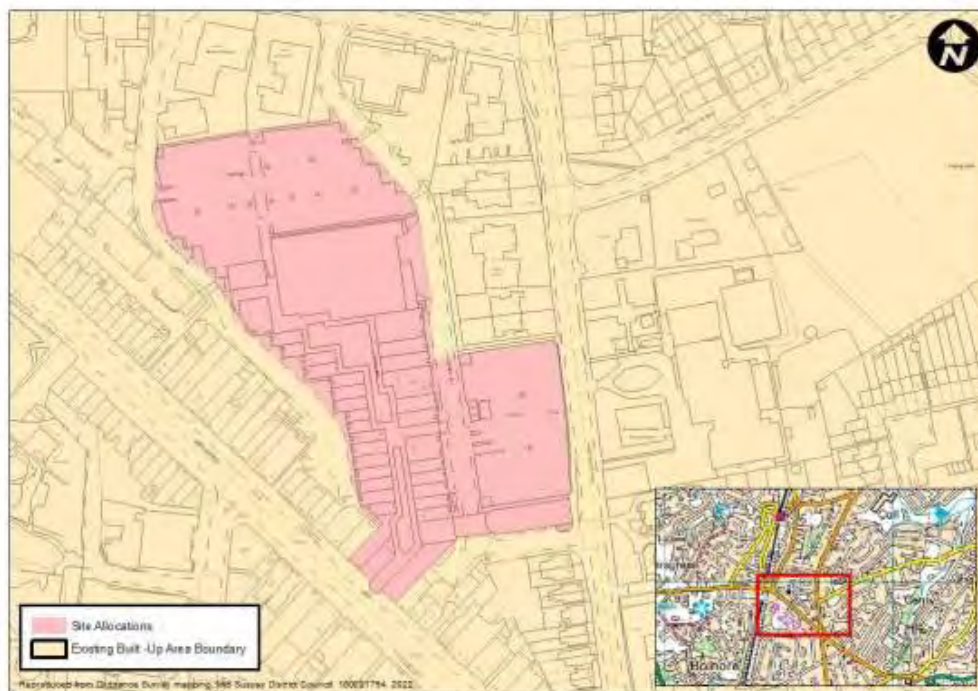
D.8.11.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Additionally, the policy requires delivery of new play space on site, as well as contributions towards sports facilities and other community infrastructure improvements. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) through improving the provision of and access to recreation and leisure facilities.

- D.8.11.4 Furthermore, the policy requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).
- D.8.11.5 The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. A large proportion of the site coincides with good quality semi-improved grassland priority habitat which would be lost and/or degraded as a result of the proposed development. A minor negative impact on biodiversity would be expected (SA Objective 7).
- D.8.11.6 The site is located within ‘Horsgate High Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study²⁰. Policy DPH11 states that the proposal should “*Contain development to central and eastern parts of site to reduce potential impacts on setting on High Weald AONB (to be informed by an LVIA)*”. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.
- D.8.11.7 Policy DPH11 requires the development to “*Provide appropriate mitigation to address the potential impact on nearby Grade II listed building ‘South Lodge’*” informed by a Heritage Impact Assessment. This may also help to inform appropriate and comprehensive mitigation for effects on ‘Borde Hill’ RPG, within which ‘South Lodge’ lies. An overall negligible impact on cultural heritage (SA Objective 9) could be achieved.
- D.8.11.8 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 4, 5, 6, 7, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

²⁰ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

D.8.12 Policy DPH12: Orchards Shopping Centre, Haywards Heath

Policy DPH12: Orchards Shopping Centre, Haywards Heath			
SHELAA:	1121	Settlement:	Haywards Heath
Gross Site Area (ha):	1.9	Number of Units:	100
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Education • Sustainable Travel • Healthcare • Emergency services Provision of: <ul style="list-style-type: none"> • Sustainable Transport measures • Car parking 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Deliver a mixed use development including retail, leisure, residential and other complimentary town centre uses to help provide a central and diverse hub for the town centre.
- Pedestrian routes through the site should be clear and link well to adjacent areas.
- Maximise active frontages in the design of any redevelopment.
- Enhance car parking within the town centre through the provision of multi-storey and/or decked car parking, optimising the site's topography and taking into account the design principles set out in the 2020 Mid Sussex Design Guide SPD.
- Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II* listed building 'St Wilfrids Church'.
- Take into account the 2021 Haywards Heath Town Centre Masterplan SPD and opportunities for The Orchards Shopping Centre (Chapter 5).

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH12	++	++	++	++	+	+	0	+	0	++	-	0	++	+

D.8.12.1 Policy DPH12 relates to Site 1121, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.12.2 The policy requires financial contributions towards various community facilities and infrastructure, including play space, sports facilities, education and emergency facilities, which would be likely to benefit SA Objectives 2, 3 and 4. These objectives were already assessed positively owing to the site’s location with respect to existing facilities and the effects of other policies.

D.8.12.3 The policy seeks to “*Deliver a mixed use development including retail, leisure, residential and other complimentary town centre uses to help provide a central and diverse hub for the town centre*” with good pedestrian connectivity. The emphasis on sustainable travel links and the likely improved offer of local services and shopping provides a likelihood of reducing transport-related GHG emissions and encouraging a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 100 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

D.8.12.4 Furthermore, through the provision of a central and diverse hub for Haywards Heath incorporating active frontages and “*optimising the site’s topography and taking into account the design principles set out in the 2020 Mid Sussex Design Guide SPD*”, there is potential for enhancement of the local townscape character and strengthening sense of place. Therefore, the policy could potentially result in a minor positive impact on landscape (SA Objective 8).

D.8.12.5 The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

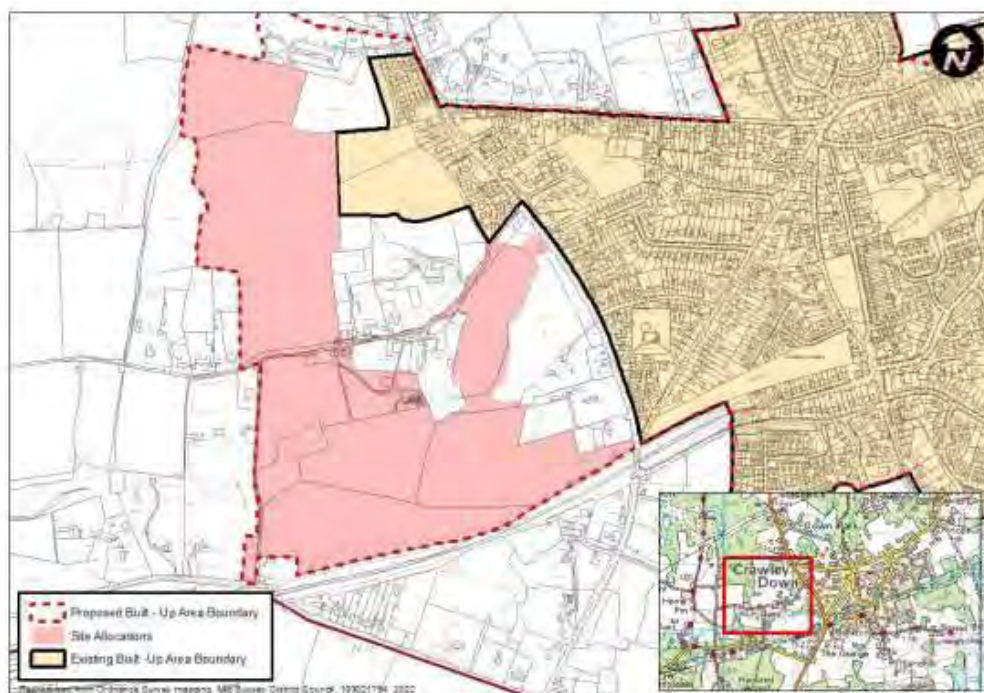
D.8.12.6 Policy DPH12 requires the development to be “*Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II* listed*

building ‘St Wilfrids Church’”. An overall negligible impact on cultural heritage (SA Objective 9) would be expected.

D.8.12.7 The findings for SA Objectives 1, 2, 3, 4, 5, 6, 7, 9, 10, 11, 12, 13 and 14 are unchanged from the post-mitigation site assessment.

D.8.13 Policy DPH13: Land to west of Turners Hill Road, Crawley Down

Policy DPH13: Land to west of Turners Hill Road, Crawley Down			
SHELAA:	688	Settlement:	Crawley Down
Gross Site Area (ha):	33.7	Number of Units:	350
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing • Open space • Playspace • Sports pitches • 50 bed (C2) care home • Community building/Doctor surgery Financial contributions towards the provision of: <ul style="list-style-type: none"> • Community buildings • Library • Ashdown Forest SPA and SAC mitigation measures • Education • Sustainable Transport • Healthcare • Emergency services Provision of: <ul style="list-style-type: none"> • Sewerage network upgrades • Sustainable transport measures • Highway works 		



Policy DPH13: Land to west of Turners Hill Road, Crawley Down

Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Provide suitable vehicular, pedestrian and cycle access via Turners Hill Road
- The site is located in a largely rural area and the following requirements and mitigation will be necessary as part of master planning:
 - o Retention and enhancement of perimeter screening
 - o Avoid development in most sensitive areas, including central ridge
 - o Mitigation of the impact of development on the affected areas of ancient woodland and veteran trees, including buffers
 - o Assessment of areas of archaeological interest – Crest of Sandstone Ridge and stream running through the High Weald that has a potential pre-historic bank
- Provision of parkland in southern part of site and along western boundary linking to north section of site
- Enhanced pedestrian and cycle connections to Crawley Down, including the Worth Way

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH13	++	+	+	+	+	-	-	-	0	-	-	0	0	+

D.8.13.1 Policy DPH13 relates to Site 688, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.13.2 The policy sets out provision of sustainable transport measures which would be expected to improve travel choice, with requirement to “Provide suitable vehicular, pedestrian and cycle access via Turners Hill Road” and “Enhanced pedestrian and cycle connections to Crawley Down, including the Worth Way”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to many services, it is likely that reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport to some extent, although a minor negative impact would be expected overall for SA Objective 10. A negligible effect could be achieved overall regarding SA Objective 13, in terms of improving sustainable access to town centres and local employment opportunities.

D.8.13.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. The policy sets out a range of requirements for community infrastructure, including on-site open space, sports pitches and, potentially, a doctor’s

- surgery to serve the new development, as well as financial contributions towards further community facilities and sustainable transport. The proposed development would also include a 50-bed care home. The policy would be likely to improve access to and provision of community and healthcare facilities, resulting in a minor positive impact on SA Objectives 2 and 4.
- D.8.13.4 Furthermore, the policy requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools, and particularly secondary schools, in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).
- D.8.13.5 The proposed sustainable travel improvements, including active travel links, may help to reduce transport-related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 350 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.
- D.8.13.6 The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. The site coincides with sections of 'Wallage Lodge Shaw', 'Wallage Wood', 'Bushy Wood' and 'Front Wood' ancient woodlands, and deciduous woodland priority habitat. Despite the proposed "*Mitigation of the impact of development on the affected areas of ancient woodland and veteran trees, including buffers*", at this stage of plan making, until the details of mitigation measures have been agreed, there is potential for adverse impacts on ancient woodland, as a result of the construction and occupation of 350 new dwellings. A minor negative impact on biodiversity would be expected (SA Objective 7).
- D.8.13.7 The site is located within 'Crawley Down Northern Fringe' which has 'low/medium' capacity, according to the Landscape Capacity Study²¹. Policy DPH13 sets out a range of measures to reduce or mitigate adverse impacts on the rural landscape, including avoiding development in the most sensitive areas, the "*Retention and enhancement of perimeter screening*" and "*Provision of parkland in southern part of site and along western boundary linking to north section of site*". Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.
- D.8.13.8 Heritage officer comments provided by the Council indicate that the development of the site could lead to a 'moderate' adverse impact on archaeology. The policy requires an "*Assessment of areas of archaeological interest*" which would help to inform appropriate

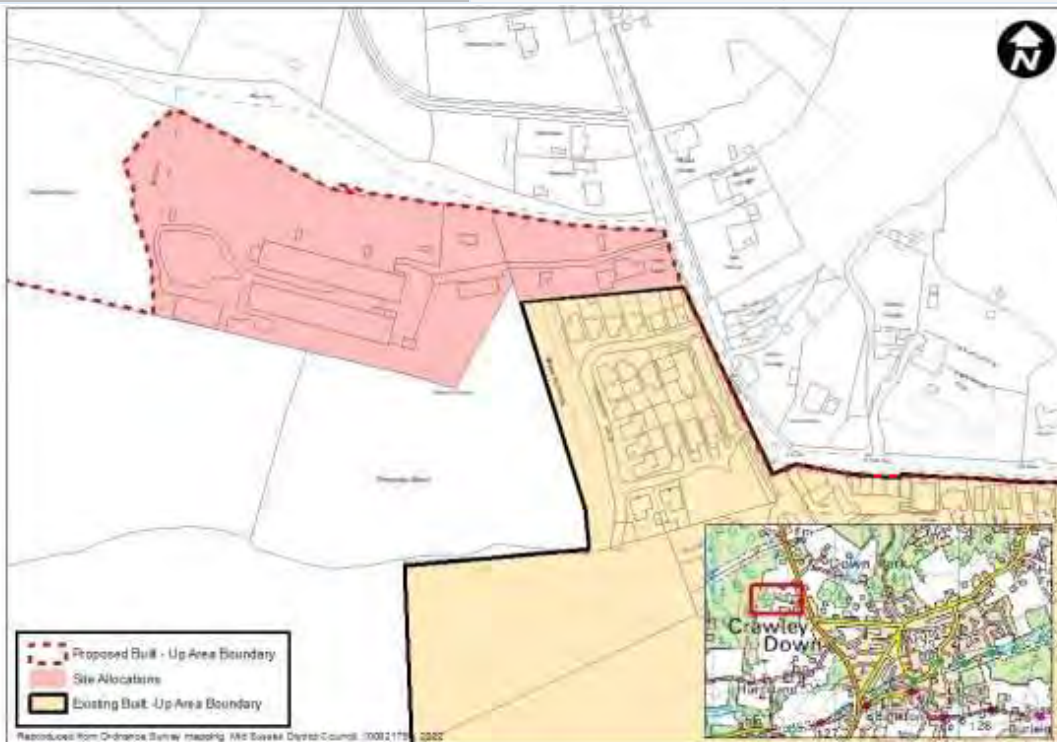
²¹ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

mitigation measures, with a negligible impact expected overall for cultural heritage (SA Objective 9).

D.8.13.9 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The findings for SA Objectives 1, 5, 6, 7, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8.14 Policy DPH14: Hurst Farm, Turners Hill Road, Crawley Down

Policy DPH14: Hurst Farm, Turners Hill Road, Crawley Down			
SHELAA:	743	Settlement:	Crawley Down
Gross Site Area (ha):	2.2	Number of Units:	37
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Play space • Sports facilities • Community buildings • Library • Ashdown Forest SPA and SAC mitigation measures • Education • Sustainable Transport 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Provide suitable vehicular, pedestrian and cycle access from Turners Hill Road
- Mitigation measures will be required to protect the setting and form of parts of the site that fall within and adjacent to sensitive landscape areas

Policy DPH14: Hurst Farm, Turners Hill Road, Crawley Down

- Ancient woodland is located along the western and south eastern edges of the site, appropriate buffers will be required
- Provide appropriate mitigation to address the potential impact on Grade II listed building ‘Westlands’. The mitigation strategy should be informed by a Heritage Impact Assessment.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH14	+	+	+	0	+	-	0	0	0	0	0	0	0	+

D.8.14.1 Policy DPH14 relates to Site 743, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.14.2 The policy sets out provision of “sustainable transport measures” including the requirement to “Provide suitable vehicular, pedestrian and cycle access from Turners Hill Road”. These measures would be expected to improve travel choice. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

D.8.14.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) through improving the provision of and access to recreation and leisure facilities.

D.8.14.4 Further benefits would be likely in relation to the local community through the outlined financial contributions; however, the site is located outside of sustainable travel times to existing community facilities and may restrict sustainable travel choices to facilities to some extent. The policy would be expected to reduce the potential for negative effects associated with the community, with a negligible impact recorded overall for SA Objective 4. The site is in close proximity to Site 688 and could benefit from the provision of play space, sports pitches and potential doctor surgery proposed within Policy DPH13 if this comes forward;

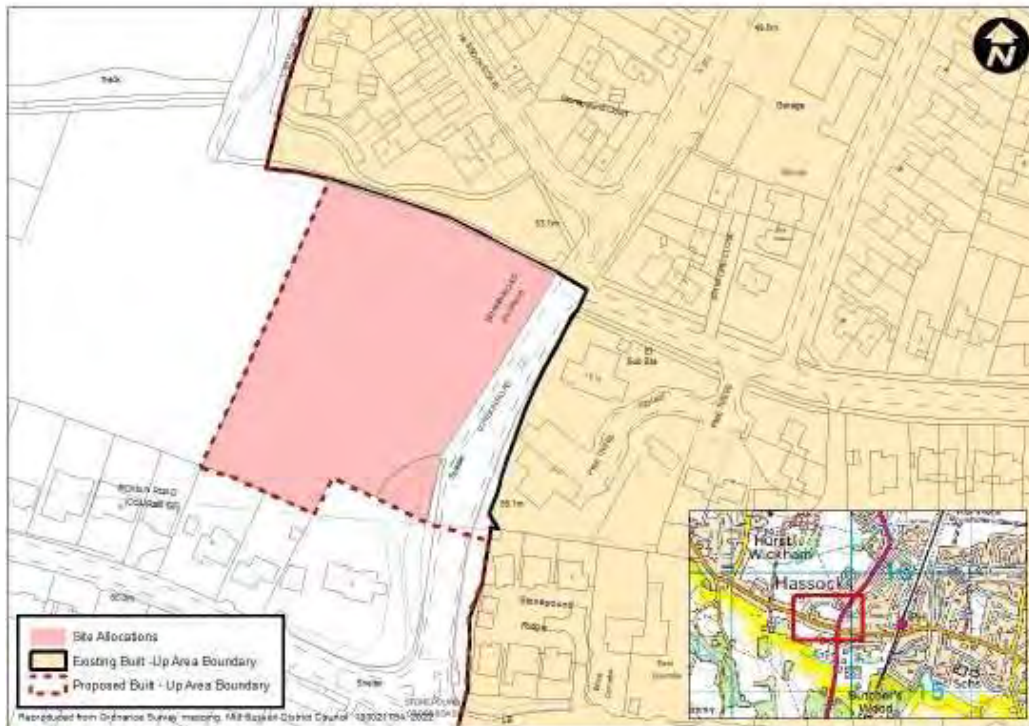
however, the relative delivery timescales are uncertain at the time of assessment and there is potential for one site to come forward without the other.

- D.8.14.5 The policy also requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools, and particularly secondary schools, in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).
- D.8.14.6 The site is adjacent to two stands of ancient woodland: ‘Pescotts Wood West’ and ‘Pescotts Wood East’. Policy DPH14 states that “*appropriate buffers will be required*” to protect the woodlands. Considering the existing development on site, and the adjacent residential areas, it is likely that the proposed introduction of 37 dwellings would not introduce a significant adverse effect on the ancient woodland. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.
- D.8.14.7 The site is located within ‘Crawley Down Northern Fringe’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study²². Policy DPH14 states that “*Mitigation measures will be required to protect the setting and form of parts of the site that fall within and adjacent to sensitive landscape areas*”. The site is relatively small-scale and enclosed by trees, with some existing development on site. Although there may be a change in the landscape character to some extent due to the proposed development, by providing a suitable buffer for the surrounding ancient woodland it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).
- D.8.14.8 Policy DPH14 requires the development to be “*Provide appropriate mitigation to address the potential impact on Grade II listed building “Westlands”*” informed by a Heritage Impact Assessment. An overall negligible impact on cultural heritage (SA Objective 9) would be expected.
- D.8.14.9 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The findings for SA Objectives 1, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

²² Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

D.8.15 Policy DPH15: Land rear of 2 Hurst Road, Hassocks

Policy DPH15: Land rear of 2 Hurst Road, Hassocks			
SHELAA:	210	Settlement:	Hassocks
Gross Site Area (ha):	0.9	Number of Units:	25
Anticipated Infrastructure		On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport Provision of: <ul style="list-style-type: none"> • Sustainable Transport measures • Highway works 	



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan Housing Allocations
- Provide suitable vehicular, pedestrian and cycle access from London Road, including necessary off-site highways improvements to ensure traffic movements along London Road are not impeded. This will include the provision of a right hand turn into the site.
- Retain and enhance mature trees/ hedgerows along site boundaries, including screening to A273.
- Mitigate potential impacts from development on TPOs in south east corner and along northern boundary.
- Provide appropriate landscaping taking into account any sensitive, longer views to the north west of the site.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH15	+	0	++	++	+	-	0	0	0	0	0	0	++	+

D.8.15.1 Policy DPH15 relates to Site 210, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.15.2 The site is located within the settlement of Hassocks, and has good connectivity to existing facilities and is well served by public transport infrastructure. Policy DPH15 seeks to further improve sustainable transport for the site, including “*suitable vehicular, pedestrian and cycle access from London Road*” which may encourage the uptake of active travel. The policy also requires financial contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to benefit health and wellbeing through improving the provision of and access to recreation and leisure facilities for the local community.

D.8.15.3 However, the site is located within 200m of ‘Mid Sussex AQMA No. 1’ and adjacent to the A273, with potential adverse implications for the health of site end users. The policy requires the development to “*Retain and enhance mature trees/ hedgerows along site boundaries, including screening to A273*”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Considering the trend of improvements in NO₂ levels within the AQMA²³, alongside the proposed screening measures, a negligible impact could be achieved overall with regard to health and wellbeing (SA Objective 2) and transport (SA Objective 10).

D.8.15.4 Policy DPH15 seeks to “*Mitigate potential impacts from development on TPOs in south east corner and along northern boundary*” and “*Provide appropriate landscaping taking into account any sensitive, longer views to the north west of the site*”. These measures would be likely to reduce adverse effects on the surrounding landscape character. By retaining the hedgerows which surround the site, and assuming new development would be in keeping with the existing adjacent housing development, it is anticipated that there would be a negligible impact overall for landscape (SA Objective 8).

²³ Mid Sussex District Council (2021) Air Quality Annual Status Report, June 2021. Available at: <https://www.midsussex.gov.uk/media/8021/2021-air-quality-annual-statement-status-report.pdf> [Date Accessed: 19/10/22]

D.8.15.5 These measures could also help to retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.

D.8.15.6 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 3, 4, 5, 6, 9, 11, 12, 13 and 14 are unchanged from the post-mitigation site assessment.

D.8.16 Policy DPH16: Land west of Kemps, Hurstpierpoint

Policy DPH16: Land west of Kemps, Hurstpierpoint			
SHELAA:	13	Settlement:	Hurstpierpoint
Gross Site Area (ha):	5.8	Number of Dwellings:	90
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport • Healthcare • Emergency Services Provision of: <ul style="list-style-type: none"> • Wastewater treatment and sewerage network upgrades • Sustainable transport measures • Highway works 		



Policy DPH16: Land west of Kemps, Hurstpierpoint

Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable access from Orchard Way.
- Take a landscape-led approach to development.
- Retain and enhance mature trees/ hedgerows on site boundaries and within the site.
- Protect and enhance the streams on the western boundaries and crossing the site.
- Provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west of the site, including ecological corridors.
- Provide open green space, locally equipped playspace, SuDS.
- Retain and enhance the existing PROW crossing the site.
- Create new pedestrian and cycle links to connect to the existing PROW network.
- Provide appropriate mitigation to address the potential impact on the neighbouring Grade II listed building ‘Langton Grange’ and the Langton Lane Conservation Area. The mitigation strategy should be informed by a Heritage Impact Assessment.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH16	+	+	+	++	+	-	0	-	-	++	0	0	++	+

D.8.16.1 Policy DPH16 relates to Site 13, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.16.2 The site is located within the settlement of Hurstpierpoint, and has relatively good connectivity to existing facilities and is well served by public transport infrastructure. The policy seeks to improve the provision of “*sustainable transport measures*”, including a requirement to “*Create new pedestrian and cycle links to connect to the existing PROW network*” which may encourage the uptake of active travel. The policy also requires financial contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2). The policy would also be likely to improve the provision of and access to recreation and leisure facilities for the local community (SA Objective 4), and which is already assessed positively.

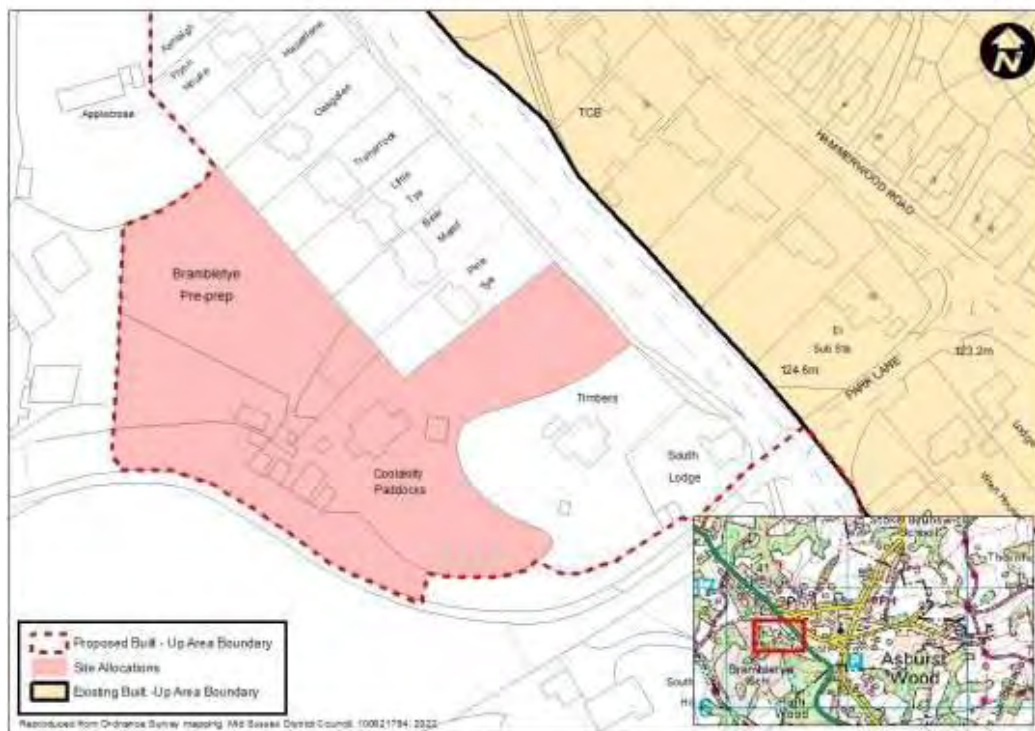
D.8.16.3 The policy also requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

- D.8.16.4 The policy seeks to “*Retain and enhance mature trees/ hedgerows on site boundaries and within the site*” and ensure that ecological corridors are conserved through proposed landscaping measures including along the streams which pass through the site. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.
- D.8.16.5 The site is located within ‘Hurstpierpoint Low Weald’ which has ‘negligible/low’ capacity, according to the Landscape Capacity Study²⁴. Policy DPH16 encourages a “*landscape-led approach to development*” which retains and enhances the mature trees and hedgerows along the site boundaries and provides “*appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west of the site, including ecological corridors*”. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.
- D.8.16.6 Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘high’ harm to the adjacent Langton Lane Conservation Area and Grade II Listed Building ‘Langton Grange’. Despite the policy requirements to “*Provide appropriate mitigation*” to address the impacts, informed by a Heritage Impact Assessment, it is likely that the loss of the current field systems would diminish the separation of the heritage assets from the settlement of Hurstpierpoint and could alter their settings. A minor negative impact on cultural heritage cannot be ruled out at this stage until the details of the proposals have been agreed (SA Objective 9).
- D.8.16.7 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 4, 5, 6, 8, 9, 10, 11, 12, 13 and 14 are unchanged from the post-mitigation site assessment.

²⁴ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

D.8.17 Policy DPH17: The Paddocks, Lewes Road, Ashurst Wood

Policy DPH17: The Paddocks, Lewes Road, Ashurst Wood			
SHELAA:	984	Settlement:	Ashurst Wood
Gross Site Area (ha):	0.84	Number of Dwellings:	8-12
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Ashdown Forest SPA and SAC mitigation measures 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable access from Lewes Road.
- Take a landscape-led approach to development.
- Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB.
- Retain mature trees/ hedgerows on site boundaries. The layout of the site should take into account the location of the trees and allow for their future retention and to prevent overshadowing into private gardens.
- Avoid the appearance of a car-dominated layout in the design of the development in accordance with the Mid Sussex Design Guide SPD.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH17	+	0	+	+	+	-	0	0	0	0	0	0	-	+

D.8.17.1 Policy DPH17 relates to Site 984, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.17.2 The site is located outside of sustainable travel times to some local facilities and services, including train stations. Policy DPH17 does not include specific provisions relating to sustainable transport or active travel, although it does encourage development to “*Avoid the appearance of a car-dominated layout*” which may serve to reduce reliance on private car use, to some extent. The policy also requires financial contributions towards play space, sports facilities and other community infrastructure; therefore, the development would be expected improve the provision of and access to recreation and leisure facilities with benefits to health and wellbeing, and for the local community (SA Objective 4) which is already assessed positively.

D.8.17.3 However, the site is located adjacent to the A22, with potential adverse implications for the health of site end users. The policy requires the development to “*Retain mature trees/hedgerows on site boundaries*”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2) and transport (SA Objective 10).

D.8.17.4 The policy requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

D.8.17.5 Landscape officer comments provided by the Council indicate that the development of the site could lead to a ‘moderate’ adverse impact on High Weald AONB, due to the potential impact on woodland and trees. The site is located within ‘Luxford High Weald’ which has ‘negligible/low’ capacity, according to the Landscape Capacity Study²⁵. Policy DPH17 states

²⁵ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

that the proposal should “*take a landscape-led approach to development*”, retain the mature trees and hedgerows surrounding the site, and “*Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB*”. The site is small-scale and enclosed by trees and existing development, with some existing buildings on site. Although there would be a change in the landscape character to some extent due to the proposed development, it is expected that adverse impacts on the landscape character could be reduced through the policy provisions and with reference to the design guide, with a negligible impact overall for landscape (SA Objective 8).

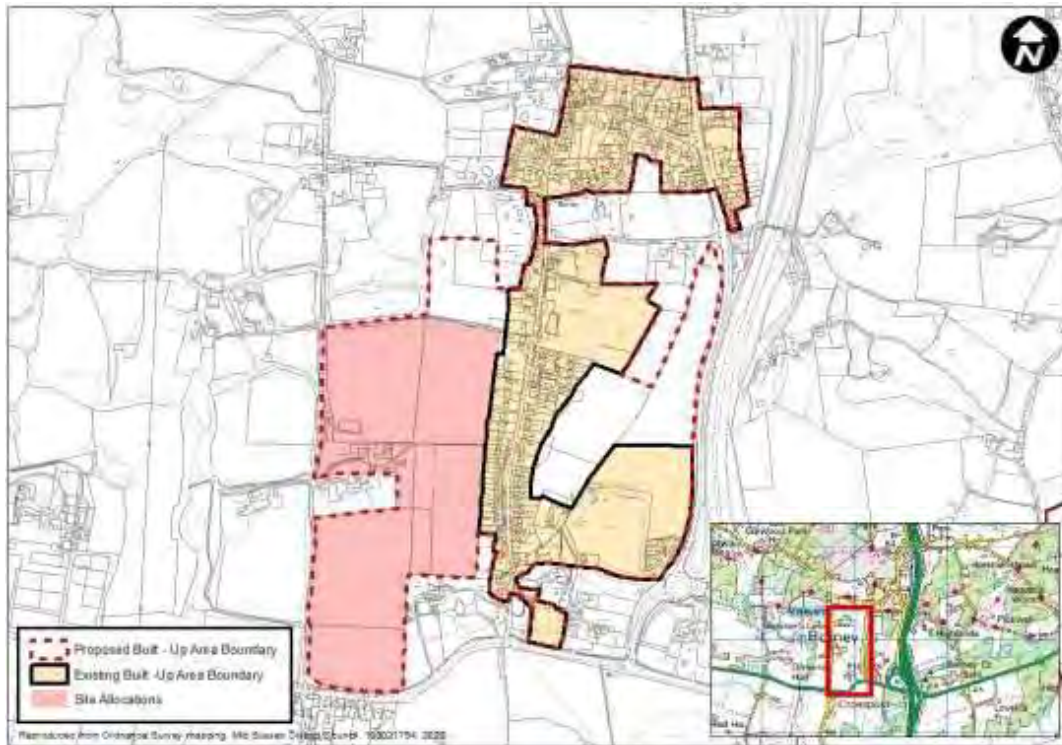
D.8.17.6 The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. The southern edge of the site coincides with deciduous woodland priority habitat. The policy states that development will “*Retain mature trees/hedgerows on site boundaries*” which would be expected to ensure there is no degradation or loss of the priority habitat. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

D.8.17.7 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The findings for SA Objectives 1, 4, 5, 6, 9, 11, 12, 13 and 14 are unchanged from the post-mitigation site assessment.

D.8.18 Policy DPH18: Land at Foxhole Farm, Bolney

Policy DPH18: Land at Foxhole Farm, Bolney			
SHELAA:	1120	Settlement:	Bolney
Gross Site Area (ha):	18.4	Number of Dwellings:	200
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing • County Park • Community Allotments • Community Facility • Land education provision Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Education • Sustainable Transport • Healthcare • Emergency Services Provision of: <ul style="list-style-type: none"> • Sustainable transport measures • Highway works 		

Policy DPH18: Land at Foxhole Farm, Bolney



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable vehicular, pedestrian and cycle access from Cowfold Road (A272).
- Provide additional pedestrian and cycle access to The Street from north of the site between Westmeadow and Downland.
- Retain mature trees/ hedgerows along site boundaries.
- Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II listed building, ‘Walnut and Well Cottage’, and Bolney Conservation Areas (North and South).
- Provide country park and community allotments.
- Provide a community facility (e.g. community retail)
- Provide community working hub
- Explore opportunities to enhance education provision in the village that meets an identified local need

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH18	++	0	+	+	+	-	0	-	0	-	-	0	0	+

D.8.18.1 Policy DPH18 relates to Site 1120, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further

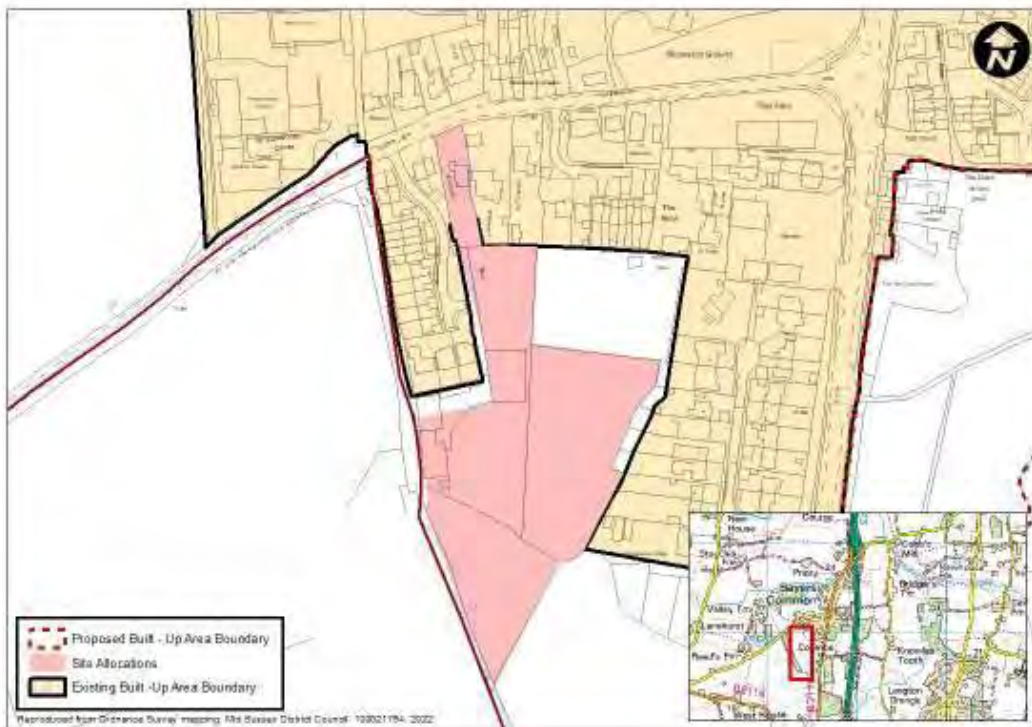
- improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.
- D.8.18.2 The policy sets out provision of “*sustainable transport measures*” including the requirement to “*Provide suitable vehicular, pedestrian and cycle access from Cowfold Road (A272)*” and “*additional pedestrian and cycle access to The Street from north of the site between Westmeadow and Downland*”. These measures would be expected to improve travel choice and encourage active travel, with a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport to some extent, although a minor negative impact would be expected overall for SA Objective 10. A negligible effect could be achieved overall regarding SA Objective 13, in terms of improving sustainable access to town centres and local employment opportunities.
- D.8.18.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires the development to “*Provide [a] country park and community allotments*” as well as financial contributions towards play space, sports facilities, healthcare and other community infrastructure. These measures would be likely to improve provision of and access to recreation and leisure facilities, resulting in a minor positive impact on community (SA Objective 4).
- D.8.18.4 However, the site is located adjacent to the A272, with potential adverse implications for the health of site end users in relation to exposure to pollution. The policy requires the development to “*Retain mature trees/hedgerows along site boundaries*”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2).
- D.8.18.5 The proposed sustainable travel improvements, including active travel links, may help to reduce transport-related GHG emissions to some extent. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 200 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.
- D.8.18.6 The policy requires development to “*Explore opportunities to enhance education provision in the village that meets an identified local need*”. Therefore, the policy would be expected to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

- D.8.18.7 The site is located within ‘Bolney Sloping High Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study²⁶. It is likely that there would be a change in the landscape character to some extent due to the proposed development of 200 homes. Policy DPH18 states that the proposal should “*Retain mature trees/hedgerows along site boundaries*” and provide a country park which may help to promote access to outdoor space and enjoyment of the countryside. Despite these provisions, at this stage of the planning process, a minor negative impact on the character of the landscape (SA Objective 8) cannot be ruled out.
- D.8.18.8 Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘low’ to ‘moderate’ adverse impact on nearby listed buildings, Bolney Conservation Area, and archaeology. Policy DPH18 states that the development should be “*Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II listed building, ‘Walnut and Well Cottage’, and Bolney Conservation Areas (North and South)*”. This would be likely to help inform appropriate mitigation measures, with a negligible impact expected overall for cultural heritage (SA Objective 9).
- D.8.18.9 The policy seeks to “*Retain mature trees/hedgerows along site boundaries*” which may help to conserve ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.
- D.8.18.10 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 5, 6, 8, 9, 10, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

²⁶ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

D.8.19 Policy DPH19: Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common

Policy DPH19: Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common			
SHELAA:	1026	Settlement:	Sayers Common
Gross Site Area (ha):	1.5	Number of Dwellings:	33
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport Provision of: <ul style="list-style-type: none"> • Sustainable transport measures • Highway works 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Prioritise pedestrian and cycle access through the site into Significant allocation DPSC2 and towards Reeds Lane.
- Upgrade and integrate the existing PROW which crosses the southern portion of the site.
- Provide suitable access onto Reeds Lane either directly or via Meadow View.
- Avoid developing areas of existing flood risk and mitigate impacts through integration of SuDS.
- Retain, protect and enhance existing mature trees across the site and hedgerows along site boundaries and ensure development provides a positive edge to these features.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH19	+	+	+	+	+	-	0	0	0	0	0	0	0	+

D.8.19.1 Policy DPH19 relates to Site 1026, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.19.2 The policy sets out provision of “sustainable transport measures” including the requirement to “Prioritise pedestrian and cycle access through the site into Significant allocation DPSC2 and towards Reeds Lane”. These measures would be expected to improve travel choice and encourage active travel, with a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that reliance on private car use would remain, albeit to a relatively small extent as the site is proposed for only 33 dwellings. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

D.8.19.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires financial contributions towards play space, sports facilities and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to recreation and leisure facilities for the local community.

D.8.19.4 The policy also requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3). The site is in close proximity to Site 799 and could benefit from the provision of primary and secondary schools proposed within Policy DPSC2 if this comes forward; however, the relative delivery timescales are uncertain at the time of assessment and there is potential for one site to come forward without the other.

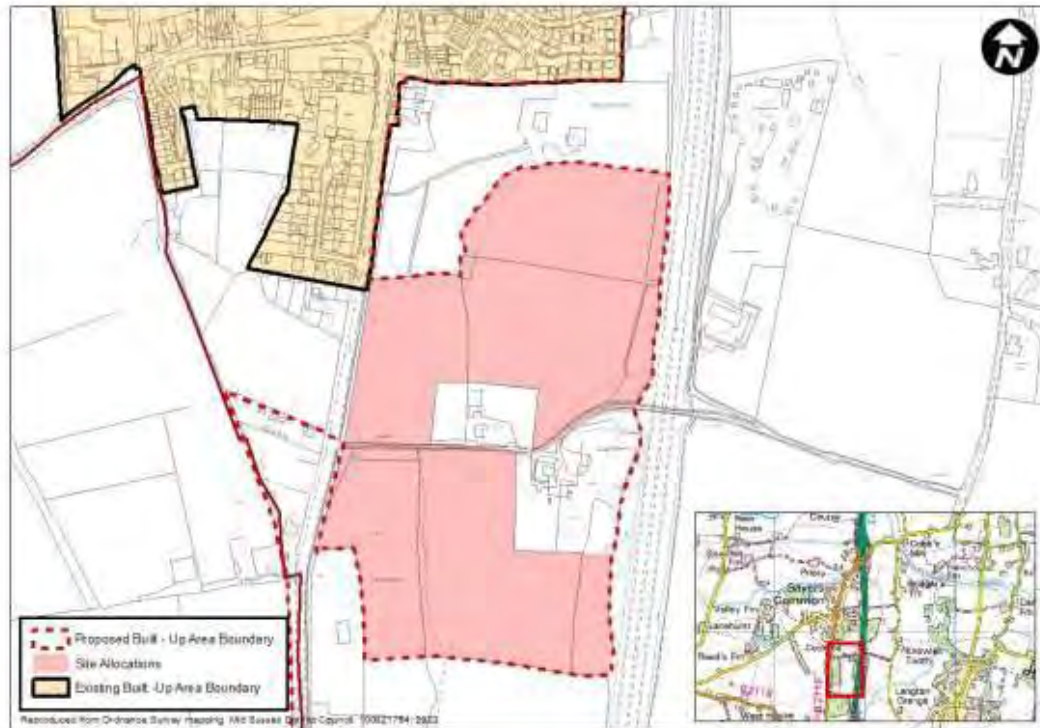
- D.8.19.5 The site is located within ‘Hickstead – Sayers Common Low Weald’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study²⁷. The site is relatively small-scale and enclosed by trees and existing development, and Policy DPH19 states that the proposal should “*Retain, protect and enhance existing mature trees across the site and hedgerows along site boundaries and ensure development provides a positive edge to these features*”. Although there would be a change in the landscape character to some extent due to the proposed development, by retaining the trees which surround the site it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).
- D.8.19.6 The retention and enhancement of mature trees and hedgerows could potentially help to conserve ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.
- D.8.19.7 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8.20 Policy DPH20: Land at Coombe Farm, London Road, Sayers Common

Policy DPH20: Land at Coombe Farm, London Road, Sayers Common			
SHELAA:	601	Settlement:	Sayers Common
Gross Site Area (ha):	14.2	Number of Dwellings:	210
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport • Healthcare • Emergency Services Provision of: <ul style="list-style-type: none"> • Wastewater treatment and sewerage network upgrades • Sustainable transport measures • Highway works 		

²⁷ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

Policy DPH20: Land at Coombe Farm, London Road, Sayers Common



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II listed buildings ‘Coombe Farmhouse’ and ‘Coombe Barn’.
- Prioritise pedestrian and cycle access throughout the site linking to Significant site allocation DPSC2 and bus stops on the B2118 to the west.
- Upgrade and integrate the existing PROW which crosses the site.
- Comprehensively masterplan development of the site including a main area of open space to create a focal point for the development and provide suitable access onto the B2118.
- Provide necessary buffer, protection and mitigation to areas of Ancient Woodland on and adjacent to the site, including measures to minimise public access to the woodland, provision of a woodland management plan and woodland enhancement package.
- Retain, protect and enhance mature trees across the site and hedgerows along site boundaries and ensure development provides a positive edge to these features and any areas of woodland.
- Avoid developing areas of existing flood risk and mitigate impacts through integration of SuDS.
- Mitigate noise impacts associated with the adjacent A23 to the east.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH20	++	0	0	+	+	-	0	-	-	0	-	0	0	+

D.8.20.1 Policy DPH20 relates to Site 601, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further

- improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.
- D.8.20.2 The policy sets out provision of “*sustainable transport measures*” including the requirement to “*Prioritise pedestrian and cycle access throughout the site linking to Significant site allocation DPSC2 and bus stops on the B2118 to the west*” and to integrate the PRoW which crosses the site. These measures would be expected to improve travel choice and encourage active travel, with a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.
- D.8.20.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires provision of an area of open space on site, as well as financial contributions towards play space, sports facilities, healthcare and other community infrastructure. These measures would be likely to improve provision of and access to healthcare, recreation and leisure facilities, resulting in a minor positive impact on community (SA Objective 4).
- D.8.20.4 However, the site is located adjacent to the A23, with potential adverse implications for the health of site end users. The policy requires the development to “*Retain, protect and enhance mature trees across the site and hedgerows along site boundaries*” and “*Mitigate noise impacts associated with the adjacent A23 to the east*”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2).
- D.8.20.5 The proposed sustainable travel improvements, including active travel links, may help to reduce transport-related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 210 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.
- D.8.20.6 The policy requires financial contributions towards education, which could potentially help to improve the provision of and access to schools in the local area; although, owing to the location of the site outside of sustainable travel times to both primary and secondary schools, it is likely that some reliance on less sustainable travel methods would remain. The policy would be expected to reduce the potential for negative effects associated with access to education, with a negligible impact recorded overall (SA Objective 3). The site is in close

proximity to Site 799 and could benefit from the provision of primary and secondary schools proposed within Policy DPSC2 if this comes forward; however, the relative delivery timescales are uncertain at the time of assessment and there is potential for one site to come forward without the other.

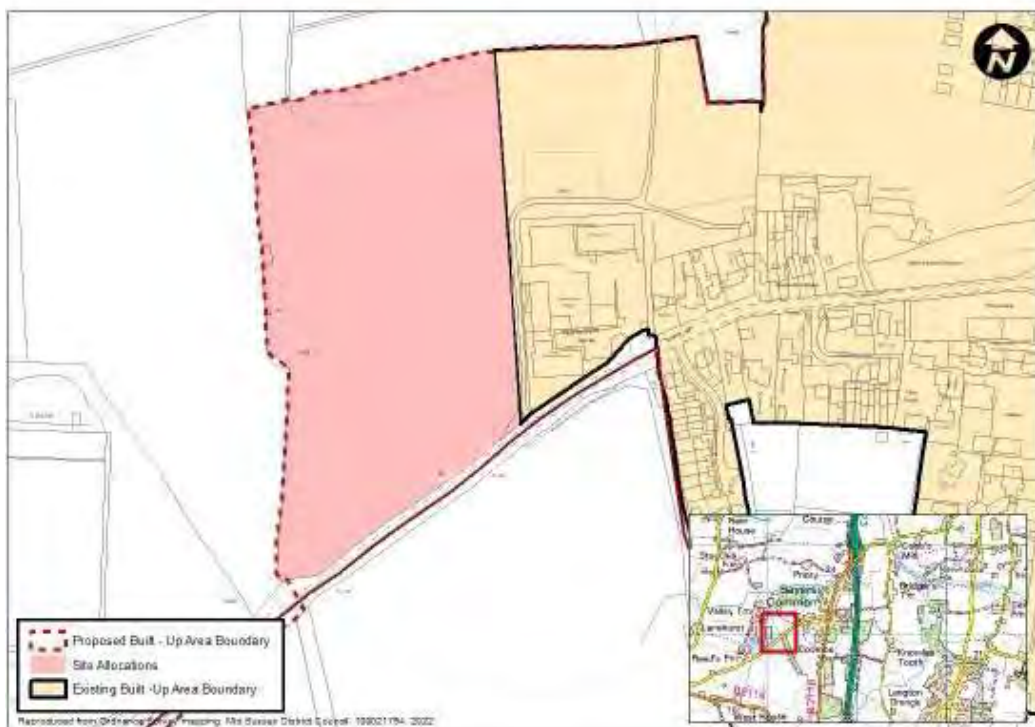
- D.8.20.7 The site coincides with ‘Coombe Wood’ and ‘Coombe Farm Shaw’ ancient woodland, and is adjacent to ‘Sayers Common Wood’. The site also coincides with deciduous woodland priority habitat. The policy requires development to provide *“buffer, protection and mitigation”* for these woodlands, *“including measures to minimise public access to the woodland, provision of a woodland management plan and woodland enhancement package”*. These measures would be likely to help ensure that the ancient woodland is protected from increased public access and disturbance as a result of the proposed development, if effectively implemented and monitored, reducing the potential for adverse effects. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.
- D.8.20.8 The site is located within ‘Hickstead – Sayers Common Low Weald’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study²⁸. The site is relatively well enclosed by the woodland and the A23 to the east, with some nearby existing development, however, it is likely that there would be a change in the landscape character to some extent due to the proposed development of 210 homes. Policy DPH20 states that the proposal should be informed by a comprehensive masterplan, *“including a main area of open space to create a focal point for the development”*, and should *“Retain, protect and enhance mature trees across the site and hedgerows along site boundaries and ensure development provides a positive edge”*. Despite these provisions, at this stage of the planning process, a minor negative impact on the character of the landscape (SA Objective 8) cannot be ruled out.
- D.8.20.9 Heritage officer comments provided by the Council indicate that the development of the site could lead to a ‘high’ adverse impact on nearby listed buildings. Policy DPH20 states that the development should be *“Informed by a Heritage Impact Assessment, provide an appropriate layout and design which protects the setting of nearby Grade II listed buildings ‘Coombe Farmhouse’ and ‘Coombe Barn’”*. Despite these requirements, it is likely that the loss of the current field systems could adversely affect the setting of the listed buildings to some extent. A minor negative impact on cultural heritage cannot be ruled out at this stage (SA Objective 9).
- D.8.20.10 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and

²⁸Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at:
https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 5, 6, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8.21 Policy DPH21: Land to the West of Kings Business Centre, Reeds Lane, Sayers Common

Policy DPH21: Land to the West of Kings Business Centre, Reeds Lane, Sayers Common			
SHELAA:	830	Settlement:	Sayers Common
Gross Site Area (ha):	3.3	Number of Dwellings:	100
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport • Healthcare • Emergency Services Provision of: <ul style="list-style-type: none"> • Wastewater treatment and sewerage network upgrades • Highway improvements • Sustainable transport measures 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Comprehensively masterplan development of the site in combination with site allocation SA30 (Land to the North of Lyndon, Reeds Lane, Sayers Common) providing a main area of open space to create a focal point for the development and provide suitable access onto Reeds

Policy DPH21: Land to the West of Kings Business Centre, Reeds Lane, Sayers Common

Lane.

- Prioritise pedestrian and cycle access throughout the combined development and create links to Significant site allocation DPSC2 to the south and provide appropriate extension to the footway on Reed’s Lane.
- Upgrade and integrate the existing PROW which crosses the site.
- Retain, protect and enhance mature trees and hedgerows along the south, west and north boundaries along with the hedgerow adjacent to the Kings Business Centre to the east and ensure development provides a positive edge to these features and the site boundaries.
- Avoid developing areas of existing flood risk and mitigate impacts through integration of SuDS.
- Undertake an archaeological assessment and provide any appropriate mitigation arising from the results.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH21	++	+	0	+	+	-	0	0	0	0	-	0	0	+

D.8.21.1 Policy DPH21 relates to Site 830, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.21.2 The policy sets out provision of “sustainable transport measures” including the requirement to “Prioritise pedestrian and cycle access throughout the combined development and create links to Significant site allocation DPSC2 to the south and provide appropriate extension to the footway on Reed’s Lane”. These measures would be expected to improve travel choice and encourage active travel, with a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

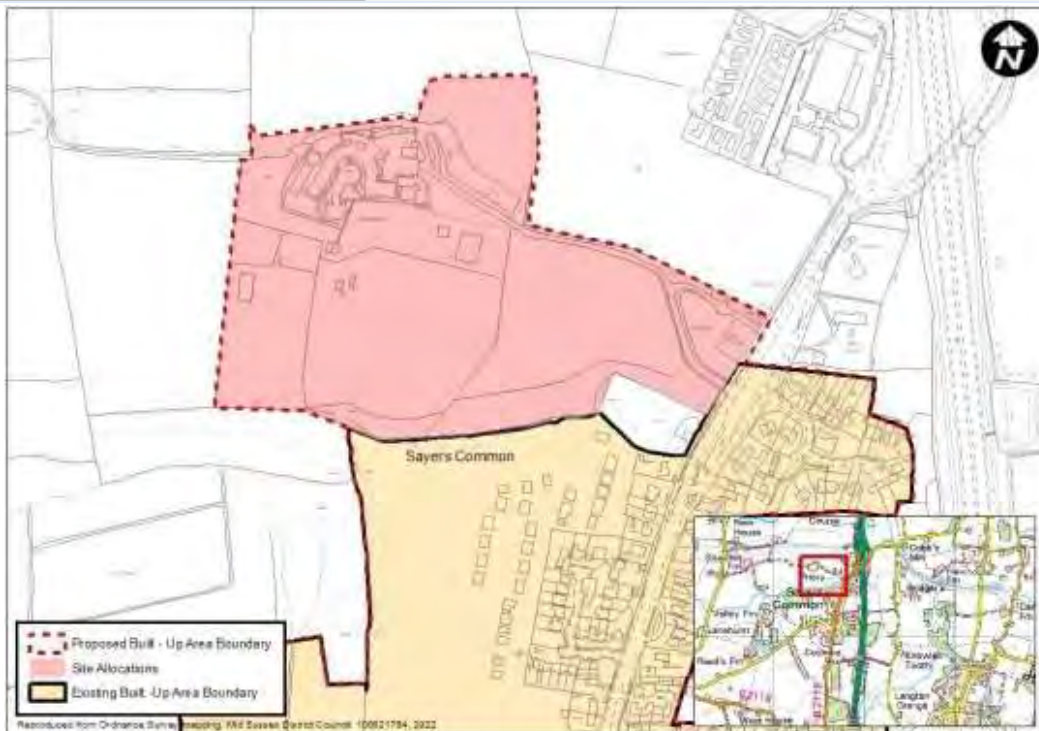
D.8.21.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires provision of an area of open space on site, as well as financial contributions towards play space, sports facilities, healthcare and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to healthcare, recreation and leisure facilities for the local community.

- D.8.21.4 The policy also requires financial contributions towards education, which could potentially help to improve the provision of and access to schools in the local area; although, owing to the location of the site outside of sustainable travel times to both primary and secondary schools, it is likely that some reliance on less sustainable travel methods would remain. The policy would be expected to reduce the potential for negative effects associated with access to education, with a negligible impact recorded overall (SA Objective 3). The site is in close proximity to Site 799 and could benefit from the provision of primary and secondary schools proposed within Policy DPSC2 if this comes forward; however, the relative delivery timescales are uncertain at the time of assessment and there is potential for one site to come forward without the other.
- D.8.21.5 The proposed sustainable travel improvements, including active travel links, may help to reduce transport-related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 100 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.
- D.8.21.6 The site is located within ‘Hickstead – Sayers Common Low Weald’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study²⁹. Policy DPH21 states that the proposal should be informed by a comprehensive masterplan, “*providing a main area of open space to create a focal point for the development*” and “*Retain, protect and enhance mature trees and hedgerows along the south, west and north boundaries along with the hedgerow adjacent to the Kings Business Centre to the east and ensure development provides a positive edge*”. The site is relatively well enclosed by woodland and adjacent business parks. Although there would be a change in the landscape character to some extent due to the proposed development, by retaining the trees and hedgerows it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).
- D.8.21.7 The retention and enhancement of mature trees and hedgerows could potentially help to conserve ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.
- D.8.21.8 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

²⁹ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

D.8.22 Policy DPH22: Land at LVS Hassocks, London Road, Sayers Common

Policy DPH22: Land at LVS Hassocks, London Road, Sayers Common			
SHELAA:	1003	Settlement:	Sayers Common
Gross Site Area (ha):	6.4	Number of Dwellings:	200
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport • Healthcare • Emergency services Provision of: <ul style="list-style-type: none"> • Wastewater treatment and sewerage network upgrades • Highway works • Sustainable transport measures 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Prioritise pedestrian and cycle access throughout the development and integrate with and upgrade the existing PROW which crosses the site.
- Provide any necessary upgrades to the existing access onto B2118.
- Retain, protect and enhance mature trees and hedgerows across the site and ensure development provides a positive edge to these features and the wider countryside.
- Avoid developing areas of existing flood risk, particularly along the southern boundary and mitigate impacts through integration of SuDS.
- Undertake an archaeological assessment and provide any appropriate mitigation arising from the results.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH22	++	+	0	0	+	-	0	-	0	0	-	0	0	+

D.8.22.1 Policy DPH22 relates to Site 1003, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.22.2 The policy sets out provision of “sustainable transport measures” including the requirement to “Prioritise pedestrian and cycle access throughout the development and integrate with and upgrade the existing PROW which crosses the site”. These measures would be expected to improve travel choice and encourage active travel, with a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

D.8.22.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) through improving the provision of and access to recreation and leisure facilities.

D.8.22.4 Further benefits would be likely in relation to the local community through the outlined financial contributions; however, the site is located outside of sustainable travel times to existing community facilities and may restrict sustainable travel choices to facilities to some extent. The policy would be expected to reduce the potential for negative effects associated with the community, with a negligible impact recorded overall for SA Objective 4.

D.8.22.5 The policy requires financial contributions towards education, which could potentially help to improve the provision of and access to schools in the local area; although, owing to the location of the site outside of sustainable travel times to both primary and secondary schools, it is likely that some reliance on less sustainable travel methods would remain. The policy would be expected to reduce the potential for negative effects associated with access to education, with a negligible impact recorded overall (SA Objective 3). The site is in close

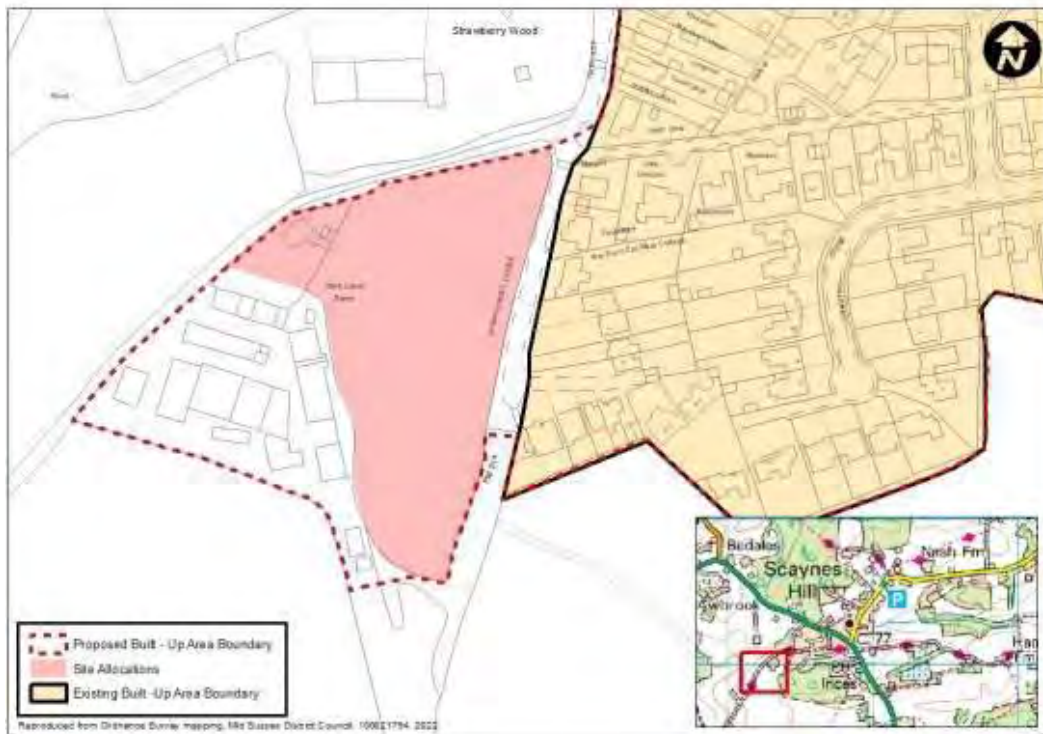
proximity to Site 799 and could benefit from the provision of primary and secondary schools proposed within Policy DPSC2 if this comes forward; however, the relative delivery timescales are uncertain at the time of assessment and there is potential for one site to come forward without the other.

- D.8.22.6 The proposed sustainable travel improvements, including active travel links, may help to reduce transport-related GHG emissions and encourage a modal shift away from private car use, with benefits to climate change and vehicle emissions. However, a minor negative effect would be likely to remain in relation to energy and waste (SA Objective 11) owing to the introduction of 200 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.
- D.8.22.7 The site is located within ‘Hickstead – Sayers Common Low Weald’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study³⁰. The site is relatively well enclosed by the hedgerows / trees to the west, and the existing residential development to the south. There is some existing development on site in the form of a SEN School, to the north. However, it is likely that there would be a change in the landscape character to some extent due to the proposed development of 200 homes. Policy DPH22 states that the proposal should “*Retain, protect and enhance mature trees and hedgerows across the site and ensure development provides a positive edge to these features and the wider countryside*”. Despite these provisions, at this stage of the planning process, a minor negative impact on the character of the landscape (SA Objective 8) cannot be ruled out.
- D.8.22.8 The retention and enhancement of mature trees and hedgerows could potentially help to conserve ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.
- D.8.22.9 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 5, 6, 8, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

³⁰ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

D.8.23 Policy DPH23: Ham Lane Farm House, Ham Lane, Scaynes Hill

Policy DPH23: Ham Lane Farm House, Ham Lane, Scaynes Hill			
SHELAA:	1020	Settlement:	Scaynes Hill
Gross Site Area (ha):	0.97	Number of Dwellings:	30
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport Provision of: <ul style="list-style-type: none"> • Sustainable Transport measures • Highway works 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable vehicular, pedestrian and cycle access from Ham Lane.
- Create new pedestrian links to existing PROW network along site's southern boundary.
- Retain existing mature trees and hedgerows along site boundary.
- Mitigation of potential adverse noise impacts from adjacent industrial workshops.
- Exclude development within Ancient Woodland buffer in south east corner of site.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH23	+	+	+	+	+	-	0	0	0	0	0	0	0	+

D.8.23.1 Policy DPH23 relates to Site 1020, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.23.2 The policy sets out provision of “sustainable transport measures” including the requirement to “Provide suitable vehicular, pedestrian and cycle access from Ham Lane” and to “Create new pedestrian links to existing PROW network along site’s southern boundary”. These measures would be expected to improve travel choice and encourage active travel, with a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

D.8.23.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. Therefore, the development at this location would be expected to result in a minor positive impact on health and wellbeing (SA Objective 2) and community (SA Objective 4), through improving the provision of and access to recreation and leisure facilities for the local community.

D.8.23.4 The policy also requires financial contributions towards education. Therefore, the policy could potentially help to improve the provision of and access to schools in the local area to ensure that the educational needs of the development can be met, resulting in a minor positive impact on education (SA Objective 3).

D.8.23.5 The majority of site is located within ‘Scaynes Hill High Weald’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study³¹. Policy DPH23 states that the proposal should “Retain existing mature trees and hedgerows along site boundary” and

³¹Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

include a buffer for the ancient woodland to the south east. The site is relatively small-scale and enclosed on two sides by existing development. Although there would be a change in the landscape character to some extent due to the proposed development, by retaining the trees and hedgerows it is anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 8).

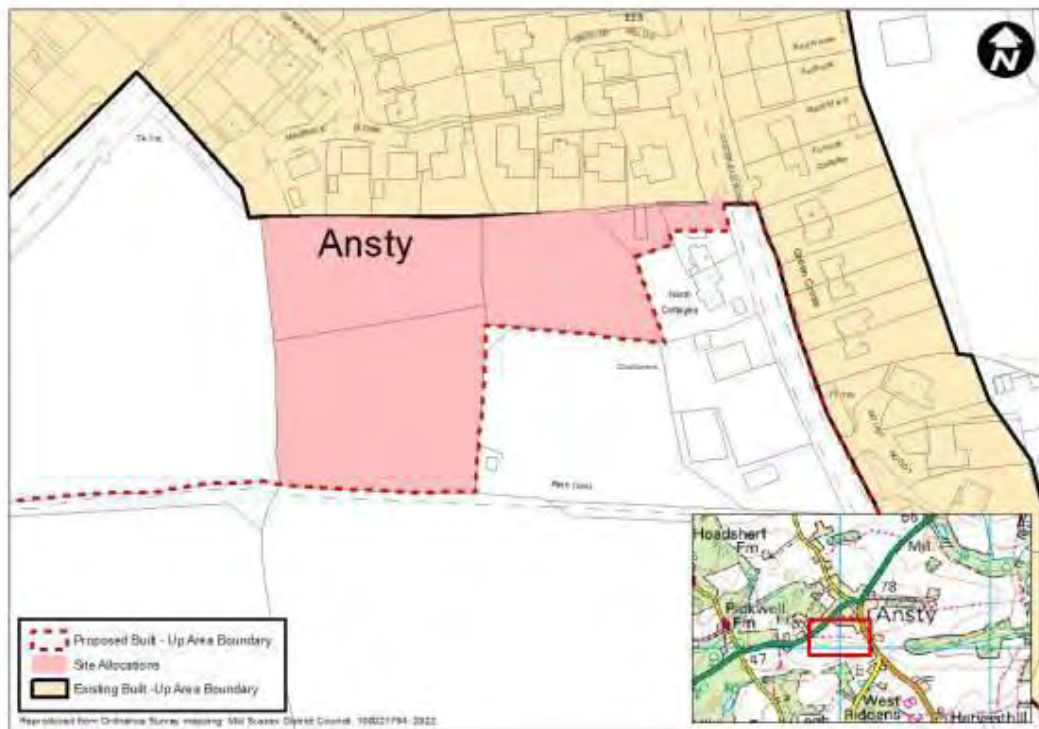
D.8.23.6 The retention and enhancement of mature trees and hedgerows, and incorporation of a suitable buffer to protect the nearby ancient woodland ‘Anchor Wood’ to the south east, would be likely to reduce potential for adverse effects on biodiversity, and could potentially help to conserve ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

D.8.23.7 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The findings for SA Objectives 1, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8.24 Policy DPH24: Challoners, Cuckfield Road, Ansty

Policy DPH24: Challoners, Cuckfield Road, Ansty			
SHELAA:	631	Settlement:	Ansty
Gross Site Area (ha):	1.3	Number of Dwellings:	37
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport Provision of: <ul style="list-style-type: none"> • Sustainable Transport measures • Highway works 		

Policy DPH24: Challoners, Cuckfield Road, Ansty



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable access from Cuckfield Road.
- Retain and enhance mature trees/ hedgerows on site boundaries especially on the southern boundary adjacent to the PROW.
- Maintain the rural character of the PROW on the southern boundary of the site.
- The layout of the site should take into account the location of the trees and allow for their future retention and to prevent overshadowing into private gardens.
- The design and layout of the site should reflect a transition from the built environment to the rural countryside.
- The design and layout of the site should reflect the rural character of the settlement and avoid being too urban or suburban.
- Integrate development with the site to the west (DPH25) by providing pedestrian and cycling connections and green infrastructure connectivity.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH24	+	0	0	+	+	-	0	0	0	0	0	0	0	+

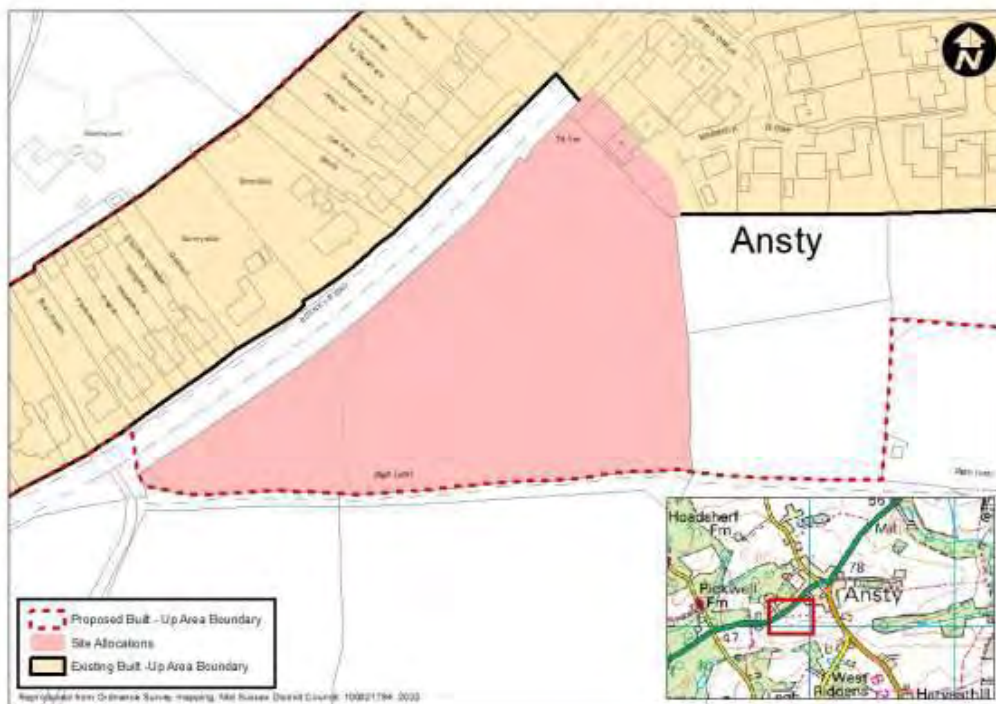
D.8.24.1 Policy DPH24 relates to Site 631, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further

- improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.
- D.8.24.2 The policy includes provision of “*sustainable transport measures*” which would be expected to improve travel choice, with the policy requiring development proposals to “*Integrate development with the site to the west (DPH25) by providing pedestrian and cycling connections and green infrastructure connectivity*”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.
- D.8.24.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. These measures would be likely to improve provision of and access to recreation and leisure facilities, resulting in a minor positive impact on community (SA Objective 4).
- D.8.24.4 However, the site is located in close proximity to the A272, with potential adverse implications for the health of site end users. The policy requires the development to “*Retain and enhance mature trees/ hedgerows on site boundaries*”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2).
- D.8.24.5 The policy also requires financial contributions towards education, which could potentially help to improve the provision of and access to schools in the local area; although, owing to the location of the site outside of sustainable travel times to both primary and secondary schools, it is likely that some reliance on less sustainable travel methods would remain. The policy would be expected to reduce the potential for negative effects associated with access to education, with a negligible impact recorded overall (SA Objective 3).
- D.8.24.6 The site is relatively small-scale and enclosed by hedgerows and adjacent existing residential development. Policy DPH24 also sets out to “*Retain and enhance mature trees/ hedgerows on site boundaries especially on the southern boundary adjacent to the PROW*” and ensure that the development design and layout reflects “*a transition from the built environment to the rural countryside*”. These measures would be likely to help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.

D.8.24.7 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The findings for SA Objectives 1, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8.25 Policy DPH25: Land to the west of Marwick Close, Bolney Road, Ansty

Policy DPH25: Land to the west of Marwick Close, Bolney Road, Ansty			
SHELAA:	784	Settlement:	Ansty
Gross Site Area (ha):	1.5	Number of Dwellings:	45
Anticipated Infrastructure	On-site: <ul style="list-style-type: none"> • 30% affordable housing Financial contributions towards the provision of: <ul style="list-style-type: none"> • Playspace • Sport facilities • Community buildings • Library • Education • Sustainable Transport Provision of: <ul style="list-style-type: none"> • Sustainable Transport measures • Highway works 		



Policy Requirements

- Refer to Policy DPH4 which sets out the general development principles for all District Plan housing allocations.
- Provide suitable access from Upton Drive and Marwick Close.
- Retain and enhance mature trees/ hedgerows on site boundaries especially on the southern boundary adjacent to the PROW and in the south-west of the site.
- Maintain the rural character of the PROW on the southern boundary of the site.
- The layout of the site should take into account the location of the trees and allow for their future retention and to prevent overshadowing into private gardens.

Policy DPH25: Land to the west of Marwick Close, Bolney Road, Ansty

- The design and layout of the site should reflect a transition from the built environment to the rural countryside.
- The design and layout of the site should reflect the rural character of the settlement and avoid being too urban or suburban.
- Integrate development with the site to the east (DPH24) by providing pedestrian and cycling connections and green infrastructure connectivity.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH25	+	0	0	+	+	-	0	0	0	0	0	0	0	+

D.8.25.1 Policy DPH25 relates to Site 784, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

D.8.25.2 The policy includes provision of “*sustainable transport measures*” which would be expected to improve travel choice, with the policy requiring development proposals to “*Integrate development with the site to the east (DPH24) by providing pedestrian and cycling connections and green infrastructure connectivity*”. This would be expected to result in a benefit to transport and accessibility; although, owing to the location of the site outside of sustainable travel times to some services, it is likely that some reliance on private car use would remain. The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to town centres and local employment opportunities.

D.8.25.3 Encouraging active travel may also have benefits to health and wellbeing, through encouraging physical exercise. Furthermore, the policy requires contributions towards play space, sports facilities, and other community infrastructure. These measures would be likely to improve provision of and access to recreation and leisure facilities, resulting in a minor positive impact on community (SA Objective 4).

D.8.25.4 However, the site is adjacent to the A272, with potential adverse implications for the health of site end users. The policy requires the development to “*Retain and enhance mature trees/hedgerows on site boundaries*”, which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent.

Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2).

- D.8.25.5 The policy also requires financial contributions towards education, which could potentially help to improve the provision of and access to schools in the local area; although, owing to the location of the site outside of sustainable travel times to both primary and secondary schools, it is likely that some reliance on less sustainable travel methods would remain. The policy would be expected to reduce the potential for negative effects associated with access to education, with a negligible impact recorded overall (SA Objective 3).
- D.8.25.6 The site is relatively small-scale and enclosed by hedgerows and adjacent existing residential development. Policy DPH25 also sets out to “*Retain and enhance mature trees/ hedgerows on site boundaries especially on the southern boundary adjacent to the PROW and in the south-west of the site*” and ensure that the development design and layout reflects “*a transition from the built environment to the rural countryside*”. These measures would be likely to help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.
- D.8.25.7 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The findings for SA Objectives 1, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

D.8.26 Policy DPH26: Older Persons Housing and Specialist Accommodation

DPH26: Older Persons Housing and Specialist Accommodation

Older Persons' Housing Need

Over the Plan Period there is an estimated for 1,887 additional dwellings with support or care and 211 additional bedspaces. The need by type identified by the 2021 SHMA is set out below:

Accommodation Type and Tenure		Need (units/ bedspaces)
Housing with Support (<i>retirement living or sheltered housing</i>)	Market	801
	Affordable	15
Housing with Care (<i>extra care</i>)	Market	857
	Affordable	214
Residential Care Bedspaces	n/a	300
Nursing Care Bedspaces	n/a	0 ³²

Site Allocations

To ensure that a sufficient amount of older persons' housing and specialist accommodation is delivered to meet identified needs, the Council makes provision for older persons' accommodation as part of the following site allocations:

- DPSC1: Land at west of Burgess Hill
- DPSC2: Land south of Reeds Lane, Sayers Common
- DPSC3: Land at Crabbet Park, Crophorne
- DPH13: Land to west of Turners Hill Road, Crawley Down

The amount of land made available should be commensurate with the overall scale of development proposed at the significant sites.

In addition, two sites are allocated specifically for older persons' specialist accommodation:

- DPH27: Land at Byanda, Hassocks
- DPH28: Land at Hyde Lodge, London Road, Handcross

The precise yield and accommodation type will be determined following further work site promoter/landowners and commensurate increases to overall yields and densities to reflect this type of accommodation as older persons accommodation can be provided at higher densities.

Allocations and proposals for older persons' accommodation will be required to:

- i. provide affordable housing in line with Policy DPH32, where classified as C2 or C3; and
- ii. be in accordance with the identified need as shown in the table above.

New developments

Proposals for new older persons' housing and those with specialist accommodation needs will be supported where the following criteria are met:

³² The Council's 2021 SHMA shows that there is currently an oversupply of 89 Nursing Care Bedspaces in the district, therefore provision should be focussed on other forms of older persons' accommodation.

DPH26: Older Persons Housing and Specialist Accommodation

- iii. The site is allocated for such a use within the District Plan, Site Allocations DPD or Neighbourhood Plan, or the site is located within or contiguous to the Built-Up Area Boundary, as defined on the Policies Map;
- iv. The site is accessible by foot or public transport to local shops, services, community facilities and the wider public transport network;
- v. The planning application is 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 for residents, staff and visitors;

Extensions to Housing for Older People and Specialist Housing

Proposals for extensions, upgrades and/or annexes to older person’s housing and specialist accommodation will be supported where:

- vi. There is a demonstrable need to support the existing accommodation; and
- vii. The design respects the character and appearance of the host building and local area and is sub-servient to the existing building; and
- viii. The cumulative additions are not disproportionate to the original building; and
- ix. It does not result in an unacceptable loss of privacy for existing or neighbouring residents.

Loss of Housing for Older People and Specialist Housing

The loss of existing specialist forms of accommodation for older people and those with specialist housing needs will not be supported unless it is demonstrated to the Council’s satisfaction that:

- x. There is no longer an identified need for the type of housing;
- xi. Suitable alternative provision is, or will be, provided locally so that there is no net loss; or
- xii. The accommodation no longer meets minimum standards required to provide acceptable care and it is not practicable or viable to improve the accommodation to minimum standards or adapt for alternative specialist accommodation.

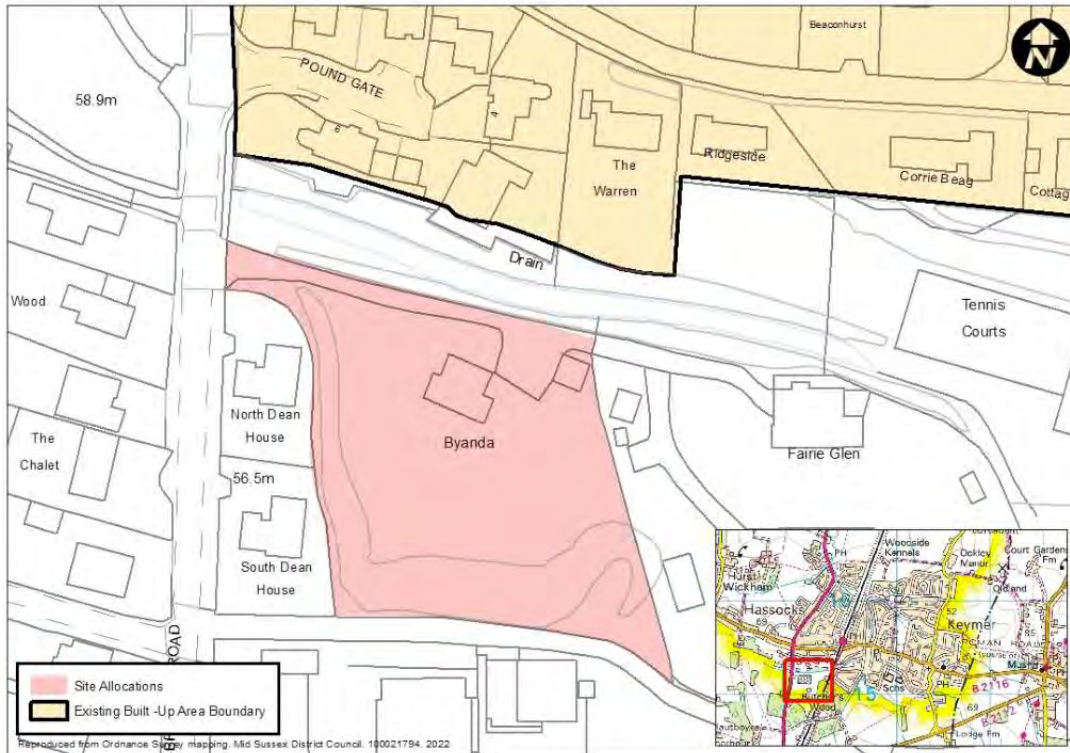
Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH26	+	+	0	+	0	0	0	+	0	+	0	0	0	0

D.8.26.1 Over the Plan period, it is likely that there will be an increase in the need for homes for the elderly and those in need of specialist care. It is expected that people over the age of 60 will require different types of housing of various sizes and tenures, and those over 80 will have particular needs for specialist forms of housing, including some homes with care provision and access for those with reduced mobility. Policy DPH26 sets criteria for related development proposals and aims to provide adequate accommodation for older residents and those with specialist needs within Mid Sussex. Therefore, this policy would be likely to have a minor positive impact on housing and specialist accommodation provision (SA Objective 1).

- D.8.26.2 By providing specialist and supported homes for older residents across the Plan area, this policy would be expected to result in benefits to the health and wellbeing of these residents. In addition, this policy would be likely to help support a more inclusive and vibrant community, and therefore, result in a minor positive impact on health and wellbeing and communities (SA Objectives 2 and 4).
- D.8.26.3 Additionally, Policy DPH26 seeks to ensure that new development proposals for older persons' housing is "*accessible by foot or public transport to local shops, services community facilities and the wider public network*". This would help ensure that vulnerable residents would not be cut off from these essential services and will also help to ensure that residents have opportunities choose to use sustainable transport instead of private vehicles, potentially resulting in the reduction of transport related GHG emissions. A minor positive impact on climate change and transport could therefore be expected (SA Objective 10).
- D.8.26.4 This policy states that new proposals should be "*located within or contiguous to the Built-Up Area Boundary*". Additionally, development proposals for annexes to older persons' housing and special accommodation should respect "*the character and appearance of the host building and local area and is sub-servient to the existing building*". Through supporting proposals which respect the setting of the local landscape, a minor positive impact could be expected (SA Objective 8).

D.8.27 Policy DPH27: Land at Byanda, Hassocks

Policy DPH27: Land at Byanda, Hassocks			
SHELAA:	1101	Settlement:	Hassocks
Gross Site Area (ha):	0.4	Number and type of older persons accommodation:	TBC



Policy Requirements

Land at Byanda is on the southern side of Hassocks and well located for older persons' accommodation. The type and yield from the site will be confirmed following regulation 18 consultation.

The General Development Principles in Policy DPH4 will apply to this site.

Objectives:

- Suitable vehicular, pedestrian and cycle access from Brighton Road.
- Retain existing mature trees and hedgerows along site boundaries.
- Mitigate risk from surface water flooding.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH27	+	0	0	++	+	-	0	0	0	0	+/-	0	++	++

D.8.27.1 Policy DPH27 relates to Site 1101, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a

range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.

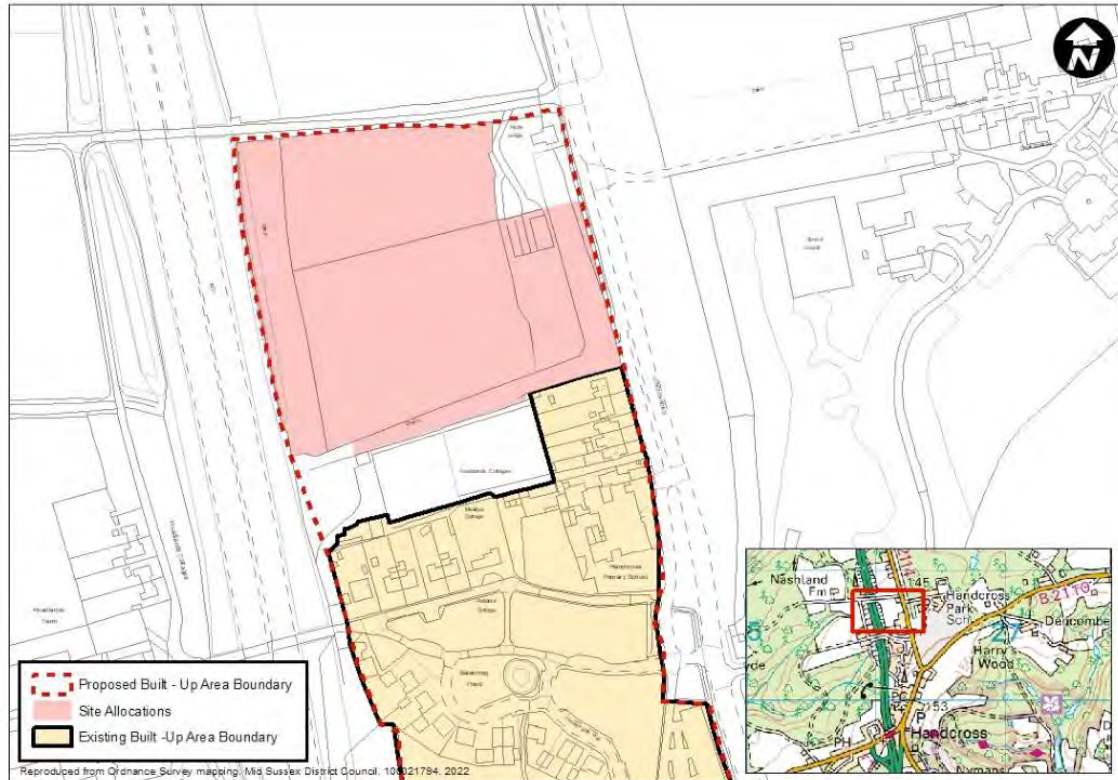
- D.8.27.2 The policy sets out the allocation of the site for older persons' accommodation, which would be expected to cater for the housing needs of the elderly population, resulting in positive effects on housing and wellbeing. The site seeks to provide "*Suitable vehicular, pedestrian and cycle access from Brighton Road*", which would be expected to improve travel choice for site end users, including sustainable transport connections, which are already relatively good in the settlement of Hassocks.
- D.8.27.3 However, the site is located within 200m of 'Mid Sussex AQMA No. 1' and adjacent to the A273, with potential adverse implications for the health of site end users. The policy requires the development to "*Retain existing mature trees and hedgerows along site boundaries*", which may help to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Considering the trend of improvements in NO₂ levels within the AQMA³³, alongside the proposed screening measures, a negligible impact could be achieved overall with regard to health and wellbeing (SA Objective 2) and transport (SA Objective 10).
- D.8.27.4 The site is located within 'Hurstpierpoint Southern Fringe' which has 'negligible/low' capacity, according to the Landscape Capacity Study³⁴. The site is relatively small-scale and enclosed by trees and existing development, with some buildings currently on site. Policy DPH27 requires development to retain the existing mature trees and hedgerows along the site boundaries, which may help to reduce adverse effects on the surrounding landscape character (SA Objective 8), as well as retain and enhance ecological corridors and habitats. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would also be expected.
- D.8.27.5 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development, and potential sterilisation of mineral resources within the MSA. The type and yield of development that would be delivered on site is unknown at the time of assessment, and so the potential impacts on energy and waste consumption are uncertain (SA Objective 11). The findings for SA Objectives 1, 3, 4, 5, 6, 9, 11, 12, 13 and 14 are unchanged from the post-mitigation site assessment.

³³ Mid Sussex District Council (2021) Air Quality Annual Status Report, June 2021. Available at: <https://www.midsussex.gov.uk/media/8021/2021-air-quality-annual-statement-status-report.pdf> [Date Accessed: 19/10/22]

³⁴ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

D.8.28 Policy DPH28: Land at Hyde Lodge, Handcross

Policy DPH28: Land at Hyde Lodge, Handcross			
SHELAA:	1106	Settlement:	Handcross
Gross Site Area (ha):	3.0	Number and type of older persons accommodation:	TBC



Policy Requirements

Land at Hyde Lodge, Handcross is located on the northern side of the village and is well located to services including health care. The type and yield from the site will be confirmed following regulation 18 consultation.

The General Development Principles in Policy DPH4 will apply to this site.

Objectives:

- Provide access from the B2114 London Road.
- Extend the 30mph speed limit northwards (to be discussed with the Highways Authority).
- Provide a pedestrian access in the south-east corner of the site where there is an existing gateway.
- Retain the existing rural character of London Road.
- Take a landscape-led approach to development
- Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB.
- Take into account the objectives of the High Weald AONB Management Plan, the High Weald Housing Design Guide and the Colour Study.
- The design and layout of the site should reflect a transition from the built environment to the rural countryside.
- The design and layout of the site should reflect the rural character of the settlement and avoid being too urban or suburban.
- Careful design to take into account and mitigate any impacts from noise and air quality from the A23.
- Retain the character of Hyde Lodge and its gardens.
- Retain and enhance mature trees/ hedgerows on site boundaries and the tree belt in the west of the site.

Policy DPH28: Land at Hyde Lodge, Handcross

- Upgrade bus stop infrastructure, for example, bus shelter and real time information.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH28	+	+	0	+	+	-	0	-	0	0	+/-	0	0	++

- D.8.28.1 Policy DPH28 relates to Site 1106, which was assessed alongside reasonable alternatives in **Appendix C** (pre-mitigation) and **Appendix D** (post-mitigation). The site policy sets out a range of site-specific requirements which would be expected to result in further improvements to sustainability performance, compared to the post-mitigation assessment findings for this site.
- D.8.28.2 The policy sets out the allocation of the site for older persons’ accommodation, which would be expected to cater for the housing needs of the elderly population, resulting in positive effects on housing and wellbeing, and the local community (SA Objective 4). The site seeks to “Provide a pedestrian access in the south-east corner of the site” and “Upgrade bus stop infrastructure”, which would be expected to improve travel choice for site end users, including sustainable transport connections.
- D.8.28.3 However, the site is located adjacent to the A23, with potential adverse implications for the health of site end users. The policy requires the development to incorporate “Careful design to take into account and mitigate any impacts from noise and air quality from the A23” and retain and enhance the tree belt along the road. These measures would be likely to provide a buffer to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. Overall, a minor positive impact on health and wellbeing (SA Objective 2) would be expected, owing to the proposed emphasis on sustainable travel improvements and the provision of older persons’ accommodation.
- D.8.28.4 The policy would be expected to reduce the potential for negative effects associated with climate change and transport, with a negligible impact recorded overall for SA Objective 10. This effect would be likely to extend to SA Objectives 13 and 14, in terms of improving sustainable access to and from the site.
- D.8.28.5 Landscape officer comments provided by the Council indicate that the development of the site could lead to a ‘moderate’ adverse impact on High Weald AONB. The site is also located within ‘Pease Pottage – Handcross High Weald’ which has ‘low’ capacity, according to the

Landscape Capacity Study³⁵. Policy DPH28 requires an LVIA to be undertaken to “*inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB*”, as well as ensuring that development proposals take into account the objectives of the High Weald AONB Management Plan, the High Weald Housing Design Guide and the Colour Study. Whilst these measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a minor negative impact on the landscape character (SA Objective 8) would be likely to remain.

D.8.28.6 The site coincides with deciduous woodland, along the western edge. Policy DPH28 seeks to “*Retain and enhance mature trees/ hedgerows on site boundaries and the tree belt in the west of the site*”, with associated benefits to ecological corridors and habitat conservation. Subject to no significant effects being identified in the HRA, a negligible impact on biodiversity (SA Objective 7) would be expected.

D.8.28.7 A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land as a result of the development. The type and yield of development that would be delivered on site is unknown at the time of assessment, and so the potential impacts on energy and waste consumption are uncertain (SA Objective 11). The findings for SA Objectives 1, 3, 4, 5, 6, 9, 11, 12 and 14 are unchanged from the post-mitigation site assessment.

³⁵ Hankinson Duckett Associates (2007) Mid Sussex Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/3236/ep48i_landscapecapacitystudy_combined.pdf [Date accessed: 28/09/22]

D.8.29 Policy DPH29: Gypsies, Travellers and Travelling Showpeople

DPH29: Gypsies, Travellers and Travelling Showpeople

The Mid Sussex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (2022) identifies a need for 4 net permanent pitches for Gypsies and Travellers who still travel³⁶ and 12 net permanent pitches for Gypsies and Travellers who no longer travel³⁷, for the period 2021 to 2038. Part of the 16-pitch need will be met by the delivery of existing commitments³⁸, as shown in the table below.

Gypsy and Traveller Provision

Gypsy and Traveller Pitch Provision	No longer travel	Still Travel
Minimum Permanent Pitch Requirement (2021 to 2038)	12	4
Commitments (as at 1 April 2021)	13	0
Total residual requirement	0	4

To ensure that a sufficient amount of suitable permanent accommodation for Gypsies, Travellers and Travelling Showpeople is delivered to meet identified needs within an appropriate timescale, the Council requires that provision is made on strategic sites and/or Significant allocations to contribute to the overall need.

New and extensions to Gypsy, Traveller and Travelling Showpeople sites

In guiding the allocation of Gypsy, Traveller and Travelling Showpeople sites³⁹ (permanent and transit) and considering planning applications, proposals will be supported provided that:

- i. The site or extension satisfies a clearly defined need, as evidenced by the Mid Sussex Gypsy and Traveller Accommodation Assessment, or the best available evidence;
- ii. The site is reasonably accessible to schools, shops, health and other local services and community facilities;
- iii. The site has or will have safe vehicular and pedestrian access to and from the road network and will have adequate provision for parking, turning space, servicing and emergency vehicles;
- iv. The development is appropriately located and designed or capable of being designed to in the case of outline applications, to ensure good quality living accommodation for residents and that the local environment (noise and air quality) of the site would not have a detrimental impact on the health and well-being of the residents;
- v. The sites are compatible with neighbouring land uses, and minimise impact on adjacent uses and built form and landscape character;
- vi. In rural and semi-rural areas sites should not dominate the nearest settled community;

³⁶ For Gypsies, Travellers and Travelling Showpeople who meet, or considered may meet, the definition of a Gypsy and Traveller and Travelling Showperson for planning purposes, provided in Annex 1- PPTS (2015)

³⁷ For Gypsies, Travellers and Travelling Showpeople who do not meet the definition of a Gypsy and Traveller and Travelling Showperson for planning purposes, provided in Annex 1- PPTS (2015)

³⁸ Commitments here are defined as allocations within the District Plan, Neighbourhood Plans and planning permissions.

³⁹ For Gypsies and Travellers who meet and do not meet the definition of a Gypsy, Traveller and Travelling Showperson for planning purposes, provided in Annex 1 – PPTS (2015) i.e. Gypsies and Travellers who still travel and settled Gypsies and Travellers who no longer travel

DPH29: Gypsies, Travellers and Travelling Showpeople

- vii. Each pitch should be capable of accommodating 1 mobile home, 1 touring caravan, 2 car parking spaces, an amenity building and amenity space;
- viii. Sites for Travelling Showpeople should include adequate space for storage and/ or keeping and exercising any animals associated with Travelling Showpeople’s needs;
- ix. Any site within the 7km zone of influence around Ashdown Forest will require an appropriate assessment under the Habitats Regulations to be undertaken and appropriate mitigation provided as required (Policy DPC6: Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) refers); and
- x. In the case of proposals within the High Weald AONB, Policy DPC4: High Weald Area of Outstanding Natural Beauty will apply.

The determination of planning applications for new sites or extensions to sites providing accommodation for settled Gypsy and Traveller and Travelling Showpeople use will be considered under the relevant District Plan policies.

Existing Gypsy, Traveller and Travelling Showpeople sites

Existing Gypsy and Traveller sites will be safeguarded for Gypsy and Traveller use. Planning permission will not be granted for an alternative use on an existing site unless an alternative, replacement site has been identified and developed to provide facilities of an equivalent or improved standard (including its location) whilst there remains a need for such sites as evidenced by the Gypsy and Traveller Accommodation Assessment, or the best available evidence.

Any new or extensions to existing Gypsy, Traveller or Travelling Showpeople sites granted permanent planning permission shall also be safeguarded for such use.

The provision of permanent and suitable accommodation to meet the changing needs of current and future Gypsy, Traveller and Travelling Showpeople households will be monitored to ensure a suitable supply of such sites is provided at the appropriate time.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH29	+	+	0	+	0	0	0	0	0	0	0	0	0	0

D.8.29.1 In accordance with the Planning policy for traveller sites⁴⁰, Gypsies and Travellers are defined as “Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or

⁴⁰ MHCLG (2015) Planning policy for traveller sites. Available at: <https://www.gov.uk/government/publications/planning-policy-for-traveller-sites> [Date Accessed: 20/01/22]

old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such”.

- D.8.29.2 Travelling Showpeople are defined as *“Members of a group organised for the purposes of holding fairs, circuses or shows (whether or not travelling together as such). This includes such persons who on the grounds of their own or their family’s or dependants’ more localised pattern of trading, educational or health needs or old age have ceased to travel temporarily, but excludes Gypsies and Travellers as defined above”⁴¹*
- D.8.29.3 This policy would be expected to meet the identified pitch targets for Travellers and Travelling Showpeople which address the likely permanent and transit accommodation needs, and as such, have a minor positive impact on housing (SA Objective 1).
- D.8.29.4 This policy requires all proposed Gypsy and Traveller sites to meet various criteria including provisions for safe access and within reasonable distance to schools and other facilities. Additionally, development of these sites must be *“appropriately located and designed or capable of being designed to ... ensure good quality living accommodation for residents and that the local environment (noise and air quality) of the site would not have a detrimental impact on the health and well-being of the residents”*. Therefore, minor positive impacts on site end users’ health and wellbeing and access to community facilities would be expected from this policy (SA Objectives 2 and 4).
- D.8.29.5 Policy DPH29 seeks to ensure developments of Gypsy and Traveller sites minimise impacts on landscape settings, including the High Weald AONB as per Policy DPC4, and also requires the proposals to ensure that *“Any site within the 7km zone of influence around Ashdown Forest will require an appropriate assessment under the Habitats Regulations to be undertaken and appropriate mitigation provided as required”* as per Policy DPC6. Although this policy seeks to mitigate and minimise potential impacts on biodiversity and landscape assets, such as Ashdown Forest SPA and SAC and High Weald AONB, negligible impacts on receptors associated with these themes within the Plan area would be expected (SA Objectives 7 and 8) where the criteria set out within the policy would likely neither wholly protect nor enhance these assets.

⁴¹ Ibid

D.8.30 Policy DPH30: Self and Custom Build Housing

DPH30: Self and Custom Build Housing

The District Council believes that self- and custom-build housing has an important role to play in increasing housing choice in the district, consequently:

- i. Proposals for self- or custom-build housing developments will be supported on suitable sites and subject to compliance with other relevant policies within the District Plan.
- ii. Provision of serviced plots for self- or custom-build housing will be encouraged on all suitable sites, subject to the level of demand for such housing and viability.
- iii. A minimum of 5% of the residential plots on housing sites comprising of 100 or more dwellings, subject to feasibility and viability, will need to be provided as serviced plots for self- or custom-build housing.
- iv. Serviced plots will need to have a water supply, foul and surface water drainage, telecommunications and an electricity supply available at the plot boundary and legal access to a public highway.
- v. Affordable housing on self or custom build sites will need to be provided through serviced land being made available at nil cost or through individual serviced plots being transferred at nil cost.
- vi. A design code, prepared by the developers and agreed with the District Council, will need to be followed for each site and individual plot passports will also be required.
- vii. Each self or custom build plot will need to form a separate phase of the development in order to facilitate the timely submission of a reserved matters planning application by the intended occupant of each plot.
- viii. Communities preparing Neighbourhood Plans will be encouraged to identify suitable sites for self- and custom-build housing plots within their neighbourhood plan area.

The above policy will be monitored and kept under review, having regard to any changes to evidence of demand.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH30	+	0	0	0	0	0	0	+	0	0	0	0	0	0

D.8.30.1 This policy seeks to meet the needs of those wishing to build their own homes. The policy aims to secure a proportion of residential sites of 100 or more units to be available for self-build housing.

D.8.30.2 This policy would be likely to have a positive impact by ensuring that new housing delivered across the Plan area can accommodate the diverse requirements of residents within Mid Sussex, and therefore, have a minor positive impact on housing (SA Objective 1).

D.8.30.3 By encouraging the development of self and custom build housing, in accordance with local design guides, this policy could help to increase the diversity of buildings within neighbourhoods and provide visual interest. This could potentially result in a minor positive impact on the character of the local landscape and townscape (SA Objective 8).

D.8.31 Policy DPH31: Housing Mix

DPH31: Housing Mix

To support the delivery of sustainable, mixed and balanced communities, housing development will:

- 1) provide a mix of dwelling types and sizes from new development (including affordable housing) that reflects current and future local housing needs. The Council expects the ranges set out in the below table to be used as a starting point;

Housing Mix split

	1 bed / 2 person	2 bed / 4 person	3 bed / 5 person	4+bed / 6 person
Market housing	5-10%	20-25%	40-45%	25-30%
Affordable Ownership	10-15%	50-55%	25-30%	5-10%
Affordable Rented	30-35%	40-45%	15-20%	5-10%

- 2) Variations to the above will be considered where the Council is satisfied that:
 - i. The site characteristics and location dictate that there is a more appropriate mix of sized of dwellings;
 - ii. There is an identified need for a particular size of dwelling in the nearest settlement; and/ or
 - iii. There are demonstrable financial viability reasons for doing so.

Other accommodation types

To meet the identified current and future the needs of different groups in the community, the Council will seek a range of accommodation types to be delivered on new developments which are of an appropriate size, scale and location. This could include provision of bungalows and other forms of suitable accommodation, where in accordance with the Mid Sussex Design Guide SPD.

The types of accommodation include that which is suitable for:

- Older persons (DPH26);
- People with disabilities (DPH36);
- People who wish to build their own home (DPH30);
- Build to Rent;
- Co-Living; and
- Gypsy and traveller community (DPH29).

Where applicable, specific policies on the different accommodation types are identified against each of the above.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH31	+	+	0	+	0	0	0	0	0	0	0	0	0	0

D.8.31.1 An appropriate mix of housing is required across the Plan area to help ensure that the varied needs of current and future residents are met. This in particular may include an increased number of smaller homes and affordable homes which would be likely to help provide appropriate accommodation for the elderly and first-time buyers entering the market.

D.8.31.2 Policy DPH31 seeks to “provide a mix of dwelling types and sizes from new development (including affordable housing) that reflects current and future local housing needs”, including the provision of specialist accommodation for those with particular needs, as well as accommodation for Gypsy and Traveller communities. This would be likely to have a minor positive impact on local housing provision (SA Objective 1). By providing a suitable mix of housing types and tenure, this policy would be expected to meet the varying needs of residents, as well as contribute to a vibrant and varied community, and as such a minor positive impact on health and wellbeing and community is expected (SA Objectives 2 and 4).

D.8.32 Policy DPH32: Affordable Housing

DPH32: Affordable Housing

Delivering the amount and type of housing which meets the needs of all sectors of the community is a key objective of the District Plan. Consequently, the Council requires:

- I. a minimum of 30% on-site affordable housing, with the number of units rounded up to the next whole number, on all residential and mixed-use developments providing 10 dwellings or more, or with a maximum combined gross floorspace of greater than 1,000m²;
- II. the full 30% affordable housing requirement to be provided on each and every phase of a phased development, and for the affordable housing to be fully integrated within the development;
- III. developments in the High Weald Area of Outstanding Natural Beauty providing 6 – 9 dwellings, but with a maximum combined gross floorspace of less than 1,000m², to provide a commuted payment towards off-site provision equivalent to providing 30% on-site affordable housing;
- IV. in the case of redevelopment, at least the same number of affordable homes to be re-provided in accordance with current mix and tenure requirements, on sites where the most recent use has been for affordable housing;
- V. a mix of affordable housing tenure comprising 25% First Homes and 75% social or affordable rented, unless the best available evidence supports a different mix;

DPH32: Affordable Housing

- VI. Unless otherwise agreed with the Council the tenure, type and size split on each site is to be as shown in the table below. The majority of 2-bed/ 4 person units should be provided as houses rather than flats, wherever possible.

Affordable housing split

	1 bed / 2 person	2 bed / 4 person	3 bed / 5 person	4+bed / 6 person
Affordable Ownership	10-15%	50-55%	25-30%	5-10%
Affordable Rented	30-35%	40-45%	15-20%	5-10%

- VII. A minimum 4% of affordable housing units (rounded up to the next whole number) on all schemes, unless agreed otherwise with the Council’s Housing Enabling Officer, to be wheelchair accessible dwellings for rent, built to the requirements contained in Part M4(3)(1) (a) and (b) and Part M4(3)(2)(b) of schedule 1 of the Building Regulation 2010 as amended;
- VIII. fully serviced land to be provided for the construction of the requisite number of affordable homes at nil cost, and for the affordable properties to be transferred to a Registered Provider at a price which reflects a nil land value and nil public subsidy;
- IX. affordable housing units to meet the occupational and minimum floor area requirements in the table below, or any other increased standard which supersedes these, since the units are likely to be fully occupied;

No of Beds	No of Persons	Minimum floor area – 1 storey (excluding staircases and hallways in the case of duplex flats/ coach houses/FOGs)	Minimum floor area – 2 storey	Minimum floor area – 3 storey	Minimum floor area – Wheelchair Accessible dwelling
1	2	50m2 / 538ft2	58m2 / 624ft2	-	60m2 / 646ft2 (1B/2PF)
2	4	70m2 / 753ft2	79m2 / 850ft2	-	84m2 / 904ft2 (2B/4PF) 103m2 / 1109ft2 (2B/4PH)
3	5	-	93m2 / 100ft2	99m2 / 1066ft2	121m2 / 1302ft2 (3B/5PH)
3	6	-	102m2 / 1098ft2	108m2 / 1163ft2	133m2 / 1432ft2 (3B/6PH)

DPH32: Affordable Housing

4	6	-	106m2 / 1141ft2	112m2 / 1206ft2	138m2 / 1485ft2 (4B/6PH)
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- X. all affordable housing units to be fully integrated into the scheme layout, and provided in clusters of no more than 10 units with open market units in between each cluster, (a couple of extra units may be allowed in clusters which include flats), in order to create more balanced communities;
- XI. affordable housing units to be ‘tenure blind’ so that affordable and private homes are indistinguishable from one another, in terms of design, build quality, appearance, materials and site location.

Proposals which do not provide a minimum of 30% affordable housing will be refused, unless clear evidence demonstrates, to the Council’s satisfaction, that the site cannot viably support the required number of affordable housing units. The Council’s approach to the assessment of financial viability is set out in its viability policy (see Policy DPI7), but it should be noted that the submitted viability appraisal must be based on a policy compliant scheme, including 30% Affordable Housing. All viability appraisals will be made publicly available and will be assessed with the assistance of an external consultant at the developer’s cost. A viability review will also be required later in the project, for all schemes which are not policy compliant. At the review stage more accurate information about build costs and sales values, will be able to be provided for assessment.

Financial contributions, in place of on-site affordable housing, will only be agreed where there are exceptional reasons preventing the provision of on-site affordable housing. These include where:

- there are prohibitively high service charges;
- schemes comprise less than 6 units;
- the development comprises a single block retirement scheme; or
- the Council wishes to use such funding to develop its own housing.

In such cases a financial contribution payable prior to works commencing and reflecting the full cost of providing alternative serviced land for the required number of units (rounded up if the resultant number is not a whole number), will be sought. The amount per unit will depend on the size, location and type of affordable housing required to be provided by the scheme. The contribution will be sought through an appropriate planning obligation.

Development proposals will be expected to optimise the use of land, and any proposal which appears to have an artificially low density, in order to avoid the required thresholds for affordable housing, may be refused planning permission. The same will also apply to any site which appears to have been deliberately sub-divided, as a possible measure to avoid the required affordable housing threshold.

The above policy will be monitored and kept under review, having regard to the Council’s Housing Strategy and any changes to evidence of housing needs.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH32	+	+	0	+	0	0	0	0	0	0	0	0	0	0

D.8.32.1 Policy DPH32 seeks to ensure that, throughout the Plan area, the MSDPR delivers an appropriate mix of affordable housing that meets the varied needs of current and future residents, whereby “proposals which do not provide a minimum of 30% affordable housing will be refused” unless there is clear evidence that the requirement is wholly unachievable.

D.8.32.2 This policy sets out the requirements for provision of affordable housing, including those which are wheelchair accessible, to ensure that suitable residential development is provided to meet the social and economic needs of the population. Therefore, the policy would be expected to have a minor positive impact on housing provision (SA Objective 1). Through meeting the identified need of affordable housing, Policy DPH32 will enable residents to purchase more affordable homes within their means potentially resulting in positive impacts on financial wellbeing, with subsequent minor positive health impacts (SA Objective 2).

D.8.32.3 In seeking to integrate affordable housing into new development, the policy also has the potential to create more inclusive communities by meeting the needs of local people; therefore, a minor positive impact on SA Objective 4 could be expected.

D.8.33 Policy DPH33: First Homes

DPH37: First Homes

First Homes are part of the Government’s policy to promote home ownership and can be delivered through developer contributions and First Homes Exception sites.

First Homes will be supported by the District Council as part of the 30% affordable housing requirement (DPH36), subject to compliance with other relevant policies within the development plan and the following criteria:

- i. First Homes must form 25% of the total number of affordable units on a site even where more than 30% affordable housing is being provided;
- ii. The dwellings are discounted by a minimum of 30% against the market value;
- iii. After the discount has been applied, the first sale of the home is priced no higher than £250,000;
- iv. The purchaser meets the First Homes eligibility criteria; and
- v. The local connection test criteria are met by the purchaser.

In order to meet the Local Connection Criteria the purchaser must:

DPH37: First Homes

1. be ordinarily resident within the Mid Sussex District Council’s administrative area and have been for a continuous period of not less than 12 consecutive months prior to exchange of contracts for the relevant First Home; and/or
2. have a close family association with the Mid Sussex District Council’s administrative area by reason of a parent or child who is ordinarily resident within the Mid Sussex District Council’s administrative area.

Or meet such other local connection criteria as may be published by the District Council from time to time as its “First Homes Local Connection Criteria” and which is in operation at the time of the relevant disposal of the First Home.

First Homes Exception Sites

The District Council will support First Homes Exception Sites provided that the following additional criteria are met:

- vi. The proposals are wholly or primarily for First Homes;
- vii. There is an identified local need for First Homes which is not already being met elsewhere in the district;
- viii. The development is located adjacent to an existing settlement containing key local services, including a local convenience shop, access to a bus stop with adequate services, and, if possible, a primary school;
- ix. The proposal is proportionate in size and scale to the existing settlement and respects its setting; and
- x. The site is not located within a designated rural area⁴².

All affordable homes delivered as First Homes in the above circumstances will be secured through a S106 agreement to ensure that the discount, relevant eligibility and local connection criteria remain in perpetuity.

Neighbourhood Plans may apply their own First Homes eligibility criteria, an increased minimum discount and lower price and income caps in line with national guidance. Alterations to the criteria or requirements must however be evidence based and not impede the delivery of homes.

	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Policy Reference	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH33	+	+	0	+	0	0	0	0	0	0	0	0	0	0

D.8.33.1 Policy DPH33 seeks to ensure that First Homes are provided as part of the overall residential mix, type and tenure of houses delivered within the Plan period. First Homes, as set out by

⁴² National Parks, Areas of Outstanding Natural Beauty and areas designated as ‘rural’ under Section 157 of the Housing Act 1985 (Annex 2, NPPF)

the policy, will make up 25% of the total number of affordable housing units (as set within Policy DPH32).

- D.8.33.2 This policy sets out the requirements for the development of First Homes and First Home Exception Sites which would be supported by the Council, and therefore by meeting the identified need for first time buyers within the Plan area, a minor positive impact on housing is expected (SA Objective 1). Through meeting the identified need of First Homes, Policy DPH33 will enable residents to purchase more affordable homes within a community of their choice potentially resulting in positive impacts on financial wellbeing and subsequent positive health impacts, as well as helping to create more vibrant and inclusive local communities. A minor positive impact on health and wellbeing and community and equality could therefore be expected (SA Objectives 2 and 4).

D.8.34 Policy DPH34: Rural Exception Sites

DPH34: Rural Exception Sites

The development of rural exception sites for affordable housing will be permitted provided that:

- i. the development comprises 100% affordable housing;
- ii. the housing is to meet the needs of current or recent residents of the Parish or those with a current employment or close family connection to the Parish;
- iii. The size of properties is justified by a Parish Housing Needs Survey carried out in the last 5 years;
- iv. The occupancy of the homes is restricted in perpetuity to those with a genuine local need for affordable housing;
- v. The scale of the development respects the setting, form and character of the settlement and surrounding landscape; and
- vi. The development is adjacent to, or in close proximity to, a rural settlement containing a local convenience shop and access to a bus stop with adequate bus services, and if possible a primary school.

Where it can be clearly demonstrated through evidence that, from a viability perspective, the site cannot support a scheme comprising 100% affordable housing, the District Council will consider an element of open market and/ or self and custom- build housing. This will be limited to that required to facilitate scheme viability, up to a maximum of 20% of the overall scheme, provided that:

- The requirements of ii), iii), v) and vi) can be met for the overall scheme and for the affordable housing element i) and iv) can be met; and
- The new development physically integrates the open market and affordable housing, which should seek to be ‘tenure blind’ and makes best use of the land.

Details of the evidence required to justify an element of open market and/ or self-build housing is set out in the Council’s Viability Policy (see Policy DPI7).

The delivery of rural exception sites will normally be led by Parish Councils, through planning applications, Community Right to Build schemes, Neighbourhood Development Orders or through Neighbourhood Plans and sites must be brought forward in partnership with the relevant Parish

DPH34: Rural Exception Sites

Council, a specialist rural Registered Provider and the Council’s Planning and Housing Enabling Team.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH34	+	0	+	0	0	-	0	+	0	+	0	0	0	0

- D.8.34.1 Rural exception sites are small sites used for affordable housing in perpetuity where sites would not typically be used for housing⁴³. Paragraph 78 of the NPPF⁴⁴ states that *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs and consider whether allowing some market housing on these sites would help to facilitate this”*.
- D.8.34.2 This policy would be expected to help meet the housing requirements and increase the provision of affordable housing across the Plan area. Therefore, a minor positive impact on housing would be expected (SA Objective 1).
- D.8.34.3 Through Policy DPH34, the development of rural exception sites for affordable housing will only be permitted if certain criteria are met including *“The scale of the development respects the setting, form and character of the settlement and surrounding landscape”* and *“The development is adjacent to, or in close proximity to, a rural settlement containing a local convenience shop and access to a bus stop with adequate bus services, and if possible a primary school”*. Therefore, through ensuring landscape settings and accessibility to public transport and local services (potentially including primary schools) are considered, minor positive impacts on education, landscape and climate change and transport could be expected (SA Objectives 3, 8 and 10).
- D.8.34.4 Rural exception sites could potentially be located on previously undeveloped land in the open countryside. As such, development proposals (although of a smaller scale) would be likely to result in the loss of soil resources, and therefore, have a minor negative impact on natural resources (SA Objective 6).

⁴³ MHCLG (2021) National Planning Policy Framework. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date Accessed: 20/01/22]

⁴⁴ Ibid

D.8.35 Policy DPH35: Dwelling Space Standards

DPH35: Dwelling Space Standards

Minimum nationally described space standards, see Glossary, for internal floor space and storage space will be applied to all new residential development.

These standards are applicable to:

- Open market dwellings and affordable housing (see DPH32: Affordable Housing for the occupance and minimum floor area requirements for Affordable Housing);
- The full range of dwelling types; and
- Dwellings created through subdivision or conversion.

All dwellings will be required to meet these standards, or subsequent equivalent standards, other than in exceptional circumstances where clear evidence will need to be provided to show that the internal form or special features prevent some of the requirements being met.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH35	0	+	0	0	0	0	0	0	0	0	0	0	0	0

D.8.35.1 The Nationally Described Space Standards⁴⁵ help to ensure that all development satisfies the requirement for internal space, in particular, ensuring more affordable homes still provide new residents with enough internal space. In general, it is expected that the greater the internal space within a property, the better the standard of living for residents.

D.8.35.2 An increased amount of residential space facilitates an improved standard of living, leading to a more comfortable and higher quality life. As such, a minor positive impact on health and wellbeing is expected from this policy (SA Objective 2).

⁴⁵ MHCLG (2015) Technical housing standards – nationally described space standards. Available at: <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard> [Date Accessed: 21/01/22]

D.8.36 Policy DPH36: Accessibility

DPH36: Accessibility

All development will be required to meet and maintain high standards of accessibility so that all users can use them safely and easily.

This will apply to all development, including changes of use, refurbishments and extensions, open spaces, the public realm and transport infrastructure, and will be demonstrated by the applicant.

With regard to listed buildings, meeting standards of accessibility should ensure that the impact on the integrity of the building is minimised.

Category 2 – Accessible and Adaptable Dwellings

All residential developments will be expected to meet Category 2 – accessible and adaptable dwellings under Building Regulations – Approved Document M Requirement M4(2), with the following exceptions:

- i. Where new dwellings are created by a change of use;
- ii. Where the scheme is for flatted residential buildings of fewer than 10 dwellings;
- iii. Where specific factors such as site topography make such standards unachievable by practicable and/ or viable means;

Wheelchair-user dwellings

- Category 3 – Wheelchair-user dwellings under Building Regulations – Approved Document M Requirement M4(3)(2)(a) will be required for a minimum of 5% of market homes, dependent on the suitability of the site and the need at the time.
- Where affordable housing is required, a minimum of 4% of the affordable housing units (rounded up to the next whole number), on all suitable schemes, unless otherwise agreed with the Council's Housing Enabling Officer, will be required to be wheelchair accessible dwellings (M4(3)(2)(b)) for rent.

The Requirement will also apply to private extra care, assisted living or other such schemes designed for frailer older people or others with disabilities and those in need of care or support services.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH36	+	+	0	0	0	0	0	0	0	0	0	0	0	0

- D.8.36.1 Mid Sussex is an area with an increasingly high population of older people, with approximately 21% of the population aged 65 or over in 2020⁴⁶. As such, future residential development needs to consider accessibility requirements for the elderly, as well as families with young children and those with specific needs.
- D.8.36.2 Policy DPH36 would be likely to help ensure residential developments allow for the safe and convenient access for a variety of residents, including older people and wheelchair users. Therefore, this policy would be likely to have a minor positive impact on housing, through meeting requirements of the whole population including older people, and residents' health and wellbeing through such provisions (SA Objectives 1 and 2).

⁴⁶ ONS (2020) Mid Year Population Estimates June 2020. Available at:
<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalescotlandandnorthernireland> [Date Accessed: 21/01/22]

D.9 Infrastructure

D.9.1 Policy DPI1: Securing Infrastructure

DPI1: Securing Infrastructure

Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of infrastructure and/or mitigation measures to meet the additional need arising from the proposal. Both on-site and off-site provision, including beyond the district boundary, may be required to address the impacts of development, including cumulative effects on the existing infrastructure.

Existing infrastructure services and facilities will be protected where they contribute to the needs of local communities, unless an equivalent replacement or improvement is provided or there is sufficient alternative provision of the same type in the area, and subject to requirements set out elsewhere in the Plan.

Infrastructure should be provided at the appropriate time, prior to the development becoming operational or being occupied. Applicants will be expected to have early engagement with infrastructure providers to ensure any necessary works can be undertaken in a timely manner. Larger developments may need to be phased to ensure that this requirement can be met.

Where a proposal would be made unviable in light of the infrastructure requirements, open book calculations verified by an independent consultant approved by the Council must be provided for considerations. All viability appraisals will be made publicly available and will be assessed with the assistance of an external consultant at the developer's cost. The Council's approach to the assessment of financial viability is set out in its viability policy (see Policy DPI7).

The design and layout of a development should ensure future access to utility infrastructure for maintenance and upgrading.

Proposals by service providers for the delivery of utility infrastructure required to meet the needs generated by new development in the District and by existing communities will be encouraged and permitted, subject to accordance with other policies within the Plan.

Infrastructure will need to be planned and delivered to ensure its future resilience against the impacts of climate change.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI1	0	+	+	+	+	0	0	+	0	+	+	+	+	+

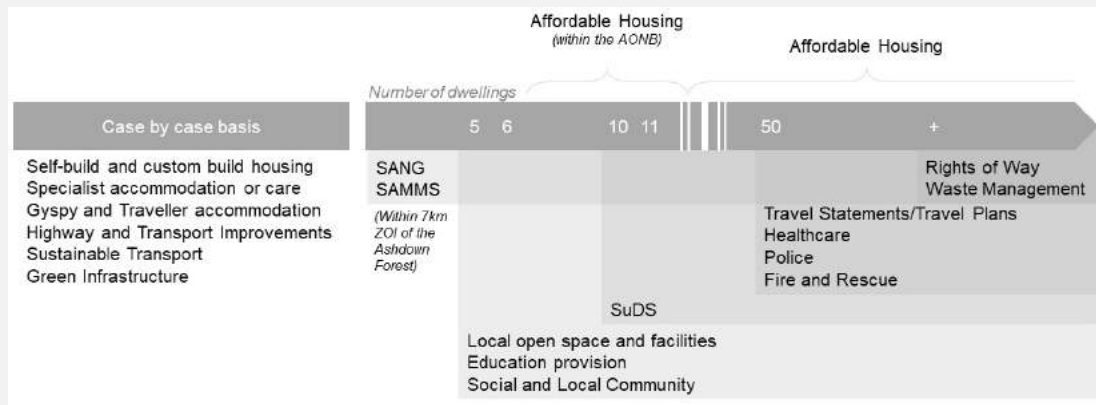
- D.9.1.1 Policy DPI1 aims to ensure that the Plan provides appropriate and proportionate infrastructure to deliver and support the proposed development, including schools and health facilities. This policy would be likely to help ensure that there are adequate services for all new residents in the area and could potentially improve the type and range of services available to current and future residents.
- D.9.1.2 This policy supports development proposals which would provide the infrastructure required to serve current and future residents, including utilities. Therefore, a minor positive impact on transport, energy and water resources could be expected in relation to potential improvements on public transport, energy efficient technologies and water supply and treatment infrastructure within the Plan area (SA Objectives 10, 11 and 12).
- D.9.1.3 The delivery of services and facilities to support new communities may include health care services, leisure facilities (such as improvements to sports facilities), schools and delivery/maintenance of GI associated with new developments, which may include the provision of publicly accessible open spaces, and enhancements to public rights of way. The policy has the potential to have a minor positive impact on landscape and townscape (SA Objective 8), access to education (SA Objective 3) as well as the health and wellbeing of new communities (SA Objectives 2 and 4).
- D.9.1.4 Furthermore, the policy could result in infrastructure improvements associated with the transport network and would support economic activity and encourage inward investment in the Plan area. The policy has the potential to have a minor positive impact on economic regeneration and growth (SA Objectives 13 and 14).
- D.9.1.5 The infrastructure improvements could also help to ensure the maintenance of existing flood defences. There is the potential for a minor positive impact on climate change adaptation and resilience to flood risk (SA Objective 5).

D.9.2 Policy DPI2: Planning Obligations

DPI2: Planning Obligations

Where required, the Council will use planning obligations to address the impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations 2010 (as amended). This may include but is not limited to the planning obligations set out in the figure below.

Indicative planning obligations



Other planning obligations may be sought to secure policy requirements set out in this plan and to mitigate the specific impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations 2010 (as amended).

Appendix 3 sets out the infrastructure quantity and accessibility standards and formulae used to calculate contributions. The infrastructure standards may be reviewed and will be set following assessments of need and viability. Contributions will be subject to inflation reviews to ensure the necessary infrastructure can be delivered.

Where a planning obligation (which may also be known as a Section 106 Agreement or Unilateral Undertaking) is entered into, the Council will secure fees associated with the monitoring of any planning obligations in addition to the Council’s legal costs in drafting and completing the agreement. The current applicable fees to be levied will be shown on the Council’s website.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI2	0	+	+	+	+	0	+	+	0	+	+	0	0	0

D.9.2.1 Policy DPI2 sets out the use of planning obligations in relation to addressing “the impacts of development in line with the legal tests set out in the Community Infrastructure Levy Regulations 2010”. The Community Infrastructure Levy is an important tool for local authorities to use to help them deliver the infrastructure required to support further

development within the area, and this policy provides supplementary information to these provisions on a case-by-case basis and thresholds relating to the proposed dwelling numbers.

- D.9.2.2 The planning obligations, as outlined within the policy's flow diagram figure, relate to the different types of provisions required over certain dwelling thresholds. These concern sustainability topics such as health and wellbeing, education, social and community facilities, flood management, biodiversity (for example the Ashdown Forest Zone of Influence), public rights of way management, transport and energy. The policy could help to ensure that site end users are served by suitable infrastructure and are located in areas with good access to these services and facilities. Therefore, minor positive impacts relating to these SA Objectives could be expected (SA Objectives 2, 3, 4, 5, 7, 8, 10 and 11).

D.9.3 Policy DPI3: Major Infrastructure Projects

DPI3: Major Infrastructure Projects

In responding to major infrastructure proposals as a consultee or decision maker the Council will consider applications against the relevant national planning policy and the strategy and relevant policies of the development plan. The objective from the Council's perspective is that such proposals should, where possible, contribute positively to the implementation of the spatial strategy and meet the underlying objectives of the plan. However, the Council will seek to adopt an approach which is consistent with relevant NPS and take into account operational requirements of the MIP.

For a NSIP the Council will take into account through the preparation of a Local Impact report, how proposals through their formulation and implementation, avoid or minimise adverse impacts or harm to local places, communities and businesses and maximise local benefits wherever possible. Where the Council is the decision maker, these matters will be taken into account through the planning application process. In all cases the Council will also assess where appropriate how the consideration of alternatives has informed the proposals.

The Council will consider the benefits and impacts of a proposal having regard to direct, indirect secondary and cumulative benefits and impacts, and benefits and impact interactions. This assessment will include the construction, operation and decommissioning (including restoration) stages of the project. It will also have regard to reasonably foreseeable development proposals in the local area, including other infrastructure projects and employment and residential development.

Depending upon the scale and nature of the proposals, in order to present sufficient information for the Council to undertake the assessment, it may request the preparation of Delivery Plans.

Delivery Plans will identify measures to be taken to maximise benefits, to avoid and minimise impacts, and to mitigate and compensate for impacts, with respect to matters such as the economy, climate change, sustainability, the environment, biodiversity net gain, transport and movement, housing, local communities (including safety, health, leisure and general well-being) council services, and education where this is justified by reference to national policy.

DPI3: Major Infrastructure Projects

The Management or Delivery Plans should identify the systems and resources that will be used to implement the proposed measures.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI3	0	+	+	0	+	0	0	0	0	+	+	0	+	+

- D.9.3.1 Policy DPI3 sets out the Council’s approach to considering major infrastructure projects and sets out requirements for developers with respect to preparation of various documents to support details surrounding the major infrastructure project including Local Impact reports. The policy states that “*proposals should, where possible, contribute positively to the implementation of the spatial strategy and meet the underlying objectives of the plan*” and should ensure that they “*avoid or minimise adverse impacts or harm to local places, communities and businesses and maximise local benefits wherever possible*”.
- D.9.3.2 Through ensuring large infrastructure projects contribute positively to the district’s spatial strategy, minor positive impacts on economic regeneration and growth (SA Objectives 13 and 14) within the district could result where improved infrastructure (for example roads and public transport) could promote better access to shops, services and other businesses. Additionally, large infrastructure projects could provide local residents with employment, further positively impacting the economy.
- D.9.3.3 Policy DPI3 seeks to provide further guidance for large infrastructure projects to adhere to. Large infrastructure projects, once complete, could provide various benefits to the Plan area including residents’ health and wellbeing (for example hospital provision), education, flood risk management, public transport and energy efficiency and waste treatment (for example potential improvements to energy production and waste processing infrastructure) and therefore minor positive impacts relating to these SA Objectives could be expected (SA Objectives 2, 3, 5, 10 and 11).
- D.9.3.4 The remaining topics covered within the SA Objectives are assessed as negligible for impacts from this policy where it aims to ensure major infrastructure projects “*avoid and minimise impacts, and to mitigate and compensate for impacts*”. Any future major infrastructure projects will be assessed for their sustainability performance in relation to these topics, and others, on a case-by-case basis through various legal procedures including those outlined within Policy DPI3.

D.9.4 Policy DPI4: Communications Infrastructure

DPI4: Communications Infrastructure

The Council will encourage the incorporation of high quality digital infrastructure including fibre to new housing, employment and retail developments.

The expansion of the electronic communications network and digital infrastructure to the towns and rural areas of the District will be supported.

When considering proposals for new telecommunications equipment the following criteria will be taken into account:

- The location and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area. On buildings, apparatus and associated structures should be located and designed in order to seek to minimise impact to the external appearance of the host building;
- New telecommunications equipment should not have an unacceptable effect on sensitive areas, including areas of ecological interest, areas of landscape importance, Areas of Outstanding Natural Beauty, the South Downs National Park, archaeological sites, conservation areas or buildings of architectural or historic interest and should be sensitively designed and sited to avoid damage to the local landscape character;
- Preference will be for use to be made of existing sites rather than the provision of new sites.

When considering applications for telecommunications development, regard will be given to the operational requirements of telecommunications networks and the technical limitations of the technology.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI4	0	0	0	0	0	+	0	0	0	+	0	0	+	+

D.9.4.1 Policy DPI4 supports the provision of high-quality digital infrastructure, such as superfast broadband, and electronic communications throughout the Plan area, in order to meet the needs of the current and future population.

D.9.4.2 With improvements to broadband and electronic communications in the area under this policy, residents would be likely to have greater access to essential services from home. This would provide increased opportunities to work from home and access a wider range of employment opportunities, resulting in a minor positive impact on economic growth (SA Objective 14). Through increasing the range of employment opportunities available within the district, this policy could also result in a minor positive impact on economic regeneration (SA Objective 13).

- D.9.4.3 Additionally, with improved access to online facilities and home working, this policy could potentially help to reduce the need to travel and reliance on private car use such as for commuting to workplaces, and in turn, reduce local congestion. This could potentially lead to a minor positive impact on climate change and transport, due to reduced emissions associated with less traffic, and transport (SA Objective 10).
- D.9.4.4 Through preferring that communications infrastructure proposals “*use to be made of existing sites rather than the provision of new sites*” there may potentially be less undeveloped land and associated soil resources used for development, leading to minor positive impacts on natural resources (SA Objective 6).

D.9.5 Policy DPI5: Open Space, Sport and Recreational Facilities

DPI5: Open Space, Sport and Recreational Facilities

Development that provides new and/or enhanced open space, leisure, sport and recreational facilities, including allotments, to support healthy lifestyles and in accordance with the strategic aims of the Playing Pitch Study, Play & Amenity Green Space Study and Community Buildings Study (or as the studies are updated) will be supported.

The provision of new open space, leisure, sport and recreational facilities, including the provision of public open space, play areas and equipment, will be required for all new residential developments in accordance with Policies DPI1: Securing Infrastructure and DPI2: Planning Obligations. On-site provision will be required where appropriate, including making land available for this purpose. Planning conditions and/or planning obligations will be used to secure such facilities. The design of open space and public realm should accord with the Mid Sussex Design Guide SPD.

Sites for appropriate open space, leisure, sport and recreational facilities to meet local needs will be identified through Neighbourhood Plans or a Development Plan Document produced by the District Council.

Proposals that involve the loss of open space, leisure, sports and recreational buildings and land, including playing fields, will not be supported unless:

- an assessment has been undertaken which has clearly shown the open space, leisure, sports or recreational land or building to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Whilst a site may be surplus to requirements for open space, leisure, sport and recreation use, it may still be of environmental, social or cultural value. The site's development may have unacceptable visual or amenity impact, or adversely affect its wider healthy lifestyles, green infrastructure or biodiversity functions, including for climate change mitigation and resilience. Applicants will therefore need to carefully consider such as proposal alongside other policies in this Plan.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI5	0	+	0	+	0	0	+	+	0	0	0	0	0	0

D.9.5.1 This policy would be likely to help ensure residents have good access to open space, sport and recreational facilities, including play facilities for children and sports pitches. This would be expected to encourage outdoor exercise and provide space for reflection. Therefore, a minor positive impact on mental and physical health would be expected (SA Objective 2).

D.9.5.2 Policy DPI5 seeks to increase the provision of green spaces and recreational facilities, helping to ensure residents have access to a diverse range of natural spaces and habitats. The provision of green spaces can help create attractive places to live and strengthen a sense of place for local communities and help contribute to a sense of community and social cohesion. By supporting the provision of green space across the Plan area, this policy would be expected to have a minor positive impact regarding community cohesion (SA Objective 4), as well as enhancing the multi-functional benefits of GI including in terms of biodiversity and landscape (SA Objectives 7 and 8).

D.9.6 Policy DPI6: Community and Cultural Facilities and Local Services

DPI6: Community and Cultural Facilities and Local Services

The provision or improvement of community and cultural facilities and local services that contribute to creating sustainable communities will be supported where the proposal is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside and where:

- The need for the community or cultural facility or local service is clearly demonstrated;
- There would be no harm on highway safety or severe residual cumulative impacts on the road network;
- It encourages sustainable travel opportunities;
- It will not adversely affect the character, landscape, historical significance, appearance and amenity of the area;
- The design and layout of the proposals, including ancillary facilities, area sensitive to the existing character and setting;
- It does not have an adverse effect on residential amenity in the local area;
- It will not have an adverse effect on the vitality and viability of existing facilities in the locality or relevant assets of community value; and
- It meets the requirements of other relevant development plan policies.

Proposals that involve the loss of a community or cultural facility (including those facilities and services where the loss would reduce the community’s ability to meet its day-to-day needs locally), will not be supported unless:

DPI6: Community and Cultural Facilities and Local Services

- an assessment has been undertaken which has clearly shown the community or cultural facility or local service to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative community and cultural provision, the benefits of which clearly outweigh the loss of the current or former use.

New residential development will be required to contribute to the provision of new or enhanced community facilities in accordance with Policies DPI1: Securing Infrastructure and DPI2: Planning Obligations. The on-site provision of new community facilities will be required on larger developments, where appropriate, including making land available for this purpose. Planning conditions and/or planning obligations will be used to secure such facilities.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI6	0	+	0	+	0	0	0	0	0	0	0	0	0	+

D.9.6.1 Policy DPI6 seeks to protect existing community facilities and support development proposals for new or improved facilities. This policy would be expected to ensure that existing local facilities are retained and enhanced, which would be likely to improve local residents’ access to services such as health facilities, sports facilities and schools.

D.9.6.2 By encouraging the retention or provision of these community facilities, this policy would be expected to have a minor positive impact in regard to health, access to community facilities and supporting local businesses, potentially leading to economic growth (SA Objectives 2, 3, 4 and 14).

D.9.7 Policy DPI7: Viability

DPI7: Viability

Where a planning application is not policy compliant, in respect of infrastructure contributions and/or Affordable Housing, at the time of submission the following approach will be taken:

- I. A Viability Appraisal must be submitted by the applicant prior to validation of the planning application. It must be based on a policy compliant affordable housing scheme and the District Council's required tenure and size mix, and current costs and values. There must also be a clear correlation between a development's specification, Build Costs and development values.
- II. It must be submitted in a clear and accessible format with full supporting evidence to substantiate the inputs and assumptions used. A full working electronic version of the Viability Appraisal model used will be required so that it can be fully tested and interrogated. The Viability Appraisal will be assessed by the District Council with advice from a suitably qualified external consultant/s and the cost of this external advice is to be borne by the Developer.
- III. The Viability Assessment will consider whether the approach adopted and the inputs used are appropriate and adequately justified by evidence and experience. It will determine whether the level of infrastructure contributions and affordable housing provision proposed by the applicant are the maximum that can be viably supported or whether a greater level of policy compliance can be achieved.
- IV. Where reductions in infrastructure contributions and/ or affordable housing provision are agreed on viability grounds at planning application stage the District Council will include the estimated Gross Development Value and Build Costs at this stage in a planning obligation, together with details of the required Advanced Stage Viability Review.
- V. A viability review will be required later in the project, for all schemes where policy requirements are not met in full at the time planning permission is granted. This will enable any increase in viability to be calculated so that greater or full compliance with the Development Plan can be achieved. At the review stage accurate and up to date evidence of Build Costs and Sales Values, the key variables most likely to change over time, will be able to be provided for assessment.
- VI. During the Advanced Stage Viability Review the Gross Development Value and Build Costs, will be re-assessed by the District Council with advice from a suitably qualified external consultant and the formula will be applied, to determine whether there has been an increase in viability from that anticipated when the planning application was submitted.
- VII. If a surplus (i.e. further profit) results from the application of the formula, it will be split between the District Council and the Developer 60%/40% and the 60% payable to the District Council will be put towards infrastructure contributions and / or off-site affordable housing provision. This will enable policy requirements which were not deemed deliverable at planning application stage to be met in full or part.
- VIII. All Viability Appraisals will be made publicly available on the planning register, in order to increase openness and transparency in the planning process. Redaction of any information will only be allowed in exceptional circumstances

The above policy will also apply where a Developer is asserting that it is not viable to provide 100% affordable housing in the case of a Rural Exception Site, and consequently wishes to provide an element of open market and / or self-build housing up to a maximum of 20% of the total.

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPI7	+/-	+/-	+/-	+/-	0	0	0	0	0	+/-	+/-	+/-	+/-	+/-

D.9.7.1 Policy DPI7 sets out a range of criteria which must be adhered to, in exceptional circumstances where a development proposal may generate insufficient value to support the full range of requirements set out in other District Plan policies.

D.9.7.2 The policy could potentially result in a benefit in terms of requiring applicants to robustly demonstrate through a Viability Appraisal how the proposal is economically unviable, to ensure there are valid reasons for departing from the required contributions. By setting the requirements out in a planning policy, this could give greater certainty regarding the delivery of appropriate infrastructure depending on the circumstance for each scheme.

D.9.7.3 However, the potential for “*reductions in infrastructure contributions and/ or affordable housing provision*” set out through this policy could result in possible adverse effects on the provision of social and community infrastructure including schools, affordable housing and choice in housing, open space and green infrastructure, transport infrastructure and renewable energy schemes. The effects of this policy on SA Objectives 1, 2, 3, 4, 10, 11, 12, 13 and 14 are uncertain.

D.9.7.4 The policy would be unlikely to directly impact SA Objective 5, 6, 7, 8 and 9.

Appendix E: Reasonable Alternative Site Post-Mitigation Assessments

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E.1 Introduction

E.1.1 Preface

- E.1.1.1 The process which has been used to appraise reasonable alternative sites is sequenced through two stages. Firstly, sites are assessed in terms of impacts on the baseline without consideration of mitigation. Secondly, the appraisal findings are further assessed in light of any relevant mitigation that is available through for example, emergent District Plan Review (DPR) policies.
- E.1.1.2 The pre-mitigation assessment provides a baseline assessment of each site and identifies any local constraints. The pre-mitigation assessment does not consider mitigating factors such as District Plan policy. The purpose of this stage is to identify the impacts that would need to be overcome for development to optimise sustainability performance.
- E.1.1.3 The post-mitigation assessment considers how Local Plan policy would help to avoid or reduce the impacts that were identified at the pre-mitigation stage.
- E.1.1.4 It is important to demonstrate the amount of mitigation that may be required to ensure a site can optimise sustainability performance. The level of intervention that may be required to facilitate effective mitigation varies and can help determine the eventual choice of preferred options in the plan. Sites which require low levels of intervention are likely to be preferable to sites that require complex and potentially unviable strategies.
- E.1.1.5 **Chapter E.2** summarises the pre-mitigation impacts of the 44 reasonable alternative sites considered throughout this stage of the SA process, **Chapter E.3** provides detail on the mitigation within the Mid Sussex DPR and **Chapter E.4** summarises the post-mitigation impacts of the 44 sites.
- E.1.1.6 **Chapter E.5** presents a series of recommendations Lepus has provided to the Council, highlighting ways in which to improve or enhance the Mid Sussex DPR policies, which may further mitigate identified potential adverse impacts, and the Council's responses to these recommendations.

E.2 Pre-Mitigation Assessment

E.2.1 Overview

E.2.1.1 A total of 44 reasonable alternative sites have been assessed in the SA. These assessments are presented in **Appendix C** of the Regulation 18 SA Report. **Table E.2.1** re-presents the pre-mitigation impact matrix for all 44 reasonable alternative sites considered throughout the preparation of the Mid Sussex DPR.

Table E.2.1: Pre-mitigation impact matrix for all reasonable alternative sites

Site Reference	1 Housing	2 Health and Wellbeing	3 Education	4 Community and Crime	5 Flooding	6 Natural Resources	7 Biodiversity	8 Landscape	9 Cultural Heritage	10 Transport	11 Energy and Waste	12 Water Resources	13 Economic Regeneration	14 Economic Growth
13	+	-	-	++	-	-	0	-	-	-	-	0	++	+
18	++	-	--	-	--	--	--	-	-	-	--	-	-	++
19	+	-	--	-	--	-	0	-	-	-	-	0	-	+
198	+	-	-	-	+	-	-	--	0	-	-	-	-	+
210	+	-	++	+	+	-	0	-	0	-	-	0	+	+
503	++	-	--	-	-	--	--	-	-	-	--	0	-	-
508	+	-	--	-	-	-	0	-	0	-	-	0	-	+
526	+	-	-	-	+	-	0	-	-	-	-	0	-	+
543	+	-	-	-	+	-	0	-	0	-	-	0	-	+
556	+	-	-	-	--	-	-	-	-	-	-	-	-	+
573	+	-	++	-	+	-	0	-	0	-	-	0	-	+
575	++	-	--	-	--	--	--	-	-	-	--	-	-	+
601	++	-	--	-	--	-	--	-	-	-	--	0	-	+
617	++	-	-	-	-	-	0	-	-	-	--	0	-	+
631	+	-	--	-	+	-	0	-	0	-	-	0	-	+
678	++	-	--	-	--	--	--	-	-	-	--	-	-	+
686	++	-	-	-	--	-	-	-	-	-	--	0	-	+
688	++	-	-	-	--	-	--	-	-	-	--	-	-	+
736	++	-	--	-	--	--	--	-	-	-	--	-	-	++
740	++	-	0	-	--	--	--	-	0	-	--	-	-	++
743	+	-	-	-	--	-	-	-	0	-	-	0	-	-
784	+	-	--	-	+	-	0	-	0	-	-	0	-	+
789	+	-	-	-	+	-	0	-	-	-	-	0	-	+
799	++	-	-	-	--	--	0	-	-	-	--	0	-	++
830	++	-	--	-	--	-	0	--	0	-	--	-	-	+
844	++	-	-	-	-	-	-	-	-	-	--	0	-	+
858	+	-	--	-	+	-	-	-	0	-	-	0	-	+
984	+	-	-	-	+	-	-	-	0	-	0	0	-	+

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
986	++	-	-	-	--	-	-	-	-	-	--	0	-	+
1003	++	-	--	-	--	-	0	-	0	-	--	-	-	+
1018	++	-	-	-	--	-	0	-	0	-	--	0	-	+
1020	+	-	-	-	-	-	-	-	0	-	-	0	-	+
1022	++	-	--	-	--	--	--	-	-	-	--	-	-	-
1026	+	-	-	-	--	-	0	-	0	-	-	0	-	+
1030	+	-	-	-	+	-	-	-	0	-	-	-	-	+
1063	+	-	-	-	+	-	0	-	-	-	-	0	-	+
1075	++	-	-	-	--	-	-	-	-	-	--	-	-	+
1095	++	-	-	-	--	--	-	-	-	-	--	-	-	+
1101	+	-	0	++	--	-	0	-	-	-	+/-	0	++	++
1105	++	-	--	-	--	--	-	-	-	-	--	-	-	+
1106	+	-	0	-	-	-	-	--	0	-	+/-	0	-	++
1120	++	-	-	-	-	-	0	-	-	-	--	0	-	+
1121	++	+	++	++	-	+	-	+/-	0	++	--	0	+	-
1123	++	-	++	++	-	-	-	+/-	0	++	--	0	+	-

E.3 Mitigating effects of draft policies

E.3.1 Introduction

E.3.1.1 The sustainability appraisal of 44 reasonable alternative allocations against baseline sustainability information has identified a number of adverse effects associated with the SA Objectives in the SA Framework (see **Table E.2.1**). The purpose of this chapter is to consider if and how these effects can be mitigated by applying the mitigation hierarchy.

E.3.1.2 The first stage of the mitigation hierarchy is to consider if the adverse effect can be avoided. This may be possible by withdrawing the potential site allocation.

E.3.1.3 SA is an iterative process of assessment which feeds back into the plan-making process. Where sites are selected as being a ‘preferred option’ for allocation on the basis that the plan makers consider their inclusion to be necessary, mitigation measures should be explored to reduce the overall significance of any identified adverse effects. If it is not possible to mitigate identified adverse effects, these will remain at the end of the SA process and will be declared in the Environmental Report, which is prepared at the Regulation 19 stage.

E.3.1.4 One way to reduce adverse impacts identified against baseline receptors is to consider the potential mitigating effects of planning policies. **Tables E.3.1 – E.3.14** list the identified adverse impacts according to SA Objectives and list the policies from the draft Mid Sussex DPR that might reasonably be expected to help mitigate identified adverse effects.

E.3.1.5 Each table has three columns. Column one lists the adverse effect, column two lists relevant planning policies and the final column indicates the extent to which these policies would be expected to mitigate each identified adverse effect.

E.3.1.6 It should be noted that the 26 site allocation policies (DPSC1-3, DPH5-25 and DPH27-28) have not informed the post-mitigation assessments, as they do not relate to all reasonable alternatives. The site allocation policies provide further site-specific requirements in relation to the preferred sites for allocation in the DPR which were considered subsequently to the pre- and post-mitigation assessments of the reasonable alternative sites.

E.3.2 SA Objective 1 – Housing

E.3.2.1 No direct adverse impacts are anticipated as a result of the proposed development at any of the reasonable alternative sites.

E.3.2.2 Policies DPN4, DPC4 and DPC5 relate to the protection of ancient woodland, the High Weald AONB and the South Downs National Park. The protection afforded to these environmental designations may constrain the delivery of housing development in some locations.

E.3.3 SA Objective 2 – Health and Wellbeing

E.3.3.1 **Table E.3.1** presents the identified adverse impacts on health and wellbeing, and the likely impacts post-mitigation.

Table E.3.1: Identified adverse impacts and potential mitigation for SA Objective 2 – Health and Wellbeing

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to health facilities and services	<p>Policy DPH4 states that housing allocations should contribute towards necessary infrastructure provision including health care facilities and Policy DPI1 seeks to secure infrastructure and protect existing services and facilities including those that provide health care.</p> <p>Policy DPI2 could help to ensure that impacts of development on infrastructure, including healthcare and community facilities and services, are mitigated through setting out the process of planning obligations.</p> <p>Various policies including DPS6, DTB1, DTB9, DPT4, DPH3, DPH4 and DPH36 could help to ensure new residents have good access to public transport to reach community facilities.</p>	<p>These policies would be likely to improve site end users’ access to healthcare; however, the policies would not be expected to fully mitigate the existing restricted access to these services in all locations, especially in terms of providing sustainable connections for rural areas of Mid Sussex to NHS hospitals.</p>
Limited access to leisure facilities and services	<p>Policy DPI5 sets out standards for provision of new open space, sports and recreational facilities alongside new developments and as stand-alone developments.</p> <p>Policy DPE8 supports leisure and tourism related development within rural areas which would likely improve access for residents living in those areas.</p> <p>Policy DPN3 seeks to protect and enhance areas of greenspace through green infrastructure provision.</p> <p>Policies DPI1 and DPI3 would be expected to protect leisure facilities through ensuring major infrastructure developments protect existing facilities serving the community.</p>	<p>These policies would be likely to improve access to leisure facilities for development proposals within or in the outskirts of settlements which contain existing leisure centres. However, these policies would not be expected to fully mitigate the existing restricted access to these services for residents of more rural areas within Mid Sussex.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Limited access to, and the net loss of, natural green spaces</p>	<p>Policy DPH4 sets out various criteria for housing allocations including access to natural greenspaces.</p> <p>Policy DPI5 seeks to ensure that existing open space with recreational value is protected from development and sets out standards for new open space provision alongside new developments.</p> <p>Policy DPC6 sets out criteria for the contribution to provision of Suitable Alternative Natural Greenspace (SANG) for recreational use with the aim of reducing recreational impacts at Ashdown Forest SPA and SAC.</p> <p>Policy DBP1 seeks to ensure that developments incorporate greenspace into the overall character and design of proposals.</p>	<p>These policies would be expected to mitigate the limited access to public greenspace and community open spaces and ensure that no existing green space with public value is lost to development.</p>
<p>Increase in, and exposure to, air and noise pollution (including from AQMAs and main roads)</p>	<p>Policy DPN9 wholly regards air pollution within the Plan area and seeks to reduce exposure to areas of poor air quality and sets out the requirement for Air Quality Assessments for major developments within or in close proximity to an AQMA. The policy also sets out requirements for air quality mitigation measures and to ensure developments make positive contributions towards the aims of the Council's Air Quality Action Plan.</p> <p>Policy DPH4 sets out various criteria for housing allocations including avoidance or mitigation of air pollution within proposals.</p> <p>Several of the policies, including Policy DPT1, seek to prioritise sustainable and active modes of travel which would contribute towards a reduction in traffic-related emissions.</p> <p>Policy DPB1 promotes high quality design of new developments which aim to ensure the development does not result in, or is exposed to, excessive noise pollution.</p>	<p>These policies would not be expected to fully mitigate the impacts of transport associated emissions and noise pollution from new development proposals located in close proximity to the AQMA or main roads.</p>
<p>Limited access to the PRoW or cycle network</p>	<p>Policy DPH4 includes criteria for housing allocations to safeguard the PRoW network and ensure the provisions of convenient cycling and walking routes.</p> <p>Policy DPT1 seeks to ensure developments prioritise sustainable and active modes of travel with safe and convenient routes for walking and cycling.</p>	<p>These policies would be expected to mitigate adverse impacts on accessibility to PRoW and cycle networks for the majority of proposed development sites.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy DPT2 regards the protection and provision of rights of way and other recreational routes, including Sustrans national cycle routes.</p> <p>Policy DPN3 encourages proposals to explore opportunities for integrating PRow, footpaths, bridleways and cycle routes into the multi-functional GI network to improve connectivity.</p>	

E.3.4 SA Objective 3 – Education

E.3.4.1 **Table E.3.2** presents the identified adverse impacts on education and the likely impacts post-mitigation.

Table E.3.2: Identified adverse impacts and potential mitigation for SA Objective 3 – Education

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Limited access to primary and secondary schools.	<p>Policy DPH4 seeks to ensure that all new development contributes towards necessary infrastructure provision including education capacity as required by Policy DP1.</p> <p>Policy DPH34 outlines the criteria in which rural exception sites should meet in order to be deemed sustainable, including being ideally located in close proximity to a primary school.</p> <p>Policy DPI6 supports the provision or improvement of community facilities in order to create sustainable communities, including educational facilities.</p> <p>Policy DPH29 seeks to ensure that sites proposed for Gypsy and Traveller accommodation are located in a reasonably accessible location to educational facilities.</p>	<p>These policies would improve sustainable transport provision and ensure that major developments are located within reasonable walking distances to primary education, however, these policies would not be expected to fully mitigate adverse impacts on poor accessibility to education in all locations in this largely rural district, particularly in relation to providing sustainable access to secondary schools.</p> <p>Due to the rural nature of the district and spread of secondary schools, there is an inevitability that pupils will need to travel relatively long distances to reach secondary education, such that not all pupils will be within walking distance.</p> <p>The development of new and expanded schools on ‘significant sites’ identified in the DPR would improve access by locating site-end users in closer proximity to primary education or increasing capacity at existing schools.</p> <p>Overall, assuming that the majority of journeys to secondary schools would be by sustainable transport modes as advocated by the DPR policies, such as public transport or school buses, the policies would be expected to reduce the potential for negative impacts associated with accessibility to education.</p>

E.3.5 SA Objective 4 – Community and Crime

E.3.5.1 **Table E.3.3** presents the identified adverse impacts on community and crime and the likely impacts post-mitigation.

Table E.3.3: Identified adverse impacts and potential mitigation for SA Objective 4 – Community and Crime

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Limited access to or loss of community facilities</p>	<p>Policy DPI6 seeks to support the provision or improvement of community and cultural facilities and local services and outlines the contribution requirements for new residential development regarding these facilities. The policy would also resist the loss of existing community or cultural facilities, unless there is objective evidence that the service is surplus to requirement.</p> <p>Policy DPI2 regards the planning obligations for new developments in relation to the provision of these facilities.</p> <p>Policy DPI5 regards the protection and provision of open space, sport and recreational facilities and would be expected to improve access to these facilities.</p> <p>Policy DPE4 supports development within a defined town or village centre and would be expected to improve access to local services. The policy also seeks to reduce impacts of retail developments outside of these centres through retail impact assessments.</p> <p>Various policies including DPT1 would be expected to improve access to local services through improvements to sustainable transport provision or enhancement.</p>	<p>Although these policies are likely to improve access to local services and facilities and help promote community cohesion, they would not be expected to fully mitigate the adverse impact on restricted access to local services and facilities at sites which currently have limited access, such as those in more rural locations (assessed as those over 150m from a defined Built-up Area Boundary, in agreement with MSDC).</p> <p>The policies would however be expected to mitigate the potential loss of existing community facilities.</p>

E.3.6 SA Objective 5 – Flooding

E.3.6.1 **Table E.3.4** presents the identified adverse impacts on flooding and the likely impacts post-mitigation.

Table E.3.4: Identified adverse impacts and potential mitigation for SA Objective 4 – Flooding

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Risk of fluvial flooding	<p>Policy DPS4 would help to ensure that development proposals would not place new residents at an increased risk of fluvial flooding or exacerbate flood risk in surrounding areas, through requiring development to adopt a sequential approach to ensure that the appropriate uses are located in areas at greater flood risk from all sources. This policy requires development to ensure that development is safe across its lifetime and would not increase flood risk elsewhere and seeks to sensitively integrate SuDS with the local landscape.</p> <p>Policy DPH4 sets out general principles for housing allocations and includes criteria for flood risk management of a site including Flood Risk Assessments and SuDS.</p> <p>Policy DPN3 seeks to ensure that development proposals make contributions to GI networks.</p> <p>Policy DPS12 sets out criteria to ensure all development is of sustainable design and construction, including use of SuDS as outlined within Policy DPS4.</p>	<p>These policies would not be expected to fully mitigate fluvial flooding within proposed development sites where the entirety or the majority of the site coincides with high-risk areas (Flood Zone 3). Six of the reasonable alternative sites (18, 556, 678, 736, 740 and 1105) coincide with small areas of Flood Zone 2 and/or 3, and as such, the adverse impacts at all sites would be likely to be mitigated through the application of District Plan policies.</p>
Risk of surface water flooding	<p>Policy DPS4 would help to ensure that development proposals would not place new residents at an increased risk of flooding, including surface water flooding, or exacerbate flood risk in surrounding areas, through requiring development to adopt a sequential approach to ensure that the appropriate uses are located in areas at greater flood risk from all sources. This policy requires development to ensure that development is safe across its lifetime and would not increase flood risk elsewhere and seeks to sensitively integrate SuDS with the local landscape.</p> <p>Policy DPH4 sets out general principles for housing allocations and includes criteria for flood risk management of a site including Flood Risk Assessments and SuDS.</p> <p>Policy DPN3 seeks to ensure that development proposals make contributions to GI networks.</p>	<p>Overall, these policies would be expected to mitigate the risk of surface water flooding and would seek to prevent the exacerbation of surface water flood risk in surrounding areas.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	Policy DPS12 sets out criteria to ensure all development is of sustainable design and construction, including use of SuDS as outlined within Policy DPS4.	

E.3.7 SA Objective 6 – Natural Resources

E.3.7.1 **Table E.3.5** presents the identified adverse impacts on natural resources and the likely impacts post-mitigation.

Table E.3.5: Identified adverse impacts and potential mitigation for SA Objective 6 – Natural Resources

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Loss of greenfield / previously undeveloped land with an ecological or landscape value and loss of BMV land	<p>Policies DPH34 and DPS3 promote the efficient use of land.</p> <p>Policy DPN10 supports the remediation of contaminated land and as such could encourage the redevelopment of previously developed land.</p> <p>Policy DPC1 supports rural growth where development will not lead to a significant loss of high-grade agricultural land.</p> <p>Policies DPC4 and DPC5 supports development within either the High Weald AONB or South Downs National Park only where developments would conserve or enhance these areas of landscape value.</p>	The majority of potential sites for development in Mid Sussex comprise previously undeveloped land. These policies would not be expected to mitigate the loss of greenfield land, or the loss of ALC Grades 1, 2 and 3 land, due to the nature and scale of the development proposed in the MSDPR.
Sterilisation of mineral resources within Mineral Safeguarding Areas	Policies DPH4 and DPC1 set out criteria that development proposals must adhere to which would be likely to ensure that mineral resources are not unnecessarily sterilised by development and that areas of existing mineral supply infrastructure are protected.	The policies seek to prevent the sterilisation of mineral resources from development. These policies would be expected to ensure safeguarded minerals are protected or extracted prior to development, where viable, within identified MSAs.

E.3.8 SA Objective 7 – Biodiversity

E.3.8.1 **Table E.3.6** presents the identified adverse impacts on biodiversity and the likely impacts post-mitigation.

Table E.3.6: Identified adverse impacts and potential mitigation for SA Objective 6 – Biodiversity

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Threats or pressures to Habitats sites (SAC, SPA and Ramsar sites)	<p>Policy DPC6 sets out criteria for new development to meet to help prevent adverse effects on the Ashdown Forest SPA and SAC, including mitigation requirements. Policy DPC3 directs development proposals to the criteria as set out within Policy DPC6.</p> <p>Policy DPN9 would be expected to help protect Ashdown Forest SPA and SAC against impacts of poor air quality relating to new development and potential areas of increased traffic.</p>	<p>An HRA is being prepared to accompany the DPR which will consider potential for likely significant effects on Habitats sites including through change in air quality and water resources, amongst others. At the time of writing, the conclusions of the HRA are not available. The extent to which these policies mitigate potential negative impacts on Habitats sites is uncertain at this stage.</p>
Threats or pressures to nationally designated sites (SSSIs)	<p>Policy DPN1 recognises the importance of natural capital assets, including SSSIs, within the Plan area and would be expected to ensure that development proposals demonstrate that designated sites are protected according to their importance and ecological contribution.</p>	<p>The policy would be expected to fully mitigate potential impacts of developments on SSSIs.</p>
Threats or pressures to ancient woodland and veteran trees	<p>Policies DPN1 and DPN4 recognise the importance of areas of ancient woodland and seek to protect them from adverse impacts arising from development.</p> <p>Additionally, the policies seek to protect veteran trees.</p>	<p>These policies would make positive contributions to protecting ancient woodland and veteran trees. However, due to the proximity of some sites being coincident or adjacent to areas of ancient woodland and/or veteran trees there is the potential for adverse impacts on ancient woodland for some sites at this stage.</p>
Threats or pressures to locally designated sites and non-designated sites (LNR, LWS and priority habitats)	<p>Policies DPN1, DPN2, DPN3 and DPN4 recognise the importance of locally designated sites, which includes LNRs and Local Wildlife Sites, and non-designated sites such as priority habitats and would ensure that development proposals deliver biodiversity net gain and incorporate GI where possible.</p>	<p>These policies would make positive contributions to protecting designated and non-designated biodiversity assets. Disturbance of an adjacent LNR and loss / degradation of priority habitat would be anticipated with development of some sites. Although the provision of additional GI would be expected to contribute towards mitigating this</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
		impact, policies would not be expected to fully mitigate this impact.
<p>Loss / degradation of GI and ecological networks</p>	<p>Policies DPN1 and DPN3 would ensure protection and enhancement of green and blue infrastructure across the plan area and therefore contribute to mitigating negative ecological impacts associated with development.</p> <p>Policy DPN2 requires all development proposals to deliver a minimum of 10% biodiversity net gain as set out in legislation (or as amended by the government).</p> <p>Policies DPS1, DPS2 and DPH2 set criteria for ensuring developments provide or contribute to green and blue infrastructure, which would help to mitigate climate change impacts.</p>	<p>The Local Plan policies would be expected to mitigate potential negative ecological impacts associated with development, as they would be expected to ensure that development contributes to the creation, enhancement and protection of Mid Sussex’s GI network and ecological assets, including through the delivery of a minimum of 10% biodiversity net gain and 20% biodiversity net gain for Significant Sites.</p>

E.3.9 SA Objective 8 – Landscape

E.3.9.1 **Table E.3.7** presents the identified adverse impacts on landscape and the likely impacts post-mitigation.

Table E.3.7: Identified adverse impacts and potential mitigation for SA Objective 8 – Landscape

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Effects on the setting of the High Weald AONB</p>	<p>Policy DPC4 relates directly to the High Weald AONB and seeks to ensure that development within the AONB conserves and enhances its qualities (as set out in the High Weald AONB Management Plan) and remains in keeping with the landscape character.</p> <p>Policy DPC1 aims to protect and enhance the countryside and seeks to ensure that development proposals, in order to be supported, are informed by landscape character assessment.</p> <p>Policies DPC3 and DPH4 regard the criteria for developments to meet including those located within the High Weald AONB.</p> <p>Policy DPB1 promotes high quality design and seeks to ensure that development proposals make positive contributions to the landscape and respond appropriately to their surroundings.</p> <p>Policy DPI4 seeks to ensure that communications infrastructure development does not lead to impacts on areas of landscape importance.</p>	<p>Identified adverse impacts on the setting of the High Weald AONB from development proposals would be expected to be mitigated by these policies.</p> <p>However, a level of uncertainty remains as to the potential for adverse impacts arising from development proposals for Sites 198, 984 and 1106 which are located within the AONB and are identified as having the potential to have a ‘moderate’ adverse impact on the character of the landscape. As such, these policies would not be expected to fully mitigate adverse impacts at these sites and there remains the potential for significant adverse effects on this designated landscape.</p>
<p>Effects on the setting of the South Downs National Park</p>	<p>Policy DPC5 regards the setting of the South Downs National Park and sets criteria for development proposals to protect the special qualities of the landscape.</p> <p>Policy DPC1 aims to protect and enhance the countryside and ensures that development proposals, in order to be supported, are informed by landscape character assessment.</p> <p>Policies DPC3 and DPH4 regard the criteria for developments to meet which could help protect the setting of the South Downs National Park.</p> <p>Policy DPB1 promotes high quality design and seeks to ensure that development proposals make positive contributions to the landscape and respond appropriately to their surroundings.</p>	<p>Identified adverse impacts on the setting of the South Downs National Park from development proposals would be expected to be mitigated by these policies.</p> <p>However, a level of uncertainty remains as to the potential for adverse impacts arising from development proposals for Sites 13, 19, 575, 799, 986, 1022, 1095 and 1105 which are located in close proximity to the South Downs National Park and some of these sites comprise significantly large areas of undeveloped land. As such, these policies may not</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	Policy DPI4 seeks to ensure that communications infrastructure development does not lead to impacts on areas of landscape importance.	fully mitigate adverse impacts at these sites.
Threaten or result in the loss of rural and locally distinctive landscape character	<p>Various policies would be expected to ensure that development proposals consider landscape character including Policies DPC1, DPC3, DPN2, DPN3, DPH29, DPH34 and DPI4, for example for biodiversity net gain and green infrastructure provision and developments regarding Gypsy and Traveller sites, as well as developments within rural areas.</p> <p>Policy DPB1 seeks to ensure that new developments are of high quality and conserve and enhance their surroundings. Policies DPH2 and DPH3 regard sustainable development within and outside of built-up areas, and proposals which fall into these categories must adhere to the criteria set out within Policy DPB1.</p> <p>Policies DPB2 and DPB3 seek to ensure the conservation, enhancement and enjoyment of Mid Sussex's historic character and heritage assets.</p>	<p>These policies would help to mitigate adverse impacts on the landscape character arising from the proposed development, to some extent.</p> <p>However, many sites are located in areas in the Landscape Capacity Study (2007)¹ identified as being of low to negligible capacity for residential development. These policies are not expected to fully mitigate the potential impacts on landscape character in Mid Sussex and there remains the potential for minor adverse impacts.</p>
Development threatens areas of high landscape sensitivity / capacity	<p>Policies which include requirements for development to conserve and enhance the surrounding landscape, such as Policies DPC1, DPC2, DPC3, DPC4, DPC5 and DPB1, would be expected to contribute towards the protection of sensitive landscapes from development pressures.</p> <p>Policy DPC2 seeks to prevent coalescence of settlements to maintain separate identities of individual towns and villages within the Plan area.</p>	<p>Local plan policies would help to reduce adverse impacts on the landscape.</p> <p>However, it is unlikely that impacts on areas identified as being of 'low' landscape capacity and 'high' landscape sensitivity, as identified within the 2007 Landscape Capacity Study, could be mitigated through policy, as these areas are stated to be unable to accommodate development without a minor adverse impact on landscape character.</p>
Impacts on Country Parks	<p>Although no policies directly refer to the protection or enhancement of country parks and their setting, various policies including DPB1, DPN3 and DPH4 could help to reduce adverse impacts by ensuring development proposals are</p>	<p>Local plan policies would be expected to mitigate identified adverse impacts on the Worth Way Country Park.</p>

¹ Mid Sussex District Council (2007) Landscape Capacity Study. Available at: https://www.midsussex.gov.uk/media/7712/08_08_mid_sussex_landscape_capacity_study.pdf [Date Accessed: 02/02/2022]

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	of high-quality design, well-related to their surroundings and incorporate GI.	
Change in views experienced by users of the PRoW network / local residents	Policies S5, S7 and T41 would be expected to respect visual amenity and ensure development proposals incorporate designs which enhance appearance and retain important views, as well as ensuring that development takes account of the setting and character of the local area.	These policies would be likely to help to mitigate the impact of development on views experienced by users of the PRoW network and local residents, to some extent, and particularly for sites within more urbanised areas. However, due to the scale of development proposed in some locations this policy is not expected to fully mitigate this impact for more rural sites.
Increase risk of coalescence / urban sprawl	Policy DPC2 seeks to prevent coalescence of settlements to maintain separate identities of individual towns and villages within the Plan area. Policies DPH4 and DPB1, which seek to promote high quality design and the integration of GI amongst development, may help to reduce some of the negative impacts associated with integration of new development into the countryside and limit the impacts associated with urban sprawl.	These policies may help to reduce some of the negative impacts associated with integration of new development into the countryside. However, due to the rural context in which some of the new development is situated, the policies would not be expected to fully mitigate these impacts.

E.3.10 SA Objective 9 – Cultural Heritage

E.3.10.1 **Table E.3.8** presents the identified adverse impacts on cultural heritage and the likely impacts post-mitigation.

Table E.3.8: Identified adverse impacts and potential mitigation for SA Objective 9 – Cultural Heritage

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Potential direct impacts on heritage assets (Listed Buildings, Conservation Areas and Registered Parks and Gardens).</p>	<p>Policies DPB2 specifically regards the protection of Listed Buildings and other heritage assets within the Plan area. Additionally, DPB3 outlines criteria for proposed developments within Conservation Areas to adhere to protect the settings of Conservation Areas and assets within them.</p> <p>Policy DPN5 seeks to protect the character, appearance and setting of a registered park or garden.</p> <p>Policy DPC3 regards new homes within the countryside and supports proposals where the development leading to the re-use of non-designated heritage assets such as rural buildings would lead to securing the asset’s future.</p> <p>Policy DPH4 provides criteria for housing allocations within the MSDPR to adhere to, including conserving and enhancing designated and non-designated heritage assets.</p>	<p>These policies would be expected to ensure that no heritage assets are lost as a result of development, apart from in exceptional circumstances. The policies would also be expected to mitigate potential negative impacts on the character and setting of heritage assets arising from development proposals in close proximity to heritage assets.</p>
<p>Alteration of character or setting of a heritage asset (Listed Buildings, Conservation Areas and Scheduled Monuments).</p>	<p>Policies DPB2 specifically regards the protection of Listed Buildings and other heritage assets within the Plan area. Additionally, DPB3 outlines criteria for proposed developments within Conservation Areas to adhere to protect the settings of Conservation Areas and assets within them.</p> <p>Policy DPB1 sets out various criteria to achieve high quality design including the conservation of cultural and heritage assets and their settings.</p> <p>Policy DPN5 seeks to protect the character, appearance and setting of a registered park or garden.</p> <p>Policy DPC4 regards the conservation and protection of the High Weald AONB historic</p>	<p>These policies would be expected to mitigate potential negative impacts on the character and setting of heritage assets arising from development proposals in close proximity to heritage assets, however, the potential impacts of development on heritage assets depends on the detailed nature of the proposals and how these changes may affect the significance of the heritage asset. At this stage of the planning process, there remains the potential for adverse impacts on settings on heritage assets as a result of development at the following sites: 13, 18, 575 and 799.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>landscape features, including the conservation of cultural heritage assets.</p> <p>Policy DPH4 provides criteria for housing allocations within the MSDPR to adhere to, including conserving and enhancing designated and non-designated heritage assets.</p>	
<p>Alteration of character or setting of archaeological features</p>	<p>Policy DPB2 seeks to conserve heritage assets within the Plan area including those of archaeological interest.</p> <p>Policy DPH4 provides criteria for housing allocations within the MSDPR to adhere to, including requirements to undertake desk-based archaeological surveys prior to submission of planning applications.</p> <p>Policy DPI4 ensures that development proposals for communications infrastructure do not have an unacceptable effect on various receptors including archaeological sites.</p>	<p>Without a greater understanding of the significance of the heritage assets affected (and the potential for, as yet undiscovered, below ground assets) and details of the development proposals there remains a level of uncertainty in the assessment of impacts on the historic environment.</p>

E.3.11 SA Objective 10 – Climate Change and Transport

E.3.11.1 **Table E.3.9** presents the identified adverse impacts on climate change and transport and the likely impacts post-mitigation.

Table E.3.9: Identified adverse impacts and potential mitigation for SA Objective 10 – Climate Change and Transport

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
Generation of carbon emissions from increased traffic	<p>Policy DPS1 seeks to address the causes of climate change through an integrated and holistic approach and promotes active travel and sustainable transport throughout the Plan area, as well as various other policies which promote these criteria within the Plan such as DPH4 and DPT1.</p> <p>Policy DPT4 sets out criteria for new developments to incorporate electrical vehicle charging infrastructure which would help to promote use of these vehicles and reduce emissions.</p>	<p>Whilst these policies would seek to ensure current carbon emissions within the Plan area do not increase further, it is likely that these policies would not fully mitigate the impacts from new development on traffic related carbon emissions.</p>
Limited access to bus services and train stations	<p>Although there are no policies within the Plan which regard improving access to railway stations, various policies such as Policy DPT1 could help to enhance highway networks and public transport provision which may increase access to railway stations.</p>	<p>This policy would be expected to improve access to bus stops, and to railway stations for development proposals within or in the outskirts of settlements which contain an existing railway station.</p> <p>However, this policy would not be anticipated to fully mitigate the restricted access to railway stations in the remaining more rural settlements or those without an existing station.</p>
Limited access to local services and facilities	<p>Policies DPT1, DPT2 and DPT3 would be expected to improve access to local services through sensitive land use planning and improvements to sustainable transport provision. Policy DPE8 in particular sets out accessibility standards for strategic developments in relation to local services and community facilities within rural areas.</p> <p>Policy DPE4 seeks to create active and accessible town and village centres which support a suitable range of retail and community uses to encourage local retail patterns.</p>	<p>Although these policies are likely to improve access to local services and facilities and help promote community cohesion, they would not be expected to fully mitigate the adverse impact on restricted access to local services and facilities at sites which currently have limited access, such as those in more rural locations.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy DPI6 supports proposals for the provision of community and cultural facilities and local services and resists the loss of existing community facilities.</p>	
<p>Lack of safe pedestrian / cycle access</p>	<p>Policies DPT2 and DPT3 support protection and enhancement of PRoWs, recreational routes and cycleways through new development which should link to the existing cycle and pedestrian network.</p> <p>DPH4 outlines that new development should meet various criteria to create and enhance multi-purpose rights of way for pedestrians and cyclists. The policy also seeks that new development provides new connections to existing corridors of the existing GI network.</p> <p>Various other policies, including DPS1, DBPI, DPT1 and DPS6 encourage proposals to explore opportunities for integrating PRoW, footpaths, bridleways and cycle routes into current networks to improve connectivity.</p>	<p>These policies would be expected to mitigate adverse impacts on accessibility to PRoW and cycle networks for the majority of proposed development sites.</p>

E.3.12 SA Objective 11 – Energy and Waste

E.3.12.1 **Table E.3.10** presents the identified adverse impacts on energy and waste and the likely impacts post-mitigation.

Table E.3.10: Identified adverse impacts and potential mitigation for SA Objective 11 – Energy and Waste

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Increased energy consumption related GHG emissions.</p>	<p>Policy DPS3 supports renewable and low carbon projects, including community-led schemes and outlines that new development should provide opportunities for incorporating decentralised, renewable and low carbon energy schemes.</p> <p>Policy DPB1 seeks to ensure that all development contributes to the reduction of carbon emissions throughout the design, construction and operation stages.</p> <p>Policy DPS2 aims to ensure that new homes are as energy efficient and sustainable as possible using BREEAM or HQM standards. The policy promotes a transition towards net zero carbon development.</p> <p>Policy DPE1 encourages high value employment development to achieve net zero carbon by 2050. Policy DPH4 sets out various criteria for housing allocations to achieve including the delivery of net zero carbon and maximum possible use of renewable energy technologies. Through this policy, new homes from 2025 are to be designed as energy efficient as possible to achieve net-zero goals throughout their lifetime. Policies DPS1 and DPS2 also support net zero carbon development and improvements in energy efficiency to achieve these goals through sustainable design and construction methods.</p>	<p>In June 2021, Mid Sussex Council commissioned climate change experts to help achieve net zero carbon throughout the district by 2050².</p> <p>Although these policies would be expected to have a positive impact in helping to reduce emissions associated with the occupation of housing and mixed-use sites, they would not be expected to fully mitigate this impact and would be unlikely to facilitate sufficient reductions in carbon emissions to fully achieve net zero within the plan period.</p>
<p>Increase in household waste.</p>	<p>Although there are no policies within the Plan which regard reducing household waste, various policies contribute to this aim.</p> <p>Policies DPI1, DPI2 and DPI3 would help to secure necessary infrastructure to help meet the needs of current residents which may include enhancement of waste and recycling infrastructure.</p>	<p>These policies seek to mitigate waste production in line with objectives set out under the Sustainability Strategy³ and would help to mitigate identified adverse impacts.</p>

² Mid Sussex District Council (2022) Climate and Environmental Sustainability. Available at: <https://www.midsussex.gov.uk/environment/climate-and-environmental-sustainability/> [Date accessed: 29/09/22]

³ Ibid

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
	<p>Policy DPS2 seeks to ensure that all development follows the waste hierarchy to minimise the amount of waste disposed to landfill and maximise recycling rates.</p> <p>Various policies including DPE6 and DPH4 aim to improve recycling provisions to help minimise waste leading to landfill.</p>	

E.3.13 SA Objective 12 – Water Resources

E.3.13.1 **Table E.3.11** presents the identified adverse impacts on the economy and the likely impacts post-mitigation.

Table E.3.11: Identified adverse impacts and potential mitigation for SA Objective 12 – Water Resources

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Increased risk of watercourse pollution</p>	<p>Policy DPS5 wholly regards the protection and enhancement of water resources and water quality and sets out measures to for new developments to help control pollution of the water environment.</p> <p>Policy DPS2 sets out criteria to achieve sustainable design and construction including the requirement for development to minimise its impact on water resources and water quality</p> <p>Policy DPN1 sets out to protect and enhance biodiversity assets within the Plan area through development proposals meeting various criteria which would help to protect habitats including those within the water environment.</p> <p>Policy DPN3 seeks to deliver a range of green and blue infrastructure within proposals of new developments as well as protect existing green and blue infrastructure assets and links such as watercourses. Furthermore, various policies such as DPS1 and DPH4 set out GI requirements to achieve their aims, where the provision of GI resources could help to protect the water environment from pollution impacts.</p>	<p>These policies would be expected to effectively manage and mitigate the potential adverse impacts on the contamination of watercourses within the Plan area arising through development proposals.</p>

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Unsustainable levels of water consumption</p>	<p>Policy DPS5 seeks to protect and enhance water resources and supports development proposals where they demonstrate that there is adequate water supply to serve the development. Additionally, the policy supports development or expansion of water supply infrastructure to serve current or future development or to improve long-term water supply. Policies DPI1, DPI2 and DPI3 seek to support infrastructure provisions and provides criteria for these developments.</p> <p>Policy DPS2 provides criteria to meet sustainable development standards and includes requirements for developments to meet relevant water consumption standards. This policy seeks to provide water neutrality through new developments and promote water efficiency measures through reducing water use and recycling water, for example through greywater recycling.</p> <p>Policy DPH4 provides various criteria for housing allocation developments to adhere to including the minimisation of water consumption, through criteria set out within other Plan polices.</p>	<p>The Gatwick Sub Region Water Cycle Study⁴ comprises a large proportion of Mid Sussex District and states that water resources are under significant pressure. The study explores water companies' strategies to manage water supplies in the context of water resource availability in the region.</p> <p>These policies, along with adherence to national legislation and guidance from studies such as the Water Cycle Study, would be expected to effectively manage and mitigate the potential adverse impacts on water resources for future use within the Plan area arising through development proposals.</p>

⁴ Entec (2011) Gatwick Sub Region – Outline Water Cycle Study. Available at: <https://www.midsussex.gov.uk/media/2608/water-cycle-study-outline-report.pdf> [Date Accessed: 26/01/22]

E.3.14 SA Objective 13 – Economic Regeneration

E.3.14.1 **Table E.3.12** presents the identified adverse impacts on economic regeneration and the likely impacts post-mitigation.

Table E.3.12: Identified adverse impacts and potential mitigation for SA Objective 13 – Economic Regeneration

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Limited access to local services and facilities</p>	<p>Policies DPT1, DPT2 and DPT3 would be expected to improve access to local services through sensitive land use planning and improvements to sustainable transport provision. Policy DPE8 in particular sets out accessibility standards for strategic developments in relation to local services and community facilities within rural areas.</p> <p>Policy DPE4 seeks to create active and accessible town and village centres which support a suitable range of retail and community uses to encourage local retail patterns.</p> <p>Policy DPE7 seeks to protect smaller village and neighbourhood centres, to help meet the needs of local communities.</p> <p>Policy DPI6 supports proposals for the provision of community and cultural facilities and local services and resists the loss of existing community facilities.</p>	<p>Although these policies are likely to improve access to local services and facilities and help promote regeneration of local centres through improved access, they would not be expected to fully mitigate the adverse impact on restricted access to local services and facilities at sites which currently have limited access, such as those in more rural locations.</p>

E.3.15 SA Objective 14 – Economic Growth

E.3.15.1 **Table E.3.13** presents the identified adverse impacts on economic growth and the likely impacts post-mitigation.

Table E.3.13: Identified adverse impacts and potential mitigation for SA Objective 14 – Economic Growth

Identified adverse impact	Potential mitigating influence of Mid Sussex District Plan Review policies	Commentary: Will the policies mitigate the identified adverse effects?
<p>Net change in employment floorspace</p>	<p>Policy DPE1 sets out criteria to achieve sustainable economic development including supporting expansion of businesses and ensuring that major development proposals allocated within the Plan demonstrate how they would address identified local skills shortages and support local employment.</p> <p>Policy DPE2 seeks to protect existing employment sites and provides the criteria in which it would support development of sites for employment uses. The policy would ensure that employment sites will only be re-developed for non-employment uses where the existing use is unviable.</p> <p>Policy DPE4 seeks to create active and accessible town and village centres which support a suitable range of retail and community uses to encourage local retail patterns.</p> <p>Policy DPE6 supports development within primary shopping areas which meet various criteria set out within the policy and aims to ensure that the vitality and viability of these centres are not harmed.</p> <p>Policy DPE8 supports small scale economic development within rural areas including farm diversification and leisure and tourism related development.</p> <p>Policy DPE9 seeks to enhance the tourism economy of Mid Sussex.</p>	<p>It would be anticipated that these policies would mitigate any loss of employment floorspace as a result of residential development, with sufficient provision made elsewhere in the Plan area.</p> <p>However, the redevelopment of existing employment sites may lead to a change in the type and range of employment opportunities available within the Plan area.</p>

E.4 Post-mitigation site assessments

E.4.1 Overview

E.4.1.1 Following careful consideration of the mitigation effects of the Local Plan strategic, thematic and DM policies on the assessment findings, the post-mitigation assessment findings for all 44 reasonable alternative sites considered throughout the Mid Sussex DPR preparation have been presented in **Table E.4.1**.

Table E.4.1: Post-mitigation impact matrix for all reasonable alternative sites

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change and Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
13	+	-	0	++	+	-	+/-	-	-	++	0	0	++	+
18	++	-	-	-	0	--	-	-	-	-	-	0	-	++
19	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
198	+	0	0	0	+	-	-	--	0	-	0	0	-	+
210	+	-	++	++	+	-	+/-	-	0	-	0	0	++	+
503	++	0	-	-	+	--	-	-	0	-	-	0	-	+
508	+	0	-	0	+	-	+/-	-	0	-	0	0	+	+
526	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
543	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
556	+	0	0	+	0	-	-	-	0	-	0	0	-	+
573	+	-	++	0	+	-	+/-	-	0	-	0	0	-	+
575	++	-	-	-	+	--	-	-	-	-	-	0	-	+
601	++	-	-	-	+	-	-	-	0	-	-	0	-	+
617	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
631	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
678	++	-	-	-	0	--	-	-	0	-	-	0	-	+
686	++	0	0	0	+	-	-	-	0	-	-	0	-	+
688	++	-	0	-	+	-	-	-	0	-	-	0	-	+
736	++	-	-	-	0	--	-	-	0	-	-	0	-	++
740	++	-	0	-	0	--	-	-	0	-	-	0	-	++
743	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
784	+	-	-	0	+	-	+/-	-	0	-	0	0	-	+
789	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
799	++	-	0	-	+	--	+/-	-	-	-	-	0	-	++
830	++	-	-	-	+	-	+/-	-	0	-	-	0	-	+
844	++	-	0	0	+	-	+/-	-	0	-	-	0	-	+
858	+	0	-	-	+	-	-	-	0	-	0	0	-	+
984	+	-	0	+	+	-	-	--	0	-	0	0	-	+

Site Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change and Transport	Energy and Waste	Water Resources	Economic Regeneration	Economic Growth
986	++	-	0	-	+	-	-	-	0	-	-	0	-	+
1003	++	-	-	-	+	-	+/-	-	0	-	-	0	-	+
1018	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
1020	+	0	0	0	+	-	+/-	-	0	-	0	0	-	+
1022	++	-	-	-	+	--	-	-	0	-	-	0	-	+
1026	+	-	0	0	+	-	+/-	-	0	-	0	0	-	+
1030	++	0	0	+	+	-	0	-	0	-	0	0	-	+
1063	+	-	0	-	+	-	+/-	-	0	-	0	0	-	+
1075	++	-	0	++	+	-	-	-	0	-	-	0	-	+
1095	++	-	0	-	+	--	-	-	0	-	-	0	-	+
1101	+	-	0	++	+	-	+/-	-	0	-	+/-	0	++	++
1105	++	-	-	-	0	--	-	-	0	-	-	0	-	+
1106	+	-	0	-	+	-	-	--	0	-	+/-	0	-	++
1120	++	-	0	-	+	-	+/-	-	0	-	-	0	-	+
1121	++	++	++	++	+	+	0	+/-	0	++	-	0	++	+
1123	++	++	++	++	+	+	0	+/-	0	++	-	0	++	+

E.5 Recommendations

- E.5.1.1 A series of recommendations have been identified as to how the Mid Sussex DPR planning policies might be usefully expanded or modified to provide mitigation measures that will help further reduce the identified adverse effects associated with each SA Objective. The recommendations have been fed back to the Council to assist with their decision making as the DPR evolves.
- E.5.1.2 These recommendations are set out in **Table 5.3** of the main SA report.



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Habitats Regulations Assessment of the Mid Sussex District Plan Review

Regulation 18

Mid Sussex District Council

Project number: 60671970

October 2022

Quality information

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3	July 2022	Updates to HRA in response to further MSDP changes	JR	James Riley	Technical Director
4	October 22	Final consultation	for JR	James Riley	Technical Director

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1. Non-Technical Summary

Introduction

- 1.1 AECOM was appointed by Mid Sussex District Council (the Council) to produce a Habitats Regulations Assessment (HRA) of their Regulation 18 Local Plan. An HRA examines the effects of the Local Plan on internationally important wildlife sites. The requirement for HRA is set by the Conservation of Habitats and Species Regulations 2017 (as amended). HRA has two principal stages which are documented in the full report produced to accompany the Local Plan: an initial high-level stage (called the Likely Significant Effects Test) that examines all policies and allocations and determines whether there is any conceivable mechanism for a negative effect on internationally important wildlife sites, and a subsequent more detailed analysis, if relevant, called an Appropriate Assessment. There is no standard content for an Appropriate Assessment, it is literally whatever further assessment is appropriate to draw a conclusion regarding adverse effects on the integrity of any internationally important wildlife sites. As part of the HRA process it is essential to consider the potential for effects not only from the Local Plan in isolation, but also 'in combination' with other plans and projects (such as Local Plans of surrounding local authorities).
- 1.2 During the Likely Significant Effects (LSEs) Test it was determined that the only internationally important wildlife site for which Likely Significant Effects (i.e., the potential for a significant effect) could not be dismissed, and which therefore required further analysis, was Ashdown Forest Special Area of Conservation and Special Protection Area. Ashdown Forest is designated as a Special Area of Conservation for its heathland and its population of great crested newt. It is designated as a Special Protection Area for its population of two bird species: nightjar and Dartford warbler. Impacts arising from growth in Mid Sussex that required further investigation through Appropriate Assessment concerned two impact pathways: atmospheric pollution from vehicle exhaust emissions associated with traffic traversing the forest, and recreational pressure. Each impact pathway and the conclusions of the Appropriate Assessment are summarised in turn below. The assessment below will need to be updated for the Regulation 19 HRA.

Appropriate Assessment (AA)

- 1.3 In preparing the Mid Sussex District Plan (MSDP) two different Housing Scenarios (4 and 4b) were explored, differing in the allocation of one Significant Site at Ansty for 1,600 dwellings and 1,000m² of employment floorspace. The HRA appraised both housing options. With regard to recreational pressure on Ashdown Forest SAC/SPA there was no difference between the two scenarios because the Ansty site lies well outside the core catchment of the SAC/SPA. With regard to air quality there was only a very slight difference in forecast impacts with Scenario 4b (including the Ansty site) having the greatest impact by a very slight margin.

Atmospheric Pollution

- 1.4 Traffic and air quality modelling was undertaken for five different model scenarios, comprising the Baseline (current emission rates based on traffic count data and other sources of atmospheric pollution), Future Baseline (current vehicle emissions extrapolated to the end of the Plan period, accounting for improvements to vehicle emission factors), Do Minimum (future emission rates accounting for growth in adjoining authorities, but excluding the MSDP Review) and two Do Something scenarios (future emission rates accounting for growth in adjoining authorities and the two growth scenarios proposed for Mid Sussex District). Air quality modelling was undertaken along 13 road links and 23 transects up to 200m from the roadside, in increments of 10m perpendicular to relevant roads.
- 1.5 Air quality modelling data show that an in-combination increase in nitrogen deposition and ammonia concentrations at three transects (T6, T10 and T11) is mathematically perceptible; however, the contribution of the MSDP is only marginally above zero¹ except at the roadside

¹ In the UK air quality data are generally not reported to more than 2 decimal places to avoid false precision. If the results due to the Mid Sussex District Plan were much smaller they would be reported as effectively zero i.e. 'less than 0.01'.

where no SAC habitat is present. In accordance with legal precedent, plans and projects that have no appreciable effect on a site can be concluded not to result in adverse effects and legally excluded from in-combination assessment. Three other transects (T5, T7 and T9) were assessed in more detail. At transects T5 (New Road), T7 (A22) and T9 (A275), in-combination nitrogen doses at the nearest areas of heathland (since in all cases there is road verge and dense gorse scrub at the closest points to the road where pollution is highest) are forecast to be mathematically perceptible (being 3%, 2% and 6% of the Critical Load for nitrogen, respectively). However, the contribution of the MSDP at all transects is only marginally above zero² / mathematically imperceptible, meaning that the increase in nitrogen deposition that is forecast is primarily attributable to growth outside Mid Sussex District. Furthermore, the forecast nitrogen deposition rates at transects T5 and T9 in 2039 are still 1.6 and 0.8 kg N/ha/yr better than the 2019 baseline due to the effect of vehicles with improved emissions technology (i.e. compliant with the Euro6 emissions standard) making up an increasing component of the vehicle fleet. The total ammonia concentrations beyond 10m from the roadside were either below the Critical Level (T5, T9) or were concluded to be negligible compared to seasonal and annual fluctuations (for all other transects).

- 1.6 The potential ecological impacts of the worst-case in-combination nitrogen dose to heathland (0.56 kg N/ha/yr at 10m from the A275, T9) were also discussed. Published data in the peer-reviewed literature indicate that such deposition (if it constituted a net increase) could result in a small (0.1%) increase in grass cover or a reduction in species richness of 0.2 species in a situation where there were no other over-riding factors exerting a greater influence on botanical composition of the sward. Any ecological impacts would reduce at greater distances from roads. The ecological context was then considered as it is key to interpretation; modelling of all transects illustrates that the vast majority of nitrogen due to traffic growth will be deposited within 1m-10m of the modelled roads, within the road verge and belts of dense gorse, bracken and trees that line the relevant parts of the A22, A275 and other roads. These areas have low sensitivity to nitrogen deposition and contain lower value habitats due to the general presence of the road and its associated salt spray, dust, runoff, and altered drainage or soils. In addition, the belts of dense gorse and trees close to the road may be preserved in the long-term to protect SPA birds using the heathland more broadly from exposure to the disturbing (visual and noise) effects of the road and to reduce the risk of livestock straying into the carriageway. Moreover, localised dense gorse can be of direct value for one of the SPA birds (Dartford warbler) as nesting and foraging habitat, as cited in the Supplementary Advice on the Conservation Objectives for the SAC. Even at roadside locations the additional nitrogen deposition due to traffic growth would not prevent heathland restoration if Natural England ever did decide to undertake it, particularly within the context of the forecast net reduction in total nitrogen deposition due to improved vehicle emissions technology.
- 1.7 Moreover, Natural England have confirmed in previous discussions over the Wealden, Tunbridge Wells and South Downs Local Plans that nitrogen deposition from traffic is not preventing the SAC heathland from achieving favourable conservation status, but that the primary issue is lack of management which is ultimately a land stewardship issue for the site owners and managers rather than something associated with the implementation of Local Plans. For example, a review of Natural England's SSSI condition assessment clearly indicates that historic (and in many cases current) inadequate management is the reason why only 20% of Ashdown Forest SAC is currently in a favourable condition. That is not to say that there is no objective to address nitrogen deposition at the SAC. The Shared Nitrogen Action Plan (SNAP) is the primary mechanism by which Natural England aim to reduce nitrogen deposition. It is targeted at agriculture rather than traffic because almost three times more nitrogen deposited in the SAC stems from agriculture (fertiliser and livestock) than traffic. Overall, agricultural emissions affect a much greater area of the SAC, whereas the effect of the roads is localised. The forecast 'in combination' nitrogen doses due to traffic growth will have a negligible effect on the land managers' ability to restore good quality heathland through improved management and the implementation of the SNAP.

² In the UK air quality data are generally not reported to more than 2 decimal places to avoid false precision. If the results due to the Mid Sussex Local Plan were much smaller they would be reported as effectively zero i.e. 'less than 0.01'.

- 1.8 For all these reasons it is considered that the ability of the SAC and SPA to achieve its Conservation Objectives would not be significantly compromised by the MSDP growth either alone or in combination with other plans or projects.

Recreational Pressure

- 1.9 For the AA, the visitor surveys undertaken in the Ashdown Forest SPA / SAC in 2008, 2016 and 2021 were reviewed and recreation patterns assessed. The data from the 2008 and 2016 surveys indicate that Mid Sussex residents, particularly those from East Grinstead, along with residents from other local authority areas are frequent visitors to the site. Based on the initial survey results and subsequent data analysis, a 7km zone of influence surrounding the SPA / SAC was established, in which mitigation requirements in the form of Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) apply to residential developments.
- 1.10 The Local Plan Review allocates a net increase of 444 dwellings within or just beyond 7km of the Ashdown Forest SPA / SAC. According to average housing occupancy figures (2.4 residents per dwelling) and Natural England SANG standards (8ha per 1,000 population increase), delivery of the 444 dwellings would require approx. 8.5ha of functional SANG to be provided. The Council already has a SANG inventory in place, which provides bespoke and strategic mitigation for recreational pressure. This is comprised of operational SANG (e.g. East Court & Ashplats Wood) and SANGs that are to be delivered as part of emerging development proposals and allocations (e.g. Imberhorne Farm) or are shortly to become operational (e.g. Hill Place Farm). Provided that these are delivered as planned, it is considered that sufficient residual capacity is available to accommodate the additional growth coming forward under the review of the MSDP. For example, the proposed strategic Imberhorne Farm SANG in East Grinstead is likely to provide around 40Ha of SANG. Overall, AECOM concludes that an adequate framework regarding SANG provision is in place, but work will need to be undertaken to ensure that functional SANG is available prior to dwellings becoming occupied (see Conclusions and Recommendations).
- 1.11 Work on the SAMM strategy for the Ashdown Forest SPA / SAC has been ongoing between the local authorities of Wealden, Mid Sussex, Lewes, Tunbridge Wells, Tandridge and Sevenoaks in partnership with the Conservators of Ashdown Forest and Natural England since 2012. Key SAMM projects that are being undertaken in the site include a Code of Conduct that is focused on dog walkers, provision of adequate signage and interpretation boards, deployment of volunteer dog rangers and an Access Management Lead Officer, and protected bird surveys. The working group has published a SAMM tariff guidance document that currently sets out a per-dwelling tariff of £1,170 (subject to annual review), to be paid into an inter-authority monetary pot that funds the SAMM initiatives. All residential dwellings within the 7km mitigation zone are subject to this tariff, such that the integrity of the SPA / SAC is protected.

Conclusions and Recommendations

Atmospheric Pollution

- 1.12 Air quality modelling data at key road links highlight that there will be no adverse effect on the integrity of the Ashdown Forest SPA / SAC, both alone and in-combination. The contribution of the MSDP to nitrogen deposition and ammonia concentrations is mathematically imperceptible at the closest areas of heathland and in many cases only marginally above zero. In-combination atmospheric pollution impacts are typically below 1% of the Critical Load or, where this is exceeded, would not prevent nitrogen deposition from significantly improving in the period to 2039 and would not prevent heathland restoration at the SAC through improved management (since the main issue with heathland quality and establishment at this SAC is long-term under-management) or interfere with broader initiatives to reduce nitrogen deposition rates across the SAC through the Shared Nitrogen Action Plan.

Recreational Pressure

- 1.13 Mid Sussex District Council is a member of the Ashdown Forest SAMM Partnership and acknowledges the 7km mitigation zone surrounding the Ashdown Forest SPA / SAC, which

requires the delivery of SANG and SAMM measures. There is a policy in the Local Plan that supports the strategic solution for recreational pressure on Ashdown Forest. An adequate SANG approach has already been adopted by the Council and the existing / future SANGs are projected to have sufficient capacity to accommodate the new residential growth proposed to be allocated in the MSDP. The Council would have to ensure that sufficient SANG capacity is or will be available prior to giving planning consent for any proposed residential allocations that lie within the 7km zone of influence. Contributions to SAMM are governed by the published SAMM guidance document and will be collected accordingly. Provided that the process of SANG identification and delivery is progressed in agreement with Natural England and contributions towards the SAMM Strategy are collected, any potential adverse effects of the MSDP on the Ashdown Forest SPA / SAC regarding recreational pressure can be excluded.

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2. Introduction

Background

- 2.1 AECOM has been appointed by Mid Sussex District Council (the Council) to undertake a Habitats Regulations Assessment (HRA) of the Regulation 18 Mid Sussex District Plan (MSDP) Review. The objective of an HRA is to identify any aspects of a Plan that may result in Likely Significant Effects (LSEs) and, where relevant, adverse effects on the integrity of the National Site Network (NSN), either in isolation or in combination with other plans and projects. The NSN is comprised of European sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites). Furthermore, the HRA is also to advise on appropriate policy mechanisms for delivering mitigation where adverse effects on integrity are identified. Under the Conservation of Habitats and Species Regulations 2017 (as amended), an Appropriate Assessment of impact pathways is required, where a plan or project is likely to result in Likely Significant Effects (LSEs) upon a European Site, either individually or in combination.
- 2.2 A review of the currently adopted MSDP 2014-2031 has commenced. The new MSDP will cover the years between 2021 and 2039. It is understood that the MSDP Review will update and revise some Plan policies, while others remain unchanged, and include several new policies. However, this HRA examines all Local Plan policies.
- 2.3 An initial appraisal of the designated sites surrounding Mid Sussex District, and the impact pathways linking to the proposed growth, indicates that two European sites require consideration, the Ashdown Forest SPA / SAC and Castle Hill SAC. HRA implications are particularly relevant to the Ashdown Forest SPA / SAC, designated for ground-nesting birds and sensitive heathland, which has been under intense pressure from development. Recreational disturbance and atmospheric pollution are the main growth-related impact pathways that apply to these designations.
- 2.4 In preparing the Mid Sussex District Plan (MSDP) two different Housing Scenarios (4 and 4b) were explored, differing in the allocation of one Significant Site at Ansty for 1,600 dwellings and 1,000m² of employment floorspace. The HRA appraised both housing options. With regard to recreational pressure on Ashdown Forest SAC/SPA there was no difference between the two scenarios because the Ansty site lies well outside the core catchment of the SAC/SPA. With regard to air quality there was only a very slight difference in forecast impacts with Scenario 4b (including the Ansty site) having the greatest impact by a very slight margin. Since Scenario 4 is the one ultimately selected for the Regulation 18 District Plan, the focus of the discussion in the report is on that scenario (i.e. without the Ansty site), although the air quality data for both scenarios are presented in Appendix C.

Legislation

- 2.5 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019³.
- 2.6 The HRA process applies the ‘Precautionary Principle’⁴ to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the European site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question. Figure 1 below sets out the legislative basis for Appropriate Assessment.

³ These don't replace the 2017 Regulations but are just another set of amendments.

⁴ The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: “*When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis*”.

- 2.7 Plans and projects that are associated with potential adverse impacts on European sites may still be permitted if there are no reasonable alternatives and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

Figure 1: The legislative basis for Appropriate Assessment

- 2.8 Over time the phrase ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has arisen in order to distinguish the process from the individual stage described in the law as an ‘Appropriate Assessment’.
- 2.9 In spring 2018 the ‘Sweetman’ European Court of Justice ruling⁵ clarified that ‘mitigation’ (i.e. measures that are specifically introduced to avoid or reduce a harmful effect on a European site that would otherwise arise) should **not** be taken into account when forming a view on Likely Significant Effects. Mitigation should instead only be considered at the Appropriate Assessment stage. This HRA is cognisant of that ruling.

Scope of the Project

- 2.10 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Current guidance suggests that the following European sites should be included in the scope of an HRA assessment:
- All European sites within the boundary of Mid Sussex District; and,
 - Other European sites shown to be linked to development in Mid Sussex through a known ‘pathway’ (discussed below).
- 2.11 Generally, it is uncommon for development plans to be deemed to have significant impacts on European sites situated more than 10km from areas of growth. For example, most core recreational catchments (except for some coastal sites) are under 10km in size and the average vehicle commuting distance of a UK resident is approx. 10km. It should be noted that the presence of a conceivable impact pathway linking a Plan to a European site does not mean that Likely Significant Effects (LSEs) will occur.
- 2.12 In some cases, development impacts can extend beyond 10km, particularly where hydrological pathways are involved, which is why the source-pathway-receptor concept is also used to help determine whether there are potential pathways connecting development to European sites. This takes site-specific sensitivities into account, including issues such as nutrient neutrality or water levels, quantity and flow.
- 2.13 Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a European site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could affect European sites through, for example, disturbance of ground-nesting birds. Guidance from the Ministry of Housing, Communities and Local Government (MHCLG) states that the HRA should be ‘*proportionate to the geographical scope of the [plan policy]*’ and

⁵ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

that ‘an AA need not be done in any more detail, or using more resources, than is useful for its purpose’ (MHCLG, 2006, p.6).

- 2.14 This basic principle has also been reflected in court rulings. The Court of Appeal⁶ has ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be ‘achieved in practice’ to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to planning permissions (rather than a Plan level document)⁷. In this case the High Court ruled that for ‘a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations’.
- 2.15 Given an initial assessment of the relevant European sites and the impact pathways present, and referring to the HRA work that was undertaken for the adopted Mid Sussex Local Plan, this HRA will discuss (at least as far as the LSEs stage) the following European sites:
- Ashdown Forest SPA / SAC (adjoining the Mid Sussex district boundary, situated entirely within Wealden District); and
 - Castle Hill SAC (approx. 6.7km to the south-east of the Mid Sussex District boundary in the neighbouring authorities of Lewes and Brighton and Hove).
- 2.16 For the HRA, the views of the statutory nature conservation advisors, namely Natural England, will be sought as part of the consultation process on the scope of the European sites assessed. The distribution of the above European sites in relation to Mid Sussex District is shown in Appendix A. An introduction to, the qualifying features (species and habitats), Conservation Objectives, and threats and pressures to the integrity of these European sites are set out in Chapter 3.
- 2.17 In order to fully inform the screening for LSEs stage, several studies and online information databases have been consulted. These include:
- Future development proposed (and, where available, HRAs) for the adjoining authorities of Wealden, Tunbridge Wells, Sevenoaks, Tandridge, Crawley, Horsham, Adur, Brighton and Hove and Lewes;
 - Road traffic statistics from the Department for Transport (<https://roadtraffic.dft.gov.uk>);
 - Journey-to-work data from the Population Census 2011 (<https://www.nomisweb.co.uk/census/2011/WU03UK>);
 - Visitor surveys carried out in the Ashdown Forest SPA / SAC by Footprint Ecology in 2016 and 2021 (the latter largely replicating the methodology of the 2016 survey to provide comparative data for recreational pressure);
 - The HRAs produced for the adopted Mid Sussex Local Plan and those of adjoining authorities;
 - Site Improvement Plans and Supplementary Conservation Advice Notes for relevant European sites published by Natural England;
 - The UK Air Pollution Information System (www.apis.ac.uk); and
 - Multi Agency Geographic Information for the Countryside (MAGIC) and its links to SSSI citations and the JNCC website (www.magic.gov.uk).

⁶No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁷High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

Quality Assurance

- 2.18 This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.
- 2.19 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2019)

3. Methodology

Introduction

- 3.1 The HRA has been carried out with reference to the general EC guidance on HRA⁸ and general guidance on HRA published by government in July 2019⁹. AECOM has also been mindful of the implications of European case law in 2018, notably the Holohan ruling and the People over Wind ruling, both discussed below.
- 3.2 Figure 2 below outlines the stages of HRA according to current EC guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan.

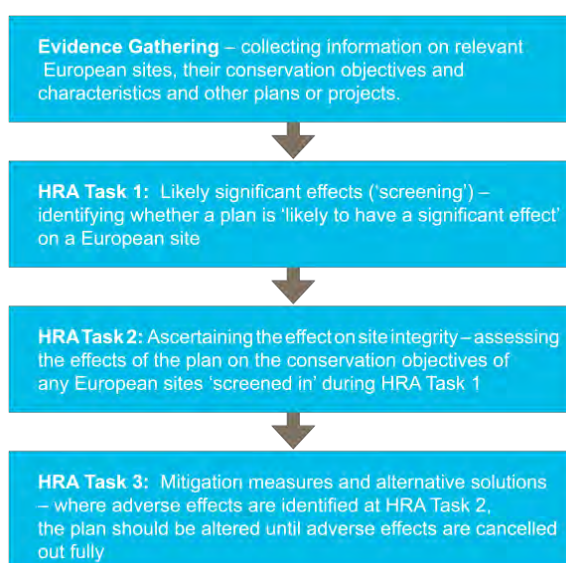


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001¹.

Description of HRA Tasks

HRA Task 1 – Screening for Likely Significant Effects (LSEs)

- 3.3 Following evidence gathering, the first stage of any Habitats Regulations Assessment is the screening for Likely Significant Effects (LSEs), essentially a high-level assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

“Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?”

- 3.4 The objective is to filter out those Plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in any impacts upon European sites, usually because there is no mechanism for a negative interaction. This stage is undertaken in Chapter 5 of this report and in Appendix B.

⁸ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁹ <https://www.gov.uk/guidance/appropriate-assessment>

HRA Task 2 – Appropriate Assessment (AA)

- 3.5 Where it is determined that a conclusion of ‘no Likely Significant Effects (LSEs)’ cannot be drawn, the analysis proceeds to the next stage of HRA known as Appropriate Assessment. Case law has clarified that ‘Appropriate Assessment’ is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to Appropriate Assessment compared to the screening stage.
- 3.6 By virtue of the fact that it follows screening for LSEs, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. One of the key considerations during Appropriate Assessment is whether there is available mitigation that would entirely address the potential effect. In practice, the Appropriate Assessment would take any policies or allocations that could not be dismissed following the high-level screening and assess the potential for an effect in more detail, with a view to concluding whether there would be a potential for an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the European site(s)). A decision by the European Court of Justice¹⁰ concluded that measures intended to avoid or reduce the harmful effects of a proposed Plan or project on a European site may no longer be considered by competent authorities at the screening for LSEs stage of HRA. That ruling has been taken into account in producing this HRA.
- 3.7 Also, in 2018 the Holohan ruling¹¹ was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that ‘*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*’ [emphasis added]. Due account of this decision has been given in this HRA in relation to the Ashdown Forest SPA, which is designated for mobile ground-nesting birds (although it is to be noted that the qualifying species are not considered to be critically dependent on functionally linked habitats).

HRA Task 3 – Avoidance and Mitigation

- 3.8 Where necessary, measures are recommended for incorporation into the Plan in order to mitigate and / or avoid adverse effects on European sites. There is considerable precedent concerning the level of detail that a Local Plan document needs to contain regarding mitigation for impact pathways on European sites (e.g. regarding recreational pressure). The implication of this precedent is that it is not necessary for all measures to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 3.9 When discussing mitigation for a Local Plan, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves since a Local Plan document is a high-level policy document.
- 3.10 In any Local Plan, there are numerous policies for which there is a limit to the degree of assessment that is possible at the Plan level. This is because either:
- The policy in question does not contain any specifics as to what will be delivered or where, and so cannot be assessed in detail at the Plan level. In these cases, the Appropriate Assessment focusses on precautionary mitigation that can be included in the plan to ensure that whatever proposals come forward will not result in adverse effects on integrity; or
 - The nature of potential impacts (e.g. visual and noise disturbance arising from construction or loss of functionally linked habitat) are related to how the development will be designed and constructed, and therefore cannot be assessed in detail at the plan level. In these instances, the Appropriate Assessment focusses on available mitigation measures, the extent to which such measures would be achievable and effective, and

¹⁰ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

¹¹ Case C-461/17

whether an adequate protective framework exists to ensure that the policy would not lead to an adverse effect on the integrity of any internationally designated sites.

- 3.11 In these instances, the advice of Advocate-General Kokott¹² is also worth considering. She commented that: *'It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure'* [emphasis added].

¹² Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49 <http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

4. European Sites

Ashdown Forest SAC

Introduction

- 4.1 The Ashdown Forest SAC is an extensive area of common land located between East Grinstead and Crowborough, and entirely within Wealden District. The geology of the Ashdown Sands (which underlies Ashdown Forest), in combination with the wetter and cooler local climate, gives rise to sandy soils, which are characteristically acid, clay and nutrient-poor. In turn, this soil type has promoted the development of heathland, valley mire and damp woodland communities.
- 4.2 Despite a recent acceleration in the development of woodland, Ashdown Forest remains one of the largest single continuous blocks of lowland heath in south-east England. A range of typical heathland flora is supported, including heather (*Calluna vulgaris*), bell heather (*Erica cinerea*), cross-leaved heath (*Erica tetralix*), gorse (*Ulex europaeus*) and dwarf gorse (*Ulex minor*). A rich invertebrate fauna (e.g. beetles, dragonflies, damselflies and butterflies) and unique assemblage of heath and woodland birds critically depend on the SAC habitat (see section on the overlapping Ashdown Forest SPA below).
- 4.3 The damp heath woodland may be varied, including birch (*Betula sp.*, acting as primary colonisers), oak (*Quercus robur*), willow (*Salix sp.*) and pine (*Pinus sp.*). In areas where grazing management has been limited, woodland often encroaches on former heath, forming dense and shaded areas with sparse ground flora. In many instances where Natural England's site condition assessment identifies sub-components as 'unfavourable declining', a lack of grazing management has been identified as a main contributing factor to negative site condition.

Qualifying Features¹³

- 4.4 Annex I habitats:
- Northern Atlantic wet heathland with *Erica tetralix*
 - European dry heaths
- 4.5 Annex II species present as a qualifying feature, but not a primary reason for site selection:
- Great-crested newt *Triturus cristatus*

Conservation Objectives¹⁴

- 4.6 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;
- 4.7 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats and habitats of qualifying species
 - The structure and function (including typical species) of qualifying natural habitats
 - The structure and function of the habitats of qualifying species

¹³ Available at: <https://sac.jncc.gov.uk/site/UK0030080> [Accessed on the 21/10/2021]

¹⁴ Available at: <http://publications.naturalengland.org.uk/publication/6183967367626752> [Accessed on the 21/10/2021]

- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Threats / Pressures to Site Integrity

- 4.8 The key environmental sensitivities and impact pathways are summarised in the corresponding section on the Ashdown Forest SPA below because Natural England's Site Improvement Plan covers both the SAC and SPA.

Ashdown Forest SPA

Introduction

- 4.9 The mosaic of habitats, and specifically the heath and woodland, in Ashdown Forest harbours a high species richness of birds. These include woodland specialists (e.g. woodcock, tree pipits, siskins, lesser redpoll) as well as various birds of prey (e.g. buzzards, sparrowhawk, hobby). However, most notably, Ashdown Forest harbours specialist species that critically depend on the heath for survival, including nightjar and Dartford warbler.
- 4.10 The Dartford warbler depends on mature, dry heath habitats (especially gorse) in good condition for surviving the winter. It is a ground-nesting bird that builds a grassy, cup-shaped nest under the protective cover of dense heather or gorse. Similarly, nightjar usually build their nests in small gaps in dry heather, which provide shelter and protection from potential predators. Both species depend on the rich invertebrate fauna that is supported by the heath.

Qualifying Species¹⁵

- 4.11 This site qualifies under Article 4.1 of the Directive (79/409/EEC) by supporting populations of European importance of the following species:

Annex I breeding species:

- European nightjar (*Caprimulgus europaeus*) – 35 pairs (1% of the breeding population in GB)
- Dartford warbler (*Sylvia undata*) – 29 pairs (1.8% of the breeding population in GB)

Conservation Objectives¹⁶

- 4.12 With regard to the SPA and the individual species and/or assemblage of species for which the site has been classified (the 'Qualifying Features' listed below), and subject to natural change;
- 4.13 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;
- The extent and distribution of the habitats of the qualifying features
 - The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

¹⁵ Available at: <http://publications.naturalengland.org.uk/publication/6399918323269632> [Accessed on the 21/10/2021]

¹⁶ Available at: <http://publications.naturalengland.org.uk/publication/6399918323269632> [Accessed on the 21/10/2021]

Threats / Pressures to Site Integrity^{17 18}

4.14 The following threats / pressures to the integrity of the Ashdown Forest SPA (and SAC) have been identified in Natural England's Site Improvement Plan and Supplementary Advice on the Conservation Objectives for the SAC:

- Change in land management
- Air pollution: Impact of atmospheric nitrogen deposition
- Public access / disturbance
- Hydrological changes

Castle Hill SAC

Introduction

4.15 The Castle Hill SAC is a 114.54ha large site that encompasses dry grassland / steppes (90%), humid / mesophile grassland (5%) and heath / scrub (5%). It is situated in the South Downs National Character Area and South Downs National Park. The site is one of the best examples in East Sussex of the nationally uncommon chalk grassland habitat. Particular variations of plant and animal communities are seen along gradients of aspect and slope. Notable species in the sward include sheep's-fescue *Festuca ovina*, meadow oat-grass *Helictotrichon pratense*, upright brome *Bromopsis erecta* and tor-grass *Brachypodium pinnatum*.

4.16 The plant communities within the SAC also support a number of rare and scarce species, including spider-orchid *Ophrys sphegodes*, burnt orchid *Orchis ustulate* and early gentian *Gentianella anglica*. Scrub compartments provide breeding habitat for a range of downland birds, such as yellowhammer, corn bunting, linnets and whitethroat. A rich orthopteran fauna is also associated with the site, including great green bush cricket and wart-biter grasshopper.

Qualifying Features¹⁹

4.17 Annex I habitats that are a primary reason for selection of this site:

- Semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brometalia*) (note that this includes important orchid sites)

4.18 Annex II species present as a qualifying feature, but not a primary reason for site selection:

- Early gentian *Gentianella anglica*

Conservation Objectives²⁰

4.19 With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

4.20 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats

¹⁷ Available at: <http://publications.naturalengland.org.uk/publication/5793096570765312> [Accessed on the 21/10/2021]

¹⁸

<http://publications.naturalengland.org.uk/publication/6183967367626752#:~:text=Downloads%20available%20for%20this%20record%20%20PDF%2C%2031.0%20K%20...%20%20202014%2F09%2F09%20> [Accessed on the 21/12/2021]

¹⁹ Available at: <https://sac.jncc.gov.uk/site/UK0012836> [Accessed on the 21/10/2021]

²⁰ Available at: <http://publications.naturalengland.org.uk/publication/6088288314064896> [Accessed on the 21/10/2021]

- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Threats / Pressures to Site Integrity²¹

4.21 The following threats / pressures to the integrity of the Castle Hill SAC are identified in Natural England's Site Improvement Plan:

- Undergrazing
- Fertiliser use
- Air pollution: Impact of atmospheric nitrogen deposition

²¹ Available at: <http://publications.naturalengland.org.uk/publication/6241234389565440> [Accessed on the 21/10/2021]

5. Identified Impact Pathways

Atmospheric Pollution (Nitrogen Deposition)

5.1 The main pollutants of concern for European sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂) and are summarised in Table 1. Ammonia can have a directly toxic effect upon vegetation, particularly at close distances to the source such as near road verges²². NO_x can also be toxic at very high concentrations (far above the annual average Critical Level). High levels of NO_x and NH₃ are likely to increase the total nitrogen (N) deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in nitrogen deposition from the atmosphere can, if sufficiently great, enhance soil fertility and lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats^{23 24}.

Table 1: Main sources and effects of air pollutants on habitats and species²⁵

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO ₂)	<p>The main sources of SO₂ are electricity generation, and industrial and domestic fuel combustion. However, total SO₂ emissions in the UK have decreased substantially since the 1980's.</p> <p>Another origin of sulphur dioxide is the shipping industry and high atmospheric concentrations of SO₂ have been documented in busy ports. In future years shipping is likely to become one of the most important contributors to SO₂ emissions in the UK.</p>	<p>Wet and dry deposition of SO₂ acidifies soils and freshwater, and may alter the composition of plant and animal communities.</p> <p>The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species.</p> <p>However, SO₂ background levels have fallen considerably since the 1980's and are now not regarded a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to returning lichen species and improved tree health in London.</p>
Acid deposition	<p>Leads to acidification of soils and freshwater via atmospheric deposition of SO₂, NO_x, ammonia, and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, which most of this contributed by lower sulphate levels.</p>	<p>Gaseous precursors (e.g. SO₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition.</p> <p>Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds / plants.</p> <p>Not all sites are equally susceptible to acidification. This varies depending on soil type, bed rock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz rich rocks tend to be more susceptible.</p>

²² http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.

²³ Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. (2006). Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176.

²⁴ Dijk, N. (2011). Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation. *Global Change Biology* **17**: 3589-3607.

²⁵ Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>).

Pollutant	Source	Effects on habitats and species
Ammonia (NH ₃)	<p>Ammonia is a reactive, soluble alkaline gas that is released following decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock.</p> <p>Ammonia reacts with acid pollutants such as the products of SO₂ and NO_x emissions to produce fine ammonium (NH₄⁺) - containing aerosol. Due to its significantly longer lifetime, NH₄⁺ may be transferred much longer distances (and can therefore be a significant trans-boundary issue).</p> <p>While ammonia deposition may be estimated from its atmospheric concentration, the deposition rates are strongly influenced by meteorology and ecosystem type.</p>	<p>The negative effect of NH₄⁺ may occur via direct toxicity, when uptake exceeds detoxification capacity and via nitrogen accumulation.</p> <p>Its main adverse effect is eutrophication, leading to species assemblages that are dominated by fast-growing and tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen.</p> <p>As emissions mostly occur at ground level in the rural environment and NH₃ is rapidly deposited, some of the most acute problems of NH₃ deposition are for small relict nature reserves located in intensive agricultural landscapes.</p>
Nitrogen oxides (NO _x)	<p>Nitrogen oxides are mostly produced in combustion processes. Half of NO_x emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. NO_x concentrations have been falling for decades due to improvements in vehicle emissions technology and this will accelerate after 2030 as electric vehicles (or other non-combustion engine vehicles) spread through the vehicle fleet following the Government's ban on the sale of new petrol and diesel cars and vans in 2030.</p>	<p>Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NO_x for all vegetation types has been set to 30 ug/m³.</p> <p>Deposition of nitrogen compounds (nitrates (NO₃), nitrogen dioxide (NO₂) and nitric acid (HNO₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification.</p> <p>In addition, NO_x contributes to the eutrophication of soils and water, altering the species composition of plant communities at the expense of sensitive species.</p>
Nitrogen (N) deposition	<p>The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO_x) or reduced (e.g. NH₃) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices.</p> <p>The nitrogen pollutants together are a large contributor to acidification (see above).</p>	<p>All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally.</p> <p>Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from nitrogen eutrophication. This is because many semi-natural plants cannot assimilate the surplus nitrogen as well as many graminoid (grass) species.</p> <p>Nitrogen deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.</p>
Ozone (O ₃)	<p>A secondary pollutant generated by photochemical reactions involving NO_x, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above).</p> <p>Increasing anthropogenic emissions of ozone precursors in the UK have led to an increased number of days when ozone levels rise above 40ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to require action at international level to reduce levels of the precursors that form ozone.</p>	<p>Concentrations of O₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings.</p> <p>High O₃ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reduction in floral biomass, reduction in crop yield (e.g. cereal grains, tomato, potato), reduction in the number of flowers, decrease in forest production and altered species composition in semi-natural plant communities.</p>

- 5.2 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping²⁶. As such these will not be associated with Local Plan growth. Ammonia emissions originate from agricultural practices²⁷, with some chemical processes also making notable contributions and traffic also contributing materially at a local scale. NOx emissions are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion of its overall NOx footprint (92%) through associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison²⁸. Therefore, emissions of NOx and ammonia can reasonably be expected to increase as a result of the Plan, primarily due to an increase in the volume of commuter traffic associated with housing growth.
- 5.3 The World Health Organisation has the following critical thresholds for plant communities: The critical NOx concentration (critical level) for the protection of vegetation is 30 µgm⁻³ and the critical level for ammonia 1-3 µgm⁻³ (depending on whether normal vegetation or lichens and bryophytes are involved). Additionally, ecological studies have determined 'Critical Loads'²⁹ of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH₃).
- 5.4 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant (Figure 3 and reference ³⁰). Therefore, this distance has been used throughout this HRA to determine whether Likely Significant Effects (LSEs) on sensitive European sites may arise due to implementation of the Plan.

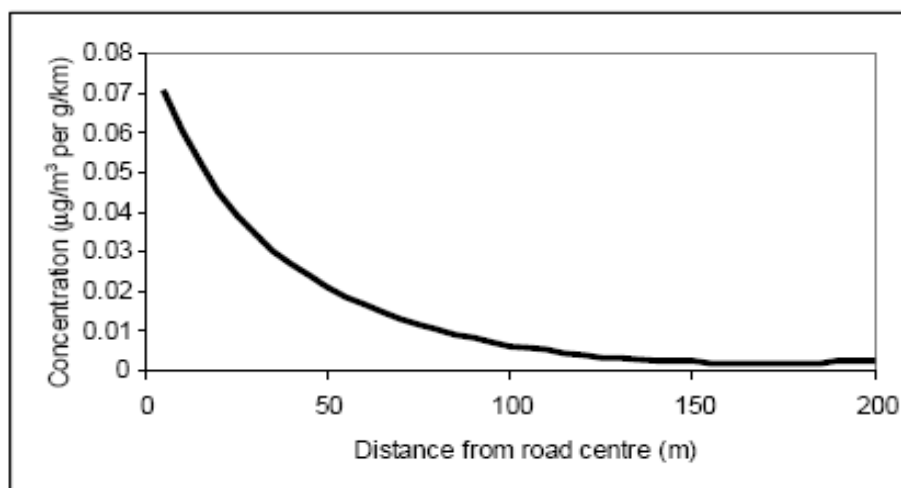


Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT³¹)

- 5.5 Several studies have been previously commissioned to consider the impact of traffic associated with new housing and employment development at Ashdown Forest. For example, an Air Quality Monitoring and Modelling Study was undertaken by Air Quality Consultants on behalf of Wealden District Council, which highlighted that the annual mean critical levels for both NH₃ and NOx are being exceeded in close proximity to roads traversing the SAC. However, it has generally been difficult to attribute variation in these habitats, primarily due to a range of confounding variables such as grazing management, visitor pressure and other roadside physical disturbances (e.g. salt spray, particulates and debris). Another study undertaken by ECUS on behalf of Wealden District Council, investigated ecological impacts caused by nitrogen deposition along 15 road transects in the Ashdown Forest SAC. The study determined that the transects showed low

²⁶ http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.

²⁷ Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. (1998). A new inventory for ammonia emissions from U.K. agriculture. *Atmospheric Environment* **32**: 309-313.

²⁸ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php> [Accessed on the 21/10/2021]

²⁹ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.

³⁰ Available at: <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013> [Accessed on the 21/10/2021]

³¹ Available at: <http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf> [Accessed on the 21/10/2021]

overall species richness, which tended to decline with distance from road (in other words diversity was greater closer to the road than more distant, the opposite of what one might expect if nitrogen deposition were the main factor governing vegetation composition). Furthermore, there was no correlation between soil total nitrogen levels with distance from road, implying that road traffic alone clearly does not account for soil chemistry variation and species composition. As a general rule undergrazing and inadequate management is the primary reason more of this site does not support good quality heathland. Roads can have a significant effect but their effect will be felt closest to the road which is generally the habitat less representative of SAC features and is affected by a range of other factors controlling vegetation composition, known as edge effects. Away from the roadside, agriculture makes the greatest contribution to nitrogen deposition across the SAC. Notwithstanding this, atmospheric pollution from road traffic clearly continues to be a contributing threat to the integrity of the Ashdown Forest SAC and requires particular attention in HRAs of Local Plans.

5.6 Overall, the following European sites within 10km of the Mid Sussex District boundary are sensitive to atmospheric nitrogen deposition, primarily due to the presence of nutrient-limited habitats (the sites in **bold** are taken forward into the following HRA chapters):

- **Ashdown Forest SPA / SAC (located in Wealden District, directly adjoining to the east of Mid Sussex District)**
- **Castle Hill SAC (located approx. 6.6km to the south-east of Mid Sussex District in the adjoining authority of Lewes and Brighton and Hove)**

Recreational Pressure

5.7 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfill conservation objectives while also providing recreational opportunity. Various research reports have provided compelling links between changes in housing and access levels³², and impacts on European protected sites^{33 34}. This applies to any habitat, but recreational pressure from housing growth is of particular significance for European sites designated for their bird interest. Different European sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex. HRAs of planning documents tend to focus on recreational sources of disturbance as a result of new residents³⁵.

Trampling Damage, Nutrient Enrichment and Wildfires

5.8 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage, which dislodges individual plants, leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:

- Wilson & Seney³⁶ examined the degree of track erosion caused by hikers, motorcyclists, horse riders and cyclists in 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.

³² Weitowitz D.C., Panter C., Hoskin R. & Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* 5. <https://doi.org/10.1093/jue/juz019>

³³ Liley D, Clarke R.T., Mallord J.W., Bullock J.M. (2006a). The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. *Natural England / Footprint Ecology*.

³⁴ Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. (2006b). Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. *Footprint Ecology / Dorset County Council*.

³⁵ The RTPI report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

³⁶ Wilson, J.P. & J.P. Seney. (1994). Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

- Cole et al³⁷ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphology was found to explain more variation in response than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
 - Cole ³⁸ conducted a follow-up study (across four vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no differential impact on vegetation cover.
 - Cole & Spildie³⁹ experimentally compared the effects of off-track trampling by hikers and horse riders (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance but recovered rapidly. Generally, it was shown that higher trampling intensities caused more disturbance.
 - In heathland sites, trampling damage can affect the value of a site to wildlife. For example, heavy use of sandy tracks loosens and continuously disturbs sand particles, reducing the habitat's suitability for invertebrates⁴⁰. Species that burrow into flat surfaces such as the centres of paths, are likely to be particularly vulnerable, as the loose sediment can no longer maintain their burrow. In some instances, nature conservation bodies and local authorities resort to hardening paths to prevent further erosion. However, this is concomitant with the loss of habitat used by wildlife, such as sand lizards and burrowing invertebrates.
- 5.9 A major concern for nutrient-poor terrestrial habitats (e.g. heathlands, sand dunes, bogs and fens) is nutrient enrichment associated with dog fouling (addressed in various reviews, e.g.⁴¹). It is estimated that dogs will defecate within 10 minutes of starting a walk and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a more spread out distribution of urine. For example, in Burnham Beeches National Nature Reserve it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually⁴². While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components⁴³.

³⁷ Cole, D.N. (1995a). Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* **32**: 203-214

Cole, D.N. (1995b). Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* **32**: 215-224

³⁸ Cole, D.N. (1995c). Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

³⁹ Cole, D.N., Spildie, D.R. (1998). Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* **53**: 61-71

⁴⁰ Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

⁴¹ Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.

⁴² Barnard A. (2003). Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* **11**:16-19.

⁴³ Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

Nutrient availability is the major determinant of plant community composition and the effect of dog defecation in sensitive habitats is comparable to a high-level application of fertiliser, potentially resulting in a shift towards plant communities that are more typical of improved grasslands.

Bird Disturbance

- 5.10 Human activity can affect birds either directly (e.g. by eliciting flight responses) or indirectly (e.g. by damaging habitat or reducing bird fitness in less obvious ways such as through inducing stress responses). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub optimal areas etc.) and physiological changes (e.g. an increase in heart rate). While such changes are less noticeable, they might result in major population-level changes by altering the balance between immigration / birth and emigration / death⁴⁴.
- 5.11 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and time spent responding to disturbance is time that is not spent feeding⁴⁵. Disturbance therefore increases energetic expenditure while reducing energetic intake, which can adversely affect the 'condition' and ultimately survival of birds. Additionally, displacement of birds from one feeding site to another can increase the pressure on the resources available within alternative foraging sites, which must sustain a greater number of birds⁴⁶. Moreover, the higher proportion of time a breeding bird spends away from its nest, the more likely it is that eggs will cool and the more vulnerable they, or any nestlings, are to predators. Recreational effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as stone curlew and nightjar^{47 48}.
- 5.12 Several factors (e.g. seasonality, type of recreational activity) may have pronounced impacts on the nature of bird disturbance. Disturbance in winter may be more impactful because food shortages make birds more vulnerable at this time of the year. In contrast, this may be counterbalanced by fewer recreational users in the winter months and lower overall sensitivity of birds outside the breeding season. Evidence in the literature suggests that the magnitude of disturbance clearly differs between different types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance compared to hiking⁴⁹. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers⁵⁰. Furthermore, differences in on-site route lengths and usage patterns likely imply that key spatial and temporal parameters (such as the area of a site potentially impacted and the frequency of disturbance) will also differ between recreational activities. This suggests that activity type is a factor that ought to be taken into account in HRAs.

Summary

- 5.13 Several European sites relevant to Mid Sussex District are designated for habitats and species that are sensitive to recreational pressure, including the Ashdown Forest SAC (supports parcels of dry and wet heathland), Ashdown Forest SPA (supports nightjar and Dartford warbler, which nest on or close to the ground) and the Castle Hill SAC (designated for semi-natural dry grassland and scrubland). The increase in residential development allocated in the MSDP Review will lead to an increase in the local population and demand for access to outdoor spaces. The HRA

⁴⁴ Riley, J. (2003). Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

⁴⁵ Riddington, R. *et al.* (1996). The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* **43**:269-279.

⁴⁶ Gill, J.A., Sutherland, W.J. & Norris, K. (1998). The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* **12**: 67-72.

⁴⁷ Clarke R.T., Liley D., Sharp J.M., Green R.E. (2013). Building development and roads: Implications for the distribution of stone curlews across the Brecks. *PLOS ONE*. <https://doi:10.1371/journal.pone.0072984>.

⁴⁸ Liley D. & Clarke R.T. (2003). The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* **114**: 219-230.

⁴⁹ Banks P.B., Bryant J.Y. (2007). Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* **3**: 14pp.

⁵⁰ Miller S.G., Knight R.L., Miller C.K. (2001). Wildlife responses to pedestrians and dogs. *Wildlife Society Bulletin* **29**: 124-132.

process needs to adequately assess potential recreational pressure effects of the Plan on these European sites.

5.14 Overall, the following European sites within 10km of the Mid Sussex District boundary are sensitive to increased recreational access, due to the allocation of residential development in the MSDP (the sites in **bold** are taken forward into the following HRA chapters):

- **Ashdown Forest SPA / SAC (located in Wealden District, directly adjoining to the east of Mid Sussex District)**
- **Castle Hill SAC (located approx. 6.6km to the south-east of Mid Sussex District in the adjoining authority of Lewes and Brighton and Hove)**

6. Screening for Likely Significant Effects (LSEs)

Atmospheric Pollution (Nitrogen Deposition)

Ashdown Forest SPA / SAC

- 6.1 The Ashdown Forest SAC is primarily designated for its extensive, continuous block of lowland heathland, comprising northern wet heath with *Erica tetralix* and European dry heath. The Air Pollution Information System (APIS) identifies both habitats as being sensitive to atmospheric pollution with a nitrogen Critical Load (CL) of 10-20 kg N/ha/yr. An exceedance of the CL may lead to a change in botanical community composition, favouring more competitive grasses over heather species. High nitrogen concentrations can also make ericaceous species more susceptible to impacts from frost and drought. In dry heaths, elevated nitrogen levels may lead to a decline in lichens and changes in plant biochemistry. The current deposition trends for the SAC indicate that the minimum CL is already being exceeded, with maximum background nitrogen deposition in the 5km grid squares within which the SAC is situated being 14.9 kg N/ha/yr. The deposition rate will be greater than this close to roads.
- 6.2 The critical load for nitrogen is already exceeded across Ashdown Forest SAC. With regard to this fact the following are relevant:
- Paragraph 5.26 of the Natural England guidance on the issue⁵¹ states that '*An exceedance [of the critical level or load] alone is insufficient to determine the acceptability (or otherwise) of a project*'. So, the fact that the critical level for NOx or ammonia, or critical load for nitrogen are already exceeded is not a legitimate basis to conclude that any further NOx, ammonia, or nitrogen (no matter how small) will result in an adverse effect;
 - Paragraph 4.25 of the same guidance states '*...1% of critical load/level are considered by Natural England's air quality specialists (and by industry, regulators and other statutory nature conservation bodies) to be suitably precautionary, as any emissions below this level are widely considered to be imperceptible...There can therefore be a high degree of confidence in its application to screen for risks of an effect*'.
- 6.3 The SAC sits entirely within Wealden District to the north-east of Mid Sussex and is traversed by several potential commuter roads, including the A275, A22 and A26 as well as smaller routes that provide direct connections across the SAC. Review of habitat mapping on MAGIC indicates that extensive fragments of heathland are located directly adjacent to all these roads, clearly within the 200m screening distance for roadside atmospheric pollution effects from vehicular traffic. Furthermore, these roads may form key routes for commuters travelling to / from the adjoining authority of Wealden, or other authorities.
- 6.4 Natural England's Site Improvement Plan highlights atmospheric pollution as a pressure to the integrity of the SAC (second to inadequate land management), with parts of the site experiencing declines in heather coverage and becoming increasingly dominated by grasses, although the Supplementary Advice on the Conservation Objectives identify the significant role of agriculture as a source of nitrogen. **The MSDP will significantly increase the population and employment opportunities within the District, likely resulting in more commuter journeys being undertaken within 200m of sensitive heathland. Therefore, Likely Significant Effects (LSEs) cannot be excluded and the site is screened in for Appropriate Assessment regarding this impact pathway.**

⁵¹ 'Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations. Version: June 2018'. <http://publications.naturalengland.org.uk/publication/4720542048845824>

6.5 The following policies contained in the MSDP are screened in for Appropriate Assessment in relation to atmospheric pollution, primarily because they may increase the number of commuter journeys within 200m of sensitive heathland in the Ashdown Forest SPA / SAC:

- Policy DPH1: Housing (allocates 18,581 dwellings in the Plan period, of which 8,332 dwellings are net new, with the potential to increase the local population by approx. 19,997);
- Policy DPH29: Gypsies, Travellers and Travelling Showpeople (allocates an unmet need for four new sites for gypsies, travellers and travelling showpeople and will result in an increase in the local population);
- Policy DPE1: Sustainable Economic Development (supports the delivery of sustainable economic development and the expansion of existing businesses across Mid Sussex, which will increase the number of commuter journeys potentially undertaken within 200m of sensitive habitats);
- Policy DPE3: Employment Allocations (allocates three employment sites on Significant Sites across Mid Sussex District and will result in an increase in the volume of commuter traffic);
- Policy DPE4: Town and Village Centre Development (identifies the development / retail hierarchy in the town centres of Mid Sussex and, potentially, where retail opportunities will be increased, intensified or maximized); and
- Policy DPE9: Sustainable Tourism and the Visitor Economy (supports sustainable tourism opportunities across the District, such as through increased visitor accommodation and new attractions, which may lead to an increase in vehicular traffic).

6.6 Modelling undertaken for the MSDP HRA (reported in Section 7 of this report and the Air Quality Impact Assessment in Appendix C) has identified that Transects T5, T6, T7, T9, T11 and T12 are all forecast to experience an increase in traffic due to the MSDP and are forecast to have an 'in combination' nitrogen dose at the roadside that will exceed 1% of the critical load, this being the threshold for defining an imperceptible nitrogen dose. As a result, likely significant effects cannot be dismissed 'in combination' with other plans or projects.

6.7 Great-crested newts are an Annex II qualifying feature of the SAC, which rely on freshwater ponds for reproduction, with larvae emerging between August and October. They prefer well vegetated ponds in a range of settings, including pastoral and arable farmland. While it is noted that the newts do not necessarily require high water quality, APIS identifies the species' broad habitat (standing open water and canals) as sensitive to atmospheric pollution. However, the main limiting nutrient in freshwater is phosphorus (which is not associated with road traffic), with nitrogen being of much lower importance. Therefore, this HRA does not consider great-crested newts further in relation to atmospheric pollution.

Castle Hill SAC

6.8 The Castle Hill SAC is designated for semi-natural dry grasslands and scrubland facies on calcareous substrates (this includes important orchid sites) that have a nitrogen CL of 15-25 kg N/ha/yr (see previous section). Natural England's Site Improvement Plan (SIP) lists the impact of atmospheric nitrogen deposition as a key pressure to the site with potential knock-on effects on community composition. However, a review of the road network shows that there are no major ('A') roads within 200m of the Castle Hill SAC (the closest point being approx. 1.7km from the A27. Therefore, AECOM concludes that road traffic is unlikely to be a major contributor to nitrogen deposition across the SAC, especially compared to nitrogen from agricultural sources. Indeed, the SIP specifies that fertiliser use on land bordering the SAC, such as on arable land parcels sloping down towards the site, is a major contributor of nitrogen through erosion, leaching and runoff. Overall, LSEs of the MSDP on the Castle Hill SAC regarding atmospheric pollution can be excluded and the site is screened out from Appropriate Assessment in relation to this impact pathway.

Recreational Pressure

Ashdown Forest SPA / SAC

- 6.9 The qualifying ground-nesting birds in the Ashdown Forest SPA (nightjar and Dartford warbler) are sensitive to disturbance, particularly from visitors that walk their dogs off-lead. These species nest on or close to the ground and disturbance can lead to reduced time spent incubating eggs, provisioning for chicks, increased energy expenditure and, in the case of prolonged disturbance, abandonment of eggs. Recreational trampling can also lead to the destruction of eggs, killing of chicks and damage to SAC vegetation upon which qualifying birds rely. Natural England's SIP identifies public access as potentially impacting breeding birds in the SPA and work that is ongoing to reduce visitor pressure, including baseline work to identify current impacts and identifying necessary mitigation interventions.
- 6.10 Previous visitor surveys undertaken within the Ashdown Forest SPA / SAC, entirely situated within Wealden District, have established the site as an attractive and compelling destination, drawing visitors from a large geographical catchment. Data from the surveys have been used to identify a core recreational catchment (i.e. the zone that 75% of visitors to the site derive from based on the linear distance to home postcodes) for the SPA / SAC of 7km, which includes a large portion of Mid Sussex District, including the nearest major settlement of East Grinstead. Therefore, it can be reasonably expected that residential growth in the authority would result in increased visitor numbers and disturbance in the SPA / SAC. A review of Natural England's SSSI condition assessments further corroborates this. For example, the assessment for East Chase Unit 47 states that the area is heavily used by walkers (especially dog walkers), although there is little evidence to indicate that visitors venture far off-track.
- 6.11 **The available evidence base highlights that recreational pressure is a continuing concern for the Ashdown Forest SPA / SAC, with visitor numbers expected to further increase due to emerging Local Plans. Therefore, LSEs of the MSDP on the Ashdown Forest SPA / SAC regarding recreational pressure cannot be excluded and these sites are screened in for Appropriate Assessment.**
- 6.12 The following policies contained in the MSDP are screened in for Appropriate Assessment in relation to recreational pressure, primarily because they will lead to an increase in the population of Mid Sussex and additional demand for recreational space, with potential implications for the Ashdown Forest SPA / SAC:
- Policy DPH1: Housing (allocates 18,581 dwellings in the Plan period, of which 8,332 dwellings are net new, with the potential to increase the local population by approx. 19,997);
 - Policy DPH29: Gypsies, Travellers and Travelling Showpeople (allocates an unmet need for four new sites for gypsies, travellers and travelling showpeople and will result in an increase in the local population); and
 - Policy DPE9: Sustainable Tourism and the Visitor Economy (supports sustainable tourism opportunities across the District, such as through increased visitor accommodation and new attractions, which may lead to an increase in recreational pressure).

Castle Hill SAC

- 6.13 The site is designated for semi-natural dry grasslands and scrubland facies on calcareous substrates, the grassland components of which are more sensitive to recreational trampling and nutrient enrichment from dog faeces. Trampling damage is of elevated concern where the sward comprises grasslands containing significant orchid assemblages or rare orchid species. The Castle Hill SAC supports a range of rare and scarce orchids including early spider-orchid and burnt orchid. However, Natural England's SIP does not list recreational use as a key pressure / threat for the SAC.

- 6.14 Site accessibility is a major factor in determining potential recreational impacts in nature conservation sites. There is a limited number of footpaths that permeate the SAC and it is considered that most visitors will stick to the route network without venturing off-path. At a distance of 6.7km from Mid Sussex District (and only one formal car park situated to the west of the SAC in Woodingdean), the site also lies beyond the core recreational catchment that is documented for most inland, terrestrial European sites (typically approx. 5km). Overall, AECOM concludes that there will be no LSEs of the MSDP on the Castle Hill SAC regarding recreational pressure and the site is screened out from Appropriate Assessment regarding this impact pathway.

7. Appropriate Assessment

Atmospheric Pollution (Nitrogen Deposition)

7.1 The following policies were screened in for Appropriate Assessment with regard to atmospheric pollution, because LSEs could not be excluded both alone and in combination:

- Policy DPH1: Housing (allocates 18,581 dwellings in the Plan period, of which 8,332 dwellings are net new, with the potential to increase the local population by approx. 19,997);
- Policy DPH29: Gypsies, Travellers and Travelling Showpeople (allocates an unmet need for four new sites for gypsies, travellers and travelling showpeople and will result in an increase in the local population);
- Policy DPE1: Sustainable Economic Development (supports the delivery of sustainable economic development and the expansion of existing businesses across Mid Sussex, which will increase the number of commuter journeys potentially undertaken within 200m of sensitive habitats);
- Policy DPE3: Employment Allocations (allocates three employment sites on Significant Sites across Mid Sussex District and will result in an increase in the volume of commuter traffic);
- Policy DPE4: Town and Village Centre Development (identifies the development / retail hierarchy in the town centres of Mid Sussex and, potentially, where retail opportunities will be increased, intensified or maximized); and
- Policy DPE9: Sustainable Tourism and the Visitor Economy (supports sustainable tourism opportunities across the District, such as through increased visitor accommodation and new attractions, which may lead to an increase in vehicular traffic).

Ashdown Forest SPA / SAC

7.2 It has long been established that nitrogen is an essential element for all living organisms and is the main growth-limiting nutrient in terrestrial plants. Consequently, it is known that plants are highly sensitive to changes in available nitrogen. Gaseous nitrogen is highly unreactive, so plants principally depend on oxidised and reduced nitrogen (e.g. derived from NO_x and NH₃). These forms of nitrogen are primarily linked to anthropogenic activities, with vehicle emissions being a major source of nitrogen oxides and, to a lesser extent, ammonia. The primary impact of increased dry / wet nitrogen deposition is a fertilisation effect, favouring plant species that are better adapted to assimilate bioavailable nitrogen. The resulting effect on botanical communities is often one of declining species richness and increasing abundance of more competitive species.

7.3 Effects of nitrogen on heathland plants may be direct or indirect, while interacting with a host of abiotic and biotic factors, such as species-specific sensitivities. The low-growing and non-vascular species in heathland communities are particularly vulnerable to nitrogen deposition due to their limited ability to assimilate nitrogen. The primary fertilising effect of increased nitrogen deposition increases overall plant biomass, which typically shows as an increase in growth of heather. The growth of lower-growing species like mosses and lichens is impeded by increased shading and the disappearance of bare ground. In turn, heather, through toxic effects of deposition and damage to tissues, becomes more sensitive to diseases and environmental stressors. More competitive species (e.g. bracken and purple moor-grass) are then able to encroach on former heathland habitat.

7.4 The Ashdown Forest SAC is designated for wet heaths with *Erica tetralix* and European dry heaths, both of which have a nitrogen Critical Load range of 10-20 kg N/ha/yr according to the Air Pollution Information System (APIS). Both habitat types are also sensitive to ammonia due to

the presence of lichens and bryophytes, for which APIS establishes an annual mean Critical Level of $1 \mu\text{g NH}_3/\text{m}^3$. In many areas in the UK, nitrogen CLs are already exceeded and many habitats are significantly impacted by nitrogen deposition. APIS highlights that the current maximum average nitrogen deposition rate within the 5km grid square within which the SAC is situated as 14.9 kg N/ha/yr , exceeding the minimum CL of 10 kg N/ha/yr that is identified for both dry and wet heaths. Nitrogen deposition rates will be greater than this close to roads. The maximum average ammonia concentrations in both heathland types ($1.17 \mu\text{g}/\text{m}^3$) is also above the $1 \mu\text{g}/\text{m}^3$ Critical Level established for lichens and bryophytes.

Traffic and Air Quality Modelling for the MSDP Review

7.5 Traffic and air quality modelling has been undertaken to support the Regulation 18 MSDP Review and will be updated for Regulation 19 as necessary. The air quality modelling for the Regulation 18 HRA involved five model scenarios that target different objectives as follows:

- Baseline (2019): represents air quality in a past year on roads through the SAC based upon traffic count data coupled with background pollution taken from the Air Pollution Information System in order to account for pollution from other sources such as industry and agriculture;
- Future Baseline Scenario (2039): uses the traffic data from the 'current baseline' in 2019, but applies future assessment year vehicle emission factors and background pollutant concentrations to allow for the 'in combination' assessment required for the HRA;
- Do Minimum (2039 Reference Case): future assessment year which does not include influence of planned development from the MSDP Review but does allow for residential / employment growth in authorities adjoining Mid Sussex (e.g. in Wealden, Lewes, Tandridge, Sevenoaks, Tunbridge Wells, Rother and Eastbourne); and
- Do Something Scenarios (2039): future assessment year which includes the influence of planned development from the MSDP Review and from strategic planned development in neighbouring local authorities. The difference to the 'Do Minimum' scenario allows for quantifying the air quality impacts of the MSDP Review, while also allowing for in-combination assessment.

7.6 The five future scenarios modelled for Air Quality Impact Assessment (AQIA) use different model parameters. The Future Baseline scenario effectively uses present-day AADT, but 2030 emissions factors and background concentrations. In contrast, the 'Do Minimum' and 'Do Something' scenarios utilise 2039 projected AADT, 2030 emission factors and background concentrations, without and with the MSDP Review respectively.

7.7 Changes in air quality have been modelled up to a distance of 200m from the roadside because the contribution of traffic to local atmospheric pollution levels becomes imperceptible beyond this distance and any negative effect on the vegetation from traffic growth will therefore be greatest closest to the roadside (and certainly within 200m). The data are reported at 10m intervals perpendicular to the road; this is known as a transect. In liaison with Mid Sussex District Council and Wealden District Council, a series of 23 transects at 13 locations were identified to provide good coverage of the SAC, while taking account of the fact that a) traffic data (and therefore modelled traffic emissions) will not change between road junctions, so a given stretch of road between junctions only requires one transect (sometimes one each side of the road to take account of the prevailing wind) and b) woodland is a feature of the Ashdown Forest SSSI but not the SAC. There are numerous locations where there is little to no heathland within 200m of the road network in Ashdown Forest SAC. As a result, transects have been located where heathland is present within 200m of the road.

7.8 The modelling is deliberately precautionary to allow for variation in factors such as actual growth rates. For example:

- no account has been taken of improvements in vehicle emission factors post 2030 despite the plan running to 2039;

- the CREAM tool is used to model ammonia, which more recent evidence suggests overestimates ammonia emissions for future years;
- no account has been taken of the government's ban on the sale of new petrol and diesel cars and vans from 2030 which will materially reduce emissions of both ammonia and NO_x (and thus nitrogen) in the last 9 years of the plan period compared to our forecasts; and
- no account has been taken of the role of the tree belt that lines some key roads in depleting nitrogen deposited on the heathland behind.

7.9 The air quality modelling transects are shown on the accompanying map in the Air Quality Impact Assessment in Appendix C where the detailed modelling methodology is also provided.

7.10 In summary, the modelling analysed three key pollutants shown to affect ecosystems, namely ammonia (NH₃), oxides of nitrogen (NO_x) and total nitrogen deposition. NO_x and nitrogen deposition within 200m of the roadside in 2039 is forecast to be significantly better than in 2019 notwithstanding the precautionary assumptions made about both growth and improvements in vehicle emissions factors. NO_x concentrations within 200m of all roads are expected to be below the Critical Level of 30 µg/m³ by 2039 except immediately adjacent to the A26 where there is no heathland in any event.

7.11 Along many modelled transects, nitrogen deposition rates and ammonia concentrations will remain elevated above the Critical Load and Critical Level⁵², but are forecast to be lower, or no higher, with the MSDP in place than they will be without the Local Plan, most likely due to changes in employment and housing within the district affecting journey to work patterns through the SAC, such routes simply not being significant journey to work routes for residents of Mid Sussex in the first place (since the main employment centres for Mid Sussex are away from Ashdown Forest) or the focus of future development in the district being away from Ashdown Forest. At these locations the MSDP Review will therefore not contribute to an increase in pollution.

7.12 There are three transects (T6, T10 and T11) where growth in the MSDP will make a contribution to nitrogen deposition and ammonia concentrations, but that contribution is only marginally above zero⁵³ except at the roadside itself where no SAC habitat is present. This is relevant because in European Court of Justice Case C-258/11 Advocate-General Sharpston stated at paragraph 48 of her Opinion that: *'the requirement for an effect to be 'significant' exists in order to lay down a de minimis threshold. Plans and projects that have no appreciable effect on the site can therefore be excluded. If all plans and projects capable of having any effect whatsoever on the site were to be caught by Article 6(3), activities on or near the site would risk being impossible by reason of legislative overkill'*. It is also relevant that Mr Justice Jay, when ruling in *Wealden v SSCLG* [2017] EWHC 351 (Admin) (2017), did accept that if the contribution of an individual plan or project to traffic related air quality effects on Ashdown Forest SAC was 'very small indeed' it could be legitimately and legally excluded from 'in combination assessment. This is consistent with Advocate-General Sharpston's position.

7.13 There are three remaining transects⁵⁴. These are as follows:

1. Transect T5 (New Road, east of Duddleswell) – Along this road there is a narrow verge followed by a belt of dense bracken up to c.10m from road at which point the heathland begins. By this distance from the road only a small⁵⁵ 'in combination' nitrogen dose of 0.30 kg N/ha/yr (3% of the Critical Load) is forecast, and the contribution of the MSDP is only

⁵² In line with Natural England guidance, the mere exceedance of the minimum or maximum Critical Load alone is not sufficient to conclude that a plan document will result in adverse effects on site integrity. This is due to such exceedances being the result of historic growth trends (unrelated to current plan proposals) or factors other than road traffic (e.g. agriculture).

⁵³ In the UK air quality data are generally not reported to more than 2 decimal places to avoid false precision. If the results due to the Mid Sussex Local Plan were much smaller they would be reported as effectively zero i.e. 'less than 0.01'.

⁵⁴ This does not apply to the A26 (Transect T12). Although the A26 is the busiest road through the SAC the nearest heathland is over 40m from road, by which time the in combination nitrogen dose is imperceptible (less than 1% of the critical load) while total ammonia is below the lowest critical level. Moreover, the contribution of the Mid Sussex Local Plan to pollution beyond 40m from the A26 is effectively zero.

⁵⁵ A 'small' change in atmospheric pollution is generally considered to be a change equivalent to less than 5% of the critical load (i.e. 0.5 kgN/ha/yr for heathland). This is just above the lowest dose examined in Caporn et al (2016)

marginally above zero, being 0.03-0.05 kgN/ha/yr⁵⁶. Total ammonia concentrations are forecast to be below the minimum Critical Level beyond 10m from the road. Since the contribution of the MSDP to nitrogen and ammonia at the nearest area of heathland is very small indeed it will not contribute to an adverse effect on the SAC;

2. Transect T7 (A22) – Along the A22 the verge, followed by a belt of dense trees and scrub, extends to at least 30m from the roadside and frequently further before heathland begins. By 30m from the road only a small ‘in combination’ nitrogen dose of 0.24 kg N/ha/yr (2.4% of the Critical Load) is forecast, only marginally above the threshold at which it could be dismissed as mathematically imperceptible, while the contribution of the MSDP at this distance is effectively imperceptible (0.04 kg N/ha/yr), meaning that the increase in nitrogen deposition that is forecast is primarily attributable to growth outside Mid Sussex District. Total ammonia falls below the Critical Level by 30m from the road, thus not impacting lower plants within the heathland. Since the contribution of the MSDP to nitrogen at the nearest area of heathland is effectively zero it will not contribute to an adverse effect on the SAC;
 3. Transect T9 (A275, Lewes Road) – Along the A275 the verge, followed by a belt of dense gorse or bracken, extends to at least 10-15m from the roadside and frequently further. Ammonia concentrations do not exceed the lowest Critical Level beyond 10m from the road. At 10m from the road a medium ‘in combination’ nitrogen dose of 0.56 kg N/ha/yr (5.7% of the Critical Load) is forecast and the contribution of the MSDP by 20m from the road is imperceptible (not exceeding 1% of the Critical Load), meaning that the increase in nitrogen deposition is at least partly attributable to growth within Mid Sussex District. However, even with the additional nitrogen due to traffic growth total deposition rates will be 1.18 kg N/ha/yr lower in 2039 than the 2019 baseline. Furthermore, this is conservative modelling as it freezes the improvement in vehicle emissions at 2030 and thus takes no account of the shift from petrol/diesel cars and vans to electric vehicles that will occur post 2030.
- 7.14 Modelling of all transects (particularly T5, T7 and T9, where in-combination (DS) nitrogen doses to heathland will be highest) illustrates that a significant proportion of nitrogen due to forecast traffic growth will be deposited within 1m-10m of the road, within the road verge and belts of dense gorse, bracken and trees that line the relevant parts of the A22, A275 and other roads. These areas have low sensitivity to nitrogen deposition and contain lower value habitats due to the general presence of the road and its associated salt spray, dust, runoff, and altered drainage or soils. Generally, there is no qualifying heathland within the 10m zone adjoining roads that could be impacted by atmospheric pollutants, and sometimes for a considerable distance beyond this. In addition, the belts of dense gorse and trees close to the road may be preserved in the long-term to protect SPA birds using adjoining heathland habitat from exposure to disturbing (visual and noise) effects of road traffic and to reduce the risk of livestock straying into the carriageway. Moreover, localised dense gorse can be of direct value for one of the SPA birds (Dartford warbler) as nesting and foraging habitat, as cited in the Supplementary Advice on the Conservation Objectives for the SAC. Even at roadside locations the nitrogen deposition due to traffic growth would not prevent heathland restoration if Natural England ever did decide to undertake it, particularly within the context of the forecast net reduction in total nitrogen deposition due to reductions in vehicle emissions.
- 7.15 Traffic growth will result in nitrogen deposition to areas of heathland beyond the roadside, but due to distance from the road the forecast nitrogen dose is much smaller than at the roadside. Appendix 5 of Caporn et al (2016)⁵⁷ suggests that at the forecast background nitrogen deposition rates at the SAC the worst-case additional nitrogen deposition to heathland as a result of ‘in combination’ traffic growth (c. 0.57 kg N/ha/yr at T9, 10m from the A275) could, if it constituted a net increase in deposition rate, result in a small (c.0.1%) increase in grass (graminoid) cover and a reduction in species richness (whether grasses, mosses or total species richness) at the roadside equivalent to c.0.6% of the maximum (c.0.2 species i.e. if you dropped a random

⁵⁶ In the UK air quality data are generally not reported to more than 2 decimal places to avoid false precision. If the results due to the Mid Sussex Local Plan were much smaller they would be reported as effectively zero i.e. ‘less than 0.01’.

⁵⁷ Caporn, S., Field, C., Payne, R., Dise, N., Britton, A., Emmett, B., Jones, L., Phoenix, G., S Power, S., Sheppard, L. & Stevens, C. 2016. Assessing the effects of small increments of atmospheric nitrogen deposition (above the critical load) on semi-natural habitats of conservation importance. Natural England Commissioned Reports, Number 210.

quadrat there is an approximately 20% probability you would record one less species)⁵⁸. Notably, because nitrogen deposition rates are predicted to significantly drop between 2019 and the Future Baseline (assuming no traffic growth but accounting for improvements in vehicle emissions), any impacts of the 'in combination' total nitrogen dose would occur as a retardation to vegetation recovery. Any change in vegetation (whether a reduction in species richness or retardation in community recovery) further than 10m into the SAC would be even smaller. Moreover, after 2030 (i.e. in the second part of the plan period) a significant shift from petrol and diesel cars and vans to electric vehicles can be expected due to the Government policy to ban the sale of new petrol and diesel cars from that year. Therefore, the results reported in this document can be considered precautionary.

- 7.16 Natural England have confirmed in discussions over the Wealden, Tunbridge Wells and South Downs Local Plans that nitrogen deposition from traffic is not preventing the SAC from achieving its Conservation Objectives, but that the principal issue is lack of management, which is ultimately a land stewardship issue for site owners and managers rather than a consequence of the implementation of Local Plans. For example, a review of the Natural England SSSI condition assessment covering the SAC clearly indicates that historic (and in many cases current) inadequate management is the reason why only 20% of Ashdown Forest SAC is currently in a favourable condition. That is not to say that there is no objective to address nitrogen deposition at the SAC. The Shared Nitrogen Action Plan (SNAP) is the primary mechanism by which Natural England aim to reduce nitrogen deposition to the SAC. It is targeted at agriculture rather than traffic because almost three times more nitrogen deposited to the SAC stems from agriculture (fertiliser and livestock) than traffic. Agricultural emissions also affect a much greater area of the SAC, whereas the effect of the roads is localised. The forecast 'in combination' nitrogen doses due to traffic growth will have a negligible effect on Natural England's ability to restore good quality heathland through improved management and the implementation of the SNAP.
- 7.17 For all these reasons it is considered that the ability of the SAC and SPA to achieve its Conservation Objectives would not be significantly compromised by the MSDP growth either alone or in combination with other plans or projects.
- 7.18 As a safeguard, **Policy DPN9 (Air Quality)** protects the natural environment and people from unacceptable effects of atmospheric pollution. The policy states that '*The Council will require applicants to demonstrate that there is no unacceptable impact on air quality. The development should minimise any air quality impacts, including cumulative impacts from committed developments, both during the construction process and lifetime of the completed development...*' The policy specifically makes reference to the Ashdown Forest SPA / SAC: '*In order to prevent adverse effects on the integrity of the Ashdown Forest SPA and SAC, new development likely to result in increased traffic may be expected to demonstrate how any air quality impacts, including in combination impacts, have been considered in relation to the Ashdown Forest SAC.*' Moreover, **Policy DPC6 (Ashdown Forest SPA and SAC)** addresses potential atmospheric pollution impacts by requiring site-specific air quality assessments. The modelling for the Local Plan indicates that no adverse effect on integrity will arise due to the Local Plan in combination with other plans and projects, but the above policy wording provides a further protective safeguard to the SAC.

Conclusion

- 7.19 The ability of the SAC and SPA to achieve its Conservation Objectives would not be significantly compromised by the MSDP growth either alone or in combination with other plans or projects.

⁵⁸ Caporn et al (2016) indicates that not all species respond equally to nitrogen deposition (some are stimulated, others negatively affected). For example, Table 22 of NECR2010 shows that at background rates of 15 kgN/ha/yr one would expect a dose of 1 kgN/ha/yr (twice times what is forecast in the AECOM model) to reduce the frequency of occurrence (percentage cover, or probability of presence) of five representative lowland heathland lower plant species (*Hylocomium splendens*, *Hylocomium splendens*, *Cladonia portentosa*, *Cladonia portentosa*, *Brachythecium rutabulum*) by between 0.2% and 0.5%. However, they also state on page 71 that '*The relatively small datasets mean that caution should be applied when drawing conclusions on site integrity based on the presence or absence of individual species and that this information [should] be used in conjunction with changes in species richness and composition*'.

Recreational Pressure

7.20 The following policies were screened in for Appropriate Assessment with regard to recreational pressure, because LSEs could not be excluded both alone and in combination:

- Policy DPH1: Housing (allocates 18,581 dwellings in the Plan period, of which 8,332 dwellings are net new, with the potential to increase the local population by approx. 19,997); and
- Policy DPH29: Gypsies, Travellers and Travelling Showpeople (allocates an unmet need for four new sites for gypsies, travellers and travelling showpeople and will result in an increase in the local population); and
- Policy DPE9: Sustainable Tourism and the Visitor Economy (supports sustainable tourism opportunities across the District, such as through increased visitor accommodation and new attractions, which may lead to an increase in recreational pressure).

Ashdown Forest SPA / SAC

Sensitivity of the SPA / SAC

7.21 Several studies have now shown negative impacts of housing growth on protected wildlife sites. These include evidence on the link of housing growth with nature conservation impacts, such as recreational pressure effects on ground-nesting nightjars and Dartford warblers. These species are particularly sensitive to disturbance because they nest on or close to the ground, which makes them more susceptible to trampling damage and displacement from the nest by heathland visitors. Dogs that are walked off-lead are a particular concern because they roam freely, potentially triggering major flight responses or predating on birds. Studies on nightjar breeding success have established greater failure rates for nests in proximity to footpaths.

7.22 While recreational pressure clearly has the potential to impact on individual birds / nests, population-level responses have also been observed. For example, the number of individual woodlark and nightjar in a site was negatively correlated with the amount of housing surrounding a site. In 2006, a Footprint Ecology modelling report demonstrated that the number of visitors to heathland sites was negatively correlated with nightjar density, implying that nightjars showed a statistically significant preference to habitat patches with low visitor pressure. Moreover, birds preferentially established territories away from habitat edges bordering patches with higher visitor numbers. For Dartford warblers it has been shown that disturbance events significantly reduce productivity (i.e. the number of successful broods raised) in heather-dominated territories, most likely due to the lower protection offered by heather species in comparison to gorse. The study estimated that an average of between 13 and 16 visitors passing per hour would prevent multiple broods.

7.23 It is noted that sensitivity to recreational pressure also applies to the Ashdown Forest SAC, primarily due to trampling and nutrient enrichment effects that damage SAC habitats (e.g. the wet and dry heaths) directly, as well as potentially rendering them unsuitable for supporting SPA birds. Trampling effects include direct damage to plants due to breakage and abrasion or indirect effects resulting from soil compaction and changes in soil hydrology. Trampling has been shown to lead to a more rapid appearance of bare ground in heathland than in grassland. Moreover, one study showed that when compared to grassland, heathland dominated by *Calluna* species showed a delayed response in terms of species recovery under high trampling intensities in winter. When comparing the sensitivity of dry and wet heaths, Gallet and Roze showed that wet heaths generally demonstrate lower resilience to trampling damage, most likely due to the impacts of soil compaction on water circulation. Other than trampling effects, the most important impact of recreational pressure in heathland habitats is dog fouling. For example, there was a significant linear correlation between defecation and soil phosphorus levels in recreation grounds, and high soil phosphorus concentrations remained three years after a ban on dogs. A study in Surrey established that the distribution of dog fouling coincided with a shift away from heather to wavy hair grass, likening the impact of dog fouling to the application of a fertiliser.

Evidence of Disturbance Impacts to SPA birds

7.24 A study in 2010⁵⁹ evaluated the relationship between visitor use levels and bird territories in the Ashdown Forest SPA. The methodology encompassed the overlay of visitor intensity levels (using routes weighted across a 25m by 25m cell grid) with recorded bird territories. Interestingly, and perhaps counterintuitively, bird densities generally were lowest in or near the grid cells with lowest visitor pressures, suggesting that recreation is having no impact on the distribution of birds. However, the same report also showed that habitat type represented a strong confounding factor in the study. All three SPA species (Dartford warbler, nightjar and woodlark) showed a strong preference for dry heath, which also showed significantly higher levels of visitor pressure and footpath presence. Based on the analysis undertaken, visitor disturbance currently does not appear to be impacting the use of the SPA by designated bird features. However, potential adverse effects of recreational pressure cannot be excluded, particularly in the absence of data on reproductive success.

Visitor Surveys

7.25 In 2009 an analysis of visitor data for the Ashdown Forest SPA / SAC was undertaken⁶⁰, feeding into HRAs of development plan documents at the time. It was estimated that 5,198 people visit the site over a 16-hour period, resulting in density of 2.17 visitors per ha over 16 hours. The report also developed a statistical model, predicting the additional number of visits resulting from 100 additional dwellings. For example, 100 additional dwellings in East Grinstead are estimated to cause 4.1 visits per 16 daylight hours. Overall, the model incorporates two settlements in Mid Sussex District (East Grinstead and Haywards Heath) that are projected to contribute significantly to future visit rates in the SPA / SAC.

7.26 Given the available recreation patterns, the report proposed a strategy broadly analogous to that devised for the Thames Basin Heaths where such a strategy has been shown by monitoring to be effective⁶¹; namely the identification of a series of zones around the SPA / SAC each of which triggered a combination of provision of alternative greenspace and improved access management. A 7km 'outer zone' for Ashdown Forest SAC and SPA was agreed with Natural England⁶². Development within this affected 7km 'zone' for affected authorities were required to provide a financial contribution towards the provision of Suitable Alternative Natural Greenspaces (SANGs) and Strategic Access Monitoring and Management (SAMM) in the Ashdown Forest SPA / SAC. This general approach was supported by Natural England and the Ashdown Forest Conservators.

7.27 In 2016 Footprint Ecology undertook a further visitor survey⁶³ on behalf of six local authorities (Wealden, Mid Sussex, Lewes, Tunbridge Wells, Tandridge and Sevenoaks), to provide comprehensive and current data on recreational use of the Ashdown Forest SPA / SAC. Additionally, results from the survey were to inform the strategic implementation of access management, tailor a long-term management strategy and inform the design and management of SANGs. Ensuring that SANGs are adequately sited and designed is essential for the delivery of effective mitigation and drawing visitors away from the SPA / SAC. The 2016 survey also undertook a review of the site's core catchment zone, but the 7km zone was still recognised as capturing the appropriate geographic extent of growth contributing significantly to visitor numbers in the site.

7.28 The same six local authorities commissioned a repeat visitor survey, which was undertaken in summer 2021 and published in 2022. This replicated the methodology and 18 of the 20 survey

⁵⁹ Clarke RT, Sharp J & Liley D. 2010. Ashdown Forest Visitor Survey Data Analysis (Natural England Commissioned Reports, Number 048)

⁶⁰ UE Associates and University of Brighton. 2009. Visitor Access Patterns on the Ashdown Forest: Recreational Use and Nature Conservation

⁶¹ The most recent Visitor Access Patterns on the Thames Basin Heaths Report showed a statistical decrease in visitation to the SPA despite a concurrent increase in housing within 5km of the SPA (the core catchment of that SPA), confirming the effectiveness of the solution. <https://surreyheath.moderngov.co.uk/documents/g3273/Public%20reports%20pack%2019th-Sep-2019%2010.00%20Thames%20Basin%20Heaths%20Joint%20Strategic%20Partnership%20Board.pdf?T=10>

⁶² UE Associates. October 2011. Habitat Regulations Assessment for the Mid Sussex District Plan

⁶³ When considering the magnitude of impact of the Wealden Local Plan, interviewees that visit from Wealden District regularly (i.e. daily, weekly or monthly) are clearly most important, because they are associated with the largest recreational footprint stemming from the authority. Therefore, the following section largely focuses on repeat visitors from Wealden District. D., Panter, C. & Blake, D. (2016). Ashdown Forest Visitor Survey 2016. Footprint Ecology Unpublished report.

points of the 2016 survey, allowing for comparisons of access patterns, activities undertaken and core recreational catchments. Furthermore, it provided a framework in which to assess the efficacy of the current mitigation framework, including some of the SAMM measures and SANG approaches currently in place.

Overview of the 2016 Visitor Survey Results

7.29 Overall, the visitor survey demonstrated that Ashdown Forest SPA / SAC received roughly 4,500 visits per day (slightly fewer than those modelled in Clarke et al., 2010), equating to over 1.5 million visits annually. It is one of the largest open public greenspaces in south England and clearly provides a major draw for people undertaking recreational outings. A total of 452 visitors were interviewed, with most being on a trip from home from within a 9.6km radius. Most interviewees visit the SPA / SAC regularly, as is highlighted by 63% of respondents travelling to the site at least weekly. Importantly, approx. half (46%) of people stated that they would not have visited elsewhere if they could not have visited the Ashdown Forest SPA / SAC, highlighting the attractiveness of the site to local residents.

2016 Survey Results as Relevant to Mid Sussex District

7.30 When considering the magnitude of impact of the MSDP Review, interviewees that visit from the district and those that do so regularly (i.e. daily, weekly or monthly) are clearly most important, because they are associated with the largest recreational footprint stemming from the authority. Therefore, the following section largely focuses on such 'regular' visitors.

7.31 Overall, of the 411 visitors interviewed that provided valid postcodes, 53 interviewees had travelled from Mid Sussex, accounting for 12.9% of the visitors captured in the survey and second only to Wealden in terms of overall visitor flux. This is unsurprising because the Ashdown Forest SPA / SAC lies in Wealden District, directly adjoining Mid Sussex and close to East Grinstead, a relatively large settlement in the northern part of the authority. Being the largest continuous and most attractive greenspace in close proximity, it is expected that the SPA / SAC would attract a large portion of visitors from Mid Sussex and Wealden. Furthermore, the report also indicates that people from Mid Sussex District also visit the site relatively frequently with 54.8% of all interviewed dog walkers travelling to Ashdown Forest between one to three times per week. However, it is to be noted that visit frequencies are much lower compared to interviewees from Wealden District. Given that distance to home is one of the most important predictors of site choice, this is an expected pattern. Importantly, most visitors to the site from Mid Sussex visit from the settlement of East Grinstead (30 interviewees) and the majority of these walk their dogs (57%). East Grinstead is the third most important source of recreational pressure, following Crowborough (139 interviewees) and Forest Row (50 interviewees), both in Wealden District.

7.32 Footprint Ecology's 2016 survey also assessed the Euclidean straight-line distances between home postcodes and survey points for different subsets of interview data. This is an important step for identifying the core recreational catchment of European sites, which typically encompasses the distance of the nearest 75% of postcodes to the relevant survey points. The following core recreational catchments were established:

- For all interviewees on a day trip and travelling from home – 75% of visitors lived within approx. 9.6km
- For dog-walking interviewees only – 75% of visitors lived within approx. 7.5km
- For interviewees visiting at least weekly – 75% of visitors lived within approx. 6km (note that the core recreational catchment is much smaller for interviewees that visit daily, 3.6km, and on most days, 5.9km)

7.33 Overall, the 2016 visitor survey established that the 7km core recreational catchment zone still provided a sufficiently precautionary compromise on the different types of user groups discussed above and, importantly, captured the high-impact user groups (i.e. dog walkers and those who visit at least weekly) to the SPA / SAC.

Overview of the 2021 Visitor Survey Results

7.34 The following key points emerge from a review of the 2021 report:

- Excluding tourists, 78% of visitors to the SAC live in Wealden or Mid Sussex. That alone shows these are clearly the most important districts to capture to address the recreational pressure effect.
- Approximately 80% of all frequent visitors (i.e. those who visit at least once a week) live within 7km of the SAC, which is similar to the 2016 survey.
- Moreover, 50% of all visitors (excluding tourists) live within 5km of the points at which they were surveyed. Indeed, 63% of dog walkers and 72% of weekly visitors (the two most important/beneficial groups to capture) live at just three settlements: Crowborough, East Grinstead and Uckfield, which are all within 5km of the SAC.

7.35 The focus on frequent visitors is relevant because the survey shows that the majority (58%) of current visitors to the SAC, excluding tourists, are frequent visitors and will have a disproportionate impact compared to the 42% who are occasional visitors. In summary, the 2021 visitor survey results broadly fit with those from 2016.

SANG and SAMM Mitigation

7.36 The Local Plan Review includes several residential allocations within 7km of the Ashdown Forest SPA / SAC (Table 2). The screening of the full list of housing sites allocated in the MSDP can be found in Appendix A, Table 5. Two sites either lie just outside the 7km zone or only have a very small area located within 7km (sites DPH13 and DPH14). However, since the 7km zone is not intended to be precise to the nearest 0.1km they have both been included in line with the precautionary principle. These sites are both covered by the wording in Policy DPC6 (Ashdown Forest SPA and SAC) with reference to development proposals just outside of the 7km zone of influence. Table 3 identifies that a total of 8.5ha of SANG will be required (rounded up to the nearest hectare).

Table 2: Proposed residential allocations in the 7km recreational pressure mitigation zone surrounding the Ashdown Forest SPA / SAC.

Site Name	Number of Proposed New Dwellings	Distance to Ashdown Forest SPA / SAC (km)
The Paddocks, Lewes Road, 8-12 Ashurst Wood		2.5
Land off West Hoathly Road, East Grinstead	45	3.1
Land to west of Turners Hill Road, Crawley Down ⁶⁴	350	6.8
Hurst Farm, Turners Hill Road, Crawley Down	37	7.5 (<i>included as a precaution as lies close to the 7km zone</i>)

All Proposed Residential Allocations Within Mitigation Zone 444

⁶⁴ It is to be noted that only a relatively small portion of this proposed allocation falls within the 7km mitigation zone surrounding the Ashdown Forest SPA / SAC. Therefore, any mitigation contributions may depend on the distribution of housing within the site boundary, which will be refined as the site moves forward. For precautionary reasons, a 'worst-case' capacity of 350 dwellings is assumed in the SANG requirement calculations. Further detailed assessment of the potential impacts of this proposed site allocation may be required.

Table 3: SANG requirement to mitigate the residential growth within 7km of the Ashdown Forest SPA / SAC (this being the Scenario with the greatest amount of housing within the 7km zone), accounting for average housing occupancy and Natural England SANG guidelines.

Number of Dwellings Requiring Mitigation	Number of Future Residents Requiring Mitigation	Amount of SANG Required (8ha/1,000 Population Increase)
444	1,065.6 (444 * 2.4)	8.52ha (1,065.6 * 0.008)

- 7.37 There is an existing adopted mitigation strategy for recreational pressure in Ashdown Forest which has been agreed by all authorities in the Ashdown Forest Working Group and with Natural England. It is similar to that which has been shown to be effective at the Thames Basin Heaths SPA which is designated for the same species and experiences similar types of recreational impact. Delivery of such a mitigation strategy involves the identification of measures themselves (i.e. both SANG and SAMM deliverables) and the geographic area to which these requirements apply. It is the main purpose of the Habitats Regulations Assessment (HRA) process to identify an adequate quantum of mitigation in line with the agreed strategy that ensures no adverse effects on sensitive European sites result from local development plans.
- 7.38 It is noted that Mid Sussex District Council already have a SANG inventory in place, which provides bespoke and strategic mitigation for residential developments. For example, East Court & Ashplats Wood SANG, located to the east of East Grinstead, comprises a range of features such as woodland, a lake, children's play area and car parking. Ashplats Wood itself is a 28ha large site comprising ancient woodland, streams, ponds, wildlife and a way-marked 2.5km circular route. The SANG is advertised online on the Mid Sussex District Council website, addressing the protection of Ashdown Forest. The SANG now has limited residual capacity and a visitor survey has been recently carried out to identify potential future management projects to ensure the continued effectiveness of the SANG.
- 7.39 Other SANGs are being developed as part of planning applications. For example, the Hill Place Farm SANG is now operational and is being delivered alongside 200 dwellings and will have residual capacity for 554 dwellings. The residual capacity is being transferred to Mid Sussex District Council, which will then use it as strategic SANG for future residential developments. The SANG management plan identifies three objectives for the site, including the provision of attractive alternative natural greenspace to the Ashdown Forest SPA / SAC, enhancement of the landscape attributes of key habitats in the site and maximisation of ecological interest. The Imberhorne Farm SANG in East Grinstead is another emerging SANG in support of housing allocation SA20 from the Site Allocations Development Plan Document (DPD). Taking into account the 550 dwellings from the allocated site, it is predicted that it will have residual capacity for 1,665 dwellings. However, it is to be noted that the future land ownership and management arrangements for this SANG have not been confirmed and the capacity may need to be reviewed in the future. The Concept Masterplan for the site indicates that it will comprise 71.32ha of 'additional land' in the western half of the site, the majority (c. 40ha) of which being SANG with direct foot access to the proposed dwellings. Overall, Mid Sussex District Council is well under way in developing a suite of SANGs to support the Local Plan Review.
- 7.40 Table 2 indicates that the MSDP allocates a maximum of 444 dwellings within or just beyond the 7km mitigation zone surrounding the Ashdown Forest SPA / SAC. Most of the residential growth is anticipated to occur in the western and southern part of the authority (e.g. adjacent to Crawley and Burgess Hill), outside the mitigation zone. The dwellings within the 7km Zone of Influence of the Ashdown Forest SPA / SAC would require the support of approx. 8.5ha of SANG to be delivered. As discussed above, the Council already have a SANG programme in place, which has sufficient residual capacity in place to absorb this additional growth. For example, the Imberhorne Farm SANG in East Grinstead alone (which may have c. 40ha of SANG available), is situated adequately and has sufficient residual capacity to provide an effective mitigation solution due to its proximity to the proposed housing allocations. Mid Sussex District Council would have to ensure that sufficient SANG capacity is available prior to giving planning consent.

7.41 To ensure that the SANG programme delivers ongoing effective mitigation, long-term and regular monitoring should be undertaken in designated SANGs, the details of which to be agreed in partnership with the other local authorities affected by the mitigation requirements. This is because visitors that are drawn away from protected sites and rely on access to SANGs for the majority of recreational visits, are unlikely to be captured in surveys in European sites. SANG surveys should include both visitor counts and interviews. Importantly, SANG surveys should determine to what extent interviewees from different authorities still rely on a European site, supplying important data on the effectiveness of mitigation. Furthermore, visitor monitoring at SANGs can also help in identifying future management approaches and projects that help in making such sites more attractive. For example, interviews can help in identifying footpaths for enhancement / repair, better coverage of a site with dog poo bins and creating more appealing habitats. Such information is crucial in improving SANGs and, ultimately, making them more efficient in delivering mitigation. As highlighted above, Mid Sussex's current operational SANG is at East Court & Ashplats Wood (to the east of East Grinstead) and evidence including that collected for the 2021 visitor survey identifying alternative sites people visit besides the SPA suggests that site use has increased, most likely due to housing growth. SANG monitoring should also be undertaken in the other SANGs once they are established and operational.

7.42 Work on the Strategic Access Management and Monitoring (SAMM) strategy for the Ashdown Forest SPA / SAC has been ongoing between the local authorities of Wealden, Mid Sussex, Lewes, Tunbridge Wells, Tandridge and Sevenoaks in partnership with the Conservators of Ashdown Forest and Natural England since 2012. The SAMM partnership is proactively working to deliver access management projects that address recreational impacts and monitor visitor levels across the SPA / SAC. The partnership has published a SAMM tariff guidance document that currently sets out a tariff of £1,170 per dwelling and has most recently been updated in October 2019⁶⁵. SAMM is required because local residents, notwithstanding SANGs being in place, are still likely to visit the Ashdown Forest SPA / SAC, at least occasionally. Local Authorities that deliver residential development within the site's 7km core recreational catchment have committed to collecting developer contributions with the aim to deliver the SAMM programme. The following key SAMM projects have been identified in consultation with the Conservators of Ashdown Forest and Natural England:

- Development and promotion (e.g. through media presence and leaflet distribution) of a Code of Conduct with particular focus on dog walkers⁶⁶
- Provision of appropriate signage and interpretation boards (e.g. through raising awareness of sensitive ground-nesting birds)
- Organisation of responsible dog ownership training events
- Recruitment of volunteer dog rangers, an Access Management Lead Officer and Assistant Access Management Officer
- Delivery of on-site and off-site education, information and volunteering events
- Monitoring, coordination and analysis of protected bird surveys (in collaboration with other relevant organisations)
- Continued visitor monitoring in the Ashdown Forest SPA / SAC and SANG sites

7.43 The SAMM tariff contribution for residential development in the Ashdown Forest SPA / SAC catchment zone is calculated on a per unit basis and is the same for all housing types (house, flat, studio flat – including all affordable housing). The SAMM tariff has been calculated using a cash flow model, accounting for the current housing projections, estimated costs of SAMM

⁶⁵ (October 2019). Ashdown Forest Special Protection Area (SPA) – Strategic Access Management and Monitoring Strategy Tariff Guidance for Lewes District Council, Mid Sussex District Council, Sevenoaks District Council, District Council of Tandridge, Tunbridge Wells Borough Council and Wealden District Council. Available at: <https://www.midsussex.gov.uk/media/5596/samm-strategy-tariff-guidance.pdf> [Accessed on the 25/11/2021]

⁶⁶ The Code of Conduct for dog walkers is available on the Mid Sussex District Council website: <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/> [Accessed on the 25/11/2021]

projects and a requirement for mitigation in-perpetuity. The inter-authority SAMM monetary pot is reviewed annually, in line with changes to housing numbers and the timing of housing delivery.

Mitigation contained in MSDP Review

- 7.44 Policy mitigation of recreational pressure in sensitive European sites centres around several pillars, including the recognition of any formally adopted, legally binding frameworks and preserving / enhancing other publicly accessible greenspaces. The MSDP Review acknowledges the requirements established for Ashdown Forest mitigation in **Policy DPC6 (Ashdown Forest SPA and SAC)**. This policy stipulates that *'In order to prevent adverse effects on the integrity of the Ashdown Forest SPA and SAC, new development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate any potential adverse effects.'* The policy goes on to identify the key buffer zones surrounding the site, including the 400m zone in which no net new residential dwellings are permitted and the 7km zone in which adequate SANG and SAMM provision is mandatory. Therefore, AECOM considers that the Plan recognises all essential conditions that are imposed on development in the Zone of Influence of the SPA / SAC.
- 7.45 The MSDP also maximizes the amount of greenspace provision in other parts of the District with the aim to offer alternative recreation destinations to local residents. **Policy DPN3 (Green Infrastructure)** sets out that *'Green infrastructure assets, links and the overall multi-functional network will be protected and enhanced by ensuring development:*
- *Responds to and incorporates existing on-site and off-site green infrastructure into the development design; and*
 - *Provides new green infrastructure integrated into the development design; and*
 - *Contributes to the wider green infrastructure network by taking opportunities to improve, enhance, manage and restore green infrastructure, and providing links to existing green infrastructure including outside the development's boundaries.'*
- 7.46 Policy **DPN5 (Historic Parks and Gardens)** protects the special local historic interest of special parks and gardens, some of which are likely to represent popular recreation destinations. It states that *'The character, appearance and setting of a registered park or garden, or park or garden of special local historic interest will be protected. This will be achieved by ensuring that any development within or adjacent to a registered park or garden, or park or garden of special local historic interest will only be permitted where it protects and enhances its special features, setting and views into and out of the park or garden.'*
- 7.47 Ensuring the continuing appeal of alternative recreation destinations is a key mechanism for shifting some of the recreational footprint away from more sensitive European sites.

Conclusion

- 7.48 Overall, this HRA shows that Mid Sussex District Council has an adequate SANG and SAMM strategy in place to protect the integrity of the Ashdown Forest SPA / SAC and this is the agreed strategic cross-boundary solution for Ashdown Forest that is supported by Natural England. Furthermore, the Plan policies make adequate reference to the existing mitigation framework in place to protect the integrity of the SPA / SAC. **Provided that adequately sited and sized SANG is delivered in line with the anticipated housing delivery, it is concluded that the MSDP Review will not result in adverse effects on the integrity of the SPA / SAC, both alone and in combination with other plans and projects.**

8. Conclusions & Recommendations

- 8.1 This HRA assessed the potential for the MSDP Review to result in Likely Significant Effects (LSEs) and, where relevant, adverse effects on European sites, specifically the Ashdown Forest SPA / SAC and the Castle Hill SAC. LSEs screening identified that the Castle Hill SAC could be screened out from Appropriate Assessment regarding atmospheric pollution and recreational pressure. However, due to the proximity of the district to the Ashdown Forest SPA / SAC and potential major commuter routes within 200m of air-quality sensitive habitats, the site was taken forward to Appropriate Assessment in relation to both impact pathways.

Ashdown Forest SPA / SAC

Atmospheric Pollution

- 8.2 Modelling of all transects (particularly T5, T7 and T9, where total nitrogen doses will be highest) illustrates that a significant proportion of nitrogen due to traffic growth will be deposited within 1m-10m of the road, within the road verge and belts of dense gorse, bracken and trees that line the relevant parts of the A22, A275 and other relevant roads. These areas have low sensitivity to nitrogen deposition and contain lower value habitats due to the general presence of the road and its associated salt spray, dust, runoff, and altered drainage or soils. Even at roadside locations the nitrogen due to traffic growth would not prevent heathland restoration (if Natural England decided to undertake it), particularly within the context of the forecast net reduction in total nitrogen deposition.
- 8.3 Natural England have confirmed in discussions over the Wealden, Tunbridge Wells and South Downs Local Plans that nitrogen deposition from traffic is not preventing the SAC from achieving its Conservation Objectives, but that the principal issue is lack of management, which is ultimately a land stewardship issue for the site owners and managers rather than something associated with Local Plans. For example, a review of the Natural England SSSI condition assessments clearly indicates that historic (and in many cases current) inadequate management is the reason why only 20% of Ashdown Forest SAC is currently in a favourable condition. Notwithstanding this, there is an objective to address nitrogen deposition at the SAC. The Shared Nitrogen Action Plan (SNAP) is the primary mechanism by which Natural England aim to reduce nitrogen deposition to the SAC, which is targeted at agriculture rather than traffic (three times more nitrogen deposited at the SAC stems from agriculture). The forecast 'in combination' nitrogen doses due to traffic growth will have a negligible effect on Natural England's ability to restore good quality heathland through improved management and the implementation of the SNAP.
- 8.4 **Overall, it is concluded that the MSDP Review will not result in adverse effects on the integrity of the Ashdown Forest SPA / SAC regarding atmospheric pollution, either alone or in combination with other plans or projects. No additional policy recommendations are made.**

Recreational Pressure

- 8.5 It is noted that Mid Sussex District Council already has a SANG inventory in place, which provides bespoke and strategic mitigation opportunities for the 444 dwellings to be delivered in the 7km mitigation zone surrounding the Ashdown Forest SPA / SAC. A total SANG area of approx. 8.5ha will be required according to Natural England's 8ha per 1,000 population increase. For example, East Court & Ashplats Wood SANG, located to the east of East Grinstead, comprises a range of features such as woodland, a lake, children's play area and car parking. Ashplats Wood itself is a 28ha large site comprising ancient woodland, streams, ponds, wildlife and a way-marked 2.5km circular route. The SANG is advertised online on the Mid Sussex District Council website, addressing the protection of Ashdown Forest.
- 8.6 Other SANGs are being developed as part of emerging planning applications. For example, the Hill Place Farm SANG is being delivered alongside 200 dwellings and will have residual capacity

for 554 dwellings. The SANG is now operational and the residual capacity has been transferred to Mid Sussex District Council, which will use it as strategic SANG for future residential developments. The SANG management plan identifies three objectives for the site, including the provision of attractive alternative natural greenspace to the Ashdown Forest SPA / SAC, enhancement of the landscape attributes of key habitats in the site and maximisation of ecological interest. The Imberhorne Farm SANG in East Grinstead is another emerging SANG in support of housing allocation SA20 from the Site Allocations Development Plan Document (DPD). Taking into account the 550 dwellings from the allocated site, it is predicted that it will have residual capacity for 1,665 dwellings. However, it is to be noted that the future land ownership and management arrangements for this SANG have not been confirmed and the capacity may need to be reviewed in the future. The Concept Masterplan for the site indicates that it will comprise 71.32ha of 'additional land' in the western half of the site, the majority of which being SANG with direct foot access to the proposed dwellings. Overall, Mid Sussex District Council is well under way in developing a suite of SANGs to support the Local Plan Review. Mid Sussex District Council will have to ensure that sufficient SANG capacity is available prior to giving planning consent.

8.7 Work on the Strategic Access Management and Monitoring (SAMM) strategy for the Ashdown Forest SPA / SAC has been ongoing between the local authorities of Wealden, Mid Sussex, Lewes, Tunbridge Wells, Tandridge and Sevenoaks in partnership with the Conservators of Ashdown Forest and Natural England since 2012. The SAMM partnership is proactively working to deliver access management projects that address recreational impacts and monitor visitor levels across the SPA / SAC. The partnership has published a SAMM tariff guidance document that currently sets out a tariff of £1,170 per dwelling and has most recently been updated in October 2019⁶⁷.

8.8 **Overall, given that an established mitigation framework comprising SANG and SAMM measures is in place (and this is adequately captured in Plan policy), and has been agreed with Natural England, it is concluded that the MSDP Review will not result in adverse effects on the integrity of the Ashdown Forest SPA / SAC regarding recreational pressure, either alone or in combination with other plans or projects. No additional policy recommendations are made.**

⁶⁷ (October 2019). Ashdown Forest Special Protection Area (SPA) – Strategic Access Management and Monitoring Strategy Tariff Guidance for Lewes District Council, Mid Sussex District Council, Sevenoaks District Council, District Council of Tandridge, Tunbridge Wells Borough Council and Wealden District Council. Available at: <https://www.midsussex.gov.uk/media/5596/samm-strategy-tariff-guidance.pdf> [Accessed on the 25/11/2021]

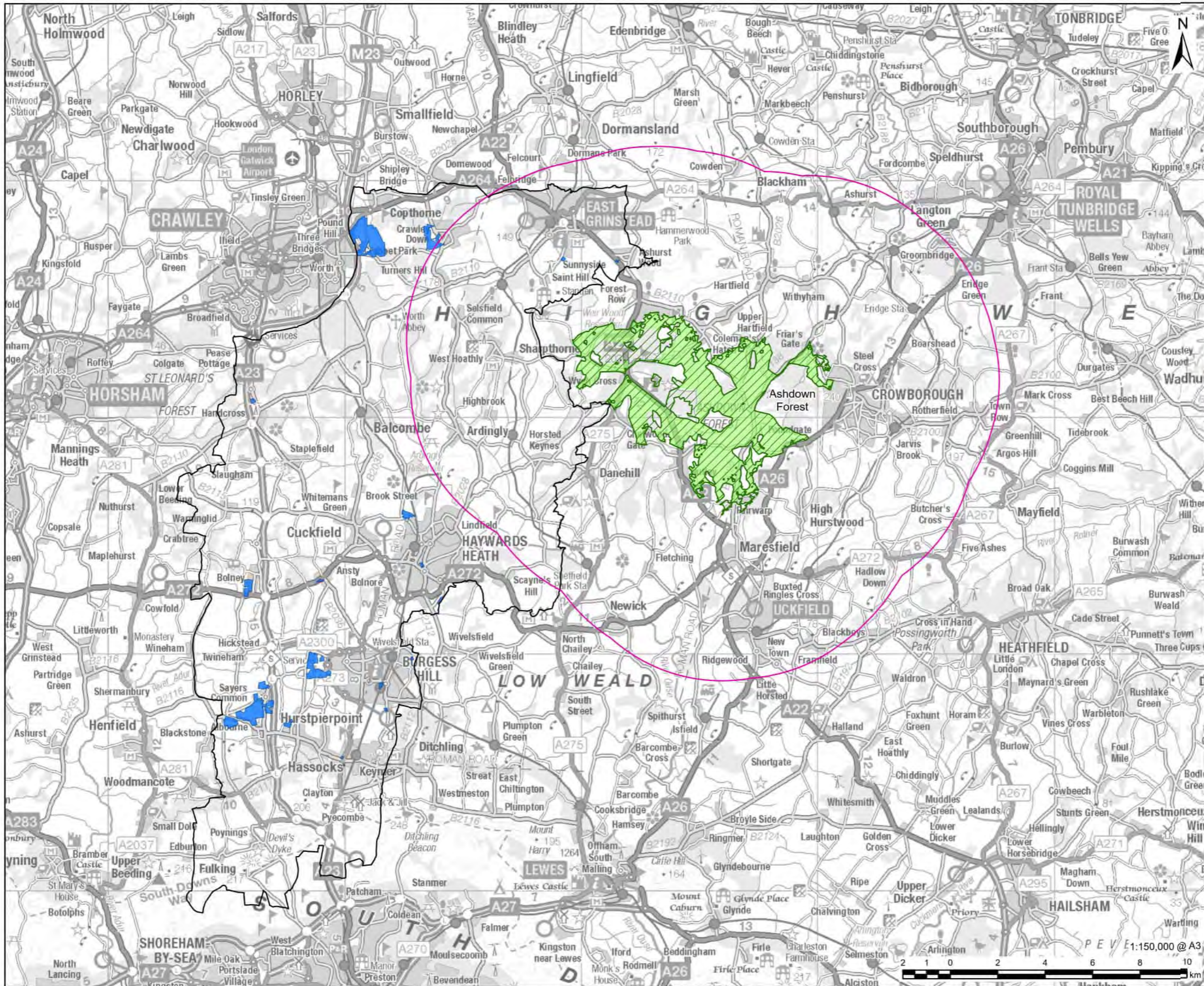
Appendix A Maps

Figure 4: Map of housing sites allocated in the MSDP Review, European sites within 10km of the district boundary and the 7km mitigation zone surrounding the Ashdown Forest SPA / SAC.

-  Mid Sussex District Boundary
-  Recreation Mitigation Buffer Zone - 7km
-  Housing Allocation
-  Special Protection Area
-  Special Area of Conservation

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Housing Allocations and European Sites Within 10km of the Mid Sussex District Boundary



Appendix B LSEs Screening

Table 4: Likely Significant Effects (LSEs) screening assessment of the policies contained in the MSDP Review. Where the LSEs screening outcome column is shaded orange, this indicates that impacts of the policy on European sites cannot be excluded and the site is screened in for Appropriate Assessment. Where this column is shaded green, there are no impact pathways present and the policy is screened out.

Policy	Summary of Policy	Likely Significant Effects (LSEs) Screening Outcome
Chapter 8 – Sustainability		
Policy DPS1: Climate Change	This policy represents the Council's approach to tackling climate change, such as through reducing carbon emissions, maximizing carbon sequestration and climate change adaptation	<p>There are no LSEs of Policy DPS1 on European sites.</p> <p>This is a positive policy for the environment that sets out the Council's approach to mitigating against climate change by reducing carbon emissions and maximizing carbon sequestration. While this is positive for the environment, in particular air quality, this has no direct relevance for European sites.</p> <p>The policy does not propose a quantum or location of residential or employment development.</p> <p>There are no impact pathways present and Policy DPS1 is screened out from Appropriate Assessment.</p>
Policy DPS2: Sustainable Design and Construction	This policy highlights that the Council will be directing development towards sustainable design and construction. Assessment frameworks will be employed (e.g. BREEAM standards) to assess this. It further addresses important topics, such as energy use, water efficiency measures and minimizing waste.	<p>There are no LSEs of Policy DPS2 on European sites.</p> <p>This is a positive policy for the environment that highlights the Council's support for sustainability regarding a range of themes, including water efficiency, energy use and minimizing waste. While this is positive for the environment, this has no direct relevance for the European sites included in this assessment.</p> <p>The policy does not propose a quantum or location of residential or employment development.</p> <p>There are no impact pathways present and Policy DPS2 is screened out from Appropriate Assessment.</p>
Policy DPS3: Renewable and	Policy DPS3 provides support for renewable and low carbon	There are no LSEs of Policy DPS3 on European sites.

<p>Low Carbon Energy Schemes</p>	<p>energy schemes, including wind turbines (one or more wind turbines), provided that negative impacts on ecology and biodiversity are acceptable.</p>	<p>This policy specifies that proposals for renewable and low carbon energy schemes across Mid Sussex will be supported, provided there are no adverse impacts on designated and non-designated wildlife sites. While the policy supports development in principle, any impact pathways relevant to European sites will be assessed and mitigated (where required) in project-level HRAs.</p> <p>There are no impact pathways present and Policy DPS3 is screened out from Appropriate Assessment.</p>
<p>Policy DPS4: Flood Risk and Drainage</p>	<p>Policy DPS4 addresses flood risk and drainage to ensure that development is safe across its lifetime. The Strategic Flood Risk Assessment (SFRA) should be utilised to identify areas at risk. Sustainable Drainage Systems (SuDS) should be implemented in all developments of 10 dwellings or more and these should be managed / maintained in the long-term. Preferably, where feasible, surface water drainage should occur via ground infiltration and, post-attenuation, to surface watercourses.</p>	<p>There are no LSEs of Policy DPS4 on European sites.</p> <p>This policy stipulates how flood risk and drainage will be addressed in developments across Mid Sussex District, including Strategic Flood Risk Assessments and provision and long-term management of Sustainable Drainage Systems (SuDS). This is a positive policy for the environment as it protects against water level / quality changes across the district.</p> <p>There are no impact pathways present and Policy DPS4 is screened out from Appropriate Assessment.</p>
<p>Policy DPS5: Water Infrastructure and Water Environment</p>	<p>This policy establishes that developments should protect and enhance water resources and quality. It provides for off-site water service infrastructure and the development / expansion of water supply or sewage treatment facilities (where</p>	<p>There are no LSEs of Policy DPS5 on European sites.</p> <p>This policy protects Mid Sussex's water resources and quality. It specifies that development will only be permitted where it does not result in an unacceptable adverse effect on the district's water assets. This is a positive policy for the environment.</p> <p>There are no impact pathways present and Policy DPS5 is screened out from Appropriate Assessment.</p>

	required and environmentally acceptable).	
Policy DPS6: Health and Wellbeing	Policy DPS6 details the Council's approach to achieving healthy, inclusive and safe places. These are outlined in the Joint Strategic Needs Assessment and West Sussex Joint Health and Wellbeing Strategy. A range of requirements are made for new developments, including high-quality design, accessibility, high-quality outdoor space, green infrastructure and biodiversity.	<p>There are no LSEs of this policy on European sites.</p> <p>Policy DPS6 promotes health and wellbeing across Mid Sussex by securing high-quality design, sustainable transport and undertaking Health Impact Assessments. It has no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPS6 is screened out from Appropriate Assessment.</p>
Chapter 9 – Natural Environment and Green Infrastructure		
Policy DPN1: Biodiversity, Geodiversity and Nature Recovery	Policy DPN1 protects and enhances the biodiversity and geodiversity of Mid Sussex. Development proposals need to retain features of interest, reduce disturbance to sensitive habitats / species, result in a net gain in biodiversity, minimize habitat fragmentation and avoid damage. Designated sites are given protection according to their importance to nature conservation.	<p>There are no LSEs of Policy DPN1 on European sites.</p> <p>This is a development management policy that protects biodiversity and geodiversity, and promotes nature recovery. Importantly, the policy provides for a general protection of Special Protection Areas and Special Areas of Conservation, including the avoidance of damage and their general enhancement. This is a positive policy from an HRA perspective.</p> <p>There are no impact pathways present and Policy DPN1 is screened out from Appropriate Assessment.</p>
Policy DPN2: Biodiversity Net Gain	Policy DPN2 highlights that biodiversity net gain will contribute to the delivery of	There are no LSEs of Policy DPN2 on European sites.

	<p>ecological networks, green infrastructure and nature recovery. Development proposals will need to deliver a Biodiversity Net Gain Plan that provides for measurable net gains in biodiversity. A minimum of 10% biodiversity net gain will be required. On Significant Sites (DPSC1 – 3) biodiversity net gain of 20% will be required.</p>	<p>This is a development management policy that aligns development in Mid Sussex with the most up-to-date biodiversity net gain requirements, specifically a minimum of 10% biodiversity net gain. While positive for the environment, biodiversity net gain is not directly relevant to European sites.</p> <p>There are no impact pathways present and Policy DPN2 is screened out from Appropriate Assessment.</p>
<p>Policy DPN3: Green Infrastructure</p>	<p>Policy DPN3 protects green infrastructure assets by requiring development to incorporate existing green infrastructure into design, provide new green infrastructure and strengthen connectivity of ecological networks. Planning applications should consider landscape assets at an early stage and consider how they link to existing and proposed greenspace features.</p>	<p>There are no LSEs of Policy DPN3 on European sites.</p> <p>This is a development management policy that promotes green infrastructure in the District, and highlights one asset in the form of a Green Circle around Burgess Hill. While not delivered to SANG standards, informal open spaces are positive because they can help absorb recreational pressure locally.</p> <p>There are no impact pathways present and Policy DPN3 is screened out from Appropriate Assessment.</p>
<p>Policy DPN4: Trees, Woodland and Hedgerows</p>	<p>Policy DPN4 protects and enhances trees, woodland and hedgerows across Mid Sussex. Development that will result in the loss of such features (including ancient woodland or veteran trees) will not be permitted. Development proposals should incorporate existing trees into design,</p>	<p>There are no LSEs of Policy DPN4 on European sites.</p> <p>This is a development management policy that protects trees, woodland and hedgerows in Mid Sussex District. While positive for the natural environment, this policy has no direct bearing on European sites.</p> <p>There are no impact pathways present and Policy DPN4 is screened out from Appropriate Assessment.</p>

	prevent damage to root systems, provide new planting and apply appropriate protection measures. There should be a 15m buffer between development and ancient woodland.	
Policy DPN5: Historic Parks and Gardens	Policy DPN5 protects the character, appearance and setting of registered parks or gardens. Development proposals in such settings will only be permitted where special features (e.g. setting and views) are protected and enhanced.	<p>There are no LSEs of Policy DPN5 on European sites.</p> <p>This is a development management policy that protects the characteristics and settings of historic parks and gardens. Publicly accessible historic parks or gardens may help reduce the number of recreational visits to more sensitive European sites, such as the Ashdown Forest SPA / SAC.</p> <p>There are no impact pathways present and Policy DPN5 is screened out from Appropriate Assessment.</p>
Policy DPN6: Pollution	Policy DPN6 requires development to avoid pollution or hazards through effects on air, noise, vibration, light, water, soil, odour, dust and other means. The health of people and the natural environment (e.g. nature conservation sites) is to be protected.	<p>There are no LSEs of Policy DPN6 on European sites.</p> <p>This is a development management policy that aims to minimize noise, air and light pollution across Mid Sussex District. This is generally a positive policy for the environment.</p> <p>There are no impact pathways present and Policy DPN6 is screened out from Appropriate Assessment.</p>
Policy DPN7: Noise Impacts	Policy DPN7 protects the natural environment (specifically also nature conservation sites) and people from unacceptable levels of noise. Generally, developments will require good acoustic design and orientation. Planning	<p>There are no LSEs of Policy DPN7 on European sites.</p> <p>This is a development management policy that aims to reduce the impacts of noise on the environment and people. While positive for the environment, this has no bearing on the European sites that are relevant to Mid Sussex District.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p>

	<p>proposals may be required to undertake noise impact assessment and consider the Council's noise guidance.</p>	<p>There are no impact pathways present and Policy DPN7 is screened out from Appropriate Assessment.</p>
<p>Policy DPN8: Light Impacts and Dark Skies</p>	<p>This policy protects the environment and people from unacceptable levels of light pollution (including from sky glow, glare and light spillage). For example, artificial light sources should be minimized through using the minimum of light required to achieve a purpose, good-quality design, low energy light sources and considering light colour. The Institute of Lighting Professionals guidance must be followed.</p>	<p>There are no LSEs of Policy DPN8 on European sites.</p> <p>This is a development management policy that aims to reduce the impacts of artificial lighting on the environment and people. For example, lighting proposals should use the minimum of light required to achieve their objective, use low energy light sources and consider the impact of light colour on wildlife. While positive for the environment, the European sites relevant to Mid Sussex District are not designated for species that have a particularly high light sensitivity.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPN8 is screened out from Appropriate Assessment.</p>
<p>Policy DPN9: Air Quality</p>	<p>Policy DPN9 protects the natural environment and people from unacceptable effects of atmospheric pollution. As a primary measure, the Council encourages active and sustainable travel modes / measures and green infrastructure. Development proposals will need to demonstrate that they will not have negative impacts on air quality. If needed, an air quality assessment will be required and the Council's guidance (Air Quality and Emissions</p>	<p>There are no LSEs of Policy DPN9 on European sites.</p> <p>This is a development management policy that protects against unacceptable impacts on air quality, such as through the identification of Air Quality Management Areas (AQMAs). Importantly, the policy also explicitly protects the Ashdown Forest SPA / SAC from air quality impacts of development schemes that will result in increases in traffic flows. The policy requires any adverse air quality effects to be mitigated, both when considered alone and in combination.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPN9 is screened out from Appropriate Assessment.</p>

	<p>Mitigation Guidance for Sussex) must be followed. Sites in proximity to Air Quality Management Areas (AQMA) and nature conservation sites will need to incorporate mitigation measures to reduce air quality impacts. The policy specifically protects the Ashdown Forest SPA / SAC from air quality impacts. Development with the potential for effects will need to demonstrate that adequate measures are in place to avoid or mitigate impacts on the SPA / SAC.</p>	
<p>Policy DPN10: Land Stability and Contaminated Land</p>	<p>Planning applications must consider whether a site is suitable for its intended purpose, taking into account ground conditions, land stability and contamination. The policy also requires measures to protect the natural environment, including soil, waterbodies, groundwater, aquifers and wildlife.</p>	<p>There are no LSEs of Policy DPN10 on European sites.</p> <p>This is a development management policy that ensures proposed development sites are fit for purpose. Making sure that there are no concerns regarding land stability and contamination will reduce the potential for negative impacts on the natural environment. While positive for the environment, this policy has no direct relevance for European sites.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPN10 is screened out from Appropriate Assessment.</p>
<p>Chapter 10 – Countryside</p>		
<p>Policy DPC1: Protection and Enhancement of the Countryside</p>	<p>Policy DPC1 protects and enhances the countryside in Mid Sussex. Furthermore, the most versatile agricultural land (Grades 1, 2 and 3a) will be protected from non-agricultural</p>	<p>There are no LSEs of Policy DPC1 on European sites.</p> <p>This is a development management policy that protects and enhances the countryside, including areas of the most versatile agricultural land. However, the protection of the countryside has no relevance for European sites.</p>

	uses. Economically viable mineral reserves in the district will be safeguarded.	There are no impact pathways present and Policy DPC1 is screened out from Appropriate Assessment.
Policy DPC2: Preventing Coalescence	Policy DPC2 maintains the unique characteristics of individual towns and villages in Mid Sussex. Development will only be permitted where it does not result in the coalescence of settlements.	<p>There are no LSEs of Policy DPC2 on European sites.</p> <p>This is a development management policy that aims at to prevent coalescence in Mid Sussex by preserving the distinct character of different settlements. However, this policy approach has no relevance for European sites.</p> <p>There are no impact pathways present and Policy DPC2 is screened out from Appropriate Assessment.</p>
Policy DPC3: New Homes in the Countryside	This policy permits new homes in the countryside provided they fulfil specific criteria, such as being essential for agricultural or forestry workers and exceptional quality of design. The policy also addresses both permanent and temporary dwellings for agricultural workers.	<p>There are no LSEs of Policy DPC3 on European sites.</p> <p>This is a development management policy that permits new homes in the countryside, provided that a set of stringent conditions is fulfilled. However, setting general conditions for the delivery of permanent or temporary agricultural dwellings in the countryside, has no immediate bearing on European sites.</p> <p>There are no impact pathways present and Policy DPC3 is screened out from Appropriate Assessment.</p>
Policy DPC4: High Weald Area of Outstanding Natural Beauty	Policy DPC4 indicates that development within the High Weald AONB will only be permitted where it conserves and enhances its natural beauty. This includes its landscape features, land management techniques and wildlife / cultural heritage.	<p>There are no LSEs of Policy DPC4 on European sites.</p> <p>This is a development management policy that conserves and enhances the beauty of the High Weald Area of Outstanding Natural Beauty, such as by abiding to the AONB Management Plan. However, conservation and enhancement of the AONB, while positive, has no direct relevance to European sites.</p> <p>There are no impact pathways present and Policy DPC4 is screened out from Appropriate Assessment.</p>
Policy DPC5: Setting of the South Downs National Park	Policy DPC5 stipulates that development that contributes to the setting of the South Downs National Park, must not detract from its visual and	There are no LSEs of Policy DPC5 on European sites.

	<p>special qualities (e.g. dark skies, tranquility, views, etc.).</p>	<p>This is a development management policy that aims at protecting the setting of the South Downs National Park (SDNP), including not impacting transitional open green spaces. However, protecting the SDNP, while positive, has no direct relevance to European sites.</p> <p>There are no impact pathways present and Policy DPC5 is screened out from Appropriate Assessment.</p>
<p>Policy DPC6: Ashdown Forest SPA and SAC</p>	<p>Policy DPC6 protects the integrity of the Ashdown Forest SPA / SAC. It prevents adverse effects from recreational pressure by ensuring that adequate mitigation measures are put in place. These requirements will be sought in accordance with the strategic solution in place for the site, such as a 400m exclusion zone where no residential development is permitted and a 7km zone in which appropriate contributions to Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) will need to be made by residential developments. The policy also stipulates that sites associated with traffic increases will require project-level HRA to ensure that they will not result in adverse effects on the SAC regarding atmospheric pollution.</p>	<p>There are no LSEs of Policy DPC6 on European sites.</p> <p>This is a development management policy that protects the Ashdown Forest SPA / SAC from adverse effects of development, both alone and in combination. The policy stipulates that mitigation for each planning application will be sought in line with the strategic mitigation framework in force at the time of application. It specifies that residential development within 7km of the Ashdown Forest SPA / SAC will need to deliver Suitable Alternative Natural Greenspace (SANG) or provide financial contributions to strategic SANG, as well as contributing to Strategic Access Management and Monitoring (SAMM). Additionally, the policy also addresses potential atmospheric pollution impacts by requiring site-specific air quality assessments.</p> <p>This policy represents the key framework for protecting the Ashdown Forest SPA / SAC. There are no impact pathways present and Policy DPC6 is screened out from Appropriate Assessment.</p>
<p>Chapter 11 – Built Environment</p>		

<p>Policy Character and Design</p> <p>DPB1: and</p>	<p>Policy DPB1 stipulates that all development should comprise high-quality design and be in keeping with the character of Mid Sussex. Developments are required to consider context, layouts / streets / spaces, structure, design and residential amenity to gain planning consent.</p>	<p>There are no LSEs of Policy DPB1 on European sites.</p> <p>This is a development management policy that sets important character and design criteria for development in Mid Sussex, including layout of streets and building design. However, design criteria generally have no direct relevance to European sites.</p> <p>There are no impact pathways present and Policy DPB1 is screened out from Appropriate Assessment.</p>
<p>Policy DPB2: Listed Buildings and Other Heritage Assets</p>	<p>This policy protects listed buildings and their settings. This is to be achieved through the use of traditional building materials. Other heritage assets of architectural or historic merit will also need to be considered by development proposals.</p>	<p>There are no LSEs of Policy DPB2 on European sites.</p> <p>This development management policy protects listed buildings and other heritage assets across Mid Sussex, including architecturally, culturally and historically important sites. However, the protection of such assets is not relevant to European sites.</p> <p>There are no impact pathways present and Policy DPB2 is screened out from Appropriate Assessment.</p>
<p>Policy Conservation Areas</p> <p>DPB3:</p>	<p>Development in Conservation Areas will need to conserve and enhance its special character and appearance. This should be achieved through sensitive design, protection of open spaces / gardens, preservation of traditional shop fronts and appropriate urban surfaces (e.g. pavements, roads).</p>	<p>There are no LSEs of Policy DPB3 on European sites.</p> <p>This development management policy protects important conservation areas across Mid Sussex. However, these areas do not relate to environmental / natural assets and as such this policy has no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPB3 is screened out from Appropriate Assessment.</p>
<p>Chapter 12 – Transport</p>		
<p>Policy Placemaking and Connectivity</p> <p>DPT1:</p>	<p>Policy DTP1 sets out that development proposals shall support the West Sussex</p>	<p>There are no LSEs of Policy DPT1 on European sites.</p>

	<p>Transport Plan 2022-2036, including the provision of Transport Assessments and sustainable travel interventions, prioritization of sustainable / active travel modes, and creation of attractive and permeable street networks.</p>	<p>This is a development management policy that outlines the Council's approach towards placemaking and connectivity. Importantly, it focuses on sustainable travel interventions and the promotion of active travel modes (i.e. walking and cycling). Importantly, transport-related management approaches can help reduce the volume of traffic, and thereby pollutant deposition, that occurs in close proximity to European sites.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPT1 is screened out from Appropriate Assessment.</p>
<p>Policy DPT2: Rights Of Way and Other Recreational Routes</p>	<p>Policy DPT2 protects Rights of Way, national cycle routes and recreational routes in Mid Sussex. It promotes access to the countryside by providing convenient links to recreational routes, delivering additional routes within and between settlements, and promoting multi-functional routes.</p>	<p>There are no LSEs of Policy DPT2 on European sites.</p> <p>This is a development management policy that protects and enhances Public Rights of Way (PRoWs) and recreational routes across Mid Sussex. This is a positive policy for European sites, because it promotes access to the wider countryside and may help reduce recreational pressure within sensitive European sites, such as the Ashdown Forest SPA / SAC.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPT2 is screened out from Appropriate Assessment.</p>
<p>Policy DPT3: Cycling</p>	<p>Development proposals are expected to remove barriers to active travel by providing high-quality active travel infrastructure and adequate opportunities cycle parking facilities. The importance of the Mid Sussex Local Cycling and Walking Infrastructure Plan (LCWIP) is highlighted.</p>	<p>There are no LSEs of Policy DPT3 on European sites.</p> <p>This is a development management policy that promotes the use of alternative transport modes, specifically active travel such as cycling (as set out in the Mid Sussex Local Cycling and Walking Infrastructure Plan (LCWIP)). Facilitating this modal shift in transport is important because it may have positive implications for air quality and recreational pressure impact pathways.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPT3 is screened out from Appropriate Assessment.</p>
<p>Policy DPT4: Parking and Electric Vehicle Charging Infrastructure</p>	<p>Policy DPT4 supports appropriate parking and electric vehicle charging infrastructure across Mid Sussex. All new non-</p>	<p>There are no LSEs of Policy DPT4 on European sites.</p> <p>This is a development management policy that sets parking and electric vehicle charging infrastructure standards across Mid Sussex, such as delivering well-integrated parking spaces and adequate Electric Vehicle</p>

	residential developments with 10 or more associated parking spaces must provide a minimum of two fast charging points and cable routes for the remaining 50%.	<p>Charging points. Promoting the use of electric vehicles is positive for minimizing air quality impacts and is one of the main measures for improving air-quality at sensitive European sites.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPT4 is screened out from Appropriate Assessment.</p>
Chapter 13 – Economy		
Policy Sustainable Economic Development	DPE1: Policy DPE1 supports sustainable economic development across the District. It encourages high-quality development of land and premises, supports the expansion of existing businesses and requires appropriate infrastructure.	<p>Likely Significant Effects of Policy DPE1 on European sites cannot be excluded.</p> <p>This policy supports sustainable economic development across Mid Sussex, including the expansion of existing businesses. New employment opportunities in the district are likely to increase the number of commuter journeys within Mid Sussex and between adjoining authorities, potentially leading to increased nitrogen and ammonia deposition in European sites.</p> <p>The following impact pathway is present:</p> <ul style="list-style-type: none"> Atmospheric pollution (through nitrogen and ammonia deposition) <p>Due to this linking impact pathway, Policy DPE1 is screened in for Appropriate Assessment.</p>
Policy Existing Employment Sites	DPE2: Policy DPE2 protects existing employment sites (e.g. General Industrial and Storage or Distribution Class Uses). It supports the intensification of employment uses within Existing Employment Sites. Furthermore, within the built-up area, expansion of employment sites will be supported.	<p>There are no LSEs of Policy DPE2 on European sites.</p> <p>This development management policy supports the protection, intensification, redevelopment and expansion of existing employment sites. However, the general support in principle for the expansion of such sites, has no direct bearing on European sites. The implications of employment development are adequately assessed as part of other policies in the Plan.</p> <p>There are no impact pathways present and Policy DPE2 is screened out from Appropriate Assessment.</p>
Policy Employment Allocations	DPE3: Policy DPE3 provides for employment land on Significant Sites: Land to South of Reeds Lane, Sayers	<p>Likely Significant Effects of Policy DPE3 on European sites cannot be excluded.</p> <p>This policy allocates employment sites across Mid Sussex, thereby likely influencing the volume of commuter traffic and routes of new commuter journeys (potentially leading within 200m of air quality sensitive habitats).</p>

	Common and Land at Crabbet Park.	<p>The following impact pathway is present:</p> <ul style="list-style-type: none"> Atmospheric pollution (through nitrogen and ammonia deposition) <p>Due to this linking impact pathway, Policy DPE3 is screened in for Appropriate Assessment.</p>
Policy DPE4: Town and Village Centre	Policy DPE4 supports development in Town or Village Centres, including the major settlements of Burgess Hill, East Grinstead and Haywards Heath. Centre boundaries for each settlement in the hierarchy are defined on the accompanying Policies Map.	<p>Likely Significant Effects of Policy DPE4 on European sites cannot be excluded.</p> <p>This policy identifies the development hierarchy in Mid Sussex and partly determines where new employment floorspace will be delivered. This will have important implications on the spread of commuter traffic across the District, dictating where atmospheric pollution issues will be greatest.</p> <p>The following impact pathway is present:</p> <ul style="list-style-type: none"> Atmospheric pollution (through nitrogen and ammonia deposition) <p>Due to this linking impact pathway, Policy DPE4 is screened in for Appropriate Assessment.</p>
Policy DPE5: Within Town and Village Centre Boundaries	The policy supports development of main town centre uses within defined boundaries, in accordance with Town Centre Masterplans.	<p>There are no LSEs of Policy DPE5 on European sites.</p> <p>This is a development management policy that supports the development of main town centre uses within Town and Village Centres. However, the support of such development in principle has no bearing on European sites and any impacts will be assessed in project-level HRAs as required.</p> <p>There are no impact pathways present and Policy DPE5 is screened out from Appropriate Assessment.</p>
Policy DPE6: Development within Primary Shopping Areas	Policy DPE6 promotes thriving centres by maintaining a dominance of Class E uses in Primary Shopping Areas. New developments for retail, food, beverage and service uses will be supported. The policy also restricts residential uses to upper storeys.	<p>There are no LSEs of Policy DPE6 on European sites.</p> <p>This is a development management policy that promotes the vitality of urban centres by supporting the dominance of and development of new Class E uses. However, the support of such development in principle has no bearing on European sites and any impacts will be assessed in project-level HRAs as required.</p> <p>There are no impact pathways present and Policy DPE6 is screened out from Appropriate Assessment.</p>

<p>Policy DPE7: Smaller Village and Neighbourhood Centres</p>	<p>Policy DPE7 defines the policy approach outside of defined Town and Village Centres. Uses in smaller villages, neighbourhood centres and parades should be protected to meet the needs of local communities, except where such uses are no longer viable.</p>	<p>There are no LSEs of Policy DPE7 on European sites.</p> <p>This is a development management policy that protects existing uses of community importance in smaller villages and neighbourhood centres. However, the support of such existing uses generally has no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPE7 is screened out from Appropriate Assessment.</p>
<p>Policy DPE8: Sustainable Rural Development and The Rural Economy</p>	<p>This policy supports new small-scale economic development and extensions to existing facilities, provided that such development is not in conflict with other policies in the Plan. It also provides support in principle for diversification of agricultural uses and the re-use of existing buildings for business uses.</p>	<p>There are no LSEs of Policy DPE8 on European sites.</p> <p>This is a development management policy that supports small-scale sustainable rural development to promote the rural economy, provided that certain conditions are met. However, the support of such development in principle has no bearing on European sites and any impacts will be assessed in project-level HRAs as required.</p> <p>There are no impact pathways present and Policy DPE8 is screened out from Appropriate Assessment.</p>
<p>Policy DPE9: Sustainable Tourism and the Visitor Economy</p>	<p>Policy DPE8 supports the retention of existing tourism accommodation and attractions. Furthermore, proposals for tourism assets will be supported, provided that sustainable travel opportunities are encouraged and a range of other conditions are met.</p>	<p>Likely Significant Effects of Policy DPE8 on European sites cannot be excluded.</p> <p>This policy supports the provision of sustainable tourism across Mid Sussex, such as through expanded visitor accommodation or new attractions. Promoting tourism can lead to a temporary increase in the local population and, often inadvertently, access levels to designated sites. Therefore, this policy may have important implications for European sites, in particular the Ashdown Forest SPA / SAC.</p> <p>The following impact pathways are present:</p> <ul style="list-style-type: none"> • Atmospheric pollution (through nitrogen and ammonia deposition) • Recreational pressure <p>Due to these linking impact pathways, Policy DPE8 is screened in for Appropriate Assessment.</p>
<p>Chapter 14 – Housing</p>		

<p>Policy Housing</p> <p>DPH1:</p>	<p>Policy DPH1 specifies the District's Local Housing Need as 18,581 dwellings over the Plan period 2021 – 2039. Importantly, 11,519 have existing planning permission, such that the District Plan only needs to make provision for 8,332 new dwellings. The housing need is to be met through delivery of three Significant Sites (DPSC1-3) and several smaller housing sites (DPH5 – DPH28).</p>	<p>Likely Significant Effects of Policy DPH1 on European sites cannot be excluded.</p> <p>This policy provides for a minimum of 8,332 new dwellings in the Plan period, which includes 1,000 dwellings in the North West Sussex Housing Market area. These new dwellings will increase the local population and result in additional demand for recreational space as well as increasing the number of commuter journeys. This may have impacts on European sites, in particular the Ashdown Forest SPA / SAC.</p> <p>The following impact pathways are present:</p> <ul style="list-style-type: none"> • Atmospheric pollution (through nitrogen and ammonia deposition) • Recreational pressure <p>Due to these linking impact pathways, Policy DPH1 is screened in for Appropriate Assessment.</p>
<p>Policy Sustainable Development – Outside the Built-up Area</p> <p>DPH2:</p>	<p>This policy supports the expansion of settlements outside of built-up areas, where this is needed to meet identified local housing, employment and community needs. All development should be sustainable.</p>	<p>There are no LSEs of Policy DPH2 on European sites.</p> <p>Policy DPH2 supports the sustainable expansion of settlements outside built-up areas, provided that this growth is sustainable. However, this is a general development policy, which does not set out a quantum or location of growth. As such, the policy has no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPH2 is screened out from Appropriate Assessment.</p>
<p>Policy Sustainable Development – Inside the Built-up Area</p> <p>DPH3:</p>	<p>Policy DPH3 supports development within built-up areas. Greater concentrations of development may be delivered in areas with good accessibility to shops, services and sustainable transport modes.</p>	<p>There are no LSEs of Policy DPH3 on European sites.</p> <p>Policy DPH3 supports development within Mid Sussex' built-up areas, provided that this growth is in keeping with the character of the District. However, this is a general development policy, which does not set out a quantum or location of growth. As such, the policy has no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPH3 is screened out from Appropriate Assessment.</p>
<p>Policy General Development Principles for Housing Allocations</p> <p>DPH4:</p>	<p>Policy DPH4 provides general principles for housing allocations and specifies other policies that will need to be considered. The key themes</p>	<p>There are no LSEs of Policy DPH4 on European sites.</p> <p>Policy DPH4 contains development principles for housing allocations, including the conservation of wildlife, protection of Green Infrastructure, Sustainable Transport Strategy. Sustainable Drainage Systems (SuDS) and</p>

	<p>covered include urban design principles, landscape considerations, social and community needs, historic environment and cultural heritage, air quality / light / noise, accessibility, flood risk and drainage, utilities, sustainability and others. Notably, Significant Sites must deliver water consumption standards of 85 litres per person per day (including external water use) and, ideally, target water neutrality.</p>	<p>utilities (e.g. water consumption). However, development management generally has no negative implications for European sites.</p> <p>There are no impact pathways present and Policy DPH4 is screened out from Appropriate Assessment.</p>
<p><i>See following table for DPSC1-3 and DPH5 to DPH28</i></p>		
<p>Policy DPH26: Older Persons' Housing and Specialist Accommodation</p>	<p>Policy DPH26 sets out that 1,887 additional dwellings with support or care capacities are provided over the Plan period. Overall, seven sites for older persons' accommodation are allocated. The policy also provides further detail regarding the potential extensions to and loss of older people and specialist housing.</p>	<p>There are no LSEs of Policy DPH30 on European sites.</p> <p>This is a development management policy that relates to the provision of homes for the elderly and people with specialist needs. However, this has no implications for European sites.</p> <p>There are no impact pathways present and Policy DPH26 is screened out from Appropriate Assessment.</p>
<p>Policy DPH29: Gypsies, Travellers and Travelling Showpeople</p>	<p>Policy DPH34 identifies that sixteen net new permanent traveller pitches are required in the Plan period 2021 to 2039, many of which will be delivered through existing commitments. A residual requirement of four pitches is unmet. On-site</p>	<p>Likely Significant Effects of Policy DPH29 on European sites cannot be excluded.</p> <p>This policy provides for a residual requirement of four gypsy and traveller pitches, which would lead to an increase in the population of Mid Sussex. Similar to new dwellings, these pitches are likely to result in additional demand for recreational space as well as increasing the number of vehicle journeys. This may have impacts on European sites, in particular the Ashdown Forest SPA / SAC.</p>

	<p>provision of pitches will be required on Significant Sites to meet the identified need. Proposals for new gypsy and traveller sites will need to meet a range of requirements, including safe access and access to community facilities. The policy stipulates that sites within the 7km mitigation zone surrounding the Ashdown Forest SPA / SAC will require Appropriate Assessment and need to deliver adequate mitigation measures.</p>	<p>Importantly, the policy specifies that sites within the 7km mitigation zone surrounding the Ashdown Forest SPA / SAC will require Appropriate Assessment and need to be in compliance with Policy DPC6 that protects this designated site.</p> <p>The following impact pathways are present:</p> <ul style="list-style-type: none"> • Atmospheric pollution (through nitrogen and ammonia deposition) • Recreational pressure <p>Due to these linking impact pathways, Policy DPH29 is screened in for Appropriate Assessment.</p>
<p>Policy DPH30: Self and Custom Build Housing</p>	<p>Policy DPH34 supports the important role that self and custom build housing is to play in the future housing in the district. A minimum of 5% of the residential plots on housing sites comprising 100 or more dwellings are to be self and custom built. These plots will need to be serviced with water, foul and surface water drainage, telecommunications and gas / electricity supply.</p>	<p>There are no LSEs of Policy DPH30 on European sites.</p> <p>This is a development management policy that supports self and custom build housing projects. However, whether houses are self-built or not has no relevance to European sites.</p> <p>There are no impact pathways present and Policy DPH30 is screened out from Appropriate Assessment.</p>
<p>Policy DPH31: Housing Mix</p>	<p>Policy DPH35 stipulates that sustainable, mixed and balanced communities need to be delivered. This includes an adequate mix of dwelling types and sizes. Furthermore, other types of accommodation (e.g. for older persons and people</p>	<p>There are no LSEs of Policy DPH31 on European sites.</p> <p>This is a development management policy that identifies the housing mix to be delivered across Mid Sussex, such as the proportion of dwellings with different capacities. However, the housing mix to be provided has no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPH31 is screened out from Appropriate Assessment.</p>

	with disabilities) are also highlighted.	
Policy DPH32: Affordable Housing	This policy supports the provision of an adequate amount and type of housing across the district, including affordable housing. For example, on residential and mixed-use development of 10 or more dwellings, a minimum of 30% affordable housing is to be provided. A minimum of 4% of affordable homes is to be provided with wheelchair accessibility.	<p>There are no LSEs of Policy DPH32 on European sites.</p> <p>This is a development management policy that stipulates the proportion of affordable housing (and associated floorspace) to be delivered across the district. However, affordable housing delivery has no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPH32 is screened out from Appropriate Assessment.</p>
Policy DPH33: First Homes	Policy DPH37 supports the delivery of First Homes in line with Government policy. Affordable first homes are to be discounted by a minimum of 30% against the market value. Furthermore, the Council will also support First Homes Exception Sites.	<p>There are no LSEs of Policy DPH33 on European sites.</p> <p>This is a development management policy detailing the Council's approach to first home ownership. However, strategies to promote home ownership have no relevance to European sites.</p> <p>There are no impact pathways present and Policy DPH33 is screened out from Appropriate Assessment.</p>
Policy DPH34: Rural Exception Sites	This policy identifies that rural exception sites for affordable housing will be permitted, provided that certain criteria are met. The delivery of rural exception sites will primarily be led by Parish Councils.	<p>There are no LSEs of Policy DPH34 on European sites.</p> <p>This is a development management policy that relates to the development of affordable housing in rural exception sites. However, these exceptions have no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPH34 is screened out from Appropriate Assessment.</p>
Policy DPH35: Dwelling Space Standards	Policy DPH39 stipulates that all new residential development will need to meet	There are no LSEs of Policy DPH35 on European sites.

	nationally set space standards for internal floorspace and storage space. These will be applied to the full range of dwelling types.	<p>This is a development management policy that identifies space standards in new dwellings, including for internal floorspace and storage space. However, this has no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPH35 is screened out from Appropriate Assessment.</p>
Policy DPH36: Accessibility	This policy provides the Council's approach to accessibility. It outlines the requirements for accessible / adaptable dwellings (category 2) and wheelchair-user dwellings (category 3).	<p>There are no LSEs of Policy DPH36 on European sites.</p> <p>This is a development management policy that sets accessibility and adaptability standards for dwellings across Mid Sussex, such as accessibility by wheelchairs. However, accessibility generally has no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPH36 is screened out from Appropriate Assessment.</p>
Chapter 15 – Infrastructure		
Policy DPI1: Securing Infrastructure	Policy DPI1 stipulates that development will need to be supported by adequate and suitably maintained infrastructure and / or mitigation measures to support any additional need. On-site or off-site infrastructure will need to be provided at an appropriate time, prior to the development becoming operational / occupied. Larger developments may need to be phased for this requirement to be met.	<p>There are no LSEs of Policy DPI1 on European sites.</p> <p>This is a development management policy that ensures the delivery of appropriate infrastructure (e.g. utilities, wastewater treatment, potable water supply) in line with emerging development. This is a positive policy for the environment. However, the European sites relevant to Mid Sussex are not designated for any habitats / species that rely on good water quality / sufficient hydrological levels.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPI1 is screened out from Appropriate Assessment.</p>
Policy DPI2: Planning Obligations	Policy DPI2 states that the Council will use planning obligations to address the impacts of development, in line with the Community Infrastructure Levy	<p>There are no LSEs of Policy DPI2 on European sites.</p> <p>This policy reserves the right of the council to set planning obligations in line with the Community Infrastructure Levy Regulations 2010 and through Section 106 Agreements. However, this process has no relevance to European sites.</p>

	<p>Regulations 2010 (as amended).</p>	<p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPI2 is screened out from Appropriate Assessment.</p>
<p>Policy DPI3: Major Infrastructure Projects</p>	<p>Policy DPI3 addresses how the Council will approach major infrastructure projects. Such proposals should contribute positively to the implementation of the spatial strategy. Nationally Significant Infrastructure Projects (NSIPs) will need to ensure that they minimize adverse impacts / harm to local places, communities and businesses. Assessments of NSIPs will include the construction, operation and decommissioning phases.</p>	<p>There are no LSEs of Policy DPI3 on European sites.</p> <p>Policy DPI3 highlights how Mid Sussex District Council will address Nationally Significant Infrastructure Projects (NSIPs). This will include adequate assessments of construction, operation and decommissioning phases. This is a positive policy because it ensures that large-scale proposals are adequately addressed. However, this process has no bearing on European sites.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPI3 is screened out from Appropriate Assessment.</p>
<p>Policy DPI4: Communications Infrastructure</p>	<p>This policy supports the delivery of high-quality digital infrastructure, including fibre broadband. New telecommunications must seek to minimize impacts on the visual amenity, character and appearance of the surrounding area. They should not have an unacceptable effect on sensitive areas, including Areas of Outstanding Natural Beauty, South Downs National Park and conservation areas.</p>	<p>There are no LSEs of Policy DPI4 on European sites.</p> <p>This is a development management policy that supports adequate communications infrastructure across the District. However, this has no direct bearing on the European sites relevant to the Mid Sussex District Plan.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPI4 is screened out from Appropriate Assessment.</p>

<p>Policy DPI5: Open Space, Sport and Recreational Facilities</p>	<p>The Council will support developments that provide new / enhanced open space, leisure, sport and recreational facilities (e.g. allotments). Proposals that result in the net loss of such features will generally not be supported unless several conditions are fulfilled.</p>	<p>There are no LSEs of Policy DPI5 on European sites.</p> <p>This is a development management policy that secures the delivery of open space, sport and recreational facilities in new developments. Such spaces are important as they absorb recreational activities locally and may help reduce the number of recreational visits to European sites.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPI5 is screened out from Appropriate Assessment.</p>
<p>Policy DPI6: Community and Cultural Facilities and Local Services</p>	<p>Policy DPI6 supports the provision or improvement of community and cultural facilities. Proposals that involve the net loss of such facilities will not be supported unless several conditions are met. Larger developments will need to provide community facilities on-site.</p>	<p>There are no LSEs of Policy DPI6 on European sites.</p> <p>This is a development management policy that protects and / or enhances community facilities and local services. However, the supply of such services has no direct relevance to the integrity of European sites.</p> <p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPI6 is screened out from Appropriate Assessment.</p>

Table 5: Housing allocation policies contained in the MSDP Review, detailing site area (ha), capacity and approx. distance to the Ashdown Forest SPA / SAC. Sites that fall within the 7km mitigation zone surrounding the SPA / SAC are colour-coded orange.

Type of Site	Policy	Site Area (ha)	Capacity	Approx. Distance to the Ashdown Forest SPA / SAC (km)
Significant sites	DPSC1: Land to West of Burgess Hill	67.7	1,400 dwellings	15.9
	DPSC2: Land to South of Reeds Lane, Sayers Common	88.5	2,000 dwellings (1,850 dwellings within the Plan period) and up to 9,000m ² of employment uses	18.9
	DPSC3: Land at Crabbet Park	172	2,300 dwellings (approx. 1,000 to the end of 2039)	8.7
Housing Allocation	DPH5: Batchelors Farm, Keymer Road, Burgess Hill	1.5	33 dwellings	15.9
	DPH6: Land at Brow Hill, Janes Lane, Burgess Hill	1.2	25 dwellings	13.5
	DPH7: Burgess Hill Station, Burgess Hill	3.5	300 dwellings	15.3
	DPH8: Land off West Hoathly Road, East Grinstead	1.8	45 dwellings	3.1
	DPH9: Land at Hurstwood Lane, Haywards Heath	1.8	45 dwellings	10.3
	DPH10: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath	1	25 dwellings	10.6
	DPH11: Land east of Borde Hill Lane, Haywards Heath	10.5	60 dwellings	8.8
	DPH12: Orchards Shopping Centre, Haywards Heath	1.9	100 dwellings	10.4
	DPH13: Land to west of Turners Hill Road, Crawley Down	33.7	350 dwellings	6.8

DPH14:	Hurst 2.2	37 dwellings	7.5 (included as a precaution as lies close to the 7km zone)
Farm, Turners Hill Road, Crawley Down			
DPH15:	Land rear of 2 Hurst Road, Hassocks	25 dwellings	17.7
DPH16:	Land west of Kempes, Hurstpierpoint	90 dwellings	18.7
DPH17:	The 0.84	8-12 dwellings	2.5
Paddocks, Lewes Road, Ashurst Wood			
DPH18:	Land at 8.99	100 dwellings	16
Foxhole Farm, Bolney			
DPH19:	Land at 1.5	33 dwellings	18.8
Chesapeke and Meadow View, Reeds Lane, Sayers Common			
DPH20:	Land at 14.2	210 dwellings	18.4
Coombe Farm, London Road, Sayers Common			
DPH21:	Land to the 3.3	100 dwellings	18.7
West of Kings Business Centre, Reeds Lane, Sayers Common			
DPH22:	Land at 6.4	120 dwellings	18.1
LVS Hassocks, London Road, Sayers Common			
DPH23:	Ham Lane 0.97	30 dwellings	8.3
Farm House, Ham Lane, Scaynes Hill			
DPH24:	1.3	37 dwellings	13.4
Challoners, Cuckfield Road, Ansty			
DPH25	Land to the 1.5	45 dwellings	13.5
west of Marwick Close, Bolney Road, Ansty			

Older Persons'
Specialist
Accommodation

DPH27: Land at 0.4 Byanda, Brighton Road, Hassocks	To be confirmed	18.2
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DPH28: Land at 3 Hyde Lodge, London Road, Handcross	To be confirmed	13.6
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Appendix C Air Quality Impact Assessment

C.1 Methodology

Ashdown Forest SAC - Air Quality Modelling

Mid Sussex District Plan Review - Regulation 18

Mid Sussex District Council

Project number: 60671970

30 September 2022

Quality information

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9. Introduction

- 9.1 Mid Sussex District Council (MSDC) is undertaking a review of its adopted District Plan 2014-2031. The Council has commissioned AECOM Limited to conduct an air quality assessment to inform the Habitats Regulations Assessment (HRA) of the Regulation 18 Mid Sussex District Plan (MSDP) Review (2021-2039).
- 9.2 The work presented in this report is to be used to inform the Appropriate Assessment of the HRA. It focuses on the impact of traffic related emissions due to planned development in the District Plan Review on sensitive ecosystems within the Ashdown Forest Special Area of Conservation (SAC). The Ashdown Forest SAC is designated for heathland, which is sensitive to nitrogen and ammonia deposition due to the presence of lichens and bryophytes.
- 9.3 This assessment therefore considers the following four key pollutants shown to affect sensitive ecosystems: ammonia (NH₃), oxides of nitrogen (NO_x), total nitrogen deposition and total acid deposition. All pollutants are considered at receptor points, within transects, up to 200m of the roadside, within the SAC.
- 9.4 Wealden District Council undertook monitoring of nitrogen dioxide (NO₂) and NH₃ from 2015 to 2020 within the Ashdown Forest SAC. Published monitoring data have been used to verify the model performance with regard to NO_x and NH₃ concentrations.
- 9.5 The main aims of this study are to:
- Identify potentially sensitive ecological receptor locations within the SAC within 200m of roads that are expected to be affected by the District Plan Review;
 - Predict annual mean NO_x and NH₃ concentrations and nitrogen and acid deposition rates for the following scenarios at selected ecological receptors;
 - Baseline year (2019): represents air quality in a past year (2019);
 - Future Baseline (2039): uses the traffic data from the 'current baseline' in 2019, but applies future assessment year vehicle emission factors and background pollutant concentrations to allow for the 'in combination' assessment required for the HRA;
 - 2039 'Do Minimum' Reference Case: future assessment year which does not include the influence of planned development from the Mid Sussex District Plan Review but does allow for strategic planned development in neighbouring local authorities; and
 - 2039 'Do Something' Scenarios 4 and 4b: future assessment year which each include the influence of planned development from the Mid Sussex District Plan Review and from strategic planned development in neighbouring local authorities, 'without' and 'with' a site at Ansty, respectively (an additional Significant Site at Ansty for 1,600 dwellings and 1,000m² of employment floorspace, which is not included under Scenario 4)⁶⁸.
 - Determine if there are any exceedances of NO_x and NH₃ critical levels, and nitrogen and acid deposition critical loads within the Ashdown Forest SAC.
- 9.6 The results are presented in the accompanying report 'Habitats Regulations Assessment of the Mid Sussex Local Plan Review'.

⁶⁸ Note that site DPH5 (Land at Ansty Farm) has no longer been allocated as there is now a different site DPH5.

10. Policy Context

Clean Air Strategy

10.1 In 2019, the UK government released its Clean Air Strategy 2019 (Defra, 2019) as part of its 25 Year Environment Plan (Defra, 2018). These documents include targets to reduce emissions of ammonia from farming activities, and nitrogen oxides from combustion processes, and thus reduce the deposition of nitrogen to sensitive ecosystems.

Environment Act

10.2 The Environment Act 2021 (HM Government, 2021) amends the Environment Act 1995 (HM Government, 1995). On 9th November 2021, the Act received Royal Assent after being first introduced to Parliament in January 2020 to address environmental protection and the delivery of the Government's 25 Year Environment Plan. It includes provisions to establish a post-Brexit set of statutory environmental principles to ensure environmental governance through an environmental watchdog, the Office for Environmental Protection (OEP).

10.3 The Secretary of State must publish a review report every five years (as a minimum and with yearly updates to Parliament). The 25 Year Environment Plan will be adopted as the first Environmental Improvement Plan (EIP) of the Environment Act 2021, with long-term legally binding targets expected to be set in 2022.

Habitats Regulations Assessment

10.4 While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment (HRA) will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

10.5 The HRA process applies the 'Precautionary Principle'⁶⁹ to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the European site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question.

10.6 Following evidence gathering, the first stage of any Habitats Regulations Assessment is the screening for Likely Significant Effects (LSEs), a high-level assessment to decide whether the Appropriate Assessment is required. Where it is determined that a conclusion of 'no Likely Significant Effects' cannot be drawn, the analysis proceeds to the Appropriate Assessment.

10.7 The District Plan will significantly increase the population and employment opportunities within the District, which may result in more commuter journeys being undertaken within 200m of sensitive heathland. Therefore, LSEs cannot be excluded, and the Ashdown Forest SAC is screened in for Appropriate Assessment regarding this impact pathway.

10.8 As such, the air quality modelling methodology and analyses presented in this report have been undertaken to inform the HRA for the Ashdown Forest SAC.

Other Guidance documents

10.9 Best practice and advice / guidance contained within documents from Natural England (Natural England, 2018), the Institute of Air Quality Management (IAQM) (IAQM, 2019), the Chartered Institute of Ecology and Environmental Management (CIEEM) (CIEEM, 2021) and National Highways (Design Manual for Roads and Bridges DMRB LA105) (DMRB, 2019) have been used to determine the methodology applied, and in the accompanying ecological interpretation of the results.

⁶⁹ The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: "When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis".

Critical Levels

- 10.10 Annual mean critical levels of NO_x and NH₃ are summarised in Table 6. These are concentrations above which adverse effects on ecosystems may occur based on present knowledge. The critical level for NO_x is taken from the EU Ambient Air Quality Directive 2008/50/EU (EU Directives, 2008) which has also been set as the Air Quality Strategy objective for the protection of vegetation and ecosystems, and has been incorporated into English legislation.
- 10.11 The EU Directive (EU Directives, 2008) states that the sampling point to determine compliance should be sited more than 20 km away from agglomerations or more than 5 km away from other built-up areas, industrial installations or motorways or major roads with traffic counts of more than 50,000 vehicles per day, which means that a sampling point must be sited in such a way that is representative of an area of at least 1,000 km². Applying the critical level for NO_x to designated nature conservation sites that are located close to busy roads is therefore precautionary.
- 10.12 The critical levels for NH₃ have not been incorporated into legislation and are a recommendation made by the United Nations Economic Commission for Europe (UNECE) Executive Body for the Convention on Long-Range Transboundary Air Pollution (CLRTAP) (UNECE, 2013).

Table 6: Annual Mean Critical Levels (NO_x and NH₃)

Pollutant	Critical Level
Oxides of nitrogen (NO _x)	30 µg/m ³
Ammonia (NH ₃)	3 µg/m ³ for higher plants 1 µg/m ³ for lichens and bryophytes

11. Methodology

11.1 This section presents the methodology used to model air quality within the Ashdown Forest. The following sources of information and data have been used to form the basis of the air quality assessment:

- Department for Environment, Food and Rural Affairs (Defra)'s Air Quality Background Concentration Maps based on a 2018 base year (Defra, 2020);
- Defra's Vehicle Emission Factors (Defra, 2021b);
- Emission rates as published in the Calculator for Road Emissions of Ammonia (CREAM) tool (Air Quality Consultants, 2020);
- 5x5 km modelled nitrogen and acid deposition data and ammonia background concentrations from the Air Pollution Information System (APIS, 2022);
- Air quality monitoring data for 2019 undertaken by Wealden District Council (WDC); and
- Traffic count and speed data provided by MSDC / SYSTRA Limited for 2019 and 2039.

11.2 The modelling assessment was conducted following methodology within Defra's LAQM.TG(16) Technical Guidance (Defra, 2021a), and guidance contained within documents from Natural England (Natural England, 2018), the Institute of Air Quality Management (IAQM) (IAQM, 2019) and the Chartered Institute of Ecology and Environmental Management (CIEEM) (CIEEM, 2021).

Pollutants of Interest

11.3 The pollutants of interest with regard to sensitive ecosystems for which critical levels and critical loads exist, and which are included in the air quality modelling and assessment of impacts on the Ashdown Forest SAC, are NO_x, NH₃, and nitrogen and acid deposition. Modelling of these pollutants is undertaken to assess the air quality impacts of planned development in the Local Plan on the Ashdown Forest SAC alone and 'in combination' with that that is in the jurisdiction of surrounding authorities.

11.4 Whilst emissions of NO_x from road vehicles are regulated according to Euro standards, emissions of NH₃ are not. This means that emissions of NH₃ from individual vehicle types are highly uncertain, particularly as measurements are rarely made (as this is not required for regulatory purposes). The uncertainty associated with the predicted nitrogen deposition rates from NH₃ is also greater than for NO₂, with the NH₃ derived nitrogen deposition rates representing an upper estimate.

11.5 There is currently no tool publicly available for the assessment of road traffic emissions of NH₃ from National Highways, Defra, Natural England, or other nature conservation bodies. However, there is evidence that exclusion of NH₃ from assessments leads to an underestimate of deposited nitrogen (Air Quality Consultants, 2020).

11.6 The methodology used to model ammonia concentrations from road traffic, using ADMS Roads, and the subsequent contribution to nitrogen deposition within the SAC (described below), is considered the most appropriate that is available at this time. The methodology has been applied by AECOM in several Appropriate Assessments to inform HRA including that for Tunbridge Wells Borough and Epping Forest District Councils.

Nitrogen Oxides

11.7 Detailed dispersion modelling of road traffic emissions of NO_x has been undertaken using the latest version of ADMS Roads (currently v5), combined with the latest version – at the time of assessment – of Defra's Emissions Factor Toolkit (EFT v11.0). The subsequent contribution of emitted NO_x to nitrogen deposition within the SAC has also been assessed.

11.8 Future fleet predictions were updated in EFT v11.0 (November 2021) for the fleet operating outside of London. However, the UK government's policy to ban the sale of new petrol and diesel cars and vans by 2030 are not accounted for in the fleet information within the current version of the EFT.

- 11.9 As the latest year for which emission factors and fleet information are available in EFT v11.0 is 2030, AECOM proposes to use 2030 information for any later modelled years. This therefore offers a precautionary approach for Local Plan modelling as it would not account for any improvements in vehicle emission factors in the latter part of the plan period (even though such improvements are likely with the introduction of Euro 7 from around 2025 or the ban on the sale of new petrol and diesel cars and vans from 2030).

Ammonia

- 11.10 In February 2020, Air Quality Consultants developed and published the Calculator for Road Emissions of Ammonia (CREAM) tool, 'in order to allow tentative predictions regarding trends in traffic-related ammonia emissions over time'. The tool is based upon remotely sensed pollutant measurements, published real-world fuel consumption data, and ambient measurements of ammonia recorded in Ashdown Forest (2014-2016).

- 11.11 The report that was published alongside the CREAM tool states that:

"It should be recognised that these emissions factors remain uncertain. Using them to make future year predictions will clearly be an improvement on any assessment which omits ammonia. They are also considered to be more robust than the emissions factors contained in the EEA Guidebook, which risk significantly under-predicting ammonia emissions. The emissions factors contained in the CREAM model can be considered to provide the most robust estimate of traffic-related ammonia possible at the present time, but they may be updated in the future as more information becomes available."

- 11.12 The CREAM tool currently uses vehicle fleet information from Defra's EFT v9 which has now been superseded. AECOM has therefore applied the ammonia emission factors, as derived by Air Quality Consultants and in the current version of CREAM, with the average vehicle fleet on rural roads from EFT v11.0 to estimate emissions in the SAC.

- 11.13 The latest version of ADMS Roads has been employed to model the dispersion of emissions of NH₃ from road traffic, consistent with the approach for modelling emissions of NOx.

Traffic Data

- 11.14 Traffic data were provided by the SYSTRA Transport Team for a series of road links within 200m of the Ashdown Forest SAC. These links were chosen as they are located on the busiest roads in the area that are expected to experience the greatest increase in flows over the District Plan period to 2039. As such, these are the roads where an air quality effect due to additional traffic growth is most likely to be observed. The Ashdown Forest SAC modelled road links are shown in Figure 5.

- 11.15 Traffic data were provided for each of the road links, in the form of 24-hour Annual Average Daily Traffic (AADT) flows, with percentage heavy duty vehicle (HDV) flows and average speed for four scenarios – 2019 baseline (also used for the future baseline), future year 'Do Minimum' (or 'Reference Case'), and future year 'Do Something' Scenarios (4 and 4b). A summary of the traffic data used in the air quality assessment is given in Annex A.1.

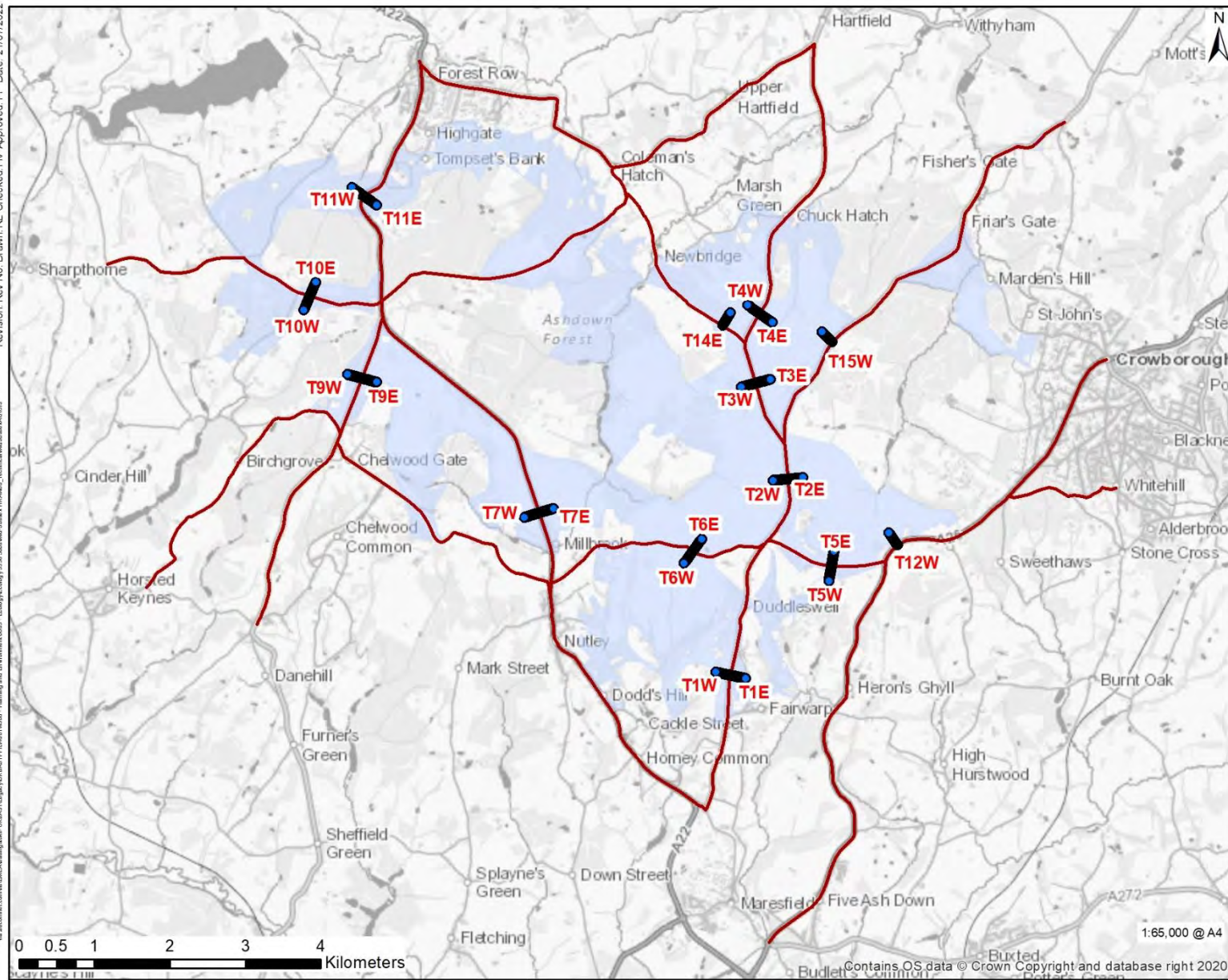
- 11.16 The emerging MSDP explores two Housing Scenarios (4 and 4b). Scenario 4b proposes an additional Significant Site at Ansty for 1,600 dwellings and 1,000m² of employment floorspace, which is not included under Scenario 4⁷⁰.

⁷⁰ Note that site DPH5 (Land at Ansty Farm) has no longer been allocated as there is now a different site DPH5.

Figure 5: Modelled Road Network and Ecological Receptor Transects

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AECOM





PROJECT
Mid Sussex District Plan Review - Regulation 18

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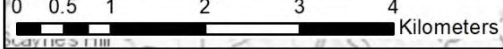
- Ecological Transects
- Modelled Network
- Ashdown Forest SAC

NOTES

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ISSUE PURPOSE
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Modelled network and ecological transects

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Figure 1



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Receptors

- 11.17 Pollutant concentrations and deposition rates have been predicted along defined transects within the SAC within 200m of affected roads, in accordance with National Highways guidance for ecological assessments (LA105) (DMRB, 2019), Natural England guidance (Natural England, 2018), and consistent with the approach undertaken to modelling impacts on Ashdown Forest for the South Downs and Lewes Local Plans. The greatest impacts from changes in road traffic emissions will be observed and modelled closest to the roadside. Consideration of the road network within 200m of the SAC is therefore considered robust as background concentrations utilised in the assessment will account for all other sources that are not defined explicitly in the model.
- 11.18 The locations of the ecological transects relevant to this project were agreed with MSDC and other stakeholders. The transects are situated at key locations where the greatest impacts upon the SAC are likely to occur. The locations are presented in Figure 5 and further details are presented in Annex A.2.
- 11.19 The receptors are situated at the closest point to the road within the SAC, and spaced every 10m within the transects, up to 200m from the roadside. All receptors are modelled at ground level.
- 11.20 The greatest impacts will generally occur where both the greatest change in traffic flows is expected and the SAC habitat (heathland) lies closest to the road. This information has been used to select transect locations. The usual approach is to place a transect on a modelled link (sometimes having a transect either side of the road to account for differences in the dispersion of emissions due to meteorology), with each link being defined as a stretch of road between changes in emissions i.e. where there are changes in traffic flows and/or speeds.
- 11.21 The modelled transects presented in Figure 5 provide a good coverage of the SAC, match well to air quality monitoring locations and previously modelled transects, and avoid modelling in areas where there is only woodland within 200m of the road. This is based on confirmation from Natural England that woodland is not an SAC interest feature, only a SSSI interest feature.

Model Setup

- 11.22 As detailed above, road traffic emissions of NO_x were derived using the latest version of Defra's Emissions Factor Toolkit (EFT v11.0) at the time of assessment, and associated guidance and tools (Defra, 2022). Road traffic emissions of NH₃ were derived using emission rates CREAM V1A (Air Quality Consultants, 2020) combined with the EFT v11.0 vehicle fleet for the relevant year.
- 11.23 Detailed dispersion modelling was undertaken using the current version of ADMS-Roads (v5.0) to model concentrations of NO_x and NH₃ using the parameters in Table 7 for the following scenarios:
- 2019 Baseline – 2019 AADT, 2019 emission factors and 2019 background concentrations;
 - 2039 Future Baseline – 2019 AADT, 2030 emission factors and 2030 background concentrations (the latest projected year available from Defra);
 - 2039 Do Minimum (Reference Case) – 2039 AADT without Local Plan, 2030 emission factors and 2030 background concentrations;
 - 2039 Do Something (Scenario 4 'Without Ansty') – 2039 AADT with Local Plan, 2030 emission factors and 2030 background concentrations; and
 - 2039 Do Something (Scenario 4b 'With Ansty') – 2039 AADT with Local Plan, 2030 emission factors and 2030 background concentrations.
- 11.24 A baseline year was modelled to provide a means of model verification – for this assessment, 2019 traffic data were provided for the modelled baseline. To support the assessment of the potential impact of the planned development in the Local Plan scenarios, a 'future baseline' and future year 'do minimum' scenario were modelled. The 'do minimum' scenario includes the

influence of development in neighbouring local authorities, whereas the ‘future baseline’ does not.

11.25 The future baseline is a hypothetical scenario as it applies improvements in vehicle emissions standards to the baseline vehicle fleet without allowing for any traffic growth. However, such an approach enables the ‘in combination’ effect of development and traffic growth to be seen unobscured by improvements in emissions technology / performance.

11.26 The difference between the ‘do something’ and the ‘do minimum’ scenarios provides the impact of the planned development within the Local Plan, alone. The difference between the ‘do something’ and the ‘future baseline’ scenarios provides a thorough and precautionary assessment of the impact of the planned development within the Local Plan ‘in combination’, as the ‘future baseline’ accounts for no future growth.

11.27 Version 11.0 of the EFT and Defra’s associated tools provide data from 2018 to 2030. For this reason, 2019 emission rates and background concentrations were used for the baseline year scenario, and 2030 emission rates and background concentrations were used for the future year scenarios.

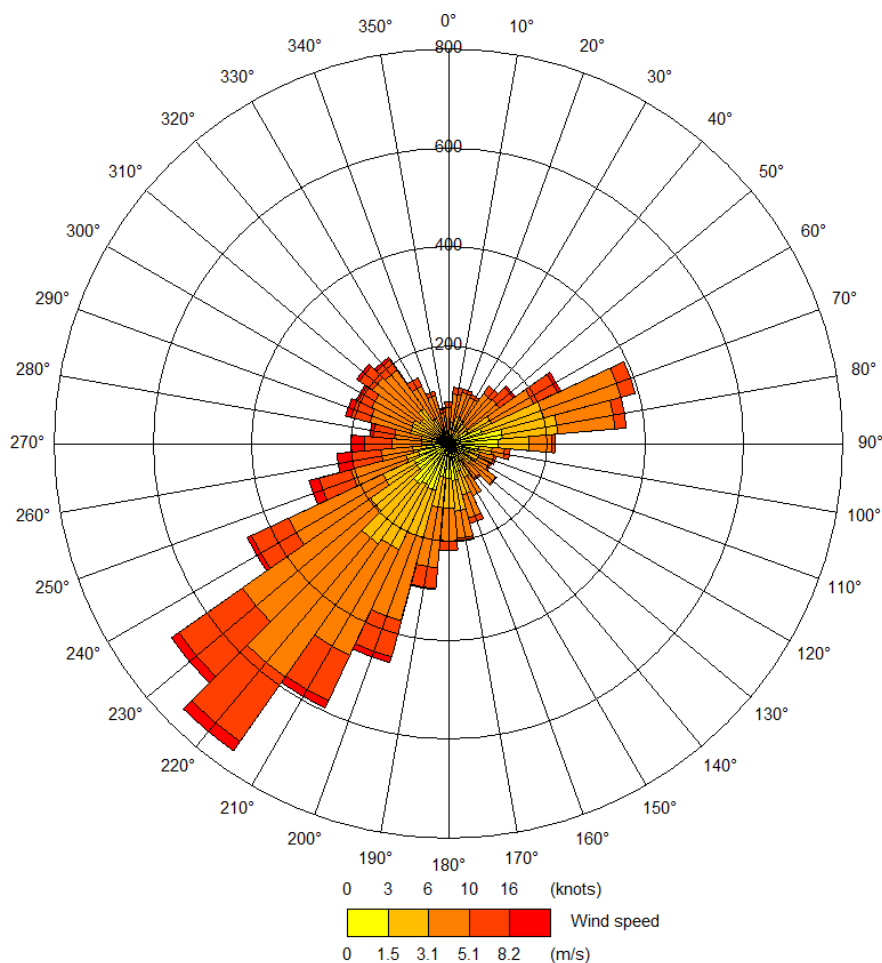
Table 7: General ADMS-Roads Model Conditions

Variables	ADMS-Roads Model Input
Surface roughness at source	0.5m
Surface roughness at Meteorological Site	0.2m
Minimum Monin-Obukhov length for stable conditions	30m
Terrain types	Flat
Receptor location	x, y coordinates determined by GIS, z = 0m for ecological receptors.
Emissions	NO _x – Defra’s EFT v11.0 NH ₃ – CREAM V1A
Meteorological data	1 year (2019) hourly sequential data from Gatwick meteorological station.
Receptors	Ecological transects
Model output	Long-term (annual) mean NO _x and NH ₃ concentrations.

Meteorological Data

11.28 One year (2019) of hourly sequential observation data from Gatwick meteorological station has been used in this assessment to correspond with the baseline traffic data and emission factors. The station is located approximately 26 km north-west of the SAC and experiences meteorological conditions that are representative of those experienced within the air quality study area. Figure 6 shows that the dominant direction of wind was from the south-west, as is typical for the UK.

Figure 6: Wind Rose, Gatwick Airport Meteorological Data, 2019



Background Data

11.29 Background concentrations of nitrogen dioxide (NO₂) and NO_x for 2019 and 2030 were extracted from Defra's 2018-based 1x1km background maps (Defra, 2020). Contributions from explicitly modelled source sectors were removed from the NO₂ and NO_x background concentrations, in accordance with Defra guidance (Defra, 2021a). The data presented in Table 8 show that the concentrations are predicted to decrease between 2019 and 2030 and NO₂ concentrations are well below the objectives.

11.30 Background NO₂ monitoring data for 2019 were reviewed, and an average of 8.1 µg/m³ calculated using 27 background monitoring locations. Defra mapped background NO₂ concentrations were identified as being approximately 4-14% lower than this average monitored concentration across the area of the SAC. As such, Defra background NO₂ and NO_x were uplifted by the calculated ratio in both the base and future years for use in the modelling assessment.

11.31 For this assessment, 2019 emission rates and monitored background concentrations were used for the baseline year scenario, and 2030 emission rates and adjusted background concentrations were used for the future year scenarios. Whilst fleet data beyond 2030 are provided within the EFT, 2030 is the latest year for which the accompanying tools are available e.g. mapped background concentrations and the NO_x-to-NO₂ calculator.

Table 8: Defra Mapped Background Pollutant Concentrations

Transects	Road Name	Grid Square (X, Y)	Annual Mean Concentrations(µg/m ³)			
			2019 NO ₂	2019 NO _x	2030 NO ₂	2030 NO _x
T1E, T1W	B2026	546500, 127500	7.3	9.3	5.4	6.8
T2E, T2W	B2026	547500, 129500	7.0	9.0	5.3	6.7
T3E, T3W	B2026	546500, 130500	7.1	9.1	5.4	6.8
T4E, T4W	B2026	546500, 131500	7.2	9.2	5.4	6.8
T5E, T5W	New Road	547500, 128500	7.1	9.1	5.3	6.7
T6E, T6W	Crowborough Road	546500, 128500	7.1	9.1	5.3	6.7
T7E, T7W	A22	544500, 129500	7.1	9.1	5.4	6.8
T8E	Kidd's Hill	546500, 131500	7.2	9.2	5.4	6.8
T9E, T9W	A275	541500, 131500	7.8	10.1	5.9	7.4
T10E, T10W	Hindleap Lane	541500, 132500	7.7	9.9	5.8	7.4
T11E, T11W	Colemans Hatch Road	541500, 133500	7.8	10.1	5.9	7.5
T12W	A26	548500, 128500	7.1	9.1	5.4	6.8
T13W	B2188	547500, 131500	7.1	9.1	5.4	6.8

Note: Sectors removed as emissions included in detailed dispersion modelling: Motorway (in of 1x1km grid square), Trunk A road (in of 1x1km grid square) and Primary A Road (in of 1x1km grid square)

Ecological Data

11.32 APIS provides 'a searchable database and information on pollutants and their impacts on habitats and species'. Data for the appropriate habitat – heathland, as this is the only habitat for which the SAC is designated – have been applied for each receptor in the study. This includes critical loads of nitrogen and the average nitrogen and acid deposition rates to the habitat, as presented in Table 9.

11.33 Background concentrations of ammonia were also sourced from modelled maps available from APIS, thereby accounting for all sources that are not explicitly defined in the model. The NH₃ background concentrations from APIS presented in Table 9 are greater than the average monitored concentration of 0.51, which is used in model verification and subsequent calculations for the baseline and future year assessments.

11.34 While gorse scrub and other shrubs are present in Ashdown Forest SAC, they are not of significance to heathland integrity in dense stands. The deposition velocity to short vegetation is applicable where such shrubs are interspersed as part of the heathland matrix.

11.35 In order to create a robust and scientifically agreed projection for background nitrogen deposition trends in the UK, even allowing for growth, the Joint Nature Conservation Committee (JNCC) commissioned the Nitrogen Futures project, which reported in 2020 (JNCC, 2020). The JNCC Nitrogen Futures project investigated whether a net improvement in nitrogen deposition (including expected development over the same period) was expected to occur to 2030 under a range of scenarios ranging from the most cautious scenario (Business As Usual, BAU, reflecting simply existing emission reduction commitments /measures already in place) to much more ambitious scenarios that would require varying amounts of additional, currently uncommitted, measures from the UK government and devolved administrations.

11.36 The report concluded that '*The scenario modelling predicts a substantial decrease in risk of impacts on sensitive vegetation by 2030, under the most likely future baseline [a scenario called '2030 NAPCP+DA (NECR NO_x)']. This is estimated to achieve the UK Government's Clean Air Strategy (CAS) target for England, defined as a 17% decrease in total reactive N deposition onto protected priority sensitive habitats, with a predicted 18.9% decrease [for England] from a 2016*

base year'. The report predicted a fall in nitrogen deposition by 2030 under every modelled scenario, including the most cautious (2030 BAU). For the BAU scenario nitrogen deposition was forecast to decrease between 2017 and 2030 from 277.1 kt N to 239.5 kt N (i.e. a reduction of 37.6 kt N).

- 11.37 Background nitrogen deposition at Ashdown Forest was specifically discussed in Annex 5 of the report as a case study. The report predicted a 1-2 kgN/ha/yr reduction in background nitrogen deposition to low growing vegetation (i.e. the heathland interest feature) at the SAC between 2016 and 2030, depending on scenario, and noted that *'The emission reductions predicted between the 2017 and 2030 baseline scenarios cover a range of sectors, including road transport, and so improvements are predicted to occur over the whole site, including the worst-affected roadside locations'*. This was the case under all modelled scenarios.
- 11.38 In summary, the Nitrogen Futures study forecast a minimum rate of improvement in background nitrogen of 0.07 kgN/ha/yr at Ashdown Forest, with other forecasts indicating a greater rate of reduction. In line with the forecast for Ashdown Forest, and therefore taking a precautionary approach, this study applies a projected decrease in background nitrogen of 0.07 kgN/ha/yr. The corresponding decrease is also reflected in the total average acid deposition rate for nitrogen in the future scenarios (reduction of 0.065 keq/ha/yr N.).
- 11.39 Over the 20-year period, this equates to a reduction in the APIS background nitrogen deposition rate presented in Table 9 (3-year average, 2018-20) of 1.4 kg N/ha/yr for the 2039 model scenarios. This decrease is also reflected in the total average acid deposition rate for nitrogen in the 2039 scenarios (reduction of 0.10 keq/ha/yr N).
- 11.40 No other changes to the APIS data have been made from those presented (3-year average, 2018-20) for any modelled scenario.
- 11.41 Not to make *any* allowance for improvements in emission factors or background concentrations would result in increased emissions and hence concentrations over the plan period as an increased number of vehicles is expected on the roads. This is not expected to occur as can be seen from previous long-term trends in the UK, which show slowing of improvements over extended periods, not worsening. Historical records (e.g. Defra monitoring trends) show that as increased vehicles enter the fleet that these increases are offset by the improvements in the emissions of the newer vehicles and the removal of older vehicles.
- 11.42 In 2018 the Court of Justice of the European Union (CJEU) ruled in cases C-293/17 and C-294/17 (often dubbed the Dutch Nitrogen cases). One aspect of that ruling concerned the extent to which autonomous measures (i.e. improvements in baseline nitrogen deposition that are not attributable to the Local Plan) can be taken into account in appropriate assessment, the CJEU ruled that it was legally compliant to take such autonomous measures into account provided the benefits were not 'uncertain' (paras. 130&132). Note that previous case law on the interpretation of the Habitats Directive has clarified that 'certain' does not mean absolute certainty but '*where no reasonable scientific doubt remains*'⁷¹ [emphasis added].
- 11.43 The forecasts for improvements in NO_x emission factors, background concentrations and background deposition rates used in this report are considered to be realistic and have the requisite level of certainty. This is because a) data are used and to a large extent they build upon established historic trends in NO_x and oxidised nitrogen deposition and b) for total nitrogen deposition they are based on a cautious use of evidenced central government forecasts associated with uptake of technology that has either already been introduced or is widely expected within the professional community to be introduced and effective before 2030, as illustrated in the Nitrogen Futures project:
- When it comes to forecasting the NO_x emissions of additional traffic, it would overestimate those emissions to assume that by 2039 the emission factors will be no different to those in 2019; to make such an assumption would be to fail to take account of the expected continued uptake of Euro 6 compliant vehicles between 2019 and 2039 and would assume (putting it simply) that no motorists would replace their cars during the entire plan period. For example,

⁷¹ Case C-239/04 Commission v Portugal [2006] ECR 10183, para. 24; Holohan et al vs. An Bord Pleanála (C-461/17), para. 33

the latest (Euro 6/VI) emissions standard only became mandatory in 2014 (for heavy duty vehicles) and 2015 (for cars) and the effects will not therefore be visible in the data available from APIS because relatively few people will have been driving vehicles compliant with that standard as early as 2019. Far more drivers can be expected to be using Euro 6 compliant vehicles by the end of the Local Plan period (2039).

- The air quality modelling tools available only go to 2030, although some data are available up to 2050. The modelling includes an inherent caution as the 2030 vehicle fleet (and hence emissions) are taken to be a proxy for 2039, whereas NO_x emissions are actually likely to be better in 2039 than in 2030. In addition, the modelling does not allow for the recent Government announcement that the ban on sales of new petrol and diesel cars and vans will be brought forward from 2035 to 2030. Indeed, the ban is not accounted for in the modelling at all since robust forecasts for the effects of the ban do not yet exist.

Table 9: APIS Data for Ecological Transects for 2018-2020

Transect	Average N Dep kgN/ha/yr [§]	Critical Load N Dep kgN/ha/yr	Total Av. Acid Dep keq/ha/yr N [§]	Critical Load N Acid Dep keq/ha/yr		Background NH ₃ (µg/m ³)*
				Min	CLMaxN	
T1E, T1W	19.18	10 - 20	1.41	0.952		2.23
T2E, T2W	19.18	10 - 20	1.41	0.952		2.23
T3E, T3W	19.46	10 - 20	1.42	0.952		2.08
T4E, T4W	19.46	10 - 20	1.42	0.952		2.08
T5E, T5W	19.18	10 - 20	1.41	0.952		2.23
T6E, T6W	19.18	10 - 20	1.41	0.952		2.23
T7E, T7W	17.92	10 - 20	1.31	0.952		1.98
T8E	19.46	10 - 20	1.42	0.952		2.08
T9E, T9W	20.72	10 - 20	1.52	0.952		2.20
T10E, T10W	20.72	10 - 20	1.52	0.952		2.20
T11E, T11W	20.72	10 - 20	1.52	0.952		2.20
T12W	19.18	10 - 20	1.41	0.952		2.23
T13W	19.46	10 - 20	1.42	0.952		2.08

Note: [§] Average nitrogen deposition rate (kgN/ha/yr) projected to decrease by 1.4 kgN/ha/yr from base year to future year (i.e. 0.07 x 20 years = 1.40 kgN/ha/yr). This results in a corresponding decrease in acid deposition of 0.100 keq/ha/yr N.

* Average 2019 monitored NH₃ background concentration applied in modelling assessment = 0.51 µg/m³

Verification

11.44 Model verification is the process by which the performance of the model is assessed to identify any discrepancies between modelled and measured concentrations at air quality monitoring sites within the study area.

11.45 Long-term roadside monitoring of both NO₂ and NH₃ has been undertaken in Ashdown Forest in recent years (2015-2020). Maps of monitoring locations are presented in Figure 7 and Figure 8.

11.46 These data have been used to make a direct comparison between 'road source' modelled and measured concentrations at the same location, so as to calculate a site-specific adjustment factor – or 'verification factor' – for the SAC for each pollutant, to enable adjustment of the model results to account for any model bias.

11.47 Defra provide guidance regarding verification of NO_x and NO₂ concentrations (Defra, 2021a). There are currently no guidelines for verifying against ammonia measurements, however the same principles have been followed as for other road sources (i.e. comparing modelled and

monitored road source contributions, separate from background concentrations). This is aligned with general air quality modelling convention.

11.48 Statistical evaluations have been used to evaluate the model performance e.g. correlation coefficient, fractional bias and Root Mean Square Error (RMSE), allowing for a better understanding of how the model results agree or diverge from the monitored observations.

NO₂ Verification

11.49 Modelled predictions were made for annual mean NO₂ concentrations at monitoring sites in order to compare monitored and modelled pollutant concentrations. The comparison of model outputs was made against selected 2019 monitoring data so as to correspond with the baseline year of assessment.

11.50 Following detailed analysis of each monitoring location in the study area, a total of 59 roadside monitoring sites were taken forward in the model verification process. Table 10 details the sites used in model verification.

Table 10: Local Authority NO₂ Monitoring Sites used in Model Verification

Site ID	Total modelled NO ₂ before adjustment (µg/m ³)	Total modelled NO ₂ after adjustment (µg/m ³)
T1	12.0	18.3
T2	12.0	18.2
T3	11.8	17.7
T4	11.8	17.8
T5	9.8	12.5
T6	10.8	15.3
T10	8.8	9.9
T11	8.6	9.5
T13	10.3	14.0
T14	11.1	15.9
T15	8.8	10.0
T16	8.7	9.7
T19	13.8	22.9
T20	14.2	23.8
T21	16.1	28.3
T22	14.3	24.2
T23	10.4	14.3
T24	9.7	12.4
T25	9.8	12.6
T28	11.9	17.9
T29	11.4	16.9
T31	14.3	24.0
T33	13.4	21.9
T34	12.6	19.9
T35	11.8	17.7

Site ID	Total modelled NO ₂ before adjustment (µg/m ³)	Total modelled NO ₂ after adjustment (µg/m ³)
T36	12.3	19.2
T37	12.8	20.2
T38	9.9	12.9
T40	10.9	15.4
T42	11.9	17.9
T44	8.8	9.9
T47	11.1	16.0
T48	11.0	15.7
T49	10.8	15.1
T51	13.0	20.8
T52	11.5	16.9
T56	10.5	14.4
T58	9.2	11.0
T59	9.8	12.6
T61	10.4	14.3
T62	10.2	13.8
T65	11.8	17.9
T66	10.2	13.7
T67	10.7	15.1
T68	9.7	12.3
T71	10.9	15.4
R1.1	14.1	23.6
R2.1	15.0	25.8
R3.1	12.1	18.6
R4.1	16.8	30.2
A1	11.8	17.6
R1.2	13.2	21.3
R1.3	12.2	18.8
R2.2	15.0	25.8
R2.3	13.8	22.8
R3.2	11.9	17.9
R3.3	10.8	15.1
R4.2	16.2	28.6
R4.3	14.8	25.4

11.51 Model performance was analysed at these monitoring sites. Without adjustment the root mean square error (RMSE) was 7.0 $\mu\text{g}/\text{m}^3$. A model adjustment factor was calculated (2.73) and applied to the model results. After adjustment the RMSE was reduced to 3.8 $\mu\text{g}/\text{m}^3$ as shown in Table 11.

Table 11: NO₂ Model Verification details

Number of Sites	Number of Monitoring Sites within $\pm 10\%$ of the Monitored Concentration Pre-Adjustment	RMSE pre-adjustment ($\mu\text{g}/\text{m}^3$)	Model Adjustment Factor Applied	Number of Sites within $\pm 10\%$ of the Monitored Concentration Post Adjustment	RMSE post adjustment ($\mu\text{g}/\text{m}^3$)	Fractional Bias post adjustment)
59	12	7.2	2.73	14	3.8	0.0

NH₃ Verification

11.52 Modelled predictions were made for annual mean NH₃ concentrations at monitoring sites in order to compare monitored and modelled pollutant concentrations. The comparison of model outputs was made against selected 2019 monitoring data so as to correspond with the baseline year of assessment.

11.53 Following detailed analysis of each monitoring location in the study area, a total of 21 monitoring sites were taken forward in the model verification process. Table 12 summarises the sites used in model verification.

11.54 A model adjustment factor was calculated (1.01) and applied to the model results. After adjustment the RMSE was 0.2 $\mu\text{g}/\text{m}^3$.

Table 12: Local Authority NH₃ Monitoring Sites used in Model Verification

Site ID	Total modelled NH ₃ before adjustment ($\mu\text{g}/\text{m}^3$)	Total modelled NH ₃ after adjustment ($\mu\text{g}/\text{m}^3$)
T14	0.89	0.89
T59	0.72	0.73
T61	0.81	0.81
T62	0.80	0.80
T65	0.98	0.99
T67	0.85	0.85
T68	0.71	0.72
R1.1	1.36	1.36
R1.2	1.22	1.23
R1.3	1.08	1.08
R1.4	0.92	0.93
R2.1	1.48	1.49
R2.2	1.48	1.49
R2.3	1.31	1.31
R2.4	1.10	1.11
R3.1	1.02	1.03

Site ID	Total modelled NH ₃ before adjustment (µg/m ³)	Total modelled NH ₃ after adjustment (µg/m ³)
R3.2	0.99	0.99
R3.3	0.85	0.85
R3.4	0.78	0.78
D3	0.98	0.98
D6	1.45	1.46

Deposition velocities

11.55 Deposition of nitrogen from road traffic derived NH₃ and NO₂ were estimated using the Air Quality Technical Advisory Group (AQTAG) deposition velocities that are cited in the 2020 Institute of Air Quality Management (IAQM) guidance (IAQM, 2019), as shown in Table 13. All of the transects have been modelled and analysed as heathland i.e. 'short vegetation' has been used at all locations as this is the only habitat for which the SAC is designated.

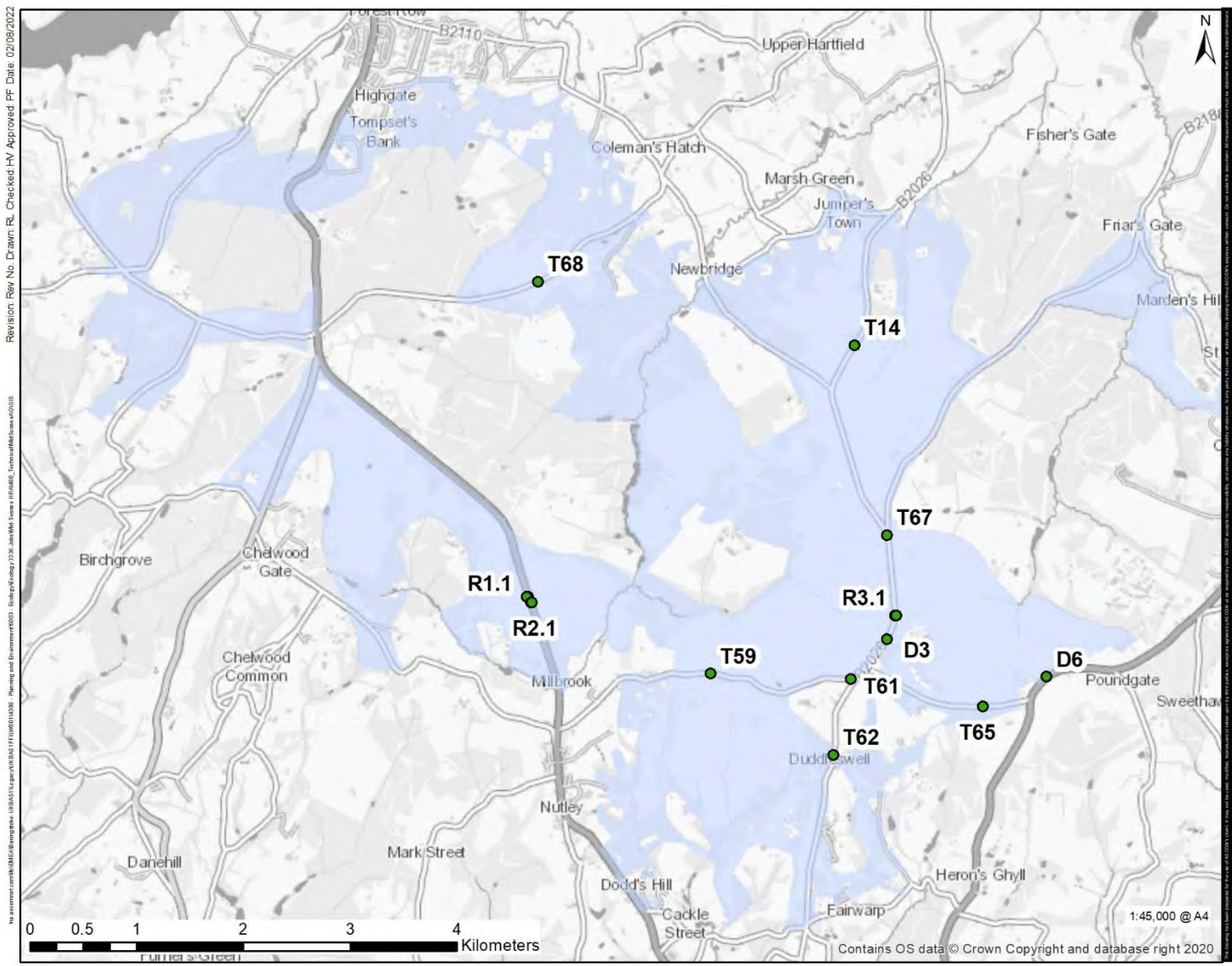
11.56 The modelling methodology does not account for any depletion of concentrations of NO_x, NO₂ or NH₃ following the deposition of nitrogen from these species. This therefore presents a precautionary assessment of the impacts of the Local Plan relative to the critical levels and loads.

Table 13: Nitrogen Deposition Velocities and Conversion Rates

Pollutant	Habitat	Nitrogen deposition conversion rates	Deposition velocity
NO ₂	Grassland / short vegetation	1 µg/m ³ NO ₂ = 0.14 kgN/ha/yr	0.0015 m/s
NH ₃	Grassland / short vegetation	1 µg/m ³ NH ₃ = 5.2 kgN/ha/yr	0.020 m/s

Figure 7: WDC Air Quality NO₂ Monitoring Sites in relation to Ashdown Forest SAC

Figure 8: WDC NH₃ Monitoring Sites in relation to Ashdown Forest SAC



AECOM
PROJECT
Mid Sussex District Plan Review - Regulation 18

CLIENT
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LEGEND
● SAC NH₃ monitoring sites
■ Ashdown Forest SAC

NOTES
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ISSUE PURPOSE
FINAL
PROJECT NUMBER
60671970
SHEET TITLE
SAC NH₃ monitoring sites

SHEET NUMBER
Figure 4

Revision: Rev No. Drawn: R. Checked: JV. Approved: PF. Date: 02/09/2022

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13. Annexes

A.1 Traffic Data

Link	2019 Base AADT	2019 Base HDV %	2019 Base Speed (kph)	2039 DM AADT	2039 DM HDV %	2039 DM Speed (kph)	2039 DS4 AADT	2039 DS4 HDV %	2039 DS4 Speed (kph)	2039 DS4B AADT	2039 DS4B HDV %	2039 DS4B Speed (kph)
14348_14114	6065	3	60	7088	3	58	7326	3	56	7329	3	56
14114_14096	10488	2	41	12580	2	41	13120	2	40	13148	2	40
11829_18129	7778	2	54	8730	2	54	8811	2	54	8825	2	54
14096_11829	9412	2	54	10628	2	54	10742	2	54	10813	2	54
15540_15539	8357	3	53	9431	3	52	9518	3	52	9516	3	52
15539_13422	6039	4	53	6821	3	53	6821	3	52	6804	3	52
18130_18131	6409	2	67	7347	2	66	7460	2	66	7474	2	66
14096_13920	3068	2	44	4300	2	44	4822	2	44	4834	2	44
18129_15538	1963	3	42	2278	2	42	2363	2	42	2341	2	42
13426_15538	2498	1	52	2556	1	51	2590	1	51	2598	1	51
15538_15537	3332	1	43	3483	2	43	3520	2	43	3532	2	43
15537_15553	598	0	43	685	0	43	685	0	43	685	0	43
15539_15538	3107	1	41	3428	1	41	3519	1	41	3538	1	41
14114_18128	1262	1	43	1183	1	43	1121	1	43	1119	1	43
13920_18130	593	0	44	893	2	44	1010	2	44	988	2	44
13920_13780	2129	2	31	2875	2	30	3084	2	30	3084	2	30
15607_14114	5070	1	35	5661	1	34	5650	1	33	5656	1	33
18132_14154	4347	1	62	4712	1	61	4945	1	61	4927	1	61
14348_18127	2966	1	32	3000	1	32	2951	2	32	2951	2	32
18127_18128	1812	2	42	2670	2	42	3058	2	42	3061	2	42
15536_15336	2920	1	43	2536	1	43	2357	1	43	2357	1	43

Link	2019 Base AADT	2019 Base HDV %	2019 Base Speed (kph)	2039 DM AADT	2039 DM HDV %	2039 DM Speed (kph)	2039 DS4 AADT	2039 DS4 HDV %	2039 DS4 Speed (kph)	2039 DS4B AADT	2039 DS4B HDV %	2039 DS4B Speed (kph)
13782_13920	1419	1	62	1818	1	61	1829	1	61	1846	1	61
18128_15336	726	1	43	804	1	43	839	2	43	839	2	43
18127_15536	3474	1	43	3361	1	43	3221	1	43	3218	1	43
18132_15607	5070	1	43	5661	1	43	5650	1	43	5656	1	43
15336_15537	2754	1	43	2345	1	43	2173	1	43	2173	1	43
18129_18130	6177	2	53	7358	2	53	7599	2	53	7630	2	53
18131_13426	4208	1	40	4307	1	40	4463	1	40	4475	1	40
14114_14348	4857	3	64	5181	3	64	5228	3	64	5257	3	64
14096_14114	8720	2	27	9055	2	26	9166	2	26	9183	2	26
18129_11829	7109	2	54	7523	2	54	7678	2	54	7675	2	54
11829_14096	7740	2	53	8217	2	53	8465	2	53	8465	2	53
15539_15540	9125	2	53	9986	2	53	10145	2	53	10212	2	53
13422_15539	5846	3	53	6261	3	53	6362	3	53	6449	3	53
18131_18130	5619	3	67	6532	3	67	6724	3	67	6728	3	67
13920_14096	2972	3	43	3186	2	42	3145	2	42	3218	2	42
15538_18129	2205	1	41	2468	1	41	2583	1	41	2594	1	41
15538_13426	2212	1	52	1784	1	52	1526	1	52	1530	1	52
15537_15538	3328	1	43	3014	1	43	2764	1	43	2764	1	43
15553_15537	574	1	43	669	1	43	592	1	43	591	1	43
15538_15539	3226	2	41	3621	2	41	3687	2	41	3666	2	41
18128_14114	1193	2	42	1959	2	41	2388	2	41	2390	2	41
18130_13920	703	5	44	1453	3	44	1604	3	44	1622	2	44
13780_13920	2162	3	31	2275	3	31	2342	3	31	2375	3	31

Link	2019 Base AADT	2019 Base HDV %	2019 Base Speed (kph)	2039 DM AADT	2039 DM HDV %	2039 DM Speed (kph)	2039 DS4 AADT	2039 DS4 HDV %	2039 DS4 Speed (kph)	2039 DS4B AADT	2039 DS4B HDV %	2039 DS4B Speed (kph)
14114_15607	4347	1	43	4712	1	43	4945	1	43	4927	1	43
14154_18132	5070	1	62	5661	1	62	5640	1	62	5646	1	62
18127_14348	2200	2	32	2460	2	32	2456	2	31	2455	2	31
18128_18127	1948	2	41	1960	2	41	1856	2	41	1853	2	41
15336_15536	2791	1	43	2902	1	43	2936	1	43	2948	1	43
13920_13782	1634	3	62	2871	2	62	3348	2	62	3377	2	62
15336_18128	793	4	43	870	3	43	903	3	43	903	3	43
15536_18127	2601	2	43	3543	2	43	3917	2	43	3919	2	43
15607_18132	4347	1	43	4712	1	43	4945	1	43	4927	1	43
15537_15336	2734	2	43	2799	2	43	2835	2	43	2847	2	43
18130_18129	5282	3	66	5972	3	65	6252	3	65	6231	3	65
13426_18131	3260	4	36	2631	6	36	2545	7	36	2545	7	36
15541_15540	5142	4	42	6086	4	42	6106	4	42	6100	4	42
15540_15541	5554	3	40	6182	3	40	6319	3	40	6372	3	40
15540_15340	2485	2	30	2594	2	30	2572	2	30	2572	2	30
15340_15540	2321	1	30	2359	1	30	2358	1	30	2355	1	30

A.2 Modelled Ecological Receptor Locations

Transect 1Ea	X co-ordinate (m)	Y co-ordinate (m)	Transect 1Wa	X co-ordinate (m)	Y co-ordinate (m)
T1Ea_1m	546585	127072	T1Wa_1m	546579	127073
T1Ea_10m	546594	127070	T1Wa_10m	546570	127075
T1Ea_20m	546604	127068	T1Wa_20m	546560	127077
T1Ea_30m	546614	127066	T1Wa_30m	546550	127079
T1Ea_40m	546624	127064	T1Wa_40m	546541	127081
T1Ea_50m	546633	127062	T1Wa_50m	546531	127083
T1Ea_60m	546643	127060	T1Wa_60m	546521	127086
T1Ea_70m	546653	127058	T1Wa_70m	546511	127088
T1Ea_80m	546663	127055	T1Wa_80m	546501	127090
T1Ea_90m	546672	127053	T1Wa_90m	546492	127092
T1Ea_100m	546682	127051	T1Wa_100m	546482	127094
T1Ea_110m	546692	127049	T1Wa_110m	546472	127096
T1Ea_120m	546702	127047	T1Wa_120m	546462	127098
T1Ea_130m	546712	127045	T1Wa_130m	546453	127100
T1Ea_140m	546721	127043	T1Wa_140m	546443	127102
T1Ea_150m	546731	127041	T1Wa_150m	546433	127104
T1Ea_160m	546741	127039	T1Wa_160m	546423	127106
T1Ea_170m	546751	127037	T1Wa_170m	546413	127108
T1Ea_180m	546760	127035	T1Wa_180m	546404	127110
T1Ea_190m	546770	127033	T1Wa_190m	546394	127113
Transect 2Ea	X co-ordinate (m)	Y co-ordinate (m)	Transect 2Wa	X co-ordinate (m)	Y co-ordinate (m)
T2Ea_1m	547344	129673	T2Wa_1m	547338	129672
T2Ea_10m	547353	129673	T2Wa_10m	547329	129671
T2Ea_20m	547363	129674	T2Wa_20m	547319	129670
T2Ea_30m	547373	129675	T2Wa_30m	547309	129669
T2Ea_40m	547383	129676	T2Wa_40m	547299	129669
T2Ea_50m	547393	129677	T2Wa_50m	547289	129668
T2Ea_60m	547403	129678	T2Wa_60m	547279	129667
T2Ea_70m	547413	129679	T2Wa_70m	547269	129666
T2Ea_80m	547423	129679	T2Wa_80m	547259	129665
T2Ea_90m	547433	129680	T2Wa_90m	547249	129664
T2Ea_100m	547443	129681	T2Wa_100m	547239	129663
T2Ea_110m	547453	129682	T2Wa_110m	547229	129662
T2Ea_120m	547463	129683	T2Wa_120m	547219	129662
T2Ea_130m	547473	129684	T2Wa_130m	547209	129661
T2Ea_140m	547483	129685	T2Wa_140m	547199	129660

T2Ea_150m	547493	129686	T2Wa_150m	547189	129659
T2Ea_160m	547502	129686	T2Wa_160m	547179	129658
T2Ea_170m	547512	129687	T2Wa_170m	547169	129657
T2Ea_180m	547522	129688	T2Wa_180m	547159	129656
T2Ea_190m	547532	129689	T2Wa_190m	547149	129655
T2Ea_200m	547542	129690	T2Wa_200m	547139	129655

Transect 3Ea	X co-ordinate (m)	Y co-ordinate (m)	Transect 3Wa	X co-ordinate (m)	Y co-ordinate (m)
T3Ea_1m	546918	130941	T3Wa_1m	546913	130940
T3Ea_10m	546927	130944	T3Wa_10m	546904	130938
T3Ea_20m	546937	130946	T3Wa_20m	546895	130935
T3Ea_30m	546946	130949	T3Wa_30m	546885	130932
T3Ea_40m	546956	130951	T3Wa_40m	546875	130930
T3Ea_50m	546966	130954	T3Wa_50m	546866	130927
T3Ea_60m	546975	130956	T3Wa_60m	546856	130925
T3Ea_70m	546985	130959	T3Wa_70m	546846	130922
T3Ea_80m	546995	130962	T3Wa_80m	546837	130920
T3Ea_90m	547004	130964	T3Wa_90m	546827	130917
T3Ea_100m	547014	130967	T3Wa_100m	546817	130914
T3Ea_110m	547024	130969	T3Wa_110m	546808	130912
T3Ea_120m	547033	130972	T3Wa_120m	546798	130909
T3Ea_130m	547043	130975	T3Wa_130m	546788	130907
T3Ea_140m	547052	130977	T3Wa_140m	546779	130904
T3Ea_150m	547062	130980	T3Wa_150m	546769	130901
T3Ea_160m	547072	130982	T3Wa_160m	546760	130899
T3Ea_170m	547081	130985	T3Wa_170m	546750	130896
T3Ea_180m	547091	130988	T3Wa_180m	546740	130894
T3Ea_190m	547101	130990	T3Wa_190m	546731	130891
T3Ea_200m	547110	130993	T3Wa_200m	546721	130888

Transect 4Ea	X co-ordinate (m)	Y co-ordinate (m)	Transect 4Wa	X co-ordinate (m)	Y co-ordinate (m)
T4Ea_1m	546969	131861	T4Wa_1m	546964	131863
T4Ea_10m	546976	131855	T4Wa_10m	546957	131868
T4Ea_20m	546985	131850	T4Wa_20m	546949	131874
T4Ea_30m	546993	131844	T4Wa_30m	546941	131880
T4Ea_40m	547001	131838	T4Wa_40m	546933	131886
T4Ea_50m	547009	131832	T4Wa_50m	546925	131892
T4Ea_60m	547017	131826	T4Wa_60m	546916	131897
T4Ea_70m	547025	131820	T4Wa_70m	546908	131903
T4Ea_80m	547033	131815	T4Wa_80m	546900	131909
T4Ea_90m	547041	131809	T4Wa_90m	546892	131915

T4Ea_100m	547050	131803	T4Wa_100m	546884	131921
T4Ea_110m	547058	131797	T4Wa_110m	546876	131927
T4Ea_120m	547066	131791	T4Wa_120m	546868	131932
T4Ea_130m	547074	131786	T4Wa_130m	546859	131938
T4Ea_140m	547082	131780	T4Wa_140m	546851	131944
T4Ea_150m	547090	131774	T4Wa_150m	546843	131950
T4Ea_160m	547098	131768	T4Wa_160m	546835	131956
T4Ea_170m	547107	131762	T4Wa_170m	546827	131961
T4Ea_180m	547115	131757	T4Wa_180m	546819	131967
T4Ea_190m	547123	131751	T4Wa_190m	546811	131973
T4Ea_200m	547131	131745	T4Wa_200m	546802	131979

Transect 5Ea	X co-ordinate (m)	Y co-ordinate (m)	Transect 5Wa	X co-ordinate (m)	Y co-ordinate (m)
T5Ea_1m	547915	128521	T5Wa_1m	547915	128515
T5Ea_10m	547917	128530	T5Wa_10m	547914	128506
T5Ea_20m	547919	128540	T5Wa_20m	547912	128496
T5Ea_30m	547920	128550	T5Wa_30m	547910	128486
T5Ea_40m	547922	128560	T5Wa_40m	547908	128476
T5Ea_50m	547924	128569	T5Wa_50m	547907	128467
T5Ea_60m	547926	128579	T5Wa_60m	547905	128457
T5Ea_70m	547927	128589	T5Wa_70m	547903	128447
T5Ea_80m	547929	128599	T5Wa_80m	547901	128437
T5Ea_90m	547931	128609	T5Wa_90m	547900	128427
T5Ea_100m	547933	128619	T5Wa_100m	547898	128417
T5Ea_110m	547934	128629	T5Wa_110m	547896	128407
T5Ea_120m	547936	128638	T5Wa_120m	547894	128398
T5Ea_130m	547938	128648	T5Wa_130m	547893	128388
T5Ea_140m	547940	128658	T5Wa_140m	547891	128378
T5Ea_150m	547941	128668	T5Wa_150m	547889	128368
T5Ea_160m	547943	128678	T5Wa_160m	547887	128358
T5Ea_170m	547945	128688	T5Wa_170m	547886	128348
T5Ea_180m	547947	128697	T5Wa_180m	547884	128338
T5Ea_190m	547948	128707	T5Wa_190m	547882	128329
T5Ea_200m	547950	128717	T5Wa_200m	547881	128319

Transect 6Ea	X co-ordinate (m)	Y co-ordinate (m)	Transect 6Wa	X co-ordinate (m)	Y co-ordinate (m)
T6Ea_1m	546084	128719	T6Wa_1m	546080	128714
T6Ea_10m	546089	128726	T6Wa_10m	546075	128707
T6Ea_20m	546095	128734	T6Wa_20m	546069	128699
T6Ea_30m	546101	128742	T6Wa_30m	546063	128691
T6Ea_40m	546107	128750	T6Wa_40m	546057	128683

T6Ea_50m	546112	128758	T6Wa_50m	546051	128675
T6Ea_60m	546118	128767	T6Wa_60m	546045	128667
T6Ea_70m	546124	128775	T6Wa_70m	546040	128659
T6Ea_80m	546130	128783	T6Wa_80m	546034	128650
T6Ea_90m	546136	128791	T6Wa_90m	546028	128642
T6Ea_100m	546142	128799	T6Wa_100m	546022	128634
T6Ea_110m	546148	128807	T6Wa_110m	546016	128626
T6Ea_120m	546154	128815	T6Wa_120m	546010	128618
T6Ea_130m	546159	128823	T6Wa_130m	546004	128610
T6Ea_140m	546165	128831	T6Wa_140m	545998	128602
T6Ea_150m	546171	128839	T6Wa_150m	545992	128594
T6Ea_160m	546177	128847	T6Wa_160m	545987	128586
T6Ea_170m	546183	128856	T6Wa_170m	545981	128578
T6Ea_180m	546189	128864	T6Wa_180m	545975	128570
T6Ea_190m	546195	128872	T6Wa_190m	545969	128561
T6Ea_200m	546201	128880	T6Wa_200m	545963	128553

Transect 7Ea	X co-ordinate (m)	Y co-ordinate (m)	Transect 7Wa	X co-ordinate (m)	Y co-ordinate (m)
T7Ea_1m	544048	129224	T7Wa_1m	544041	129222
T7Ea_10m	544057	129226	T7Wa_10m	544032	129219
T7Ea_20m	544066	129229	T7Wa_20m	544023	129216
T7Ea_30m	544076	129232	T7Wa_30m	544013	129213
T7Ea_40m	544085	129235	T7Wa_40m	544004	129210
T7Ea_50m	544095	129238	T7Wa_50m	543994	129207
T7Ea_60m	544104	129241	T7Wa_60m	543984	129204
T7Ea_70m	544114	129244	T7Wa_70m	543975	129202
T7Ea_80m	544124	129247	T7Wa_80m	543965	129199
T7Ea_90m	544133	129250	T7Wa_90m	543956	129196
T7Ea_100m	544143	129253	T7Wa_100m	543946	129193
T7Ea_110m	544152	129256	T7Wa_110m	543937	129190
T7Ea_120m	544162	129259	T7Wa_120m	543927	129187
T7Ea_130m	544171	129261	T7Wa_130m	543917	129184
T7Ea_140m	544181	129264	T7Wa_140m	543908	129181
T7Ea_150m	544191	129267	T7Wa_150m	543898	129178
T7Ea_160m	544200	129270	T7Wa_160m	543889	129175
T7Ea_170m	544210	129273	T7Wa_170m	543879	129172
T7Ea_180m	544219	129276	T7Wa_180m	543870	129169
T7Ea_190m	544229	129279	T7Wa_190m	543860	129166
T7Ea_200m	544238	129282	T7Wa_200m	543851	129164

Transect 8Ea	X co-ordinate (m)	Y co-ordinate (m)
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T8Ea_1m	546476	131704
T8Ea_10m	546481	131712
T8Ea_20m	546486	131721
T8Ea_30m	546491	131729
T8Ea_40m	546496	131738
T8Ea_50m	546501	131746
T8Ea_60m	546506	131755
T8Ea_70m	546512	131764
T8Ea_80m	546517	131772
T8Ea_90m	546522	131781
T8Ea_100m	546527	131789
T8Ea_110m	546532	131798
T8Ea_120m	546537	131806
T8Ea_130m	546543	131815
T8Ea_140m	546548	131824
T8Ea_150m	546553	131832
T8Ea_160m	546558	131841
T8Ea_170m	546563	131849
T8Ea_180m	546568	131858
T8Ea_190m	546573	131866
T8Ea_200m	546579	131875

Transect 9Ea	X co-ordinate (m)	Y co-ordinate (m)	Transect 9Wa	X co-ordinate (m)	Y co-ordinate (m)
T9Ea_1m	541706	131005	T9Wa_1m	541700	131007
T9Ea_10m	541715	131002	T9Wa_10m	541691	131009
T9Ea_20m	541725	131000	T9Wa_20m	541682	131012
T9Ea_30m	541734	130997	T9Wa_30m	541672	131014
T9Ea_40m	541744	130995	T9Wa_40m	541662	131017
T9Ea_50m	541754	130992	T9Wa_50m	541653	131020
T9Ea_60m	541763	130989	T9Wa_60m	541643	131022
T9Ea_70m	541773	130987	T9Wa_70m	541633	131025
T9Ea_80m	541783	130984	T9Wa_80m	541624	131027
T9Ea_90m	541792	130982	T9Wa_90m	541614	131030
T9Ea_100m	541802	130979	T9Wa_100m	541604	131033
T9Ea_110m	541812	130976	T9Wa_110m	541595	131035
T9Ea_120m	541821	130974	T9Wa_120m	541585	131038
T9Ea_130m	541831	130971	T9Wa_130m	541576	131040
T9Ea_140m	541841	130969	T9Wa_140m	541566	131043
T9Ea_150m	541850	130966	T9Wa_150m	541556	131046
T9Ea_160m	541860	130964	T9Wa_160m	541547	131048
T9Ea_170m	541870	130961	T9Wa_170m	541537	131051

T9Ea_180m	541879	130958	T9Wa_180m	541527	131053
T9Ea_190m	541889	130956	T9Wa_190m	541518	131056
T9Ea_200m	541899	130953	T9Wa_200m	541508	131058

Transect 10Ea	X co-ordinate (m)	Y co-ordinate (m)	Transect 10Wa	X co-ordinate (m)	Y co-ordinate (m)
T10Ea_1m	541008	132099	T10Wa_1m	541007	132093
T10Ea_10m	541012	132107	T10Wa_10m	541003	132085
T10Ea_20m	541016	132116	T10Wa_20m	540999	132076
T10Ea_30m	541020	132125	T10Wa_30m	540995	132066
T10Ea_40m	541023	132134	T10Wa_40m	540991	132057
T10Ea_50m	541027	132144	T10Wa_50m	540988	132048
T10Ea_60m	541031	132153	T10Wa_60m	540984	132039
T10Ea_70m	541035	132162	T10Wa_70m	540980	132030
T10Ea_80m	541039	132171	T10Wa_80m	540976	132020
T10Ea_90m	541043	132180	T10Wa_90m	540972	132011
T10Ea_100m	541047	132190	T10Wa_100m	540968	132002
T10Ea_110m	541051	132199	T10Wa_110m	540964	131993
T10Ea_120m	541055	132208	T10Wa_120m	540960	131984
T10Ea_130m	541059	132217	T10Wa_130m	540956	131974
T10Ea_140m	541063	132226	T10Wa_140m	540952	131965
T10Ea_150m	541066	132236	T10Wa_150m	540948	131956
T10Ea_160m	541070	132245	T10Wa_160m	540945	131947
T10Ea_170m	541074	132254	T10Wa_170m	540941	131938
T10Ea_180m	541078	132263	T10Wa_180m	540937	131928
T10Ea_190m	541082	132273	T10Wa_190m	540933	131919
T10Ea_200m	541086	132282	T10Wa_200m	540929	131910

Transect 11Ea	X co-ordinate (m)	Y co-ordinate (m)	Transect 11Wa	X co-ordinate (m)	Y co-ordinate (m)
T11Ea_1m	541734	133412	T11Wa_1m	541728	133417
T11Ea_10m	541741	133407	T11Wa_10m	541721	133422
T11Ea_20m	541749	133401	T11Wa_20m	541713	133428
T11Ea_30m	541758	133395	T11Wa_30m	541704	133434
T11Ea_40m	541766	133390	T11Wa_40m	541696	133439
T11Ea_50m	541774	133384	T11Wa_50m	541688	133445
T11Ea_60m	541782	133378	T11Wa_60m	541680	133451
T11Ea_70m	541790	133372	T11Wa_70m	541672	133456
T11Ea_80m	541799	133367	T11Wa_80m	541663	133462
T11Ea_90m	541807	133361	T11Wa_90m	541655	133468
T11Ea_100m	541815	133355	T11Wa_100m	541647	133474
T11Ea_110m	541823	133350	T11Wa_110m	541639	133479
T11Ea_120m	541831	133344	T11Wa_120m	541631	133485

T11Ea_130m	541840	133338	T11Wa_130m	541622	133491
T11Ea_140m	541848	133332	T11Wa_140m	541614	133497
T11Ea_150m	541856	133327	T11Wa_150m	541606	133502
T11Ea_160m	541864	133321	T11Wa_160m	541598	133508
T11Ea_170m	541872	133315	T11Wa_170m	541590	133514
T11Ea_180m	541881	133309	T11Wa_180m	541581	133520
T11Ea_190m	541889	133304	T11Wa_190m	541573	133525
T11Ea_200m	541897	133298	T11Wa_200m	541565	133531

Transect 12Wa	X co-ordinate (m)	Y co-ordinate (m)
T12Wa_1m	548790	128796
T12Wa_10m	548785	128804
T12Wa_20m	548779	128812
T12Wa_30m	548774	128820
T12Wa_40m	548768	128829
T12Wa_50m	548762	128837
T12Wa_60m	548757	128845
T12Wa_70m	548751	128854
T12Wa_80m	548746	128862
T12Wa_90m	548740	128870
T12Wa_100m	548735	128878
T12Wa_110m	548729	128887
T12Wa_120m	548723	128895
T12Wa_130m	548718	128903
T12Wa_140m	548712	128912
T12Wa_150m	548707	128920
T12Wa_160m	548701	128928
T12Wa_170m	548695	128936
T12Wa_180m	548690	128945
T12Wa_190m	548684	128953
T12Wa_200m	548679	128961

Transect 13Wa	X co-ordinate (m)	Y co-ordinate (m)
T13Wa_1m	547928	131484
T13Wa_10m	547922	131490
T13Wa_20m	547915	131497
T13Wa_30m	547908	131504
T13Wa_40m	547901	131511
T13Wa_50m	547894	131518
T13Wa_60m	547887	131525
T13Wa_70m	547880	131532

T13Wa_80m	547872	131540
T13Wa_90m	547865	131547
T13Wa_100m	547858	131554
T13Wa_110m	547851	131561
T13Wa_120m	547844	131568
T13Wa_130m	547837	131575
T13Wa_140m	547830	131582
T13Wa_150m	547823	131589
T13Wa_160m	547816	131596
T13Wa_170m	547809	131603
T13Wa_180m	547802	131610
T13Wa_190m	547795	131617
T13Wa_200m	547788	131624

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C.2 Results

Scenario 4 (without the Ansty site)

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T1Ea_1m	1m	30.21	14.18	13.73	13.45	1.05	1.13	1.09	1.06	23.52	21.54	21.28	21.11	1.68	1.54	1.52	1.51
T1Ea_10m	10m	18.17	10.27	10.11	10.01	0.72	0.75	0.73	0.72	20.90	19.26	19.17	19.10	1.49	1.38	1.37	1.36
T1Ea_20m	20m	15.31	9.34	9.25	9.19	0.64	0.66	0.65	0.64	20.27	18.71	18.66	18.63	1.45	1.34	1.33	1.33
T1Ea_30m	30m	14.10	8.94	8.89	8.84	0.60	0.62	0.61	0.61	20.00	18.48	18.45	18.42	1.43	1.32	1.32	1.32
T1Ea_40m	40m	13.41	8.72	8.68	8.65	0.58	0.60	0.59	0.59	19.85	18.35	18.33	18.31	1.42	1.31	1.31	1.31
T1Ea_50m	50m	12.98	8.58	8.56	8.53	0.57	0.58	0.58	0.58	19.75	18.27	18.25	18.24	1.41	1.31	1.30	1.30
T1Ea_60m	60m	12.68	8.49	8.47	8.44	0.56	0.57	0.57	0.57	19.69	18.21	18.20	18.19	1.41	1.30	1.30	1.30
T1Ea_70m	70m	12.47	8.41	8.40	8.38	0.56	0.57	0.56	0.56	19.64	18.17	18.16	18.15	1.40	1.30	1.30	1.30
T1Ea_80m	80m	12.30	8.36	8.35	8.33	0.55	0.56	0.56	0.56	19.60	18.14	18.14	18.12	1.40	1.30	1.30	1.29
T1Ea_90m	90m	12.17	8.32	8.31	8.30	0.55	0.56	0.56	0.55	19.57	18.12	18.11	18.10	1.40	1.29	1.29	1.29
T1Ea_100m	100m	12.06	8.28	8.28	8.26	0.55	0.55	0.55	0.55	19.55	18.09	18.09	18.08	1.40	1.29	1.29	1.29
T1Ea_110m	110m	11.97	8.25	8.25	8.24	0.54	0.55	0.55	0.55	19.53	18.08	18.08	18.07	1.39	1.29	1.29	1.29
T1Ea_120m	120m	11.90	8.23	8.23	8.22	0.54	0.55	0.55	0.55	19.51	18.06	18.06	18.06	1.39	1.29	1.29	1.29
T1Ea_130m	130m	11.83	8.21	8.21	8.20	0.54	0.55	0.55	0.54	19.50	18.05	18.05	18.05	1.39	1.29	1.29	1.29
T1Ea_140m	140m	11.78	8.19	8.19	8.18	0.54	0.54	0.54	0.54	19.49	18.04	18.04	18.04	1.39	1.29	1.29	1.29
T1Ea_150m	150m	11.73	8.17	8.18	8.17	0.54	0.54	0.54	0.54	19.48	18.03	18.04	18.03	1.39	1.29	1.29	1.29
T1Ea_160m	160m	11.69	8.16	8.17	8.16	0.54	0.54	0.54	0.54	19.47	18.02	18.03	18.02	1.39	1.29	1.29	1.29
T1Ea_170m	170m	11.65	8.15	8.15	8.15	0.53	0.54	0.54	0.54	19.46	18.02	18.02	18.02	1.39	1.29	1.29	1.29
T1Ea_180m	180m	11.61	8.14	8.14	8.14	0.53	0.54	0.54	0.54	19.45	18.01	18.01	18.01	1.39	1.29	1.29	1.29
T1Ea_190m	190m	11.58	8.13	8.13	8.13	0.53	0.54	0.54	0.54	19.44	18.00	18.01	18.01	1.39	1.29	1.29	1.29
T1Ea_200m	200m	11.56	8.12	8.13	8.12	0.53	0.54	0.54	0.54	19.44	18.00	18.00	18.00	1.39	1.29	1.29	1.29
T1Wa_1m	1m	28.68	13.68	13.27	13.00	1.01	1.08	1.04	1.01	23.19	21.25	21.01	20.85	1.66	1.52	1.50	1.49
T1Wa_10m	10m	17.16	9.94	9.81	9.72	0.69	0.71	0.70	0.69	20.68	19.06	18.99	18.93	1.48	1.36	1.36	1.35
T1Wa_20m	20m	14.61	9.11	9.04	8.99	0.62	0.63	0.63	0.62	20.11	18.58	18.54	18.51	1.44	1.33	1.32	1.32
T1Wa_30m	30m	13.55	8.77	8.72	8.69	0.59	0.60	0.60	0.59	19.88	18.38	18.36	18.33	1.42	1.31	1.31	1.31
T1Wa_40m	40m	12.96	8.58	8.55	8.52	0.57	0.58	0.58	0.58	19.75	18.27	18.25	18.24	1.41	1.30	1.30	1.30
T1Wa_50m	50m	12.60	8.46	8.44	8.42	0.56	0.57	0.57	0.57	19.67	18.20	18.19	18.18	1.40	1.30	1.30	1.30
T1Wa_60m	60m	12.34	8.37	8.36	8.35	0.55	0.56	0.56	0.56	19.61	18.15	18.14	18.13	1.40	1.30	1.30	1.30
T1Wa_70m	70m	12.16	8.31	8.31	8.29	0.55	0.56	0.56	0.55	19.57	18.11	18.11	18.10	1.40	1.29	1.29	1.29
T1Wa_80m	80m	12.02	8.27	8.27	8.25	0.54	0.55	0.55	0.55	19.54	18.09	18.09	18.08	1.40	1.29	1.29	1.29
T1Wa_90m	90m	11.91	8.23	8.23	8.22	0.54	0.55	0.55	0.55	19.52	18.07	18.07	18.06	1.39	1.29	1.29	1.29
T1Wa_100m	100m	11.82	8.20	8.21	8.20	0.54	0.55	0.55	0.54	19.50	18.05	18.05	18.05	1.39	1.29	1.29	1.29
T1Wa_110m	110m	11.75	8.18	8.18	8.18	0.54	0.54	0.54	0.54	19.48	18.04	18.04	18.03	1.39	1.29	1.29	1.29
T1Wa_120m	120m	11.68	8.16	8.17	8.16	0.54	0.54	0.54	0.54	19.47	18.02	18.03	18.02	1.39	1.29	1.29	1.29
T1Wa_130m	130m	11.63	8.14	8.15	8.15	0.53	0.54	0.54	0.54	19.45	18.01	18.02	18.02	1.39	1.29	1.29	1.29

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T1Wa_140m	140m	11.59	8.13	8.14	8.13	0.53	0.54	0.54	0.54	19.44	18.01	18.01	18.01	1.39	1.29	1.29	1.29
T1Wa_150m	150m	11.55	8.12	8.13	8.12	0.53	0.54	0.54	0.54	19.44	18.00	18.01	18.00	1.39	1.29	1.29	1.29
T1Wa_160m	160m	11.52	8.11	8.12	8.11	0.53	0.54	0.54	0.54	19.43	17.99	18.00	18.00	1.39	1.29	1.29	1.29
T1Wa_170m	170m	11.49	8.10	8.11	8.10	0.53	0.53	0.54	0.54	19.42	17.99	17.99	17.99	1.39	1.28	1.29	1.29
T1Wa_180m	180m	11.46	8.09	8.10	8.10	0.53	0.53	0.54	0.53	19.42	17.98	17.99	17.99	1.39	1.28	1.28	1.28
T1Wa_190m	190m	11.44	8.08	8.09	8.09	0.53	0.53	0.53	0.53	19.41	17.98	17.99	17.98	1.39	1.28	1.28	1.28
T1Wa_200m	200m	11.42	8.07	8.09	8.08	0.53	0.53	0.53	0.53	19.41	17.97	17.98	17.98	1.39	1.28	1.28	1.28
T2Ea_1m	1m	40.58	17.60	17.40	17.12	1.28	1.40	1.38	1.35	25.47	23.18	23.08	22.93	1.82	1.66	1.65	1.64
T2Ea_10m	10m	22.57	11.76	11.69	11.58	0.82	0.86	0.86	0.85	21.76	19.97	19.93	19.88	1.55	1.43	1.42	1.42
T2Ea_20m	20m	18.09	10.30	10.27	10.21	0.70	0.73	0.73	0.72	20.82	19.16	19.15	19.11	1.49	1.37	1.37	1.37
T2Ea_30m	30m	16.14	9.67	9.66	9.61	0.65	0.67	0.67	0.67	20.40	18.82	18.81	18.78	1.46	1.34	1.34	1.34
T2Ea_40m	40m	15.06	9.32	9.31	9.28	0.62	0.64	0.64	0.64	20.18	18.62	18.62	18.60	1.44	1.33	1.33	1.33
T2Ea_50m	50m	14.37	9.10	9.09	9.07	0.60	0.62	0.62	0.62	20.03	18.50	18.50	18.48	1.43	1.32	1.32	1.32
T2Ea_60m	60m	13.88	8.94	8.94	8.92	0.59	0.60	0.61	0.60	19.93	18.41	18.41	18.40	1.42	1.32	1.32	1.31
T2Ea_70m	70m	13.53	8.82	8.83	8.81	0.58	0.59	0.59	0.59	19.85	18.35	18.35	18.34	1.42	1.31	1.31	1.31
T2Ea_80m	80m	13.25	8.73	8.74	8.72	0.58	0.59	0.59	0.59	19.79	18.30	18.30	18.29	1.41	1.31	1.31	1.31
T2Ea_90m	90m	13.04	8.66	8.67	8.66	0.57	0.58	0.58	0.58	19.75	18.26	18.26	18.26	1.41	1.30	1.30	1.30
T2Ea_100m	100m	12.86	8.61	8.62	8.60	0.56	0.57	0.58	0.57	19.71	18.23	18.23	18.23	1.41	1.30	1.30	1.30
T2Ea_110m	110m	12.71	8.56	8.57	8.56	0.56	0.57	0.57	0.57	19.68	18.20	18.21	18.20	1.41	1.30	1.30	1.30
T2Ea_120m	120m	12.59	8.52	8.53	8.52	0.56	0.57	0.57	0.57	19.65	18.18	18.19	18.18	1.40	1.30	1.30	1.30
T2Ea_130m	130m	12.48	8.49	8.50	8.49	0.56	0.56	0.56	0.56	19.63	18.16	18.17	18.16	1.40	1.30	1.30	1.30
T2Ea_140m	140m	12.39	8.46	8.47	8.46	0.55	0.56	0.56	0.56	19.61	18.14	18.15	18.15	1.40	1.30	1.30	1.30
T2Ea_150m	150m	12.31	8.43	8.44	8.44	0.55	0.56	0.56	0.56	19.59	18.13	18.14	18.13	1.40	1.29	1.30	1.30
T2Ea_160m	160m	12.24	8.41	8.42	8.41	0.55	0.56	0.56	0.56	19.58	18.12	18.13	18.12	1.40	1.29	1.29	1.29
T2Ea_170m	170m	12.18	8.39	8.40	8.39	0.55	0.55	0.56	0.55	19.56	18.11	18.11	18.11	1.40	1.29	1.29	1.29
T2Ea_180m	180m	12.12	8.37	8.38	8.38	0.55	0.55	0.55	0.55	19.55	18.10	18.10	18.10	1.40	1.29	1.29	1.29
T2Ea_190m	190m	12.07	8.35	8.37	8.36	0.54	0.55	0.55	0.55	19.54	18.09	18.10	18.09	1.40	1.29	1.29	1.29
T2Ea_200m	200m	12.02	8.33	8.35	8.35	0.54	0.55	0.55	0.55	19.53	18.08	18.09	18.08	1.40	1.29	1.29	1.29
T2Wa_1m	1m	33.95	15.45	15.30	15.07	1.11	1.20	1.19	1.17	24.12	22.00	21.92	21.80	1.72	1.57	1.57	1.56
T2Wa_10m	10m	19.36	10.72	10.68	10.60	0.73	0.77	0.76	0.76	21.08	19.39	19.37	19.33	1.51	1.39	1.38	1.38
T2Wa_20m	20m	15.99	9.62	9.61	9.56	0.65	0.67	0.67	0.66	20.37	18.79	18.78	18.76	1.46	1.34	1.34	1.34
T2Wa_30m	30m	14.59	9.17	9.16	9.13	0.61	0.63	0.63	0.62	20.08	18.54	18.54	18.52	1.43	1.32	1.32	1.32
T2Wa_40m	40m	13.81	8.91	8.92	8.89	0.59	0.60	0.60	0.60	19.91	18.40	18.40	18.39	1.42	1.31	1.31	1.31
T2Wa_50m	50m	13.31	8.75	8.76	8.74	0.58	0.59	0.59	0.59	19.81	18.31	18.31	18.30	1.41	1.31	1.31	1.31
T2Wa_60m	60m	12.97	8.64	8.65	8.64	0.57	0.58	0.58	0.58	19.73	18.25	18.25	18.25	1.41	1.30	1.30	1.30
T2Wa_70m	70m	12.72	8.56	8.57	8.56	0.56	0.57	0.57	0.57	19.68	18.20	18.21	18.20	1.41	1.30	1.30	1.30
T2Wa_80m	80m	12.53	8.50	8.51	8.50	0.56	0.56	0.57	0.56	19.64	18.17	18.18	18.17	1.40	1.30	1.30	1.30
T2Wa_90m	90m	12.38	8.45	8.47	8.46	0.55	0.56	0.56	0.56	19.61	18.14	18.15	18.15	1.40	1.30	1.30	1.30
T2Wa_100m	100m	12.26	8.41	8.43	8.42	0.55	0.56	0.56	0.56	19.58	18.12	18.13	18.13	1.40	1.29	1.29	1.29
T2Wa_110m	110m	12.16	8.38	8.40	8.39	0.55	0.55	0.55	0.55	19.56	18.10	18.11	18.11	1.40	1.29	1.29	1.29

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T2Wa_120m	120m	12.07	8.35	8.37	8.36	0.54	0.55	0.55	0.55	19.54	18.09	18.10	18.09	1.40	1.29	1.29	1.29
T2Wa_130m	130m	12.00	8.33	8.35	8.34	0.54	0.55	0.55	0.55	19.53	18.07	18.08	18.08	1.39	1.29	1.29	1.29
T2Wa_140m	140m	11.94	8.31	8.33	8.32	0.54	0.55	0.55	0.55	19.51	18.06	18.07	18.07	1.39	1.29	1.29	1.29
T2Wa_150m	150m	11.88	8.29	8.31	8.30	0.54	0.55	0.55	0.55	19.50	18.05	18.06	18.06	1.39	1.29	1.29	1.29
T2Wa_160m	160m	11.84	8.28	8.29	8.29	0.54	0.54	0.55	0.55	19.49	18.04	18.06	18.05	1.39	1.29	1.29	1.29
T2Wa_170m	170m	11.80	8.26	8.28	8.28	0.54	0.54	0.54	0.54	19.48	18.04	18.05	18.05	1.39	1.29	1.29	1.29
T2Wa_180m	180m	11.76	8.25	8.27	8.27	0.54	0.54	0.54	0.54	19.48	18.03	18.04	18.04	1.39	1.29	1.29	1.29
T2Wa_190m	190m	11.72	8.24	8.26	8.25	0.54	0.54	0.54	0.54	19.47	18.02	18.04	18.03	1.39	1.29	1.29	1.29
T2Wa_200m	200m	11.69	8.23	8.25	8.25	0.53	0.54	0.54	0.54	19.46	18.02	18.03	18.03	1.39	1.29	1.29	1.29
T3Ea_1m	1m	36.67	16.38	15.90	15.72	1.18	1.28	1.24	1.22	24.96	22.77	22.51	22.41	1.78	1.63	1.61	1.60
T3Ea_10m	10m	20.81	11.24	11.07	11.00	0.77	0.81	0.79	0.79	21.67	19.93	19.84	19.80	1.55	1.42	1.42	1.41
T3Ea_20m	20m	16.91	9.98	9.88	9.84	0.67	0.69	0.69	0.68	20.84	19.23	19.18	19.16	1.49	1.37	1.37	1.37
T3Ea_30m	30m	15.24	9.44	9.37	9.34	0.63	0.64	0.64	0.64	20.49	18.93	18.90	18.88	1.46	1.35	1.35	1.35
T3Ea_40m	40m	14.32	9.14	9.09	9.07	0.60	0.62	0.61	0.61	20.30	18.77	18.74	18.73	1.45	1.34	1.34	1.34
T3Ea_50m	50m	13.73	8.95	8.91	8.90	0.59	0.60	0.60	0.60	20.17	18.66	18.64	18.63	1.44	1.33	1.33	1.33
T3Ea_60m	60m	13.32	8.81	8.79	8.77	0.58	0.59	0.59	0.58	20.08	18.59	18.57	18.57	1.43	1.33	1.33	1.33
T3Ea_70m	70m	13.02	8.72	8.70	8.68	0.57	0.58	0.58	0.58	20.02	18.53	18.52	18.52	1.43	1.32	1.32	1.32
T3Ea_80m	80m	12.78	8.64	8.63	8.62	0.56	0.57	0.57	0.57	19.97	18.49	18.49	18.48	1.43	1.32	1.32	1.32
T3Ea_90m	90m	12.60	8.58	8.57	8.56	0.56	0.57	0.57	0.56	19.93	18.46	18.45	18.45	1.42	1.32	1.32	1.32
T3Ea_100m	100m	12.45	8.53	8.53	8.52	0.55	0.56	0.56	0.56	19.90	18.43	18.43	18.42	1.42	1.32	1.32	1.32
T3Ea_110m	110m	12.33	8.49	8.49	8.48	0.55	0.56	0.56	0.56	19.87	18.41	18.41	18.40	1.42	1.31	1.31	1.31
T3Ea_120m	120m	12.23	8.46	8.46	8.45	0.55	0.55	0.55	0.55	19.85	18.39	18.39	18.39	1.42	1.31	1.31	1.31
T3Ea_130m	130m	12.14	8.43	8.43	8.43	0.55	0.55	0.55	0.55	19.83	18.38	18.38	18.37	1.42	1.31	1.31	1.31
T3Ea_140m	140m	12.06	8.41	8.41	8.40	0.54	0.55	0.55	0.55	19.82	18.36	18.36	18.36	1.42	1.31	1.31	1.31
T3Ea_150m	150m	12.00	8.39	8.39	8.38	0.54	0.55	0.55	0.55	19.80	18.35	18.35	18.35	1.41	1.31	1.31	1.31
T3Ea_160m	160m	11.94	8.37	8.37	8.37	0.54	0.55	0.55	0.55	19.79	18.34	18.34	18.34	1.41	1.31	1.31	1.31
T3Ea_170m	170m	11.89	8.35	8.36	8.35	0.54	0.54	0.55	0.55	19.78	18.33	18.33	18.33	1.41	1.31	1.31	1.31
T3Ea_180m	180m	11.84	8.34	8.34	8.34	0.54	0.54	0.54	0.54	19.77	18.32	18.33	18.32	1.41	1.31	1.31	1.31
T3Ea_190m	190m	11.80	8.32	8.33	8.32	0.54	0.54	0.54	0.54	19.76	18.31	18.32	18.32	1.41	1.31	1.31	1.31
T3Ea_200m	200m	11.76	8.31	8.32	8.31	0.54	0.54	0.54	0.54	19.75	18.31	18.31	18.31	1.41	1.31	1.31	1.31
T3Wa_1m	1m	30.24	14.30	13.94	13.79	1.02	1.09	1.06	1.05	23.63	21.62	21.42	21.35	1.69	1.54	1.53	1.52
T3Wa_10m	10m	17.62	10.21	10.10	10.05	0.69	0.72	0.71	0.70	20.99	19.36	19.30	19.27	1.50	1.38	1.38	1.38
T3Wa_20m	20m	14.86	9.31	9.26	9.23	0.62	0.63	0.63	0.63	20.41	18.86	18.83	18.82	1.46	1.35	1.35	1.34
T3Wa_30m	30m	13.72	8.94	8.91	8.89	0.59	0.60	0.60	0.59	20.17	18.66	18.64	18.63	1.44	1.33	1.33	1.33
T3Wa_40m	40m	13.10	8.74	8.72	8.71	0.57	0.58	0.58	0.58	20.04	18.55	18.54	18.53	1.43	1.32	1.32	1.32
T3Wa_50m	50m	12.70	8.61	8.60	8.59	0.56	0.57	0.57	0.57	19.95	18.48	18.47	18.47	1.43	1.32	1.32	1.32
T3Wa_60m	60m	12.43	8.53	8.52	8.51	0.55	0.56	0.56	0.56	19.90	18.43	18.43	18.42	1.42	1.32	1.32	1.32
T3Wa_70m	70m	12.24	8.46	8.46	8.45	0.55	0.56	0.56	0.55	19.85	18.39	18.39	18.39	1.42	1.31	1.31	1.31
T3Wa_80m	80m	12.09	8.41	8.41	8.41	0.54	0.55	0.55	0.55	19.82	18.37	18.37	18.36	1.42	1.31	1.31	1.31
T3Wa_90m	90m	11.97	8.38	8.38	8.37	0.54	0.55	0.55	0.55	19.80	18.35	18.35	18.35	1.41	1.31	1.31	1.31

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T3Wa_100m	100m	11.87	8.35	8.35	8.35	0.54	0.54	0.55	0.54	19.78	18.33	18.33	18.33	1.41	1.31	1.31	1.31
T3Wa_110m	110m	11.80	8.32	8.33	8.32	0.54	0.54	0.54	0.54	19.76	18.31	18.32	18.32	1.41	1.31	1.31	1.31
T3Wa_120m	120m	11.73	8.30	8.31	8.30	0.54	0.54	0.54	0.54	19.75	18.30	18.31	18.31	1.41	1.31	1.31	1.31
T3Wa_130m	130m	11.68	8.28	8.29	8.29	0.53	0.54	0.54	0.54	19.73	18.29	18.30	18.30	1.41	1.31	1.31	1.31
T3Wa_140m	140m	11.63	8.27	8.27	8.27	0.53	0.54	0.54	0.54	19.72	18.28	18.29	18.29	1.41	1.31	1.31	1.31
T3Wa_150m	150m	11.59	8.25	8.26	8.26	0.53	0.54	0.54	0.54	19.72	18.28	18.28	18.28	1.41	1.31	1.31	1.31
T3Wa_160m	160m	11.55	8.24	8.25	8.25	0.53	0.53	0.54	0.54	19.71	18.27	18.28	18.28	1.41	1.30	1.31	1.31
T3Wa_170m	170m	11.51	8.23	8.24	8.24	0.53	0.53	0.53	0.53	19.70	18.26	18.27	18.27	1.41	1.30	1.30	1.30
T3Wa_180m	180m	11.49	8.22	8.23	8.23	0.53	0.53	0.53	0.53	19.69	18.26	18.27	18.27	1.41	1.30	1.30	1.30
T3Wa_190m	190m	11.46	8.21	8.22	8.22	0.53	0.53	0.53	0.53	19.69	18.25	18.26	18.26	1.41	1.30	1.30	1.30
T3Wa_200m	200m	11.44	8.20	8.22	8.22	0.53	0.53	0.53	0.53	19.68	18.25	18.26	18.26	1.41	1.30	1.30	1.30
T4Ea_1m	1m	36.58	16.35	15.99	15.78	1.18	1.28	1.25	1.23	24.93	22.74	22.55	22.44	1.78	1.62	1.61	1.60
T4Ea_10m	10m	19.60	10.83	10.73	10.66	0.74	0.77	0.76	0.76	21.41	19.71	19.65	19.61	1.53	1.41	1.40	1.40
T4Ea_20m	20m	16.02	9.67	9.62	9.58	0.65	0.67	0.66	0.66	20.65	19.07	19.04	19.02	1.47	1.36	1.36	1.36
T4Ea_30m	30m	14.54	9.19	9.16	9.13	0.61	0.62	0.62	0.62	20.34	18.80	18.78	18.77	1.45	1.34	1.34	1.34
T4Ea_40m	40m	13.73	8.93	8.91	8.89	0.59	0.60	0.60	0.60	20.17	18.66	18.65	18.64	1.44	1.33	1.33	1.33
T4Ea_50m	50m	13.22	8.76	8.75	8.74	0.57	0.58	0.58	0.58	20.06	18.57	18.56	18.55	1.43	1.33	1.33	1.33
T4Ea_60m	60m	12.87	8.65	8.64	8.63	0.56	0.57	0.57	0.57	19.98	18.50	18.50	18.49	1.43	1.32	1.32	1.32
T4Ea_70m	70m	12.62	8.57	8.56	8.55	0.56	0.57	0.57	0.56	19.93	18.46	18.46	18.45	1.42	1.32	1.32	1.32
T4Ea_80m	80m	12.42	8.51	8.50	8.50	0.55	0.56	0.56	0.56	19.89	18.42	18.42	18.42	1.42	1.32	1.32	1.32
T4Ea_90m	90m	12.27	8.46	8.46	8.45	0.55	0.56	0.56	0.56	19.86	18.40	18.40	18.39	1.42	1.31	1.31	1.31
T4Ea_100m	100m	12.15	8.42	8.42	8.41	0.55	0.55	0.55	0.55	19.83	18.37	18.38	18.37	1.42	1.31	1.31	1.31
T4Ea_110m	110m	12.05	8.38	8.39	8.38	0.54	0.55	0.55	0.55	19.81	18.36	18.36	18.36	1.41	1.31	1.31	1.31
T4Ea_120m	120m	11.96	8.36	8.36	8.36	0.54	0.55	0.55	0.55	19.79	18.34	18.34	18.34	1.41	1.31	1.31	1.31
T4Ea_130m	130m	11.89	8.33	8.34	8.34	0.54	0.54	0.55	0.54	19.78	18.33	18.33	18.33	1.41	1.31	1.31	1.31
T4Ea_140m	140m	11.83	8.31	8.32	8.32	0.54	0.54	0.54	0.54	19.76	18.32	18.32	18.32	1.41	1.31	1.31	1.31
T4Ea_150m	150m	11.78	8.29	8.30	8.30	0.54	0.54	0.54	0.54	19.75	18.31	18.31	18.31	1.41	1.31	1.31	1.31
T4Ea_160m	160m	11.73	8.28	8.29	8.29	0.53	0.54	0.54	0.54	19.74	18.30	18.30	18.30	1.41	1.31	1.31	1.31
T4Ea_170m	170m	11.69	8.27	8.28	8.27	0.53	0.54	0.54	0.54	19.73	18.29	18.30	18.30	1.41	1.31	1.31	1.31
T4Ea_180m	180m	11.65	8.25	8.26	8.26	0.53	0.54	0.54	0.54	19.73	18.28	18.29	18.29	1.41	1.31	1.31	1.31
T4Ea_190m	190m	11.62	8.24	8.25	8.25	0.53	0.54	0.54	0.54	19.72	18.28	18.29	18.28	1.41	1.31	1.31	1.31
T4Ea_200m	200m	11.59	8.23	8.25	8.24	0.53	0.54	0.54	0.54	19.71	18.27	18.28	18.28	1.41	1.31	1.31	1.31
T4Wa_1m	1m	40.22	17.53	17.12	16.89	1.27	1.39	1.35	1.33	25.67	23.39	23.18	23.05	1.83	1.67	1.66	1.65
T4Wa_10m	10m	20.90	11.26	11.13	11.05	0.77	0.81	0.80	0.79	21.68	19.94	19.88	19.83	1.55	1.42	1.42	1.42
T4Wa_20m	20m	16.80	9.93	9.86	9.81	0.67	0.69	0.68	0.68	20.82	19.21	19.17	19.15	1.49	1.37	1.37	1.37
T4Wa_30m	30m	15.09	9.37	9.33	9.30	0.62	0.64	0.64	0.63	20.46	18.90	18.88	18.86	1.46	1.35	1.35	1.35
T4Wa_40m	40m	14.15	9.07	9.04	9.02	0.60	0.61	0.61	0.61	20.26	18.73	18.72	18.71	1.45	1.34	1.34	1.34
T4Wa_50m	50m	13.56	8.87	8.86	8.84	0.58	0.59	0.59	0.59	20.13	18.63	18.62	18.61	1.44	1.33	1.33	1.33
T4Wa_60m	60m	13.14	8.74	8.73	8.71	0.57	0.58	0.58	0.58	20.04	18.55	18.55	18.54	1.43	1.33	1.32	1.32
T4Wa_70m	70m	12.84	8.64	8.64	8.62	0.56	0.57	0.57	0.57	19.98	18.50	18.50	18.49	1.43	1.32	1.32	1.32

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T4Wa_80m	80m	12.61	8.57	8.56	8.56	0.56	0.57	0.57	0.56	19.93	18.46	18.46	18.45	1.42	1.32	1.32	1.32
T4Wa_90m	90m	12.43	8.51	8.51	8.50	0.55	0.56	0.56	0.56	19.89	18.42	18.43	18.42	1.42	1.32	1.32	1.32
T4Wa_100m	100m	12.29	8.46	8.46	8.46	0.55	0.56	0.56	0.56	19.86	18.40	18.40	18.40	1.42	1.31	1.31	1.31
T4Wa_110m	110m	12.17	8.42	8.43	8.42	0.55	0.55	0.55	0.55	19.83	18.38	18.38	18.38	1.42	1.31	1.31	1.31
T4Wa_120m	120m	12.07	8.39	8.40	8.39	0.54	0.55	0.55	0.55	19.81	18.36	18.36	18.36	1.42	1.31	1.31	1.31
T4Wa_130m	130m	11.98	8.36	8.37	8.37	0.54	0.55	0.55	0.55	19.80	18.34	18.35	18.35	1.41	1.31	1.31	1.31
T4Wa_140m	140m	11.91	8.34	8.35	8.34	0.54	0.54	0.55	0.55	19.78	18.33	18.34	18.34	1.41	1.31	1.31	1.31
T4Wa_150m	150m	11.85	8.32	8.33	8.33	0.54	0.54	0.54	0.54	19.77	18.32	18.33	18.32	1.41	1.31	1.31	1.31
T4Wa_160m	160m	11.79	8.30	8.31	8.31	0.54	0.54	0.54	0.54	19.76	18.31	18.32	18.32	1.41	1.31	1.31	1.31
T4Wa_170m	170m	11.75	8.29	8.30	8.30	0.54	0.54	0.54	0.54	19.75	18.30	18.31	18.31	1.41	1.31	1.31	1.31
T4Wa_180m	180m	11.71	8.27	8.28	8.28	0.53	0.54	0.54	0.54	19.74	18.29	18.30	18.30	1.41	1.31	1.31	1.31
T4Wa_190m	190m	11.67	8.26	8.27	8.27	0.53	0.54	0.54	0.54	19.73	18.29	18.30	18.29	1.41	1.31	1.31	1.31
T4Wa_200m	200m	11.63	8.25	8.26	8.26	0.53	0.54	0.54	0.54	19.72	18.28	18.29	18.29	1.41	1.31	1.31	1.31
T5Ea_1m	1m	42.98	18.38	19.52	19.78	1.34	1.46	1.56	1.58	25.91	23.55	24.18	24.31	1.85	1.68	1.73	1.74
T5Ea_10m	10m	23.26	11.99	12.45	12.55	0.83	0.88	0.92	0.93	21.88	20.07	20.32	20.38	1.56	1.43	1.45	1.46
T5Ea_20m	20m	18.49	10.45	10.73	10.80	0.71	0.74	0.77	0.77	20.89	19.23	19.38	19.42	1.49	1.37	1.38	1.39
T5Ea_30m	30m	16.47	9.79	10.01	10.05	0.66	0.68	0.70	0.70	20.47	18.87	18.99	19.01	1.46	1.35	1.36	1.36
T5Ea_40m	40m	15.34	9.43	9.60	9.64	0.63	0.65	0.66	0.67	20.23	18.67	18.76	18.78	1.45	1.33	1.34	1.34
T5Ea_50m	50m	14.63	9.20	9.34	9.37	0.61	0.63	0.64	0.64	20.08	18.54	18.62	18.64	1.43	1.32	1.33	1.33
T5Ea_60m	60m	14.14	9.04	9.17	9.19	0.60	0.61	0.62	0.63	19.98	18.45	18.53	18.54	1.43	1.32	1.32	1.32
T5Ea_70m	70m	13.77	8.92	9.04	9.06	0.59	0.60	0.61	0.61	19.90	18.39	18.45	18.47	1.42	1.31	1.32	1.32
T5Ea_80m	80m	13.49	8.83	8.93	8.95	0.58	0.59	0.60	0.60	19.84	18.34	18.40	18.41	1.42	1.31	1.31	1.32
T5Ea_90m	90m	13.27	8.76	8.85	8.87	0.58	0.59	0.60	0.60	19.80	18.30	18.36	18.37	1.41	1.31	1.31	1.31
T5Ea_100m	100m	13.09	8.70	8.79	8.81	0.57	0.58	0.59	0.59	19.76	18.27	18.32	18.33	1.41	1.31	1.31	1.31
T5Ea_110m	110m	12.94	8.65	8.74	8.75	0.57	0.58	0.58	0.59	19.73	18.24	18.29	18.30	1.41	1.30	1.31	1.31
T5Ea_120m	120m	12.82	8.61	8.69	8.70	0.56	0.57	0.58	0.58	19.70	18.22	18.27	18.27	1.41	1.30	1.30	1.31
T5Ea_130m	130m	12.71	8.58	8.65	8.66	0.56	0.57	0.58	0.58	19.68	18.20	18.24	18.25	1.41	1.30	1.30	1.30
T5Ea_140m	140m	12.61	8.54	8.62	8.63	0.56	0.57	0.57	0.58	19.66	18.18	18.22	18.23	1.40	1.30	1.30	1.30
T5Ea_150m	150m	12.53	8.52	8.59	8.60	0.56	0.56	0.57	0.57	19.64	18.17	18.21	18.21	1.40	1.30	1.30	1.30
T5Ea_160m	160m	12.46	8.49	8.56	8.57	0.55	0.56	0.57	0.57	19.63	18.16	18.19	18.20	1.40	1.30	1.30	1.30
T5Ea_170m	170m	12.39	8.47	8.54	8.55	0.55	0.56	0.57	0.57	19.61	18.14	18.18	18.19	1.40	1.30	1.30	1.30
T5Ea_180m	180m	12.33	8.45	8.52	8.53	0.55	0.56	0.56	0.57	19.60	18.13	18.17	18.17	1.40	1.30	1.30	1.30
T5Ea_190m	190m	12.28	8.44	8.50	8.51	0.55	0.56	0.56	0.56	19.59	18.12	18.16	18.16	1.40	1.29	1.30	1.30
T5Ea_200m	200m	12.23	8.42	8.48	8.49	0.55	0.56	0.56	0.56	19.58	18.12	18.15	18.15	1.40	1.29	1.30	1.30
T5Wa_1m	1m	32.84	15.09	15.88	16.05	1.08	1.16	1.23	1.25	23.86	21.76	22.19	22.28	1.70	1.55	1.59	1.59
T5Wa_10m	10m	19.06	10.63	10.93	11.00	0.72	0.76	0.78	0.79	21.01	19.33	19.49	19.53	1.50	1.38	1.39	1.39
T5Wa_20m	20m	15.97	9.63	9.82	9.86	0.64	0.67	0.68	0.69	20.36	18.78	18.89	18.91	1.45	1.34	1.35	1.35
T5Wa_30m	30m	14.66	9.21	9.35	9.38	0.61	0.63	0.64	0.64	20.09	18.55	18.63	18.64	1.43	1.32	1.33	1.33
T5Wa_40m	40m	13.93	8.97	9.09	9.11	0.59	0.61	0.62	0.62	19.94	18.42	18.49	18.50	1.42	1.32	1.32	1.32
T5Wa_50m	50m	13.46	8.82	8.92	8.94	0.58	0.59	0.60	0.60	19.84	18.34	18.39	18.40	1.42	1.31	1.31	1.31

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T5Wa_60m	60m	13.14	8.72	8.81	8.82	0.57	0.58	0.59	0.59	19.77	18.28	18.33	18.34	1.41	1.31	1.31	1.31
T5Wa_70m	70m	12.90	8.64	8.72	8.74	0.57	0.58	0.58	0.58	19.72	18.24	18.28	18.29	1.41	1.30	1.31	1.31
T5Wa_80m	80m	12.72	8.58	8.65	8.67	0.56	0.57	0.58	0.58	19.68	18.20	18.25	18.25	1.41	1.30	1.30	1.30
T5Wa_90m	90m	12.57	8.53	8.60	8.61	0.56	0.57	0.57	0.57	19.65	18.18	18.22	18.22	1.40	1.30	1.30	1.30
T5Wa_100m	100m	12.45	8.49	8.56	8.57	0.55	0.56	0.57	0.57	19.62	18.16	18.19	18.20	1.40	1.30	1.30	1.30
T5Wa_110m	110m	12.35	8.46	8.52	8.53	0.55	0.56	0.57	0.57	19.60	18.14	18.17	18.18	1.40	1.30	1.30	1.30
T5Wa_120m	120m	12.26	8.43	8.49	8.50	0.55	0.56	0.56	0.56	19.59	18.12	18.16	18.16	1.40	1.29	1.30	1.30
T5Wa_130m	130m	12.19	8.41	8.46	8.47	0.55	0.56	0.56	0.56	19.57	18.11	18.14	18.15	1.40	1.29	1.30	1.30
T5Wa_140m	140m	12.13	8.39	8.44	8.45	0.55	0.55	0.56	0.56	19.56	18.10	18.13	18.13	1.40	1.29	1.30	1.30
T5Wa_150m	150m	12.07	8.37	8.42	8.43	0.55	0.55	0.56	0.56	19.54	18.09	18.12	18.12	1.40	1.29	1.29	1.29
T5Wa_160m	160m	12.02	8.35	8.40	8.41	0.54	0.55	0.55	0.56	19.53	18.08	18.11	18.11	1.40	1.29	1.29	1.29
T5Wa_170m	170m	11.98	8.34	8.39	8.39	0.54	0.55	0.55	0.55	19.52	18.07	18.10	18.10	1.39	1.29	1.29	1.29
T5Wa_180m	180m	11.94	8.32	8.37	8.38	0.54	0.55	0.55	0.55	19.52	18.06	18.09	18.10	1.39	1.29	1.29	1.29
T5Wa_190m	190m	11.90	8.31	8.36	8.37	0.54	0.55	0.55	0.55	19.51	18.06	18.09	18.09	1.39	1.29	1.29	1.29
T5Wa_200m	200m	11.87	8.30	8.35	8.35	0.54	0.55	0.55	0.55	19.50	18.05	18.08	18.08	1.39	1.29	1.29	1.29
T6Ea_1m	1m	31.31	14.56	15.45	15.75	1.04	1.12	1.20	1.22	23.55	21.50	21.99	22.14	1.68	1.54	1.57	1.58
T6Ea_10m	10m	18.90	10.55	10.91	11.02	0.72	0.75	0.78	0.79	20.98	19.30	19.50	19.56	1.50	1.38	1.39	1.40
T6Ea_20m	20m	15.81	9.55	9.78	9.85	0.64	0.66	0.68	0.69	20.33	18.75	18.87	18.91	1.45	1.34	1.35	1.35
T6Ea_30m	30m	14.49	9.12	9.29	9.34	0.61	0.62	0.64	0.64	20.05	18.51	18.61	18.64	1.43	1.32	1.33	1.33
T6Ea_40m	40m	13.76	8.88	9.02	9.06	0.59	0.60	0.61	0.62	19.90	18.38	18.46	18.48	1.42	1.31	1.32	1.32
T6Ea_50m	50m	13.29	8.73	8.85	8.88	0.58	0.59	0.60	0.60	19.80	18.30	18.37	18.38	1.41	1.31	1.31	1.31
T6Ea_60m	60m	12.96	8.63	8.73	8.76	0.57	0.58	0.59	0.59	19.73	18.24	18.30	18.32	1.41	1.30	1.31	1.31
T6Ea_70m	70m	12.73	8.55	8.64	8.67	0.56	0.57	0.58	0.58	19.68	18.20	18.25	18.27	1.41	1.30	1.30	1.30
T6Ea_80m	80m	12.54	8.49	8.58	8.60	0.56	0.56	0.57	0.57	19.64	18.17	18.22	18.23	1.40	1.30	1.30	1.30
T6Ea_90m	90m	12.40	8.45	8.52	8.54	0.55	0.56	0.57	0.57	19.61	18.14	18.19	18.20	1.40	1.30	1.30	1.30
T6Ea_100m	100m	12.28	8.41	8.48	8.50	0.55	0.56	0.56	0.57	19.59	18.12	18.16	18.17	1.40	1.29	1.30	1.30
T6Ea_110m	110m	12.19	8.38	8.45	8.46	0.55	0.55	0.56	0.56	19.57	18.11	18.14	18.15	1.40	1.29	1.30	1.30
T6Ea_120m	120m	12.11	8.35	8.42	8.43	0.55	0.55	0.56	0.56	19.55	18.09	18.13	18.14	1.40	1.29	1.29	1.30
T6Ea_130m	130m	12.04	8.33	8.39	8.41	0.54	0.55	0.56	0.56	19.53	18.08	18.11	18.12	1.40	1.29	1.29	1.29
T6Ea_140m	140m	11.98	8.31	8.37	8.38	0.54	0.55	0.55	0.55	19.52	18.07	18.10	18.11	1.39	1.29	1.29	1.29
T6Ea_150m	150m	11.92	8.29	8.35	8.36	0.54	0.55	0.55	0.55	19.51	18.06	18.09	18.10	1.39	1.29	1.29	1.29
T6Ea_160m	160m	11.88	8.28	8.33	8.34	0.54	0.54	0.55	0.55	19.50	18.05	18.08	18.09	1.39	1.29	1.29	1.29
T6Ea_170m	170m	11.84	8.26	8.32	8.33	0.54	0.54	0.55	0.55	19.49	18.04	18.07	18.08	1.39	1.29	1.29	1.29
T6Ea_180m	180m	11.80	8.25	8.30	8.31	0.54	0.54	0.55	0.55	19.48	18.04	18.07	18.07	1.39	1.29	1.29	1.29
T6Ea_190m	190m	11.76	8.24	8.29	8.30	0.54	0.54	0.55	0.55	19.48	18.03	18.06	18.06	1.39	1.29	1.29	1.29
T6Ea_200m	200m	11.73	8.23	8.28	8.29	0.54	0.54	0.55	0.55	19.47	18.03	18.05	18.06	1.39	1.29	1.29	1.29
T6Wa_1m	1m	25.85	12.79	13.46	13.67	0.90	0.96	1.02	1.03	22.42	20.53	20.89	21.01	1.60	1.47	1.49	1.50
T6Wa_10m	10m	16.18	9.67	9.91	9.99	0.65	0.67	0.69	0.70	20.41	18.81	18.95	18.99	1.46	1.34	1.35	1.36
T6Wa_20m	20m	14.16	9.01	9.17	9.22	0.60	0.61	0.63	0.63	19.98	18.46	18.54	18.57	1.43	1.32	1.32	1.33
T6Wa_30m	30m	13.32	8.74	8.86	8.90	0.58	0.59	0.60	0.60	19.81	18.31	18.37	18.39	1.41	1.31	1.31	1.31

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T6Wa_40m	40m	12.86	8.59	8.69	8.72	0.56	0.57	0.58	0.59	19.71	18.23	18.28	18.29	1.41	1.30	1.31	1.31
T6Wa_50m	50m	12.57	8.50	8.59	8.61	0.56	0.57	0.57	0.58	19.65	18.17	18.22	18.23	1.40	1.30	1.30	1.30
T6Wa_60m	60m	12.37	8.43	8.51	8.53	0.55	0.56	0.57	0.57	19.60	18.14	18.18	18.19	1.40	1.30	1.30	1.30
T6Wa_70m	70m	12.22	8.39	8.46	8.47	0.55	0.55	0.56	0.56	19.57	18.11	18.15	18.16	1.40	1.29	1.30	1.30
T6Wa_80m	80m	12.10	8.35	8.41	8.43	0.55	0.55	0.56	0.56	19.55	18.09	18.13	18.14	1.40	1.29	1.29	1.30
T6Wa_90m	90m	12.01	8.32	8.38	8.40	0.54	0.55	0.55	0.56	19.53	18.07	18.11	18.12	1.39	1.29	1.29	1.29
T6Wa_100m	100m	11.93	8.29	8.35	8.37	0.54	0.55	0.55	0.55	19.51	18.06	18.09	18.10	1.39	1.29	1.29	1.29
T6Wa_110m	110m	11.87	8.27	8.33	8.34	0.54	0.54	0.55	0.55	19.50	18.05	18.08	18.09	1.39	1.29	1.29	1.29
T6Wa_120m	120m	11.81	8.26	8.31	8.32	0.54	0.54	0.55	0.55	19.49	18.04	18.07	18.08	1.39	1.29	1.29	1.29
T6Wa_130m	130m	11.77	8.24	8.29	8.30	0.54	0.54	0.55	0.55	19.48	18.03	18.06	18.07	1.39	1.29	1.29	1.29
T6Wa_140m	140m	11.73	8.23	8.28	8.29	0.54	0.54	0.55	0.55	19.47	18.02	18.05	18.06	1.39	1.29	1.29	1.29
T6Wa_150m	150m	11.69	8.22	8.26	8.27	0.53	0.54	0.54	0.54	19.46	18.02	18.04	18.05	1.39	1.29	1.29	1.29
T6Wa_160m	160m	11.66	8.20	8.25	8.26	0.53	0.54	0.54	0.54	19.45	18.01	18.04	18.04	1.39	1.29	1.29	1.29
T6Wa_170m	170m	11.63	8.20	8.24	8.25	0.53	0.54	0.54	0.54	19.45	18.01	18.03	18.04	1.39	1.29	1.29	1.29
T6Wa_180m	180m	11.60	8.19	8.23	8.24	0.53	0.54	0.54	0.54	19.44	18.00	18.03	18.03	1.39	1.29	1.29	1.29
T6Wa_190m	190m	11.57	8.18	8.22	8.23	0.53	0.54	0.54	0.54	19.44	18.00	18.02	18.03	1.39	1.29	1.29	1.29
T6Wa_200m	200m	11.55	8.17	8.21	8.22	0.53	0.54	0.54	0.54	19.43	17.99	18.02	18.02	1.39	1.29	1.29	1.29
T7Ea_1m	1m	66.46	25.93	27.54	27.81	2.09	2.32	2.48	2.50	30.09	27.30	28.25	28.41	2.15	1.95	2.02	2.03
T7Ea_10m	10m	34.36	15.59	16.30	16.42	1.18	1.28	1.35	1.36	23.24	21.14	21.56	21.63	1.66	1.51	1.54	1.54
T7Ea_20m	20m	25.44	12.72	13.18	13.25	0.93	0.99	1.03	1.04	21.28	19.42	19.69	19.74	1.52	1.39	1.41	1.41
T7Ea_30m	30m	21.51	11.45	11.80	11.85	0.81	0.86	0.89	0.90	20.41	18.66	18.87	18.90	1.46	1.33	1.35	1.35
T7Ea_40m	40m	19.27	10.73	11.01	11.06	0.75	0.79	0.81	0.82	19.91	18.23	18.40	18.42	1.42	1.30	1.31	1.32
T7Ea_50m	50m	17.83	10.27	10.50	10.55	0.71	0.74	0.76	0.77	19.59	17.95	18.09	18.12	1.40	1.28	1.29	1.29
T7Ea_60m	60m	16.81	9.94	10.15	10.18	0.68	0.71	0.73	0.73	19.36	17.76	17.88	17.90	1.38	1.27	1.28	1.28
T7Ea_70m	70m	16.06	9.70	9.88	9.92	0.66	0.68	0.70	0.70	19.19	17.61	17.72	17.74	1.37	1.26	1.27	1.27
T7Ea_80m	80m	15.49	9.51	9.68	9.71	0.64	0.66	0.68	0.68	19.06	17.50	17.60	17.62	1.36	1.25	1.26	1.26
T7Ea_90m	90m	15.02	9.36	9.52	9.55	0.63	0.65	0.66	0.67	18.96	17.41	17.50	17.52	1.35	1.24	1.25	1.25
T7Ea_100m	100m	14.65	9.24	9.39	9.41	0.62	0.64	0.65	0.65	18.87	17.34	17.42	17.44	1.35	1.24	1.24	1.25
T7Ea_110m	110m	14.34	9.14	9.28	9.30	0.61	0.63	0.64	0.64	18.80	17.28	17.36	17.37	1.34	1.23	1.24	1.24
T7Ea_120m	120m	14.07	9.06	9.18	9.21	0.60	0.62	0.63	0.63	18.74	17.23	17.30	17.31	1.34	1.23	1.24	1.24
T7Ea_130m	130m	13.85	8.98	9.10	9.12	0.60	0.61	0.62	0.62	18.69	17.18	17.25	17.27	1.34	1.23	1.23	1.23
T7Ea_140m	140m	13.65	8.92	9.03	9.05	0.59	0.60	0.62	0.62	18.65	17.14	17.21	17.22	1.33	1.22	1.23	1.23
T7Ea_150m	150m	13.48	8.87	8.97	8.99	0.59	0.60	0.61	0.61	18.61	17.11	17.17	17.19	1.33	1.22	1.23	1.23
T7Ea_160m	160m	13.32	8.82	8.92	8.94	0.58	0.59	0.60	0.61	18.58	17.08	17.14	17.15	1.33	1.22	1.22	1.23
T7Ea_170m	170m	13.19	8.77	8.87	8.89	0.58	0.59	0.60	0.60	18.55	17.06	17.11	17.12	1.32	1.22	1.22	1.22
T7Ea_180m	180m	13.07	8.73	8.83	8.85	0.58	0.59	0.60	0.60	18.52	17.03	17.09	17.10	1.32	1.22	1.22	1.22
T7Ea_190m	190m	12.96	8.70	8.79	8.81	0.57	0.58	0.59	0.59	18.50	17.01	17.06	17.07	1.32	1.22	1.22	1.22
T7Ea_200m	200m	12.86	8.67	8.76	8.77	0.57	0.58	0.59	0.59	18.47	16.99	17.04	17.05	1.32	1.21	1.22	1.22
T7Wa_1m	1m	52.99	21.59	22.88	23.09	1.71	1.88	2.01	2.03	27.25	24.72	25.48	25.61	1.95	1.77	1.82	1.83
T7Wa_10m	10m	27.07	13.24	13.76	13.85	0.97	1.04	1.09	1.10	21.64	19.73	20.04	20.09	1.55	1.41	1.43	1.44

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T7Wa_20m	20m	20.59	11.16	11.48	11.54	0.79	0.83	0.86	0.87	20.20	18.48	18.68	18.71	1.44	1.32	1.33	1.34
T7Wa_30m	30m	17.82	10.26	10.51	10.55	0.71	0.74	0.76	0.77	19.58	17.95	18.09	18.12	1.40	1.28	1.29	1.29
T7Wa_40m	40m	16.27	9.77	9.96	10.00	0.67	0.69	0.71	0.71	19.24	17.65	17.77	17.79	1.37	1.26	1.27	1.27
T7Wa_50m	50m	15.28	9.45	9.61	9.64	0.64	0.66	0.67	0.68	19.02	17.46	17.56	17.58	1.36	1.25	1.25	1.26
T7Wa_60m	60m	14.60	9.23	9.37	9.40	0.62	0.64	0.65	0.65	18.86	17.33	17.41	17.43	1.35	1.24	1.24	1.24
T7Wa_70m	70m	14.10	9.07	9.20	9.22	0.60	0.62	0.63	0.63	18.75	17.23	17.31	17.32	1.34	1.23	1.24	1.24
T7Wa_80m	80m	13.71	8.94	9.06	9.08	0.59	0.61	0.62	0.62	18.66	17.16	17.23	17.24	1.33	1.23	1.23	1.23
T7Wa_90m	90m	13.41	8.85	8.96	8.98	0.58	0.60	0.61	0.61	18.60	17.10	17.16	17.17	1.33	1.22	1.23	1.23
T7Wa_100m	100m	13.17	8.77	8.87	8.89	0.58	0.59	0.60	0.60	18.54	17.05	17.11	17.12	1.32	1.22	1.22	1.22
T7Wa_110m	110m	12.97	8.70	8.80	8.82	0.57	0.58	0.59	0.59	18.50	17.01	17.07	17.08	1.32	1.22	1.22	1.22
T7Wa_120m	120m	12.80	8.65	8.74	8.76	0.57	0.58	0.59	0.59	18.46	16.98	17.04	17.04	1.32	1.21	1.22	1.22
T7Wa_130m	130m	12.66	8.60	8.69	8.71	0.56	0.57	0.58	0.58	18.43	16.95	17.00	17.01	1.32	1.21	1.21	1.22
T7Wa_140m	140m	12.54	8.56	8.65	8.66	0.56	0.57	0.58	0.58	18.40	16.93	16.98	16.99	1.31	1.21	1.21	1.21
T7Wa_150m	150m	12.43	8.53	8.61	8.62	0.56	0.57	0.57	0.57	18.37	16.91	16.96	16.96	1.31	1.21	1.21	1.21
T7Wa_160m	160m	12.33	8.50	8.57	8.59	0.55	0.56	0.57	0.57	18.35	16.89	16.93	16.94	1.31	1.21	1.21	1.21
T7Wa_170m	170m	12.25	8.47	8.55	8.56	0.55	0.56	0.57	0.57	18.33	16.87	16.92	16.93	1.31	1.21	1.21	1.21
T7Wa_180m	180m	12.17	8.45	8.52	8.53	0.55	0.56	0.56	0.57	18.32	16.86	16.90	16.91	1.31	1.20	1.21	1.21
T7Wa_190m	190m	12.10	8.42	8.49	8.51	0.55	0.55	0.56	0.56	18.30	16.85	16.89	16.90	1.31	1.20	1.21	1.21
T7Wa_200m	200m	12.04	8.40	8.47	8.49	0.55	0.55	0.56	0.56	18.29	16.83	16.87	16.88	1.31	1.20	1.21	1.21
T9Ea_1m	1m	37.73	16.65	18.57	19.20	1.22	1.32	1.50	1.55	26.46	24.23	25.31	25.64	1.89	1.73	1.81	1.83
T9Ea_10m	10m	20.94	11.26	12.01	12.25	0.78	0.81	0.88	0.91	22.96	21.21	21.63	21.76	1.64	1.52	1.55	1.55
T9Ea_20m	20m	17.11	10.04	10.51	10.66	0.68	0.70	0.74	0.76	22.14	20.52	20.79	20.87	1.58	1.47	1.49	1.49
T9Ea_30m	30m	15.46	9.50	9.86	9.97	0.63	0.65	0.68	0.69	21.79	20.22	20.42	20.48	1.56	1.44	1.46	1.46
T9Ea_40m	40m	14.54	9.21	9.50	9.59	0.61	0.62	0.65	0.66	21.60	20.06	20.22	20.27	1.54	1.43	1.44	1.45
T9Ea_50m	50m	13.95	9.02	9.26	9.34	0.59	0.61	0.63	0.63	21.47	19.95	20.09	20.13	1.53	1.43	1.44	1.44
T9Ea_60m	60m	13.54	8.89	9.10	9.17	0.58	0.59	0.61	0.62	21.38	19.88	20.00	20.03	1.53	1.42	1.43	1.43
T9Ea_70m	70m	13.23	8.79	8.98	9.04	0.57	0.58	0.60	0.61	21.32	19.82	19.93	19.96	1.52	1.42	1.42	1.43
T9Ea_80m	80m	13.00	8.72	8.89	8.94	0.57	0.58	0.59	0.60	21.27	19.78	19.88	19.91	1.52	1.41	1.42	1.42
T9Ea_90m	90m	12.82	8.66	8.82	8.87	0.56	0.57	0.59	0.59	21.23	19.75	19.84	19.87	1.52	1.41	1.42	1.42
T9Ea_100m	100m	12.67	8.61	8.76	8.80	0.56	0.57	0.58	0.58	21.20	19.72	19.81	19.83	1.51	1.41	1.41	1.42
T9Ea_110m	110m	12.55	8.57	8.71	8.75	0.56	0.56	0.58	0.58	21.17	19.70	19.78	19.80	1.51	1.41	1.41	1.41
T9Ea_120m	120m	12.44	8.54	8.67	8.71	0.55	0.56	0.57	0.58	21.15	19.68	19.76	19.78	1.51	1.41	1.41	1.41
T9Ea_130m	130m	12.35	8.51	8.63	8.67	0.55	0.56	0.57	0.57	21.13	19.67	19.74	19.76	1.51	1.40	1.41	1.41
T9Ea_140m	140m	12.28	8.48	8.60	8.64	0.55	0.56	0.57	0.57	21.11	19.65	19.72	19.74	1.51	1.40	1.41	1.41
T9Ea_150m	150m	12.21	8.46	8.58	8.61	0.55	0.55	0.56	0.57	21.10	19.64	19.70	19.72	1.51	1.40	1.41	1.41
T9Ea_160m	160m	12.15	8.44	8.55	8.58	0.55	0.55	0.56	0.56	21.09	19.63	19.69	19.71	1.51	1.40	1.41	1.41
T9Ea_170m	170m	12.10	8.43	8.53	8.56	0.54	0.55	0.56	0.56	21.07	19.62	19.68	19.69	1.51	1.40	1.41	1.41
T9Ea_180m	180m	12.05	8.41	8.51	8.54	0.54	0.55	0.56	0.56	21.07	19.61	19.67	19.68	1.50	1.40	1.40	1.41
T9Ea_190m	190m	12.01	8.40	8.50	8.52	0.54	0.55	0.56	0.56	21.06	19.60	19.66	19.67	1.50	1.40	1.40	1.41
T9Ea_200m	200m	11.98	8.39	8.48	8.51	0.54	0.55	0.55	0.56	21.05	19.60	19.65	19.66	1.50	1.40	1.40	1.40

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T9Wa_1m	1m	38.18	16.79	18.75	19.38	1.23	1.33	1.51	1.57	26.55	24.31	25.40	25.74	1.90	1.74	1.81	1.84
T9Wa_10m	10m	20.74	11.20	11.94	12.17	0.77	0.81	0.88	0.90	22.91	21.18	21.59	21.72	1.64	1.51	1.54	1.55
T9Wa_20m	20m	16.88	9.96	10.42	10.57	0.67	0.69	0.74	0.75	22.10	20.48	20.74	20.82	1.58	1.46	1.48	1.49
T9Wa_30m	30m	15.25	9.44	9.78	9.89	0.63	0.64	0.68	0.69	21.75	20.19	20.38	20.44	1.55	1.44	1.46	1.46
T9Wa_40m	40m	14.35	9.15	9.43	9.51	0.60	0.62	0.64	0.65	21.56	20.03	20.18	20.23	1.54	1.43	1.44	1.44
T9Wa_50m	50m	13.78	8.97	9.20	9.27	0.59	0.60	0.62	0.63	21.44	19.92	20.06	20.09	1.53	1.42	1.43	1.44
T9Wa_60m	60m	13.39	8.84	9.05	9.11	0.58	0.59	0.61	0.61	21.35	19.85	19.97	20.00	1.53	1.42	1.43	1.43
T9Wa_70m	70m	13.10	8.75	8.93	8.99	0.57	0.58	0.60	0.60	21.29	19.80	19.90	19.93	1.52	1.41	1.42	1.42
T9Wa_80m	80m	12.88	8.68	8.84	8.89	0.56	0.57	0.59	0.59	21.24	19.76	19.86	19.88	1.52	1.41	1.42	1.42
T9Wa_90m	90m	12.70	8.62	8.77	8.82	0.56	0.57	0.58	0.59	21.20	19.73	19.82	19.84	1.51	1.41	1.42	1.42
T9Wa_100m	100m	12.56	8.57	8.72	8.76	0.56	0.56	0.58	0.58	21.17	19.70	19.78	19.81	1.51	1.41	1.41	1.41
T9Wa_110m	110m	12.44	8.54	8.67	8.71	0.55	0.56	0.57	0.58	21.15	19.68	19.76	19.78	1.51	1.41	1.41	1.41
T9Wa_120m	120m	12.34	8.51	8.63	8.67	0.55	0.56	0.57	0.57	21.13	19.66	19.74	19.76	1.51	1.40	1.41	1.41
T9Wa_130m	130m	12.26	8.48	8.60	8.64	0.55	0.55	0.57	0.57	21.11	19.65	19.72	19.74	1.51	1.40	1.41	1.41
T9Wa_140m	140m	12.19	8.46	8.57	8.61	0.55	0.55	0.56	0.57	21.09	19.64	19.70	19.72	1.51	1.40	1.41	1.41
T9Wa_150m	150m	12.12	8.44	8.55	8.58	0.54	0.55	0.56	0.56	21.08	19.62	19.69	19.71	1.51	1.40	1.41	1.41
T9Wa_160m	160m	12.07	8.42	8.53	8.56	0.54	0.55	0.56	0.56	21.07	19.61	19.68	19.69	1.50	1.40	1.41	1.41
T9Wa_170m	170m	12.02	8.40	8.51	8.54	0.54	0.55	0.56	0.56	21.06	19.60	19.67	19.68	1.50	1.40	1.40	1.41
T9Wa_180m	180m	11.97	8.39	8.49	8.52	0.54	0.55	0.56	0.56	21.05	19.60	19.66	19.67	1.50	1.40	1.40	1.41
T9Wa_190m	190m	11.94	8.37	8.47	8.50	0.54	0.55	0.55	0.56	21.04	19.59	19.65	19.66	1.50	1.40	1.40	1.40
T9Wa_200m	200m	11.90	8.36	8.46	8.49	0.54	0.54	0.55	0.56	21.03	19.58	19.64	19.65	1.50	1.40	1.40	1.40
T10Ea_1m	1m	58.00	23.39	25.88	26.44	1.69	1.87	2.01	2.04	30.29	27.57	28.49	28.69	2.16	1.97	2.03	2.05
T10Ea_10m	10m	28.76	13.88	14.83	15.05	0.96	1.03	1.08	1.09	24.49	22.51	22.87	22.95	1.75	1.61	1.63	1.64
T10Ea_20m	20m	21.58	11.55	12.12	12.25	0.78	0.82	0.85	0.86	23.03	21.26	21.48	21.53	1.64	1.52	1.53	1.54
T10Ea_30m	30m	18.54	10.56	10.98	11.07	0.70	0.73	0.76	0.76	22.40	20.74	20.90	20.93	1.60	1.48	1.49	1.50
T10Ea_40m	40m	16.88	10.02	10.35	10.42	0.66	0.69	0.71	0.71	22.06	20.45	20.58	20.61	1.58	1.46	1.47	1.47
T10Ea_50m	50m	15.82	9.67	9.95	10.01	0.64	0.66	0.67	0.68	21.84	20.26	20.37	20.40	1.56	1.45	1.46	1.46
T10Ea_60m	60m	15.09	9.44	9.67	9.73	0.62	0.63	0.65	0.65	21.69	20.14	20.23	20.25	1.55	1.44	1.45	1.45
T10Ea_70m	70m	14.55	9.26	9.47	9.52	0.60	0.62	0.63	0.64	21.58	20.04	20.13	20.15	1.54	1.43	1.44	1.44
T10Ea_80m	80m	14.14	9.13	9.32	9.36	0.59	0.61	0.62	0.62	21.50	19.97	20.05	20.07	1.54	1.43	1.43	1.43
T10Ea_90m	90m	13.82	9.02	9.20	9.24	0.59	0.60	0.61	0.61	21.43	19.92	19.99	20.00	1.53	1.42	1.43	1.43
T10Ea_100m	100m	13.56	8.94	9.10	9.13	0.58	0.59	0.60	0.60	21.37	19.87	19.94	19.95	1.53	1.42	1.42	1.43
T10Ea_110m	110m	13.34	8.87	9.02	9.05	0.57	0.58	0.59	0.60	21.33	19.83	19.89	19.91	1.52	1.42	1.42	1.42
T10Ea_120m	120m	13.16	8.81	8.95	8.98	0.57	0.58	0.59	0.59	21.29	19.80	19.86	19.87	1.52	1.41	1.42	1.42
T10Ea_130m	130m	13.01	8.76	8.89	8.92	0.57	0.57	0.58	0.59	21.26	19.77	19.83	19.84	1.52	1.41	1.42	1.42
T10Ea_140m	140m	12.87	8.72	8.84	8.87	0.56	0.57	0.58	0.58	21.23	19.75	19.80	19.81	1.52	1.41	1.41	1.42
T10Ea_150m	150m	12.75	8.68	8.79	8.82	0.56	0.57	0.58	0.58	21.21	19.73	19.78	19.79	1.51	1.41	1.41	1.41
T10Ea_160m	160m	12.65	8.64	8.75	8.78	0.56	0.56	0.57	0.57	21.18	19.71	19.76	19.77	1.51	1.41	1.41	1.41
T10Ea_170m	170m	12.56	8.61	8.72	8.75	0.55	0.56	0.57	0.57	21.17	19.70	19.74	19.75	1.51	1.41	1.41	1.41
T10Ea_180m	180m	12.48	8.59	8.69	8.71	0.55	0.56	0.57	0.57	21.15	19.68	19.73	19.74	1.51	1.41	1.41	1.41

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T10Ea_190m	190m	12.41	8.56	8.66	8.69	0.55	0.56	0.56	0.57	21.13	19.67	19.71	19.72	1.51	1.40	1.41	1.41
T10Ea_200m	200m	12.34	8.54	8.64	8.66	0.55	0.56	0.56	0.56	21.12	19.66	19.70	19.71	1.51	1.40	1.41	1.41
T10Wa_1m	1m	43.22	18.58	20.31	20.70	1.32	1.44	1.54	1.56	27.39	25.02	25.66	25.80	1.96	1.79	1.83	1.84
T10Wa_10m	10m	22.54	11.86	12.49	12.63	0.80	0.85	0.89	0.89	23.22	21.43	21.67	21.73	1.66	1.53	1.55	1.55
T10Wa_20m	20m	17.93	10.36	10.75	10.84	0.69	0.72	0.74	0.74	22.28	20.63	20.78	20.82	1.59	1.47	1.48	1.49
T10Wa_30m	30m	15.99	9.73	10.01	10.08	0.64	0.66	0.68	0.68	21.88	20.29	20.41	20.43	1.56	1.45	1.46	1.46
T10Wa_40m	40m	14.91	9.38	9.60	9.66	0.61	0.63	0.64	0.65	21.65	20.10	20.20	20.22	1.55	1.44	1.44	1.44
T10Wa_50m	50m	14.22	9.15	9.35	9.39	0.60	0.61	0.62	0.62	21.51	19.98	20.06	20.08	1.54	1.43	1.43	1.43
T10Wa_60m	60m	13.74	9.00	9.16	9.20	0.58	0.60	0.61	0.61	21.41	19.90	19.97	19.99	1.53	1.42	1.43	1.43
T10Wa_70m	70m	13.39	8.88	9.03	9.07	0.57	0.59	0.60	0.60	21.34	19.84	19.90	19.92	1.52	1.42	1.42	1.42
T10Wa_80m	80m	13.12	8.80	8.93	8.96	0.57	0.58	0.59	0.59	21.28	19.79	19.85	19.86	1.52	1.41	1.42	1.42
T10Wa_90m	90m	12.90	8.73	8.85	8.88	0.56	0.57	0.58	0.58	21.24	19.75	19.81	19.82	1.52	1.41	1.41	1.42
T10Wa_100m	100m	12.73	8.67	8.78	8.81	0.56	0.57	0.57	0.58	21.20	19.72	19.78	19.79	1.51	1.41	1.41	1.41
T10Wa_110m	110m	12.58	8.62	8.73	8.75	0.55	0.56	0.57	0.57	21.17	19.70	19.75	19.76	1.51	1.41	1.41	1.41
T10Wa_120m	120m	12.46	8.58	8.68	8.71	0.55	0.56	0.57	0.57	21.14	19.68	19.72	19.73	1.51	1.41	1.41	1.41
T10Wa_130m	130m	12.35	8.55	8.64	8.66	0.55	0.56	0.56	0.56	21.12	19.66	19.70	19.71	1.51	1.40	1.41	1.41
T10Wa_140m	140m	12.26	8.52	8.61	8.63	0.55	0.55	0.56	0.56	21.10	19.64	19.68	19.69	1.51	1.40	1.41	1.41
T10Wa_150m	150m	12.18	8.49	8.58	8.60	0.54	0.55	0.56	0.56	21.09	19.63	19.67	19.68	1.51	1.40	1.40	1.41
T10Wa_160m	160m	12.11	8.47	8.55	8.57	0.54	0.55	0.56	0.56	21.07	19.62	19.65	19.66	1.51	1.40	1.40	1.40
T10Wa_170m	170m	12.05	8.45	8.53	8.55	0.54	0.55	0.55	0.55	21.06	19.60	19.64	19.65	1.50	1.40	1.40	1.40
T10Wa_180m	180m	11.99	8.43	8.51	8.52	0.54	0.55	0.55	0.55	21.05	19.59	19.63	19.64	1.50	1.40	1.40	1.40
T10Wa_190m	190m	11.94	8.41	8.49	8.51	0.54	0.54	0.55	0.55	21.03	19.59	19.62	19.63	1.50	1.40	1.40	1.40
T10Wa_200m	200m	11.89	8.40	8.47	8.49	0.54	0.54	0.55	0.55	21.03	19.58	19.61	19.62	1.50	1.40	1.40	1.40
T11Ea_1m	1m	49.89	20.52	22.33	22.78	1.67	1.83	1.99	2.02	29.64	27.19	28.14	28.33	2.12	1.94	2.01	2.02
T11Ea_10m	10m	25.55	12.76	13.46	13.63	0.95	1.01	1.07	1.08	24.18	22.33	22.70	22.77	1.73	1.59	1.62	1.63
T11Ea_20m	20m	20.00	11.00	11.44	11.55	0.78	0.82	0.86	0.87	22.91	21.22	21.45	21.50	1.64	1.52	1.53	1.54
T11Ea_30m	30m	17.65	10.24	10.58	10.66	0.71	0.74	0.77	0.78	22.37	20.74	20.92	20.96	1.60	1.48	1.49	1.50
T11Ea_40m	40m	16.34	9.83	10.10	10.17	0.67	0.70	0.72	0.72	22.07	20.48	20.63	20.66	1.58	1.46	1.47	1.48
T11Ea_50m	50m	15.51	9.56	9.80	9.85	0.65	0.67	0.69	0.69	21.88	20.32	20.44	20.47	1.56	1.45	1.46	1.46
T11Ea_60m	60m	14.94	9.38	9.59	9.64	0.63	0.65	0.67	0.67	21.74	20.20	20.31	20.33	1.55	1.44	1.45	1.45
T11Ea_70m	70m	14.52	9.25	9.44	9.48	0.62	0.63	0.65	0.65	21.65	20.12	20.22	20.24	1.55	1.44	1.44	1.45
T11Ea_80m	80m	14.20	9.15	9.32	9.36	0.61	0.62	0.64	0.64	21.57	20.05	20.15	20.17	1.54	1.43	1.44	1.44
T11Ea_90m	90m	13.95	9.07	9.23	9.27	0.60	0.62	0.63	0.63	21.52	20.00	20.09	20.11	1.54	1.43	1.44	1.44
T11Ea_100m	100m	13.75	9.00	9.16	9.19	0.60	0.61	0.62	0.62	21.47	19.96	20.05	20.06	1.53	1.43	1.43	1.43
T11Ea_110m	110m	13.59	8.95	9.10	9.13	0.59	0.60	0.62	0.62	21.43	19.93	20.01	20.03	1.53	1.42	1.43	1.43
T11Ea_120m	120m	13.46	8.91	9.05	9.08	0.59	0.60	0.61	0.61	21.40	19.91	19.98	20.00	1.53	1.42	1.43	1.43
T11Ea_130m	130m	13.35	8.88	9.01	9.04	0.58	0.59	0.61	0.61	21.38	19.88	19.96	19.97	1.53	1.42	1.43	1.43
T11Ea_140m	140m	13.26	8.85	8.97	9.01	0.58	0.59	0.60	0.61	21.35	19.87	19.93	19.95	1.53	1.42	1.42	1.42
T11Ea_150m	150m	13.18	8.82	8.94	8.98	0.58	0.59	0.60	0.60	21.34	19.85	19.92	19.93	1.52	1.42	1.42	1.42
T11Ea_160m	160m	13.10	8.80	8.92	8.95	0.58	0.59	0.60	0.60	21.32	19.83	19.90	19.91	1.52	1.42	1.42	1.42

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T11Ea_170m	170m	13.04	8.78	8.90	8.93	0.57	0.58	0.59	0.60	21.30	19.82	19.89	19.90	1.52	1.42	1.42	1.42
T11Ea_180m	180m	12.99	8.76	8.88	8.90	0.57	0.58	0.59	0.59	21.29	19.81	19.87	19.89	1.52	1.41	1.42	1.42
T11Ea_190m	190m	12.93	8.74	8.86	8.88	0.57	0.58	0.59	0.59	21.28	19.80	19.86	19.87	1.52	1.41	1.42	1.42
T11Ea_200m	200m	12.89	8.73	8.84	8.87	0.57	0.58	0.59	0.59	21.27	19.79	19.85	19.86	1.52	1.41	1.42	1.42
T11Wa_1m	1m	55.55	22.33	24.36	24.89	1.84	2.02	2.20	2.24	30.88	28.31	29.39	29.60	2.21	2.02	2.10	2.11
T11Wa_10m	10m	27.85	13.50	14.29	14.49	1.01	1.09	1.16	1.17	24.70	22.79	23.21	23.29	1.76	1.63	1.66	1.66
T11Wa_20m	20m	20.93	11.29	11.77	11.89	0.81	0.85	0.89	0.90	23.12	21.40	21.66	21.71	1.65	1.53	1.55	1.55
T11Wa_30m	30m	17.88	10.32	10.66	10.74	0.72	0.75	0.78	0.78	22.42	20.79	20.97	21.01	1.60	1.49	1.50	1.50
T11Wa_40m	40m	16.17	9.77	10.04	10.10	0.67	0.69	0.71	0.72	22.03	20.45	20.59	20.62	1.57	1.46	1.47	1.47
T11Wa_50m	50m	15.10	9.43	9.65	9.70	0.64	0.65	0.67	0.68	21.78	20.24	20.35	20.37	1.56	1.45	1.45	1.46
T11Wa_60m	60m	14.37	9.20	9.38	9.42	0.61	0.63	0.65	0.65	21.61	20.09	20.19	20.20	1.54	1.43	1.44	1.44
T11Wa_70m	70m	13.84	9.03	9.19	9.23	0.60	0.61	0.63	0.63	21.49	19.98	20.07	20.08	1.54	1.43	1.43	1.43
T11Wa_80m	80m	13.45	8.91	9.04	9.08	0.59	0.60	0.61	0.61	21.40	19.90	19.98	19.99	1.53	1.42	1.43	1.43
T11Wa_90m	90m	13.15	8.81	8.93	8.96	0.58	0.59	0.60	0.60	21.33	19.84	19.91	19.92	1.52	1.42	1.42	1.42
T11Wa_100m	100m	12.91	8.73	8.85	8.87	0.57	0.58	0.59	0.59	21.27	19.80	19.86	19.87	1.52	1.41	1.42	1.42
T11Wa_110m	110m	12.71	8.67	8.77	8.80	0.56	0.57	0.58	0.58	21.23	19.76	19.81	19.82	1.52	1.41	1.42	1.42
T11Wa_120m	120m	12.55	8.62	8.72	8.74	0.56	0.57	0.58	0.58	21.19	19.72	19.78	19.79	1.51	1.41	1.41	1.41
T11Wa_130m	130m	12.42	8.58	8.67	8.69	0.56	0.56	0.57	0.57	21.16	19.70	19.75	19.76	1.51	1.41	1.41	1.41
T11Wa_140m	140m	12.30	8.54	8.63	8.65	0.55	0.56	0.57	0.57	21.13	19.67	19.72	19.73	1.51	1.41	1.41	1.41
T11Wa_150m	150m	12.20	8.51	8.59	8.61	0.55	0.56	0.56	0.56	21.11	19.65	19.70	19.71	1.51	1.40	1.41	1.41
T11Wa_160m	160m	12.12	8.48	8.56	8.58	0.55	0.55	0.56	0.56	21.09	19.64	19.68	19.69	1.51	1.40	1.41	1.41
T11Wa_170m	170m	12.05	8.46	8.53	8.55	0.54	0.55	0.56	0.56	21.07	19.62	19.66	19.67	1.51	1.40	1.40	1.41
T11Wa_180m	180m	11.98	8.44	8.51	8.52	0.54	0.55	0.55	0.56	21.06	19.61	19.65	19.66	1.50	1.40	1.40	1.40
T11Wa_190m	190m	11.92	8.42	8.49	8.50	0.54	0.55	0.55	0.55	21.05	19.60	19.63	19.64	1.50	1.40	1.40	1.40
T11Wa_200m	200m	11.87	8.40	8.47	8.48	0.54	0.55	0.55	0.55	21.03	19.59	19.62	19.63	1.50	1.40	1.40	1.40
T12Wa_1m	1m	85.55	32.02	34.45	34.75	2.62	2.92	3.16	3.19	35.24	32.12	33.53	33.69	2.52	2.29	2.39	2.41
T12Wa_10m	10m	40.18	17.44	18.45	18.57	1.34	1.46	1.56	1.57	25.74	23.48	24.07	24.14	1.84	1.68	1.72	1.72
T12Wa_20m	20m	29.00	13.85	14.49	14.57	1.02	1.10	1.16	1.17	23.31	21.34	21.72	21.76	1.66	1.52	1.55	1.55
T12Wa_30m	30m	24.01	12.25	12.72	12.78	0.88	0.94	0.98	0.99	22.21	20.39	20.66	20.69	1.59	1.46	1.48	1.48
T12Wa_40m	40m	21.11	11.32	11.70	11.74	0.80	0.84	0.88	0.88	21.57	19.83	20.05	20.08	1.54	1.42	1.43	1.43
T12Wa_50m	50m	19.23	10.72	11.03	11.07	0.75	0.78	0.81	0.82	21.15	19.47	19.65	19.67	1.51	1.39	1.40	1.41
T12Wa_60m	60m	17.89	10.29	10.55	10.58	0.71	0.74	0.77	0.77	20.85	19.21	19.37	19.39	1.49	1.37	1.38	1.38
T12Wa_70m	70m	16.90	9.97	10.20	10.23	0.68	0.71	0.73	0.73	20.63	19.02	19.16	19.17	1.47	1.36	1.37	1.37
T12Wa_80m	80m	16.13	9.72	9.92	9.95	0.66	0.68	0.70	0.71	20.46	18.87	18.99	19.01	1.46	1.35	1.36	1.36
T12Wa_90m	90m	15.52	9.52	9.71	9.73	0.64	0.66	0.68	0.68	20.32	18.76	18.86	18.88	1.45	1.34	1.35	1.35
T12Wa_100m	100m	15.02	9.36	9.53	9.55	0.63	0.65	0.66	0.67	20.21	18.66	18.76	18.77	1.44	1.33	1.34	1.34
T12Wa_110m	110m	14.61	9.23	9.38	9.40	0.62	0.63	0.65	0.65	20.12	18.58	18.67	18.68	1.44	1.33	1.33	1.33
T12Wa_120m	120m	14.27	9.12	9.26	9.28	0.61	0.62	0.64	0.64	20.04	18.52	18.60	18.61	1.43	1.32	1.33	1.33
T12Wa_130m	130m	13.98	9.03	9.16	9.17	0.60	0.61	0.63	0.63	19.98	18.46	18.53	18.54	1.43	1.32	1.32	1.32
T12Wa_140m	140m	13.73	8.95	9.07	9.08	0.59	0.61	0.62	0.62	19.92	18.41	18.48	18.49	1.42	1.32	1.32	1.32

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T12Wa_150m	150m	13.52	8.88	8.99	9.00	0.59	0.60	0.61	0.61	19.87	18.37	18.44	18.44	1.42	1.31	1.32	1.32
T12Wa_160m	160m	13.33	8.82	8.92	8.93	0.58	0.59	0.60	0.60	19.83	18.34	18.40	18.40	1.42	1.31	1.31	1.31
T12Wa_170m	170m	13.16	8.77	8.86	8.88	0.58	0.59	0.60	0.60	19.80	18.30	18.36	18.37	1.41	1.31	1.31	1.31
T12Wa_180m	180m	13.02	8.72	8.81	8.82	0.57	0.58	0.59	0.59	19.76	18.28	18.33	18.34	1.41	1.31	1.31	1.31
T12Wa_190m	190m	12.89	8.68	8.77	8.78	0.57	0.58	0.59	0.59	19.73	18.25	18.30	18.31	1.41	1.30	1.31	1.31
T12Wa_200m	200m	12.78	8.64	8.72	8.73	0.57	0.58	0.58	0.58	19.71	18.23	18.28	18.28	1.41	1.30	1.31	1.31
T14Ea_1m	1m	17.41	10.10	10.32	10.42	0.68	0.71	0.73	0.74	20.95	19.32	19.43	19.49	1.50	1.38	1.39	1.39
T14Ea_10m	10m	13.85	8.96	9.06	9.11	0.59	0.60	0.61	0.62	20.20	18.68	18.73	18.76	1.44	1.33	1.34	1.34
T14Ea_20m	20m	12.83	8.63	8.70	8.73	0.56	0.57	0.58	0.58	19.98	18.50	18.53	18.55	1.43	1.32	1.32	1.33
T14Ea_30m	30m	12.38	8.49	8.54	8.56	0.55	0.56	0.56	0.57	19.88	18.42	18.45	18.46	1.42	1.32	1.32	1.32
T14Ea_40m	40m	12.13	8.41	8.45	8.47	0.55	0.55	0.56	0.56	19.83	18.37	18.40	18.41	1.42	1.31	1.31	1.31
T14Ea_50m	50m	11.97	8.36	8.40	8.41	0.54	0.55	0.55	0.55	19.79	18.34	18.37	18.37	1.41	1.31	1.31	1.31
T14Ea_60m	60m	11.86	8.32	8.36	8.37	0.54	0.54	0.55	0.55	19.77	18.32	18.34	18.35	1.41	1.31	1.31	1.31
T14Ea_70m	70m	11.78	8.29	8.33	8.34	0.54	0.54	0.54	0.55	19.75	18.31	18.33	18.33	1.41	1.31	1.31	1.31
T14Ea_80m	80m	11.72	8.27	8.31	8.32	0.53	0.54	0.54	0.54	19.74	18.30	18.31	18.32	1.41	1.31	1.31	1.31
T14Ea_90m	90m	11.67	8.26	8.29	8.30	0.53	0.54	0.54	0.54	19.73	18.29	18.31	18.31	1.41	1.31	1.31	1.31
T14Ea_100m	100m	11.63	8.25	8.28	8.28	0.53	0.54	0.54	0.54	19.72	18.28	18.30	18.30	1.41	1.31	1.31	1.31
T14Ea_110m	110m	11.60	8.24	8.26	8.27	0.53	0.54	0.54	0.54	19.71	18.28	18.29	18.30	1.41	1.31	1.31	1.31
T14Ea_120m	120m	11.57	8.23	8.25	8.26	0.53	0.53	0.54	0.54	19.71	18.27	18.29	18.29	1.41	1.30	1.31	1.31
T14Ea_130m	130m	11.55	8.22	8.25	8.25	0.53	0.53	0.54	0.54	19.70	18.27	18.28	18.28	1.41	1.30	1.31	1.31
T14Ea_140m	140m	11.53	8.21	8.24	8.25	0.53	0.53	0.54	0.54	19.70	18.26	18.28	18.28	1.41	1.30	1.31	1.31
T14Ea_150m	150m	11.51	8.21	8.23	8.24	0.53	0.53	0.54	0.54	19.70	18.26	18.27	18.28	1.41	1.30	1.31	1.31
T14Ea_160m	160m	11.50	8.20	8.23	8.23	0.53	0.53	0.53	0.54	19.69	18.26	18.27	18.27	1.41	1.30	1.30	1.31
T14Ea_170m	170m	11.48	8.20	8.22	8.23	0.53	0.53	0.53	0.54	19.69	18.25	18.27	18.27	1.41	1.30	1.30	1.31
T14Ea_180m	180m	11.47	8.20	8.22	8.22	0.53	0.53	0.53	0.53	19.69	18.25	18.27	18.27	1.41	1.30	1.30	1.30
T14Ea_190m	190m	11.46	8.19	8.22	8.22	0.53	0.53	0.53	0.53	19.69	18.25	18.26	18.27	1.41	1.30	1.30	1.30
T14Ea_200m	200m	11.45	8.19	8.21	8.22	0.53	0.53	0.53	0.53	19.68	18.25	18.26	18.26	1.41	1.30	1.30	1.30
T15Wa_1m	1m	16.81	9.97	10.27	10.15	0.67	0.69	0.72	0.71	20.82	19.21	19.38	19.32	1.49	1.37	1.38	1.38
T15Wa_10m	10m	13.15	8.78	8.90	8.85	0.57	0.58	0.59	0.59	20.05	18.56	18.63	18.60	1.43	1.33	1.33	1.33
T15Wa_20m	20m	12.29	8.50	8.57	8.55	0.55	0.56	0.56	0.56	19.87	18.40	18.45	18.43	1.42	1.31	1.32	1.32
T15Wa_30m	30m	11.93	8.38	8.44	8.42	0.54	0.55	0.55	0.55	19.79	18.34	18.37	18.36	1.41	1.31	1.31	1.31
T15Wa_40m	40m	11.73	8.31	8.36	8.35	0.54	0.54	0.55	0.54	19.75	18.30	18.33	18.32	1.41	1.31	1.31	1.31
T15Wa_50m	50m	11.60	8.27	8.31	8.31	0.53	0.54	0.54	0.54	19.72	18.28	18.31	18.30	1.41	1.31	1.31	1.31
T15Wa_60m	60m	11.52	8.24	8.28	8.27	0.53	0.53	0.54	0.54	19.70	18.27	18.29	18.28	1.41	1.30	1.31	1.31
T15Wa_70m	70m	11.45	8.22	8.26	8.25	0.53	0.53	0.54	0.53	19.69	18.25	18.27	18.27	1.41	1.30	1.31	1.30
T15Wa_80m	80m	11.41	8.21	8.24	8.23	0.53	0.53	0.53	0.53	19.68	18.25	18.26	18.26	1.41	1.30	1.30	1.30
T15Wa_90m	90m	11.37	8.20	8.23	8.22	0.53	0.53	0.53	0.53	19.67	18.24	18.26	18.25	1.41	1.30	1.30	1.30
T15Wa_100m	100m	11.34	8.19	8.21	8.21	0.53	0.53	0.53	0.53	19.67	18.23	18.25	18.25	1.40	1.30	1.30	1.30
T15Wa_110m	110m	11.31	8.18	8.21	8.20	0.52	0.53	0.53	0.53	19.66	18.23	18.25	18.24	1.40	1.30	1.30	1.30
T15Wa_120m	120m	11.29	8.17	8.20	8.19	0.52	0.53	0.53	0.53	19.66	18.23	18.24	18.24	1.40	1.30	1.30	1.30

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Do Min	2039 Do Something	2017	2017 Future Base	2039 Ref	2039 Do Something
T15Wa_130m	130m	11.28	8.17	8.19	8.19	0.52	0.53	0.53	0.53	19.65	18.22	18.24	18.24	1.40	1.30	1.30	1.30
T15Wa_140m	140m	11.26	8.16	8.19	8.18	0.52	0.53	0.53	0.53	19.65	18.22	18.23	18.23	1.40	1.30	1.30	1.30
T15Wa_150m	150m	11.25	8.16	8.18	8.18	0.52	0.53	0.53	0.53	19.65	18.22	18.23	18.23	1.40	1.30	1.30	1.30
T15Wa_160m	160m	11.24	8.15	8.18	8.17	0.52	0.53	0.53	0.53	19.64	18.22	18.23	18.23	1.40	1.30	1.30	1.30
T15Wa_170m	170m	11.23	8.15	8.17	8.17	0.52	0.53	0.53	0.53	19.64	18.21	18.23	18.23	1.40	1.30	1.30	1.30
T15Wa_180m	180m	11.22	8.15	8.17	8.17	0.52	0.53	0.53	0.53	19.64	18.21	18.23	18.22	1.40	1.30	1.30	1.30
T15Wa_190m	190m	11.21	8.14	8.17	8.17	0.52	0.53	0.53	0.53	19.64	18.21	18.22	18.22	1.40	1.30	1.30	1.30
T15Wa_200m	200m	11.21	8.14	8.16	8.16	0.52	0.52	0.53	0.53	19.64	18.21	18.22	18.22	1.40	1.30	1.30	1.30

Scenario 4b (with the Ansty site)

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T1Ea_1m	1m	30.21	14.18	13.73	13.46	1.05	1.13	1.09	1.06	23.52	21.54	21.28	21.12	1.68	1.54	1.52	1.51
T1Ea_10m	10m	18.17	10.27	10.11	10.01	0.72	0.75	0.73	0.72	20.90	19.26	19.17	19.11	1.49	1.38	1.37	1.36
T1Ea_20m	20m	15.31	9.34	9.25	9.19	0.64	0.66	0.65	0.64	20.27	18.71	18.66	18.63	1.45	1.34	1.33	1.33
T1Ea_30m	30m	14.10	8.94	8.89	8.85	0.60	0.62	0.61	0.61	20.00	18.48	18.45	18.43	1.43	1.32	1.32	1.32
T1Ea_40m	40m	13.41	8.72	8.68	8.65	0.58	0.60	0.59	0.59	19.85	18.35	18.33	18.31	1.42	1.31	1.31	1.31
T1Ea_50m	50m	12.98	8.58	8.56	8.53	0.57	0.58	0.58	0.58	19.75	18.27	18.25	18.24	1.41	1.31	1.30	1.30
T1Ea_60m	60m	12.68	8.49	8.47	8.44	0.56	0.57	0.57	0.57	19.69	18.21	18.20	18.19	1.41	1.30	1.30	1.30
T1Ea_70m	70m	12.47	8.41	8.40	8.38	0.56	0.57	0.56	0.56	19.64	18.17	18.16	18.15	1.40	1.30	1.30	1.30
T1Ea_80m	80m	12.30	8.36	8.35	8.33	0.55	0.56	0.56	0.56	19.60	18.14	18.14	18.13	1.40	1.30	1.30	1.29
T1Ea_90m	90m	12.17	8.32	8.31	8.30	0.55	0.56	0.56	0.55	19.57	18.12	18.11	18.10	1.40	1.29	1.29	1.29
T1Ea_100m	100m	12.06	8.28	8.28	8.27	0.55	0.55	0.55	0.55	19.55	18.09	18.09	18.09	1.40	1.29	1.29	1.29
T1Ea_110m	110m	11.97	8.25	8.25	8.24	0.54	0.55	0.55	0.55	19.53	18.08	18.08	18.07	1.39	1.29	1.29	1.29
T1Ea_120m	120m	11.90	8.23	8.23	8.22	0.54	0.55	0.55	0.55	19.51	18.06	18.06	18.06	1.39	1.29	1.29	1.29
T1Ea_130m	130m	11.83	8.21	8.21	8.20	0.54	0.55	0.55	0.54	19.50	18.05	18.05	18.05	1.39	1.29	1.29	1.29
T1Ea_140m	140m	11.78	8.19	8.19	8.19	0.54	0.54	0.54	0.54	19.49	18.04	18.04	18.04	1.39	1.29	1.29	1.29
T1Ea_150m	150m	11.73	8.17	8.18	8.17	0.54	0.54	0.54	0.54	19.48	18.03	18.04	18.03	1.39	1.29	1.29	1.29
T1Ea_160m	160m	11.69	8.16	8.17	8.16	0.54	0.54	0.54	0.54	19.47	18.02	18.03	18.02	1.39	1.29	1.29	1.29
T1Ea_170m	170m	11.65	8.15	8.15	8.15	0.53	0.54	0.54	0.54	19.46	18.02	18.02	18.02	1.39	1.29	1.29	1.29
T1Ea_180m	180m	11.61	8.14	8.14	8.14	0.53	0.54	0.54	0.54	19.45	18.01	18.01	18.01	1.39	1.29	1.29	1.29
T1Ea_190m	190m	11.58	8.13	8.13	8.13	0.53	0.54	0.54	0.54	19.44	18.00	18.01	18.01	1.39	1.29	1.29	1.29
T1Ea_200m	200m	11.56	8.12	8.13	8.12	0.53	0.54	0.54	0.54	19.44	18.00	18.00	18.00	1.39	1.29	1.29	1.29
T1Wa_1m	1m	28.68	13.68	13.27	13.02	1.01	1.08	1.04	1.02	23.19	21.25	21.01	20.86	1.66	1.52	1.50	1.49
T1Wa_10m	10m	17.16	9.94	9.81	9.72	0.69	0.71	0.70	0.69	20.68	19.06	18.99	18.94	1.48	1.36	1.36	1.35
T1Wa_20m	20m	14.61	9.11	9.04	8.99	0.62	0.63	0.63	0.62	20.11	18.58	18.54	18.51	1.44	1.33	1.32	1.32
T1Wa_30m	30m	13.55	8.77	8.72	8.69	0.59	0.60	0.60	0.59	19.88	18.38	18.36	18.34	1.42	1.31	1.31	1.31
T1Wa_40m	40m	12.96	8.58	8.55	8.52	0.57	0.58	0.58	0.58	19.75	18.27	18.25	18.24	1.41	1.30	1.30	1.30
T1Wa_50m	50m	12.60	8.46	8.44	8.42	0.56	0.57	0.57	0.57	19.67	18.20	18.19	18.18	1.40	1.30	1.30	1.30
T1Wa_60m	60m	12.34	8.37	8.36	8.35	0.55	0.56	0.56	0.56	19.61	18.15	18.14	18.13	1.40	1.30	1.30	1.30
T1Wa_70m	70m	12.16	8.31	8.31	8.30	0.55	0.56	0.56	0.55	19.57	18.11	18.11	18.10	1.40	1.29	1.29	1.29
T1Wa_80m	80m	12.02	8.27	8.27	8.26	0.54	0.55	0.55	0.55	19.54	18.09	18.09	18.08	1.40	1.29	1.29	1.29
T1Wa_90m	90m	11.91	8.23	8.23	8.22	0.54	0.55	0.55	0.55	19.52	18.07	18.07	18.06	1.39	1.29	1.29	1.29
T1Wa_100m	100m	11.82	8.20	8.21	8.20	0.54	0.55	0.55	0.54	19.50	18.05	18.05	18.05	1.39	1.29	1.29	1.29
T1Wa_110m	110m	11.75	8.18	8.18	8.18	0.54	0.54	0.54	0.54	19.48	18.04	18.04	18.04	1.39	1.29	1.29	1.29
T1Wa_120m	120m	11.68	8.16	8.17	8.16	0.54	0.54	0.54	0.54	19.47	18.02	18.03	18.03	1.39	1.29	1.29	1.29
T1Wa_130m	130m	11.63	8.14	8.15	8.15	0.53	0.54	0.54	0.54	19.45	18.01	18.02	18.02	1.39	1.29	1.29	1.29
T1Wa_140m	140m	11.59	8.13	8.14	8.13	0.53	0.54	0.54	0.54	19.44	18.01	18.01	18.01	1.39	1.29	1.29	1.29
T1Wa_150m	150m	11.55	8.12	8.13	8.12	0.53	0.54	0.54	0.54	19.44	18.00	18.01	18.00	1.39	1.29	1.29	1.29
T1Wa_160m	160m	11.52	8.11	8.12	8.11	0.53	0.54	0.54	0.54	19.43	17.99	18.00	18.00	1.39	1.29	1.29	1.29
T1Wa_170m	170m	11.49	8.10	8.11	8.11	0.53	0.53	0.54	0.54	19.42	17.99	17.99	17.99	1.39	1.28	1.29	1.29

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T1Wa_180m	180m	11.46	8.09	8.10	8.10	0.53	0.53	0.54	0.53	19.42	17.98	17.99	17.99	1.39	1.28	1.28	1.28
T1Wa_190m	190m	11.44	8.08	8.09	8.09	0.53	0.53	0.53	0.53	19.41	17.98	17.99	17.98	1.39	1.28	1.28	1.28
T1Wa_200m	200m	11.42	8.07	8.09	8.09	0.53	0.53	0.53	0.53	19.41	17.97	17.98	17.98	1.39	1.28	1.28	1.28
T2Ea_1m	1m	40.58	17.60	17.40	17.14	1.28	1.40	1.38	1.36	25.47	23.18	23.08	22.94	1.82	1.66	1.65	1.64
T2Ea_10m	10m	22.57	11.76	11.69	11.59	0.82	0.86	0.86	0.85	21.76	19.97	19.93	19.88	1.55	1.43	1.42	1.42
T2Ea_20m	20m	18.09	10.30	10.27	10.21	0.70	0.73	0.73	0.72	20.82	19.16	19.15	19.12	1.49	1.37	1.37	1.37
T2Ea_30m	30m	16.14	9.67	9.66	9.61	0.65	0.67	0.67	0.67	20.40	18.82	18.81	18.79	1.46	1.34	1.34	1.34
T2Ea_40m	40m	15.06	9.32	9.31	9.28	0.62	0.64	0.64	0.64	20.18	18.62	18.62	18.60	1.44	1.33	1.33	1.33
T2Ea_50m	50m	14.37	9.10	9.09	9.07	0.60	0.62	0.62	0.62	20.03	18.50	18.50	18.48	1.43	1.32	1.32	1.32
T2Ea_60m	60m	13.88	8.94	8.94	8.92	0.59	0.60	0.61	0.60	19.93	18.41	18.41	18.40	1.42	1.32	1.32	1.31
T2Ea_70m	70m	13.53	8.82	8.83	8.81	0.58	0.59	0.59	0.59	19.85	18.35	18.35	18.34	1.42	1.31	1.31	1.31
T2Ea_80m	80m	13.25	8.73	8.74	8.73	0.58	0.59	0.59	0.59	19.79	18.30	18.30	18.29	1.41	1.31	1.31	1.31
T2Ea_90m	90m	13.04	8.66	8.67	8.66	0.57	0.58	0.58	0.58	19.75	18.26	18.26	18.26	1.41	1.30	1.30	1.30
T2Ea_100m	100m	12.86	8.61	8.62	8.61	0.56	0.57	0.58	0.57	19.71	18.23	18.23	18.23	1.41	1.30	1.30	1.30
T2Ea_110m	110m	12.71	8.56	8.57	8.56	0.56	0.57	0.57	0.57	19.68	18.20	18.21	18.20	1.41	1.30	1.30	1.30
T2Ea_120m	120m	12.59	8.52	8.53	8.52	0.56	0.57	0.57	0.57	19.65	18.18	18.19	18.18	1.40	1.30	1.30	1.30
T2Ea_130m	130m	12.48	8.49	8.50	8.49	0.56	0.56	0.56	0.56	19.63	18.16	18.17	18.16	1.40	1.30	1.30	1.30
T2Ea_140m	140m	12.39	8.46	8.47	8.46	0.55	0.56	0.56	0.56	19.61	18.14	18.15	18.15	1.40	1.30	1.30	1.30
T2Ea_150m	150m	12.31	8.43	8.44	8.44	0.55	0.56	0.56	0.56	19.59	18.13	18.14	18.13	1.40	1.29	1.30	1.30
T2Ea_160m	160m	12.24	8.41	8.42	8.41	0.55	0.56	0.56	0.56	19.58	18.12	18.13	18.12	1.40	1.29	1.29	1.29
T2Ea_170m	170m	12.18	8.39	8.40	8.39	0.55	0.55	0.56	0.55	19.56	18.11	18.11	18.11	1.40	1.29	1.29	1.29
T2Ea_180m	180m	12.12	8.37	8.38	8.38	0.55	0.55	0.55	0.55	19.55	18.10	18.10	18.10	1.40	1.29	1.29	1.29
T2Ea_190m	190m	12.07	8.35	8.37	8.36	0.54	0.55	0.55	0.55	19.54	18.09	18.10	18.09	1.40	1.29	1.29	1.29
T2Ea_200m	200m	12.02	8.33	8.35	8.35	0.54	0.55	0.55	0.55	19.53	18.08	18.09	18.09	1.40	1.29	1.29	1.29
T2Wa_1m	1m	33.95	15.45	15.30	15.09	1.11	1.20	1.19	1.17	24.12	22.00	21.92	21.81	1.72	1.57	1.57	1.56
T2Wa_10m	10m	19.36	10.72	10.68	10.60	0.73	0.77	0.76	0.76	21.08	19.39	19.37	19.33	1.51	1.39	1.38	1.38
T2Wa_20m	20m	15.99	9.62	9.61	9.57	0.65	0.67	0.67	0.66	20.37	18.79	18.78	18.76	1.46	1.34	1.34	1.34
T2Wa_30m	30m	14.59	9.17	9.16	9.14	0.61	0.63	0.63	0.62	20.08	18.54	18.54	18.52	1.43	1.32	1.32	1.32
T2Wa_40m	40m	13.81	8.91	8.92	8.90	0.59	0.60	0.60	0.60	19.91	18.40	18.40	18.39	1.42	1.31	1.31	1.31
T2Wa_50m	50m	13.31	8.75	8.76	8.74	0.58	0.59	0.59	0.59	19.81	18.31	18.31	18.30	1.41	1.31	1.31	1.31
T2Wa_60m	60m	12.97	8.64	8.65	8.64	0.57	0.58	0.58	0.58	19.73	18.25	18.25	18.25	1.41	1.30	1.30	1.30
T2Wa_70m	70m	12.72	8.56	8.57	8.56	0.56	0.57	0.57	0.57	19.68	18.20	18.21	18.20	1.41	1.30	1.30	1.30
T2Wa_80m	80m	12.53	8.50	8.51	8.51	0.56	0.56	0.57	0.57	19.64	18.17	18.18	18.17	1.40	1.30	1.30	1.30
T2Wa_90m	90m	12.38	8.45	8.47	8.46	0.55	0.56	0.56	0.56	19.61	18.14	18.15	18.15	1.40	1.30	1.30	1.30
T2Wa_100m	100m	12.26	8.41	8.43	8.42	0.55	0.56	0.56	0.56	19.58	18.12	18.13	18.13	1.40	1.29	1.29	1.29
T2Wa_110m	110m	12.16	8.38	8.40	8.39	0.55	0.55	0.55	0.55	19.56	18.10	18.11	18.11	1.40	1.29	1.29	1.29
T2Wa_120m	120m	12.07	8.35	8.37	8.36	0.54	0.55	0.55	0.55	19.54	18.09	18.10	18.09	1.40	1.29	1.29	1.29
T2Wa_130m	130m	12.00	8.33	8.35	8.34	0.54	0.55	0.55	0.55	19.53	18.07	18.08	18.08	1.39	1.29	1.29	1.29
T2Wa_140m	140m	11.94	8.31	8.33	8.32	0.54	0.55	0.55	0.55	19.51	18.06	18.07	18.07	1.39	1.29	1.29	1.29
T2Wa_150m	150m	11.88	8.29	8.31	8.31	0.54	0.55	0.55	0.55	19.50	18.05	18.06	18.06	1.39	1.29	1.29	1.29

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T2Wa_160m	160m	11.84	8.28	8.29	8.29	0.54	0.54	0.55	0.55	19.49	18.04	18.06	18.05	1.39	1.29	1.29	1.29
T2Wa_170m	170m	11.80	8.26	8.28	8.28	0.54	0.54	0.54	0.54	19.48	18.04	18.05	18.05	1.39	1.29	1.29	1.29
T2Wa_180m	180m	11.76	8.25	8.27	8.27	0.54	0.54	0.54	0.54	19.48	18.03	18.04	18.04	1.39	1.29	1.29	1.29
T2Wa_190m	190m	11.72	8.24	8.26	8.26	0.54	0.54	0.54	0.54	19.47	18.02	18.04	18.03	1.39	1.29	1.29	1.29
T2Wa_200m	200m	11.69	8.23	8.25	8.25	0.53	0.54	0.54	0.54	19.46	18.02	18.03	18.03	1.39	1.29	1.29	1.29
T3Ea_1m	1m	36.67	16.38	15.90	15.73	1.18	1.28	1.24	1.22	24.96	22.77	22.51	22.42	1.78	1.63	1.61	1.60
T3Ea_10m	10m	20.81	11.24	11.07	11.01	0.77	0.81	0.79	0.79	21.67	19.93	19.84	19.80	1.55	1.42	1.42	1.41
T3Ea_20m	20m	16.91	9.98	9.88	9.84	0.67	0.69	0.69	0.68	20.84	19.23	19.18	19.16	1.49	1.37	1.37	1.37
T3Ea_30m	30m	15.24	9.44	9.37	9.35	0.63	0.64	0.64	0.64	20.49	18.93	18.90	18.88	1.46	1.35	1.35	1.35
T3Ea_40m	40m	14.32	9.14	9.09	9.07	0.60	0.62	0.61	0.61	20.30	18.77	18.74	18.73	1.45	1.34	1.34	1.34
T3Ea_50m	50m	13.73	8.95	8.91	8.90	0.59	0.60	0.60	0.60	20.17	18.66	18.64	18.63	1.44	1.33	1.33	1.33
T3Ea_60m	60m	13.32	8.81	8.79	8.78	0.58	0.59	0.59	0.58	20.08	18.59	18.57	18.57	1.43	1.33	1.33	1.33
T3Ea_70m	70m	13.02	8.72	8.70	8.69	0.57	0.58	0.58	0.58	20.02	18.53	18.52	18.52	1.43	1.32	1.32	1.32
T3Ea_80m	80m	12.78	8.64	8.63	8.62	0.56	0.57	0.57	0.57	19.97	18.49	18.49	18.48	1.43	1.32	1.32	1.32
T3Ea_90m	90m	12.60	8.58	8.57	8.56	0.56	0.57	0.57	0.56	19.93	18.46	18.45	18.45	1.42	1.32	1.32	1.32
T3Ea_100m	100m	12.45	8.53	8.53	8.52	0.55	0.56	0.56	0.56	19.90	18.43	18.43	18.43	1.42	1.32	1.32	1.32
T3Ea_110m	110m	12.33	8.49	8.49	8.48	0.55	0.56	0.56	0.56	19.87	18.41	18.41	18.41	1.42	1.31	1.31	1.31
T3Ea_120m	120m	12.23	8.46	8.46	8.45	0.55	0.55	0.55	0.55	19.85	18.39	18.39	18.39	1.42	1.31	1.31	1.31
T3Ea_130m	130m	12.14	8.43	8.43	8.43	0.55	0.55	0.55	0.55	19.83	18.38	18.38	18.37	1.42	1.31	1.31	1.31
T3Ea_140m	140m	12.06	8.41	8.41	8.40	0.54	0.55	0.55	0.55	19.82	18.36	18.36	18.36	1.42	1.31	1.31	1.31
T3Ea_150m	150m	12.00	8.39	8.39	8.38	0.54	0.55	0.55	0.55	19.80	18.35	18.35	18.35	1.41	1.31	1.31	1.31
T3Ea_160m	160m	11.94	8.37	8.37	8.37	0.54	0.55	0.55	0.55	19.79	18.34	18.34	18.34	1.41	1.31	1.31	1.31
T3Ea_170m	170m	11.89	8.35	8.36	8.35	0.54	0.54	0.55	0.55	19.78	18.33	18.33	18.33	1.41	1.31	1.31	1.31
T3Ea_180m	180m	11.84	8.34	8.34	8.34	0.54	0.54	0.54	0.54	19.77	18.32	18.33	18.32	1.41	1.31	1.31	1.31
T3Ea_190m	190m	11.80	8.32	8.33	8.33	0.54	0.54	0.54	0.54	19.76	18.31	18.32	18.32	1.41	1.31	1.31	1.31
T3Ea_200m	200m	11.76	8.31	8.32	8.31	0.54	0.54	0.54	0.54	19.75	18.31	18.31	18.31	1.41	1.31	1.31	1.31
T3Wa_1m	1m	30.24	14.30	13.94	13.81	1.02	1.09	1.06	1.05	23.63	21.62	21.42	21.35	1.69	1.54	1.53	1.53
T3Wa_10m	10m	17.62	10.21	10.10	10.05	0.69	0.72	0.71	0.70	20.99	19.36	19.30	19.27	1.50	1.38	1.38	1.38
T3Wa_20m	20m	14.86	9.31	9.26	9.23	0.62	0.63	0.63	0.63	20.41	18.86	18.83	18.82	1.46	1.35	1.35	1.34
T3Wa_30m	30m	13.72	8.94	8.91	8.89	0.59	0.60	0.60	0.60	20.17	18.66	18.64	18.63	1.44	1.33	1.33	1.33
T3Wa_40m	40m	13.10	8.74	8.72	8.71	0.57	0.58	0.58	0.58	20.04	18.55	18.54	18.53	1.43	1.32	1.32	1.32
T3Wa_50m	50m	12.70	8.61	8.60	8.59	0.56	0.57	0.57	0.57	19.95	18.48	18.47	18.47	1.43	1.32	1.32	1.32
T3Wa_60m	60m	12.43	8.53	8.52	8.51	0.55	0.56	0.56	0.56	19.90	18.43	18.43	18.42	1.42	1.32	1.32	1.32
T3Wa_70m	70m	12.24	8.46	8.46	8.45	0.55	0.56	0.56	0.55	19.85	18.39	18.39	18.39	1.42	1.31	1.31	1.31
T3Wa_80m	80m	12.09	8.41	8.41	8.41	0.54	0.55	0.55	0.55	19.82	18.37	18.37	18.37	1.42	1.31	1.31	1.31
T3Wa_90m	90m	11.97	8.38	8.38	8.38	0.54	0.55	0.55	0.55	19.80	18.35	18.35	18.35	1.41	1.31	1.31	1.31
T3Wa_100m	100m	11.87	8.35	8.35	8.35	0.54	0.54	0.55	0.54	19.78	18.33	18.33	18.33	1.41	1.31	1.31	1.31
T3Wa_110m	110m	11.80	8.32	8.33	8.32	0.54	0.54	0.54	0.54	19.76	18.31	18.32	18.32	1.41	1.31	1.31	1.31
T3Wa_120m	120m	11.73	8.30	8.31	8.30	0.54	0.54	0.54	0.54	19.75	18.30	18.31	18.31	1.41	1.31	1.31	1.31
T3Wa_130m	130m	11.68	8.28	8.29	8.29	0.53	0.54	0.54	0.54	19.73	18.29	18.30	18.30	1.41	1.31	1.31	1.31

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T3Wa_140m	140m	11.63	8.27	8.27	8.27	0.53	0.54	0.54	0.54	19.72	18.28	18.29	18.29	1.41	1.31	1.31	1.31
T3Wa_150m	150m	11.59	8.25	8.26	8.26	0.53	0.54	0.54	0.54	19.72	18.28	18.28	18.28	1.41	1.31	1.31	1.31
T3Wa_160m	160m	11.55	8.24	8.25	8.25	0.53	0.53	0.54	0.54	19.71	18.27	18.28	18.28	1.41	1.30	1.31	1.31
T3Wa_170m	170m	11.51	8.23	8.24	8.24	0.53	0.53	0.53	0.53	19.70	18.26	18.27	18.27	1.41	1.30	1.30	1.30
T3Wa_180m	180m	11.49	8.22	8.23	8.23	0.53	0.53	0.53	0.53	19.69	18.26	18.27	18.27	1.41	1.30	1.30	1.30
T3Wa_190m	190m	11.46	8.21	8.22	8.22	0.53	0.53	0.53	0.53	19.69	18.25	18.26	18.26	1.41	1.30	1.30	1.30
T3Wa_200m	200m	11.44	8.20	8.22	8.22	0.53	0.53	0.53	0.53	19.68	18.25	18.26	18.26	1.41	1.30	1.30	1.30
T4Ea_1m	1m	36.58	16.35	15.99	15.80	1.18	1.28	1.25	1.23	24.93	22.74	22.55	22.45	1.78	1.62	1.61	1.60
T4Ea_10m	10m	19.60	10.83	10.73	10.66	0.74	0.77	0.76	0.76	21.41	19.71	19.65	19.61	1.53	1.41	1.40	1.40
T4Ea_20m	20m	16.02	9.67	9.62	9.58	0.65	0.67	0.66	0.66	20.65	19.07	19.04	19.02	1.47	1.36	1.36	1.36
T4Ea_30m	30m	14.54	9.19	9.16	9.13	0.61	0.62	0.62	0.62	20.34	18.80	18.78	18.77	1.45	1.34	1.34	1.34
T4Ea_40m	40m	13.73	8.93	8.91	8.89	0.59	0.60	0.60	0.60	20.17	18.66	18.65	18.64	1.44	1.33	1.33	1.33
T4Ea_50m	50m	13.22	8.76	8.75	8.74	0.57	0.58	0.58	0.58	20.06	18.57	18.56	18.55	1.43	1.33	1.33	1.33
T4Ea_60m	60m	12.87	8.65	8.64	8.63	0.56	0.57	0.57	0.57	19.98	18.50	18.50	18.49	1.43	1.32	1.32	1.32
T4Ea_70m	70m	12.62	8.57	8.56	8.56	0.56	0.57	0.57	0.56	19.93	18.46	18.46	18.45	1.42	1.32	1.32	1.32
T4Ea_80m	80m	12.42	8.51	8.50	8.50	0.55	0.56	0.56	0.56	19.89	18.42	18.42	18.42	1.42	1.32	1.32	1.32
T4Ea_90m	90m	12.27	8.46	8.46	8.45	0.55	0.56	0.56	0.56	19.86	18.40	18.40	18.39	1.42	1.31	1.31	1.31
T4Ea_100m	100m	12.15	8.42	8.42	8.41	0.55	0.55	0.55	0.55	19.83	18.37	18.38	18.37	1.42	1.31	1.31	1.31
T4Ea_110m	110m	12.05	8.38	8.39	8.38	0.54	0.55	0.55	0.55	19.81	18.36	18.36	18.36	1.41	1.31	1.31	1.31
T4Ea_120m	120m	11.96	8.36	8.36	8.36	0.54	0.55	0.55	0.55	19.79	18.34	18.34	18.34	1.41	1.31	1.31	1.31
T4Ea_130m	130m	11.89	8.33	8.34	8.34	0.54	0.54	0.55	0.54	19.78	18.33	18.33	18.33	1.41	1.31	1.31	1.31
T4Ea_140m	140m	11.83	8.31	8.32	8.32	0.54	0.54	0.54	0.54	19.76	18.32	18.32	18.32	1.41	1.31	1.31	1.31
T4Ea_150m	150m	11.78	8.29	8.30	8.30	0.54	0.54	0.54	0.54	19.75	18.31	18.31	18.31	1.41	1.31	1.31	1.31
T4Ea_160m	160m	11.73	8.28	8.29	8.29	0.53	0.54	0.54	0.54	19.74	18.30	18.30	18.30	1.41	1.31	1.31	1.31
T4Ea_170m	170m	11.69	8.27	8.28	8.27	0.53	0.54	0.54	0.54	19.73	18.29	18.30	18.30	1.41	1.31	1.31	1.31
T4Ea_180m	180m	11.65	8.25	8.26	8.26	0.53	0.54	0.54	0.54	19.73	18.28	18.29	18.29	1.41	1.31	1.31	1.31
T4Ea_190m	190m	11.62	8.24	8.25	8.25	0.53	0.54	0.54	0.54	19.72	18.28	18.29	18.28	1.41	1.31	1.31	1.31
T4Ea_200m	200m	11.59	8.23	8.25	8.25	0.53	0.54	0.54	0.54	19.71	18.27	18.28	18.28	1.41	1.31	1.31	1.31
T4Wa_1m	1m	40.22	17.53	17.12	16.91	1.27	1.39	1.35	1.33	25.67	23.39	23.18	23.06	1.83	1.67	1.66	1.65
T4Wa_10m	10m	20.90	11.26	11.13	11.06	0.77	0.81	0.80	0.79	21.68	19.94	19.88	19.83	1.55	1.42	1.42	1.42
T4Wa_20m	20m	16.80	9.93	9.86	9.82	0.67	0.69	0.68	0.68	20.82	19.21	19.17	19.15	1.49	1.37	1.37	1.37
T4Wa_30m	30m	15.09	9.37	9.33	9.30	0.62	0.64	0.64	0.63	20.46	18.90	18.88	18.86	1.46	1.35	1.35	1.35
T4Wa_40m	40m	14.15	9.07	9.04	9.02	0.60	0.61	0.61	0.61	20.26	18.73	18.72	18.71	1.45	1.34	1.34	1.34
T4Wa_50m	50m	13.56	8.87	8.86	8.84	0.58	0.59	0.59	0.59	20.13	18.63	18.62	18.61	1.44	1.33	1.33	1.33
T4Wa_60m	60m	13.14	8.74	8.73	8.72	0.57	0.58	0.58	0.58	20.04	18.55	18.55	18.54	1.43	1.33	1.32	1.32
T4Wa_70m	70m	12.84	8.64	8.64	8.63	0.56	0.57	0.57	0.57	19.98	18.50	18.50	18.49	1.43	1.32	1.32	1.32
T4Wa_80m	80m	12.61	8.57	8.56	8.56	0.56	0.57	0.57	0.57	19.93	18.46	18.46	18.45	1.42	1.32	1.32	1.32
T4Wa_90m	90m	12.43	8.51	8.51	8.50	0.55	0.56	0.56	0.56	19.89	18.42	18.43	18.42	1.42	1.32	1.32	1.32
T4Wa_100m	100m	12.29	8.46	8.46	8.46	0.55	0.56	0.56	0.56	19.86	18.40	18.40	18.40	1.42	1.31	1.31	1.31
T4Wa_110m	110m	12.17	8.42	8.43	8.42	0.55	0.55	0.55	0.55	19.83	18.38	18.38	18.38	1.42	1.31	1.31	1.31

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T4Wa_120m	120m	12.07	8.39	8.40	8.39	0.54	0.55	0.55	0.55	19.81	18.36	18.36	18.36	1.42	1.31	1.31	1.31
T4Wa_130m	130m	11.98	8.36	8.37	8.37	0.54	0.55	0.55	0.55	19.80	18.34	18.35	18.35	1.41	1.31	1.31	1.31
T4Wa_140m	140m	11.91	8.34	8.35	8.35	0.54	0.54	0.55	0.55	19.78	18.33	18.34	18.34	1.41	1.31	1.31	1.31
T4Wa_150m	150m	11.85	8.32	8.33	8.33	0.54	0.54	0.54	0.54	19.77	18.32	18.33	18.33	1.41	1.31	1.31	1.31
T4Wa_160m	160m	11.79	8.30	8.31	8.31	0.54	0.54	0.54	0.54	19.76	18.31	18.32	18.32	1.41	1.31	1.31	1.31
T4Wa_170m	170m	11.75	8.29	8.30	8.30	0.54	0.54	0.54	0.54	19.75	18.30	18.31	18.31	1.41	1.31	1.31	1.31
T4Wa_180m	180m	11.71	8.27	8.28	8.28	0.53	0.54	0.54	0.54	19.74	18.29	18.30	18.30	1.41	1.31	1.31	1.31
T4Wa_190m	190m	11.67	8.26	8.27	8.27	0.53	0.54	0.54	0.54	19.73	18.29	18.30	18.30	1.41	1.31	1.31	1.31
T4Wa_200m	200m	11.63	8.25	8.26	8.26	0.53	0.54	0.54	0.54	19.72	18.28	18.29	18.29	1.41	1.31	1.31	1.31
T5Ea_1m	1m	42.98	18.38	19.52	19.78	1.34	1.46	1.56	1.58	25.91	23.55	24.18	24.31	1.85	1.68	1.73	1.74
T5Ea_10m	10m	23.26	11.99	12.45	12.55	0.83	0.88	0.92	0.93	21.88	20.07	20.32	20.38	1.56	1.43	1.45	1.46
T5Ea_20m	20m	18.49	10.45	10.73	10.80	0.71	0.74	0.77	0.77	20.89	19.23	19.38	19.42	1.49	1.37	1.38	1.39
T5Ea_30m	30m	16.47	9.79	10.01	10.05	0.66	0.68	0.70	0.70	20.47	18.87	18.99	19.01	1.46	1.35	1.36	1.36
T5Ea_40m	40m	15.34	9.43	9.60	9.64	0.63	0.65	0.66	0.67	20.23	18.67	18.76	18.78	1.45	1.33	1.34	1.34
T5Ea_50m	50m	14.63	9.20	9.34	9.37	0.61	0.63	0.64	0.64	20.08	18.54	18.62	18.64	1.43	1.32	1.33	1.33
T5Ea_60m	60m	14.14	9.04	9.17	9.19	0.60	0.61	0.62	0.63	19.98	18.45	18.53	18.54	1.43	1.32	1.32	1.32
T5Ea_70m	70m	13.77	8.92	9.04	9.06	0.59	0.60	0.61	0.61	19.90	18.39	18.45	18.47	1.42	1.31	1.32	1.32
T5Ea_80m	80m	13.49	8.83	8.93	8.95	0.58	0.59	0.60	0.60	19.84	18.34	18.40	18.41	1.42	1.31	1.31	1.32
T5Ea_90m	90m	13.27	8.76	8.85	8.87	0.58	0.59	0.60	0.60	19.80	18.30	18.36	18.37	1.41	1.31	1.31	1.31
T5Ea_100m	100m	13.09	8.70	8.79	8.81	0.57	0.58	0.59	0.59	19.76	18.27	18.32	18.33	1.41	1.31	1.31	1.31
T5Ea_110m	110m	12.94	8.65	8.74	8.75	0.57	0.58	0.58	0.59	19.73	18.24	18.29	18.30	1.41	1.30	1.31	1.31
T5Ea_120m	120m	12.82	8.61	8.69	8.71	0.56	0.57	0.58	0.58	19.70	18.22	18.27	18.27	1.41	1.30	1.30	1.31
T5Ea_130m	130m	12.71	8.58	8.65	8.67	0.56	0.57	0.58	0.58	19.68	18.20	18.24	18.25	1.41	1.30	1.30	1.30
T5Ea_140m	140m	12.61	8.54	8.62	8.63	0.56	0.57	0.57	0.58	19.66	18.18	18.22	18.23	1.40	1.30	1.30	1.30
T5Ea_150m	150m	12.53	8.52	8.59	8.60	0.56	0.56	0.57	0.57	19.64	18.17	18.21	18.22	1.40	1.30	1.30	1.30
T5Ea_160m	160m	12.46	8.49	8.56	8.57	0.55	0.56	0.57	0.57	19.63	18.16	18.19	18.20	1.40	1.30	1.30	1.30
T5Ea_170m	170m	12.39	8.47	8.54	8.55	0.55	0.56	0.57	0.57	19.61	18.14	18.18	18.19	1.40	1.30	1.30	1.30
T5Ea_180m	180m	12.33	8.45	8.52	8.53	0.55	0.56	0.56	0.57	19.60	18.13	18.17	18.18	1.40	1.30	1.30	1.30
T5Ea_190m	190m	12.28	8.44	8.50	8.51	0.55	0.56	0.56	0.56	19.59	18.12	18.16	18.16	1.40	1.29	1.30	1.30
T5Ea_200m	200m	12.23	8.42	8.48	8.49	0.55	0.56	0.56	0.56	19.58	18.12	18.15	18.15	1.40	1.29	1.30	1.30
T5Wa_1m	1m	32.84	15.09	15.88	16.05	1.08	1.16	1.23	1.25	23.86	21.76	22.19	22.28	1.70	1.55	1.59	1.59
T5Wa_10m	10m	19.06	10.63	10.93	11.00	0.72	0.76	0.78	0.79	21.01	19.33	19.49	19.53	1.50	1.38	1.39	1.39
T5Wa_20m	20m	15.97	9.63	9.82	9.86	0.64	0.67	0.68	0.69	20.36	18.78	18.89	18.91	1.45	1.34	1.35	1.35
T5Wa_30m	30m	14.66	9.21	9.35	9.38	0.61	0.63	0.64	0.64	20.09	18.55	18.63	18.65	1.43	1.32	1.33	1.33
T5Wa_40m	40m	13.93	8.97	9.09	9.11	0.59	0.61	0.62	0.62	19.94	18.42	18.49	18.50	1.42	1.32	1.32	1.32
T5Wa_50m	50m	13.46	8.82	8.92	8.94	0.58	0.59	0.60	0.60	19.84	18.34	18.39	18.40	1.42	1.31	1.31	1.31
T5Wa_60m	60m	13.14	8.72	8.81	8.82	0.57	0.58	0.59	0.59	19.77	18.28	18.33	18.34	1.41	1.31	1.31	1.31
T5Wa_70m	70m	12.90	8.64	8.72	8.74	0.57	0.58	0.58	0.58	19.72	18.24	18.28	18.29	1.41	1.30	1.31	1.31
T5Wa_80m	80m	12.72	8.58	8.65	8.67	0.56	0.57	0.58	0.58	19.68	18.20	18.25	18.25	1.41	1.30	1.30	1.30
T5Wa_90m	90m	12.57	8.53	8.60	8.61	0.56	0.57	0.57	0.57	19.65	18.18	18.22	18.22	1.40	1.30	1.30	1.30

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T5Wa_100m	100m	12.45	8.49	8.56	8.57	0.55	0.56	0.57	0.57	19.62	18.16	18.19	18.20	1.40	1.30	1.30	1.30
T5Wa_110m	110m	12.35	8.46	8.52	8.53	0.55	0.56	0.57	0.57	19.60	18.14	18.17	18.18	1.40	1.30	1.30	1.30
T5Wa_120m	120m	12.26	8.43	8.49	8.50	0.55	0.56	0.56	0.56	19.59	18.12	18.16	18.16	1.40	1.29	1.30	1.30
T5Wa_130m	130m	12.19	8.41	8.46	8.47	0.55	0.56	0.56	0.56	19.57	18.11	18.14	18.15	1.40	1.29	1.30	1.30
T5Wa_140m	140m	12.13	8.39	8.44	8.45	0.55	0.55	0.56	0.56	19.56	18.10	18.13	18.14	1.40	1.29	1.30	1.30
T5Wa_150m	150m	12.07	8.37	8.42	8.43	0.55	0.55	0.56	0.56	19.54	18.09	18.12	18.12	1.40	1.29	1.29	1.29
T5Wa_160m	160m	12.02	8.35	8.40	8.41	0.54	0.55	0.55	0.56	19.53	18.08	18.11	18.11	1.40	1.29	1.29	1.29
T5Wa_170m	170m	11.98	8.34	8.39	8.40	0.54	0.55	0.55	0.55	19.52	18.07	18.10	18.11	1.39	1.29	1.29	1.29
T5Wa_180m	180m	11.94	8.32	8.37	8.38	0.54	0.55	0.55	0.55	19.52	18.06	18.09	18.10	1.39	1.29	1.29	1.29
T5Wa_190m	190m	11.90	8.31	8.36	8.37	0.54	0.55	0.55	0.55	19.51	18.06	18.09	18.09	1.39	1.29	1.29	1.29
T5Wa_200m	200m	11.87	8.30	8.35	8.36	0.54	0.55	0.55	0.55	19.50	18.05	18.08	18.08	1.39	1.29	1.29	1.29
T6Ea_1m	1m	31.31	14.56	15.45	15.73	1.04	1.12	1.20	1.22	23.55	21.50	21.99	22.13	1.68	1.54	1.57	1.58
T6Ea_10m	10m	18.90	10.55	10.91	11.02	0.72	0.75	0.78	0.79	20.98	19.30	19.50	19.55	1.50	1.38	1.39	1.40
T6Ea_20m	20m	15.81	9.55	9.78	9.84	0.64	0.66	0.68	0.69	20.33	18.75	18.87	18.91	1.45	1.34	1.35	1.35
T6Ea_30m	30m	14.49	9.12	9.29	9.34	0.61	0.62	0.64	0.64	20.05	18.51	18.61	18.63	1.43	1.32	1.33	1.33
T6Ea_40m	40m	13.76	8.88	9.02	9.06	0.59	0.60	0.61	0.62	19.90	18.38	18.46	18.48	1.42	1.31	1.32	1.32
T6Ea_50m	50m	13.29	8.73	8.85	8.88	0.58	0.59	0.60	0.60	19.80	18.30	18.37	18.38	1.41	1.31	1.31	1.31
T6Ea_60m	60m	12.96	8.63	8.73	8.76	0.57	0.58	0.59	0.59	19.73	18.24	18.30	18.32	1.41	1.30	1.31	1.31
T6Ea_70m	70m	12.73	8.55	8.64	8.67	0.56	0.57	0.58	0.58	19.68	18.20	18.25	18.27	1.41	1.30	1.30	1.30
T6Ea_80m	80m	12.54	8.49	8.58	8.60	0.56	0.56	0.57	0.57	19.64	18.17	18.22	18.23	1.40	1.30	1.30	1.30
T6Ea_90m	90m	12.40	8.45	8.52	8.54	0.55	0.56	0.57	0.57	19.61	18.14	18.19	18.20	1.40	1.30	1.30	1.30
T6Ea_100m	100m	12.28	8.41	8.48	8.50	0.55	0.56	0.56	0.57	19.59	18.12	18.16	18.17	1.40	1.29	1.30	1.30
T6Ea_110m	110m	12.19	8.38	8.45	8.46	0.55	0.55	0.56	0.56	19.57	18.11	18.14	18.15	1.40	1.29	1.30	1.30
T6Ea_120m	120m	12.11	8.35	8.42	8.43	0.55	0.55	0.56	0.56	19.55	18.09	18.13	18.14	1.40	1.29	1.29	1.30
T6Ea_130m	130m	12.04	8.33	8.39	8.41	0.54	0.55	0.56	0.56	19.53	18.08	18.11	18.12	1.40	1.29	1.29	1.29
T6Ea_140m	140m	11.98	8.31	8.37	8.38	0.54	0.55	0.55	0.55	19.52	18.07	18.10	18.11	1.39	1.29	1.29	1.29
T6Ea_150m	150m	11.92	8.29	8.35	8.36	0.54	0.55	0.55	0.55	19.51	18.06	18.09	18.10	1.39	1.29	1.29	1.29
T6Ea_160m	160m	11.88	8.28	8.33	8.34	0.54	0.54	0.55	0.55	19.50	18.05	18.08	18.09	1.39	1.29	1.29	1.29
T6Ea_170m	170m	11.84	8.26	8.32	8.33	0.54	0.54	0.55	0.55	19.49	18.04	18.07	18.08	1.39	1.29	1.29	1.29
T6Ea_180m	180m	11.80	8.25	8.30	8.31	0.54	0.54	0.55	0.55	19.48	18.04	18.07	18.07	1.39	1.29	1.29	1.29
T6Ea_190m	190m	11.76	8.24	8.29	8.30	0.54	0.54	0.55	0.55	19.48	18.03	18.06	18.07	1.39	1.29	1.29	1.29
T6Ea_200m	200m	11.73	8.23	8.28	8.29	0.54	0.54	0.55	0.55	19.47	18.03	18.05	18.06	1.39	1.29	1.29	1.29
T6Wa_1m	1m	25.85	12.79	13.46	13.66	0.90	0.96	1.02	1.03	22.42	20.53	20.89	21.00	1.60	1.47	1.49	1.50
T6Wa_10m	10m	16.18	9.67	9.91	9.98	0.65	0.67	0.69	0.70	20.41	18.81	18.95	18.99	1.46	1.34	1.35	1.36
T6Wa_20m	20m	14.16	9.01	9.17	9.21	0.60	0.61	0.63	0.63	19.98	18.46	18.54	18.57	1.43	1.32	1.32	1.33
T6Wa_30m	30m	13.32	8.74	8.86	8.89	0.58	0.59	0.60	0.60	19.81	18.31	18.37	18.39	1.41	1.31	1.31	1.31
T6Wa_40m	40m	12.86	8.59	8.69	8.72	0.56	0.57	0.58	0.59	19.71	18.23	18.28	18.29	1.41	1.30	1.31	1.31
T6Wa_50m	50m	12.57	8.50	8.59	8.61	0.56	0.57	0.57	0.58	19.65	18.17	18.22	18.23	1.40	1.30	1.30	1.30
T6Wa_60m	60m	12.37	8.43	8.51	8.53	0.55	0.56	0.57	0.57	19.60	18.14	18.18	18.19	1.40	1.30	1.30	1.30
T6Wa_70m	70m	12.22	8.39	8.46	8.47	0.55	0.55	0.56	0.56	19.57	18.11	18.15	18.16	1.40	1.29	1.30	1.30

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T6Wa_80m	80m	12.10	8.35	8.41	8.43	0.55	0.55	0.56	0.56	19.55	18.09	18.13	18.14	1.40	1.29	1.29	1.30
T6Wa_90m	90m	12.01	8.32	8.38	8.40	0.54	0.55	0.55	0.56	19.53	18.07	18.11	18.12	1.39	1.29	1.29	1.29
T6Wa_100m	100m	11.93	8.29	8.35	8.37	0.54	0.55	0.55	0.55	19.51	18.06	18.09	18.10	1.39	1.29	1.29	1.29
T6Wa_110m	110m	11.87	8.27	8.33	8.34	0.54	0.54	0.55	0.55	19.50	18.05	18.08	18.09	1.39	1.29	1.29	1.29
T6Wa_120m	120m	11.81	8.26	8.31	8.32	0.54	0.54	0.55	0.55	19.49	18.04	18.07	18.08	1.39	1.29	1.29	1.29
T6Wa_130m	130m	11.77	8.24	8.29	8.30	0.54	0.54	0.55	0.55	19.48	18.03	18.06	18.07	1.39	1.29	1.29	1.29
T6Wa_140m	140m	11.73	8.23	8.28	8.29	0.54	0.54	0.55	0.55	19.47	18.02	18.05	18.06	1.39	1.29	1.29	1.29
T6Wa_150m	150m	11.69	8.22	8.26	8.27	0.53	0.54	0.54	0.54	19.46	18.02	18.04	18.05	1.39	1.29	1.29	1.29
T6Wa_160m	160m	11.66	8.20	8.25	8.26	0.53	0.54	0.54	0.54	19.45	18.01	18.04	18.04	1.39	1.29	1.29	1.29
T6Wa_170m	170m	11.63	8.20	8.24	8.25	0.53	0.54	0.54	0.54	19.45	18.01	18.03	18.04	1.39	1.29	1.29	1.29
T6Wa_180m	180m	11.60	8.19	8.23	8.24	0.53	0.54	0.54	0.54	19.44	18.00	18.03	18.03	1.39	1.29	1.29	1.29
T6Wa_190m	190m	11.57	8.18	8.22	8.23	0.53	0.54	0.54	0.54	19.44	18.00	18.02	18.03	1.39	1.29	1.29	1.29
T6Wa_200m	200m	11.55	8.17	8.21	8.22	0.53	0.54	0.54	0.54	19.43	17.99	18.02	18.02	1.39	1.29	1.29	1.29
T7Ea_1m	1m	66.46	25.93	27.54	27.83	2.09	2.32	2.48	2.51	30.09	27.30	28.25	28.43	2.15	1.95	2.02	2.03
T7Ea_10m	10m	34.36	15.59	16.30	16.43	1.18	1.28	1.35	1.36	23.24	21.14	21.56	21.64	1.66	1.51	1.54	1.55
T7Ea_20m	20m	25.44	12.72	13.18	13.26	0.93	0.99	1.03	1.04	21.28	19.42	19.69	19.74	1.52	1.39	1.41	1.41
T7Ea_30m	30m	21.51	11.45	11.80	11.86	0.81	0.86	0.89	0.90	20.41	18.66	18.87	18.90	1.46	1.33	1.35	1.35
T7Ea_40m	40m	19.27	10.73	11.01	11.06	0.75	0.79	0.81	0.82	19.91	18.23	18.40	18.43	1.42	1.30	1.31	1.32
T7Ea_50m	50m	17.83	10.27	10.50	10.55	0.71	0.74	0.76	0.77	19.59	17.95	18.09	18.12	1.40	1.28	1.29	1.29
T7Ea_60m	60m	16.81	9.94	10.15	10.19	0.68	0.71	0.73	0.73	19.36	17.76	17.88	17.90	1.38	1.27	1.28	1.28
T7Ea_70m	70m	16.06	9.70	9.88	9.92	0.66	0.68	0.70	0.70	19.19	17.61	17.72	17.74	1.37	1.26	1.27	1.27
T7Ea_80m	80m	15.49	9.51	9.68	9.71	0.64	0.66	0.68	0.68	19.06	17.50	17.60	17.62	1.36	1.25	1.26	1.26
T7Ea_90m	90m	15.02	9.36	9.52	9.55	0.63	0.65	0.66	0.67	18.96	17.41	17.50	17.52	1.35	1.24	1.25	1.25
T7Ea_100m	100m	14.65	9.24	9.39	9.41	0.62	0.64	0.65	0.65	18.87	17.34	17.42	17.44	1.35	1.24	1.24	1.25
T7Ea_110m	110m	14.34	9.14	9.28	9.30	0.61	0.63	0.64	0.64	18.80	17.28	17.36	17.37	1.34	1.23	1.24	1.24
T7Ea_120m	120m	14.07	9.06	9.18	9.21	0.60	0.62	0.63	0.63	18.74	17.23	17.30	17.31	1.34	1.23	1.24	1.24
T7Ea_130m	130m	13.85	8.98	9.10	9.13	0.60	0.61	0.62	0.63	18.69	17.18	17.25	17.27	1.34	1.23	1.23	1.23
T7Ea_140m	140m	13.65	8.92	9.03	9.06	0.59	0.60	0.62	0.62	18.65	17.14	17.21	17.22	1.33	1.22	1.23	1.23
T7Ea_150m	150m	13.48	8.87	8.97	8.99	0.59	0.60	0.61	0.61	18.61	17.11	17.17	17.19	1.33	1.22	1.23	1.23
T7Ea_160m	160m	13.32	8.82	8.92	8.94	0.58	0.59	0.60	0.61	18.58	17.08	17.14	17.15	1.33	1.22	1.22	1.23
T7Ea_170m	170m	13.19	8.77	8.87	8.89	0.58	0.59	0.60	0.60	18.55	17.06	17.11	17.13	1.32	1.22	1.22	1.22
T7Ea_180m	180m	13.07	8.73	8.83	8.85	0.58	0.59	0.60	0.60	18.52	17.03	17.09	17.10	1.32	1.22	1.22	1.22
T7Ea_190m	190m	12.96	8.70	8.79	8.81	0.57	0.58	0.59	0.59	18.50	17.01	17.06	17.08	1.32	1.22	1.22	1.22
T7Ea_200m	200m	12.86	8.67	8.76	8.77	0.57	0.58	0.59	0.59	18.47	16.99	17.04	17.05	1.32	1.21	1.22	1.22
T7Wa_1m	1m	52.99	21.59	22.88	23.11	1.71	1.88	2.01	2.03	27.25	24.72	25.48	25.62	1.95	1.77	1.82	1.83
T7Wa_10m	10m	27.07	13.24	13.76	13.86	0.97	1.04	1.09	1.10	21.64	19.73	20.04	20.10	1.55	1.41	1.43	1.44
T7Wa_20m	20m	20.59	11.16	11.48	11.54	0.79	0.83	0.86	0.87	20.20	18.48	18.68	18.71	1.44	1.32	1.33	1.34
T7Wa_30m	30m	17.82	10.26	10.51	10.55	0.71	0.74	0.76	0.77	19.58	17.95	18.09	18.12	1.40	1.28	1.29	1.29
T7Wa_40m	40m	16.27	9.77	9.96	10.00	0.67	0.69	0.71	0.71	19.24	17.65	17.77	17.79	1.37	1.26	1.27	1.27
T7Wa_50m	50m	15.28	9.45	9.61	9.64	0.64	0.66	0.67	0.68	19.02	17.46	17.56	17.58	1.36	1.25	1.25	1.26

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T7Wa_60m	60m	14.60	9.23	9.37	9.40	0.62	0.64	0.65	0.65	18.86	17.33	17.41	17.43	1.35	1.24	1.24	1.25
T7Wa_70m	70m	14.10	9.07	9.20	9.22	0.60	0.62	0.63	0.63	18.75	17.23	17.31	17.32	1.34	1.23	1.24	1.24
T7Wa_80m	80m	13.71	8.94	9.06	9.08	0.59	0.61	0.62	0.62	18.66	17.16	17.23	17.24	1.33	1.23	1.23	1.23
T7Wa_90m	90m	13.41	8.85	8.96	8.98	0.58	0.60	0.61	0.61	18.60	17.10	17.16	17.18	1.33	1.22	1.23	1.23
T7Wa_100m	100m	13.17	8.77	8.87	8.89	0.58	0.59	0.60	0.60	18.54	17.05	17.11	17.12	1.32	1.22	1.22	1.22
T7Wa_110m	110m	12.97	8.70	8.80	8.82	0.57	0.58	0.59	0.59	18.50	17.01	17.07	17.08	1.32	1.22	1.22	1.22
T7Wa_120m	120m	12.80	8.65	8.74	8.76	0.57	0.58	0.59	0.59	18.46	16.98	17.04	17.05	1.32	1.21	1.22	1.22
T7Wa_130m	130m	12.66	8.60	8.69	8.71	0.56	0.57	0.58	0.58	18.43	16.95	17.00	17.02	1.32	1.21	1.21	1.22
T7Wa_140m	140m	12.54	8.56	8.65	8.66	0.56	0.57	0.58	0.58	18.40	16.93	16.98	16.99	1.31	1.21	1.21	1.21
T7Wa_150m	150m	12.43	8.53	8.61	8.62	0.56	0.57	0.57	0.57	18.37	16.91	16.96	16.96	1.31	1.21	1.21	1.21
T7Wa_160m	160m	12.33	8.50	8.57	8.59	0.55	0.56	0.57	0.57	18.35	16.89	16.93	16.94	1.31	1.21	1.21	1.21
T7Wa_170m	170m	12.25	8.47	8.55	8.56	0.55	0.56	0.57	0.57	18.33	16.87	16.92	16.93	1.31	1.21	1.21	1.21
T7Wa_180m	180m	12.17	8.45	8.52	8.53	0.55	0.56	0.56	0.57	18.32	16.86	16.90	16.91	1.31	1.20	1.21	1.21
T7Wa_190m	190m	12.10	8.42	8.49	8.51	0.55	0.55	0.56	0.56	18.30	16.85	16.89	16.90	1.31	1.20	1.21	1.21
T7Wa_200m	200m	12.04	8.40	8.47	8.49	0.55	0.55	0.56	0.56	18.29	16.83	16.87	16.88	1.31	1.20	1.21	1.21
T9Ea_1m	1m	37.73	16.65	18.57	19.30	1.22	1.32	1.50	1.56	26.46	24.23	25.31	25.70	1.89	1.73	1.81	1.84
T9Ea_10m	10m	20.94	11.26	12.01	12.29	0.78	0.81	0.88	0.91	22.96	21.21	21.63	21.78	1.64	1.52	1.55	1.56
T9Ea_20m	20m	17.11	10.04	10.51	10.68	0.68	0.70	0.74	0.76	22.14	20.52	20.79	20.89	1.58	1.47	1.49	1.49
T9Ea_30m	30m	15.46	9.50	9.86	9.99	0.63	0.65	0.68	0.70	21.79	20.22	20.42	20.49	1.56	1.44	1.46	1.46
T9Ea_40m	40m	14.54	9.21	9.50	9.60	0.61	0.62	0.65	0.66	21.60	20.06	20.22	20.28	1.54	1.43	1.44	1.45
T9Ea_50m	50m	13.95	9.02	9.26	9.35	0.59	0.61	0.63	0.64	21.47	19.95	20.09	20.14	1.53	1.43	1.44	1.44
T9Ea_60m	60m	13.54	8.89	9.10	9.18	0.58	0.59	0.61	0.62	21.38	19.88	20.00	20.04	1.53	1.42	1.43	1.43
T9Ea_70m	70m	13.23	8.79	8.98	9.05	0.57	0.58	0.60	0.61	21.32	19.82	19.93	19.97	1.52	1.42	1.42	1.43
T9Ea_80m	80m	13.00	8.72	8.89	8.95	0.57	0.58	0.59	0.60	21.27	19.78	19.88	19.91	1.52	1.41	1.42	1.42
T9Ea_90m	90m	12.82	8.66	8.82	8.87	0.56	0.57	0.59	0.59	21.23	19.75	19.84	19.87	1.52	1.41	1.42	1.42
T9Ea_100m	100m	12.67	8.61	8.76	8.81	0.56	0.57	0.58	0.59	21.20	19.72	19.81	19.83	1.51	1.41	1.41	1.42
T9Ea_110m	110m	12.55	8.57	8.71	8.76	0.56	0.56	0.58	0.58	21.17	19.70	19.78	19.80	1.51	1.41	1.41	1.41
T9Ea_120m	120m	12.44	8.54	8.67	8.71	0.55	0.56	0.57	0.58	21.15	19.68	19.76	19.78	1.51	1.41	1.41	1.41
T9Ea_130m	130m	12.35	8.51	8.63	8.67	0.55	0.56	0.57	0.57	21.13	19.67	19.74	19.76	1.51	1.40	1.41	1.41
T9Ea_140m	140m	12.28	8.48	8.60	8.64	0.55	0.56	0.57	0.57	21.11	19.65	19.72	19.74	1.51	1.40	1.41	1.41
T9Ea_150m	150m	12.21	8.46	8.58	8.61	0.55	0.55	0.56	0.57	21.10	19.64	19.70	19.72	1.51	1.40	1.41	1.41
T9Ea_160m	160m	12.15	8.44	8.55	8.59	0.55	0.55	0.56	0.56	21.09	19.63	19.69	19.71	1.51	1.40	1.41	1.41
T9Ea_170m	170m	12.10	8.43	8.53	8.57	0.54	0.55	0.56	0.56	21.07	19.62	19.68	19.70	1.51	1.40	1.41	1.41
T9Ea_180m	180m	12.05	8.41	8.51	8.55	0.54	0.55	0.56	0.56	21.07	19.61	19.67	19.69	1.50	1.40	1.40	1.41
T9Ea_190m	190m	12.01	8.40	8.50	8.53	0.54	0.55	0.56	0.56	21.06	19.60	19.66	19.68	1.50	1.40	1.40	1.41
T9Ea_200m	200m	11.98	8.39	8.48	8.51	0.54	0.55	0.55	0.56	21.05	19.60	19.65	19.67	1.50	1.40	1.40	1.40
T9Wa_1m	1m	38.18	16.79	18.75	19.48	1.23	1.33	1.51	1.58	26.55	24.31	25.40	25.80	1.90	1.74	1.81	1.84
T9Wa_10m	10m	20.74	11.20	11.94	12.21	0.77	0.81	0.88	0.90	22.91	21.18	21.59	21.74	1.64	1.51	1.54	1.55
T9Wa_20m	20m	16.88	9.96	10.42	10.59	0.67	0.69	0.74	0.75	22.10	20.48	20.74	20.83	1.58	1.46	1.48	1.49
T9Wa_30m	30m	15.25	9.44	9.78	9.91	0.63	0.64	0.68	0.69	21.75	20.19	20.38	20.45	1.55	1.44	1.46	1.46

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T9Wa_40m	40m	14.35	9.15	9.43	9.53	0.60	0.62	0.64	0.65	21.56	20.03	20.18	20.24	1.54	1.43	1.44	1.45
T9Wa_50m	50m	13.78	8.97	9.20	9.29	0.59	0.60	0.62	0.63	21.44	19.92	20.06	20.10	1.53	1.42	1.43	1.44
T9Wa_60m	60m	13.39	8.84	9.05	9.12	0.58	0.59	0.61	0.61	21.35	19.85	19.97	20.01	1.53	1.42	1.43	1.43
T9Wa_70m	70m	13.10	8.75	8.93	9.00	0.57	0.58	0.60	0.60	21.29	19.80	19.90	19.94	1.52	1.41	1.42	1.42
T9Wa_80m	80m	12.88	8.68	8.84	8.90	0.56	0.57	0.59	0.59	21.24	19.76	19.86	19.89	1.52	1.41	1.42	1.42
T9Wa_90m	90m	12.70	8.62	8.77	8.83	0.56	0.57	0.58	0.59	21.20	19.73	19.82	19.85	1.51	1.41	1.42	1.42
T9Wa_100m	100m	12.56	8.57	8.72	8.77	0.56	0.56	0.58	0.58	21.17	19.70	19.78	19.81	1.51	1.41	1.41	1.42
T9Wa_110m	110m	12.44	8.54	8.67	8.72	0.55	0.56	0.57	0.58	21.15	19.68	19.76	19.78	1.51	1.41	1.41	1.41
T9Wa_120m	120m	12.34	8.51	8.63	8.68	0.55	0.56	0.57	0.57	21.13	19.66	19.74	19.76	1.51	1.40	1.41	1.41
T9Wa_130m	130m	12.26	8.48	8.60	8.64	0.55	0.55	0.57	0.57	21.11	19.65	19.72	19.74	1.51	1.40	1.41	1.41
T9Wa_140m	140m	12.19	8.46	8.57	8.61	0.55	0.55	0.56	0.57	21.09	19.64	19.70	19.72	1.51	1.40	1.41	1.41
T9Wa_150m	150m	12.12	8.44	8.55	8.59	0.54	0.55	0.56	0.56	21.08	19.62	19.69	19.71	1.51	1.40	1.41	1.41
T9Wa_160m	160m	12.07	8.42	8.53	8.56	0.54	0.55	0.56	0.56	21.07	19.61	19.68	19.70	1.50	1.40	1.41	1.41
T9Wa_170m	170m	12.02	8.40	8.51	8.54	0.54	0.55	0.56	0.56	21.06	19.60	19.67	19.68	1.50	1.40	1.40	1.41
T9Wa_180m	180m	11.97	8.39	8.49	8.52	0.54	0.55	0.56	0.56	21.05	19.60	19.66	19.67	1.50	1.40	1.40	1.41
T9Wa_190m	190m	11.94	8.37	8.47	8.51	0.54	0.55	0.55	0.56	21.04	19.59	19.65	19.66	1.50	1.40	1.40	1.40
T9Wa_200m	200m	11.90	8.36	8.46	8.49	0.54	0.54	0.55	0.56	21.03	19.58	19.64	19.66	1.50	1.40	1.40	1.40
T10Ea_1m	1m	58.00	23.39	25.88	26.45	1.69	1.87	2.01	2.04	30.29	27.57	28.49	28.69	2.16	1.97	2.03	2.05
T10Ea_10m	10m	28.76	13.88	14.83	15.05	0.96	1.03	1.08	1.09	24.49	22.51	22.87	22.95	1.75	1.61	1.63	1.64
T10Ea_20m	20m	21.58	11.55	12.12	12.25	0.78	0.82	0.85	0.86	23.03	21.26	21.48	21.53	1.64	1.52	1.53	1.54
T10Ea_30m	30m	18.54	10.56	10.98	11.07	0.70	0.73	0.76	0.76	22.40	20.74	20.90	20.94	1.60	1.48	1.49	1.50
T10Ea_40m	40m	16.88	10.02	10.35	10.42	0.66	0.69	0.71	0.71	22.06	20.45	20.58	20.61	1.58	1.46	1.47	1.47
T10Ea_50m	50m	15.82	9.67	9.95	10.01	0.64	0.66	0.67	0.68	21.84	20.26	20.37	20.40	1.56	1.45	1.46	1.46
T10Ea_60m	60m	15.09	9.44	9.67	9.73	0.62	0.63	0.65	0.65	21.69	20.14	20.23	20.25	1.55	1.44	1.45	1.45
T10Ea_70m	70m	14.55	9.26	9.47	9.52	0.60	0.62	0.63	0.64	21.58	20.04	20.13	20.15	1.54	1.43	1.44	1.44
T10Ea_80m	80m	14.14	9.13	9.32	9.36	0.59	0.61	0.62	0.62	21.50	19.97	20.05	20.07	1.54	1.43	1.43	1.43
T10Ea_90m	90m	13.82	9.02	9.20	9.24	0.59	0.60	0.61	0.61	21.43	19.92	19.99	20.00	1.53	1.42	1.43	1.43
T10Ea_100m	100m	13.56	8.94	9.10	9.13	0.58	0.59	0.60	0.60	21.37	19.87	19.94	19.95	1.53	1.42	1.42	1.43
T10Ea_110m	110m	13.34	8.87	9.02	9.05	0.57	0.58	0.59	0.60	21.33	19.83	19.89	19.91	1.52	1.42	1.42	1.42
T10Ea_120m	120m	13.16	8.81	8.95	8.98	0.57	0.58	0.59	0.59	21.29	19.80	19.86	19.87	1.52	1.41	1.42	1.42
T10Ea_130m	130m	13.01	8.76	8.89	8.92	0.57	0.57	0.58	0.59	21.26	19.77	19.83	19.84	1.52	1.41	1.42	1.42
T10Ea_140m	140m	12.87	8.72	8.84	8.87	0.56	0.57	0.58	0.58	21.23	19.75	19.80	19.82	1.52	1.41	1.41	1.42
T10Ea_150m	150m	12.75	8.68	8.79	8.82	0.56	0.57	0.58	0.58	21.21	19.73	19.78	19.79	1.51	1.41	1.41	1.41
T10Ea_160m	160m	12.65	8.64	8.75	8.78	0.56	0.56	0.57	0.57	21.18	19.71	19.76	19.77	1.51	1.41	1.41	1.41
T10Ea_170m	170m	12.56	8.61	8.72	8.75	0.55	0.56	0.57	0.57	21.17	19.70	19.74	19.75	1.51	1.41	1.41	1.41
T10Ea_180m	180m	12.48	8.59	8.69	8.71	0.55	0.56	0.57	0.57	21.15	19.68	19.73	19.74	1.51	1.41	1.41	1.41
T10Ea_190m	190m	12.41	8.56	8.66	8.69	0.55	0.56	0.56	0.57	21.13	19.67	19.71	19.72	1.51	1.40	1.41	1.41
T10Ea_200m	200m	12.34	8.54	8.64	8.66	0.55	0.56	0.56	0.56	21.12	19.66	19.70	19.71	1.51	1.40	1.41	1.41
T10Wa_1m	1m	43.22	18.58	20.31	20.70	1.32	1.44	1.54	1.56	27.39	25.02	25.66	25.80	1.96	1.79	1.83	1.84
T10Wa_10m	10m	22.54	11.86	12.49	12.63	0.80	0.85	0.89	0.89	23.22	21.43	21.67	21.73	1.66	1.53	1.55	1.55

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T10Wa 20m	20m	17.93	10.36	10.75	10.84	0.69	0.72	0.74	0.74	22.28	20.63	20.78	20.82	1.59	1.47	1.48	1.49
T10Wa 30m	30m	15.99	9.73	10.01	10.08	0.64	0.66	0.68	0.68	21.88	20.29	20.41	20.43	1.56	1.45	1.46	1.46
T10Wa 40m	40m	14.91	9.38	9.60	9.66	0.61	0.63	0.64	0.65	21.65	20.10	20.20	20.22	1.55	1.44	1.44	1.44
T10Wa 50m	50m	14.22	9.15	9.35	9.39	0.60	0.61	0.62	0.63	21.51	19.98	20.06	20.08	1.54	1.43	1.43	1.43
T10Wa 60m	60m	13.74	9.00	9.16	9.20	0.58	0.60	0.61	0.61	21.41	19.90	19.97	19.99	1.53	1.42	1.43	1.43
T10Wa 70m	70m	13.39	8.88	9.03	9.07	0.57	0.59	0.60	0.60	21.34	19.84	19.90	19.92	1.52	1.42	1.42	1.42
T10Wa 80m	80m	13.12	8.80	8.93	8.96	0.57	0.58	0.59	0.59	21.28	19.79	19.85	19.86	1.52	1.41	1.42	1.42
T10Wa 90m	90m	12.90	8.73	8.85	8.88	0.56	0.57	0.58	0.58	21.24	19.75	19.81	19.82	1.52	1.41	1.41	1.42
T10Wa 100m	100m	12.73	8.67	8.78	8.81	0.56	0.57	0.57	0.58	21.20	19.72	19.78	19.79	1.51	1.41	1.41	1.41
T10Wa 110m	110m	12.58	8.62	8.73	8.75	0.55	0.56	0.57	0.57	21.17	19.70	19.75	19.76	1.51	1.41	1.41	1.41
T10Wa 120m	120m	12.46	8.58	8.68	8.71	0.55	0.56	0.57	0.57	21.14	19.68	19.72	19.73	1.51	1.41	1.41	1.41
T10Wa 130m	130m	12.35	8.55	8.64	8.67	0.55	0.56	0.56	0.56	21.12	19.66	19.70	19.71	1.51	1.40	1.41	1.41
T10Wa 140m	140m	12.26	8.52	8.61	8.63	0.55	0.55	0.56	0.56	21.10	19.64	19.68	19.69	1.51	1.40	1.41	1.41
T10Wa 150m	150m	12.18	8.49	8.58	8.60	0.54	0.55	0.56	0.56	21.09	19.63	19.67	19.68	1.51	1.40	1.40	1.41
T10Wa 160m	160m	12.11	8.47	8.55	8.57	0.54	0.55	0.56	0.56	21.07	19.62	19.65	19.66	1.51	1.40	1.40	1.40
T10Wa 170m	170m	12.05	8.45	8.53	8.55	0.54	0.55	0.55	0.55	21.06	19.60	19.64	19.65	1.50	1.40	1.40	1.40
T10Wa 180m	180m	11.99	8.43	8.51	8.53	0.54	0.55	0.55	0.55	21.05	19.59	19.63	19.64	1.50	1.40	1.40	1.40
T10Wa 190m	190m	11.94	8.41	8.49	8.51	0.54	0.54	0.55	0.55	21.03	19.59	19.62	19.63	1.50	1.40	1.40	1.40
T10Wa 200m	200m	11.89	8.40	8.47	8.49	0.54	0.54	0.55	0.55	21.03	19.58	19.61	19.62	1.50	1.40	1.40	1.40
T11Ea 1m	1m	49.89	20.52	22.33	22.82	1.67	1.83	1.99	2.02	29.64	27.19	28.14	28.35	2.12	1.94	2.01	2.02
T11Ea 10m	10m	25.55	12.76	13.46	13.65	0.95	1.01	1.07	1.08	24.18	22.33	22.70	22.78	1.73	1.59	1.62	1.63
T11Ea 20m	20m	20.00	11.00	11.44	11.55	0.78	0.82	0.86	0.87	22.91	21.22	21.45	21.50	1.64	1.52	1.53	1.54
T11Ea 30m	30m	17.65	10.24	10.58	10.67	0.71	0.74	0.77	0.78	22.37	20.74	20.92	20.96	1.60	1.48	1.49	1.50
T11Ea 40m	40m	16.34	9.83	10.10	10.17	0.67	0.70	0.72	0.73	22.07	20.48	20.63	20.66	1.58	1.46	1.47	1.48
T11Ea 50m	50m	15.51	9.56	9.80	9.86	0.65	0.67	0.69	0.69	21.88	20.32	20.44	20.47	1.56	1.45	1.46	1.46
T11Ea 60m	60m	14.94	9.38	9.59	9.64	0.63	0.65	0.67	0.67	21.74	20.20	20.31	20.34	1.55	1.44	1.45	1.45
T11Ea 70m	70m	14.52	9.25	9.44	9.48	0.62	0.63	0.65	0.65	21.65	20.12	20.22	20.24	1.55	1.44	1.44	1.45
T11Ea 80m	80m	14.20	9.15	9.32	9.36	0.61	0.62	0.64	0.64	21.57	20.05	20.15	20.17	1.54	1.43	1.44	1.44
T11Ea 90m	90m	13.95	9.07	9.23	9.27	0.60	0.62	0.63	0.63	21.52	20.00	20.09	20.11	1.54	1.43	1.44	1.44
T11Ea 100m	100m	13.75	9.00	9.16	9.20	0.60	0.61	0.62	0.62	21.47	19.96	20.05	20.06	1.53	1.43	1.43	1.43
T11Ea 110m	110m	13.59	8.95	9.10	9.14	0.59	0.60	0.62	0.62	21.43	19.93	20.01	20.03	1.53	1.42	1.43	1.43
T11Ea 120m	120m	13.46	8.91	9.05	9.09	0.59	0.60	0.61	0.61	21.40	19.91	19.98	20.00	1.53	1.42	1.43	1.43
T11Ea 130m	130m	13.35	8.88	9.01	9.04	0.58	0.59	0.61	0.61	21.38	19.88	19.96	19.97	1.53	1.42	1.43	1.43
T11Ea 140m	140m	13.26	8.85	8.97	9.01	0.58	0.59	0.60	0.61	21.35	19.87	19.93	19.95	1.53	1.42	1.42	1.42
T11Ea 150m	150m	13.18	8.82	8.94	8.98	0.58	0.59	0.60	0.60	21.34	19.85	19.92	19.93	1.52	1.42	1.42	1.42
T11Ea 160m	160m	13.10	8.80	8.92	8.95	0.58	0.59	0.60	0.60	21.32	19.83	19.90	19.91	1.52	1.42	1.42	1.42
T11Ea 170m	170m	13.04	8.78	8.90	8.93	0.57	0.58	0.59	0.60	21.30	19.82	19.89	19.90	1.52	1.42	1.42	1.42
T11Ea 180m	180m	12.99	8.76	8.88	8.91	0.57	0.58	0.59	0.59	21.29	19.81	19.87	19.89	1.52	1.41	1.42	1.42
T11Ea 190m	190m	12.93	8.74	8.86	8.89	0.57	0.58	0.59	0.59	21.28	19.80	19.86	19.87	1.52	1.41	1.42	1.42
T11Ea 200m	200m	12.89	8.73	8.84	8.87	0.57	0.58	0.59	0.59	21.27	19.79	19.85	19.86	1.52	1.41	1.42	1.42

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T11Wa_1m	1m	55.55	22.33	24.36	24.93	1.84	2.02	2.20	2.24	30.88	28.31	29.39	29.63	2.21	2.02	2.10	2.12
T11Wa_10m	10m	27.85	13.50	14.29	14.50	1.01	1.09	1.16	1.17	24.70	22.79	23.21	23.30	1.76	1.63	1.66	1.66
T11Wa_20m	20m	20.93	11.29	11.77	11.90	0.81	0.85	0.89	0.90	23.12	21.40	21.66	21.71	1.65	1.53	1.55	1.55
T11Wa_30m	30m	17.88	10.32	10.66	10.75	0.72	0.75	0.78	0.78	22.42	20.79	20.97	21.01	1.60	1.49	1.50	1.50
T11Wa_40m	40m	16.17	9.77	10.04	10.11	0.67	0.69	0.71	0.72	22.03	20.45	20.59	20.62	1.57	1.46	1.47	1.47
T11Wa_50m	50m	15.10	9.43	9.65	9.70	0.64	0.65	0.67	0.68	21.78	20.24	20.35	20.38	1.56	1.45	1.45	1.46
T11Wa_60m	60m	14.37	9.20	9.38	9.43	0.61	0.63	0.65	0.65	21.61	20.09	20.19	20.21	1.54	1.43	1.44	1.44
T11Wa_70m	70m	13.84	9.03	9.19	9.23	0.60	0.61	0.63	0.63	21.49	19.98	20.07	20.09	1.54	1.43	1.43	1.43
T11Wa_80m	80m	13.45	8.91	9.04	9.08	0.59	0.60	0.61	0.61	21.40	19.90	19.98	20.00	1.53	1.42	1.43	1.43
T11Wa_90m	90m	13.15	8.81	8.93	8.97	0.58	0.59	0.60	0.60	21.33	19.84	19.91	19.92	1.52	1.42	1.42	1.42
T11Wa_100m	100m	12.91	8.73	8.85	8.88	0.57	0.58	0.59	0.59	21.27	19.80	19.86	19.87	1.52	1.41	1.42	1.42
T11Wa_110m	110m	12.71	8.67	8.77	8.80	0.56	0.57	0.58	0.58	21.23	19.76	19.81	19.82	1.52	1.41	1.42	1.42
T11Wa_120m	120m	12.55	8.62	8.72	8.74	0.56	0.57	0.58	0.58	21.19	19.72	19.78	19.79	1.51	1.41	1.41	1.41
T11Wa_130m	130m	12.42	8.58	8.67	8.69	0.56	0.56	0.57	0.57	21.16	19.70	19.75	19.76	1.51	1.41	1.41	1.41
T11Wa_140m	140m	12.30	8.54	8.63	8.65	0.55	0.56	0.57	0.57	21.13	19.67	19.72	19.73	1.51	1.41	1.41	1.41
T11Wa_150m	150m	12.20	8.51	8.59	8.61	0.55	0.56	0.56	0.56	21.11	19.65	19.70	19.71	1.51	1.40	1.41	1.41
T11Wa_160m	160m	12.12	8.48	8.56	8.58	0.55	0.55	0.56	0.56	21.09	19.64	19.68	19.69	1.51	1.40	1.41	1.41
T11Wa_170m	170m	12.05	8.46	8.53	8.55	0.54	0.55	0.56	0.56	21.07	19.62	19.66	19.67	1.51	1.40	1.40	1.41
T11Wa_180m	180m	11.98	8.44	8.51	8.53	0.54	0.55	0.55	0.56	21.06	19.61	19.65	19.66	1.50	1.40	1.40	1.40
T11Wa_190m	190m	11.92	8.42	8.49	8.50	0.54	0.55	0.55	0.55	21.05	19.60	19.63	19.64	1.50	1.40	1.40	1.40
T11Wa_200m	200m	11.87	8.40	8.47	8.48	0.54	0.55	0.55	0.55	21.03	19.59	19.62	19.63	1.50	1.40	1.40	1.40
T12Wa_1m	1m	85.55	32.02	34.45	34.83	2.62	2.92	3.16	3.19	35.24	32.12	33.53	33.74	2.52	2.29	2.39	2.41
T12Wa_10m	10m	40.18	17.44	18.45	18.60	1.34	1.46	1.56	1.57	25.74	23.48	24.07	24.15	1.84	1.68	1.72	1.73
T12Wa_20m	20m	29.00	13.85	14.49	14.59	1.02	1.10	1.16	1.17	23.31	21.34	21.72	21.77	1.66	1.52	1.55	1.56
T12Wa_30m	30m	24.01	12.25	12.72	12.79	0.88	0.94	0.98	0.99	22.21	20.39	20.66	20.70	1.59	1.46	1.48	1.48
T12Wa_40m	40m	21.11	11.32	11.70	11.75	0.80	0.84	0.88	0.89	21.57	19.83	20.05	20.08	1.54	1.42	1.43	1.43
T12Wa_50m	50m	19.23	10.72	11.03	11.08	0.75	0.78	0.81	0.82	21.15	19.47	19.65	19.68	1.51	1.39	1.40	1.41
T12Wa_60m	60m	17.89	10.29	10.55	10.59	0.71	0.74	0.77	0.77	20.85	19.21	19.37	19.39	1.49	1.37	1.38	1.39
T12Wa_70m	70m	16.90	9.97	10.20	10.23	0.68	0.71	0.73	0.73	20.63	19.02	19.16	19.18	1.47	1.36	1.37	1.37
T12Wa_80m	80m	16.13	9.72	9.92	9.96	0.66	0.68	0.70	0.71	20.46	18.87	18.99	19.01	1.46	1.35	1.36	1.36
T12Wa_90m	90m	15.52	9.52	9.71	9.73	0.64	0.66	0.68	0.68	20.32	18.76	18.86	18.88	1.45	1.34	1.35	1.35
T12Wa_100m	100m	15.02	9.36	9.53	9.56	0.63	0.65	0.66	0.67	20.21	18.66	18.76	18.77	1.44	1.33	1.34	1.34
T12Wa_110m	110m	14.61	9.23	9.38	9.41	0.62	0.63	0.65	0.65	20.12	18.58	18.67	18.68	1.44	1.33	1.33	1.33
T12Wa_120m	120m	14.27	9.12	9.26	9.28	0.61	0.62	0.64	0.64	20.04	18.52	18.60	18.61	1.43	1.32	1.33	1.33
T12Wa_130m	130m	13.98	9.03	9.16	9.18	0.60	0.61	0.63	0.63	19.98	18.46	18.53	18.55	1.43	1.32	1.32	1.32
T12Wa_140m	140m	13.73	8.95	9.07	9.08	0.59	0.61	0.62	0.62	19.92	18.41	18.48	18.49	1.42	1.32	1.32	1.32
T12Wa_150m	150m	13.52	8.88	8.99	9.01	0.59	0.60	0.61	0.61	19.87	18.37	18.44	18.45	1.42	1.31	1.32	1.32
T12Wa_160m	160m	13.33	8.82	8.92	8.94	0.58	0.59	0.60	0.60	19.83	18.34	18.40	18.40	1.42	1.31	1.31	1.31
T12Wa_170m	170m	13.16	8.77	8.86	8.88	0.58	0.59	0.60	0.60	19.80	18.30	18.36	18.37	1.41	1.31	1.31	1.31
T12Wa_180m	180m	13.02	8.72	8.81	8.83	0.57	0.58	0.59	0.59	19.76	18.28	18.33	18.34	1.41	1.31	1.31	1.31

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T12Wa_190m	190m	12.89	8.68	8.77	8.78	0.57	0.58	0.59	0.59	19.73	18.25	18.30	18.31	1.41	1.30	1.31	1.31
T12Wa_200m	200m	12.78	8.64	8.72	8.74	0.57	0.58	0.58	0.58	19.71	18.23	18.28	18.28	1.41	1.30	1.31	1.31
T14Ea_1m	1m	17.41	10.10	10.32	10.42	0.68	0.71	0.73	0.74	20.95	19.32	19.43	19.49	1.50	1.38	1.39	1.39
T14Ea_10m	10m	13.85	8.96	9.06	9.11	0.59	0.60	0.61	0.62	20.20	18.68	18.73	18.76	1.44	1.33	1.34	1.34
T14Ea_20m	20m	12.83	8.63	8.70	8.73	0.56	0.57	0.58	0.58	19.98	18.50	18.53	18.55	1.43	1.32	1.32	1.33
T14Ea_30m	30m	12.38	8.49	8.54	8.56	0.55	0.56	0.56	0.57	19.88	18.42	18.45	18.46	1.42	1.32	1.32	1.32
T14Ea_40m	40m	12.13	8.41	8.45	8.47	0.55	0.55	0.56	0.56	19.83	18.37	18.40	18.41	1.42	1.31	1.31	1.31
T14Ea_50m	50m	11.97	8.36	8.40	8.41	0.54	0.55	0.55	0.55	19.79	18.34	18.37	18.37	1.41	1.31	1.31	1.31
T14Ea_60m	60m	11.86	8.32	8.36	8.37	0.54	0.54	0.55	0.55	19.77	18.32	18.34	18.35	1.41	1.31	1.31	1.31
T14Ea_70m	70m	11.78	8.29	8.33	8.34	0.54	0.54	0.54	0.55	19.75	18.31	18.33	18.33	1.41	1.31	1.31	1.31
T14Ea_80m	80m	11.72	8.27	8.31	8.32	0.53	0.54	0.54	0.54	19.74	18.30	18.31	18.32	1.41	1.31	1.31	1.31
T14Ea_90m	90m	11.67	8.26	8.29	8.30	0.53	0.54	0.54	0.54	19.73	18.29	18.31	18.31	1.41	1.31	1.31	1.31
T14Ea_100m	100m	11.63	8.25	8.28	8.28	0.53	0.54	0.54	0.54	19.72	18.28	18.30	18.30	1.41	1.31	1.31	1.31
T14Ea_110m	110m	11.60	8.24	8.26	8.27	0.53	0.54	0.54	0.54	19.71	18.28	18.29	18.30	1.41	1.31	1.31	1.31
T14Ea_120m	120m	11.57	8.23	8.25	8.26	0.53	0.53	0.54	0.54	19.71	18.27	18.29	18.29	1.41	1.30	1.31	1.31
T14Ea_130m	130m	11.55	8.22	8.25	8.25	0.53	0.53	0.54	0.54	19.70	18.27	18.28	18.29	1.41	1.30	1.31	1.31
T14Ea_140m	140m	11.53	8.21	8.24	8.25	0.53	0.53	0.54	0.54	19.70	18.26	18.28	18.28	1.41	1.30	1.31	1.31
T14Ea_150m	150m	11.51	8.21	8.23	8.24	0.53	0.53	0.54	0.54	19.70	18.26	18.27	18.28	1.41	1.30	1.31	1.31
T14Ea_160m	160m	11.50	8.20	8.23	8.23	0.53	0.53	0.53	0.54	19.69	18.26	18.27	18.27	1.41	1.30	1.30	1.31
T14Ea_170m	170m	11.48	8.20	8.22	8.23	0.53	0.53	0.53	0.54	19.69	18.25	18.27	18.27	1.41	1.30	1.30	1.31
T14Ea_180m	180m	11.47	8.20	8.22	8.22	0.53	0.53	0.53	0.53	19.69	18.25	18.27	18.27	1.41	1.30	1.30	1.30
T14Ea_190m	190m	11.46	8.19	8.22	8.22	0.53	0.53	0.53	0.53	19.69	18.25	18.26	18.27	1.41	1.30	1.30	1.30
T14Ea_200m	200m	11.45	8.19	8.21	8.22	0.53	0.53	0.53	0.53	19.68	18.25	18.26	18.26	1.41	1.30	1.30	1.30
T15Wa_1m	1m	16.81	9.97	10.27	10.15	0.67	0.69	0.72	0.71	20.82	19.21	19.38	19.32	1.49	1.37	1.38	1.38
T15Wa_10m	10m	13.15	8.78	8.90	8.85	0.57	0.58	0.59	0.59	20.05	18.56	18.63	18.60	1.43	1.33	1.33	1.33
T15Wa_20m	20m	12.29	8.50	8.57	8.55	0.55	0.56	0.56	0.56	19.87	18.40	18.45	18.43	1.42	1.31	1.32	1.32
T15Wa_30m	30m	11.93	8.38	8.44	8.42	0.54	0.55	0.55	0.55	19.79	18.34	18.37	18.36	1.41	1.31	1.31	1.31
T15Wa_40m	40m	11.73	8.31	8.36	8.35	0.54	0.54	0.55	0.54	19.75	18.30	18.33	18.32	1.41	1.31	1.31	1.31
T15Wa_50m	50m	11.60	8.27	8.31	8.31	0.53	0.54	0.54	0.54	19.72	18.28	18.31	18.30	1.41	1.31	1.31	1.31
T15Wa_60m	60m	11.52	8.24	8.28	8.27	0.53	0.53	0.54	0.54	19.70	18.27	18.29	18.28	1.41	1.30	1.31	1.31
T15Wa_70m	70m	11.45	8.22	8.26	8.25	0.53	0.53	0.54	0.54	19.69	18.25	18.27	18.27	1.41	1.30	1.31	1.31
T15Wa_80m	80m	11.41	8.21	8.24	8.24	0.53	0.53	0.53	0.53	19.68	18.25	18.26	18.26	1.41	1.30	1.30	1.30
T15Wa_90m	90m	11.37	8.20	8.23	8.22	0.53	0.53	0.53	0.53	19.67	18.24	18.26	18.25	1.41	1.30	1.30	1.30
T15Wa_100m	100m	11.34	8.19	8.21	8.21	0.53	0.53	0.53	0.53	19.67	18.23	18.25	18.25	1.40	1.30	1.30	1.30
T15Wa_110m	110m	11.31	8.18	8.21	8.20	0.52	0.53	0.53	0.53	19.66	18.23	18.25	18.24	1.40	1.30	1.30	1.30
T15Wa_120m	120m	11.29	8.17	8.20	8.20	0.52	0.53	0.53	0.53	19.66	18.23	18.24	18.24	1.40	1.30	1.30	1.30
T15Wa_130m	130m	11.28	8.17	8.19	8.19	0.52	0.53	0.53	0.53	19.65	18.22	18.24	18.24	1.40	1.30	1.30	1.30
T15Wa_140m	140m	11.26	8.16	8.19	8.18	0.52	0.53	0.53	0.53	19.65	18.22	18.23	18.23	1.40	1.30	1.30	1.30
T15Wa_150m	150m	11.25	8.16	8.18	8.18	0.52	0.53	0.53	0.53	19.65	18.22	18.23	18.23	1.40	1.30	1.30	1.30
T15Wa_160m	160m	11.24	8.15	8.18	8.18	0.52	0.53	0.53	0.53	19.64	18.22	18.23	18.23	1.40	1.30	1.30	1.30

Road Link	Distance from Road (m)	Total Annual Mean NOx (µg/m3)				Total Annual Mean Ammonia NH3 (µg/m3)				Total Annual Mean Nitrogen Deposition				Total Annual Mean Acid Deposition			
		2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Do Min	2038 Do Something	2017	2017 Future Base	2038 Ref	2038 Do Something
T15Wa_170m	170m	11.23	8.15	8.17	8.17	0.52	0.53	0.53	0.53	19.64	18.21	18.23	18.23	1.40	1.30	1.30	1.30
T15Wa_180m	180m	11.22	8.15	8.17	8.17	0.52	0.53	0.53	0.53	19.64	18.21	18.23	18.23	1.40	1.30	1.30	1.30
T15Wa_190m	190m	11.21	8.14	8.17	8.17	0.52	0.53	0.53	0.53	19.64	18.21	18.22	18.22	1.40	1.30	1.30	1.30
T15Wa_200m	200m	11.21	8.14	8.16	8.16	0.52	0.52	0.53	0.53	19.64	18.21	18.22	18.22	1.40	1.30	1.30	1.30

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District Plan

Community Involvement Plan (CIP) – September 2022

For the:

- **Mid Sussex District Plan (Regulation 18)**
- **Sustainability Appraisal**
- **Habitats Regulations Assessment**
- **Equality Impacts Assessment**

1. Background

The District Council is developing a new District Plan to guide development and the provision of infrastructure over the period to 2039. The new District Plan provides a vision for how Mid Sussex wants to evolve over this time and a delivery strategy for how this will be achieved.

Community involvement plays a vital role in the preparation of District Plans. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, there are two formal consultation periods for District Plans:

- Regulation 18: Preparation of a Local Plan
- Regulation 19: Publication of a Local Plan (Pre-Submission)

This Community Involvement Plan relates to the Regulation 18 consultation.

2. Role and Purpose of the Community Involvement Plan

Mid Sussex District Council adopted its Statement of Community Involvement (SCI) in March 2019.

The SCI contains 6 General Principles for Community Engagement:

- 1) **Be Timely:** Involve the community as early as possible in decision making
- 2) **Be Inclusive:** Accessible to all those who wish to take part
- 3) **Be Transparent:** Consultation material should be clear and plain-English
- 4) **Be Respectful of Other's Views:** The Council will listen to all views
- 5) **Be Efficient:** Consultation to be proportionate and use resources wisely
- 6) **Be Clear About the Results:** Decisions and results should be made clear

The SCI recognises that there is no “one size fits all” approach to consultation; recognising that each decision that requires community involvement may be for different audiences or different purposes. The SCI therefore requires that a bespoke Community Involvement Plan (CIP) is prepared for each consultation on Planning Policy documents (such as the District Plan) so that consultation can be tailored.

This Community Involvement Plan follows the template set out in the SCI. It sets out:

- Who is involved in the production and consultation of the new District Plan;
- Why people are being involved in the process;

- When and how people will be able to get involved and influence the new District Plan; and
- How the results of community involvement will be used.

The new District Plan is accompanied by a Sustainability Appraisal, Habitats Regulations Assessment and Equality Impacts Assessment, all of which are also subject to consultation at Regulation 18 stage and therefore the same consultation arrangements set out in this CIP.

3. Who is to be involved?

Early engagement

In the SCI, the Council commits to ‘front load’ consultation activity, to identify potential issues and options. This work has assisted in the formulation of policies and has informed and updated the evidence base. Early engagement with stakeholders has been sought from the very start of the process of producing the new District Plan, including:

- District Councillors, Town and Parish Councils have been briefed on the need for a new District plan and anticipated content.
- A Developers Liaison Group, which includes representatives from across the development industry, was consulted on the methodology for site selection.
- Neighbouring Local Authorities and County Authorities, on a group and individual basis. Input was sought into the methodology for the site selection;
- External organisations, such as the High Weald AONB Unit.
- Consulting other statutory consultees, such as Historic England, the Environment Agency and Natural England.

Including everyone

The Equality Impacts Assessment (EqIA) that accompanies the District Plan considers the needs of people classified as having ‘protected characteristics’.¹ This assessment concludes that there are no additional specific measures or actions needed at this time. However, the Council will continue to promote consultation exercises that are inclusive of all, including engagement with representative organisations and monitoring of the consultation.

There is further analysis of consultation practices and the actions that will be taken to ensure that everyone has the opportunity to engage with the consultation included within the EqIA which accompanies the new District Plan.²

Who will be contacted?

A number of groups will be directly contacted and asked for their comments. These are:

- District Councillors;
- Town and Parish Councils;
- ‘Specific consultation bodies’/ ‘general consultation bodies’ (statutory consultees) as set out in legislation.³ These include West Sussex County Council, adjoining local planning authorities, service providers and government agencies such as the Environment Agency and Natural England, and the South Downs National Park Authority;
- Other organisations, groups or individuals that may have an interest in the new District Plan. These include members of the Mid Sussex Partnership, voluntary services’ associations, residents’ associations, housing associations, business groups and associations,

¹ As defined by the *Equality Act 2010*

² Available at: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review/>

³ *The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)*

environmental, countryside and conservation groups, youth and elderly persons' groups and the development industry;

- Representatives of those groups highlighted as requiring targeted consultation by the EqIA;
- Subscribers to the Planning Policy e-mail alerts service⁴; and
- Internal consultees at the District Council.

Elected District Councillors have a key role to play in forming the new District Plan and will be fully involved in the process through:

- The Scrutiny Committee for Planning, Economic Growth and Net Zero (any District Councillor can attend and request to speak);
- Full Council (consists of all District Councillors); and
- Councillors will be directly informed and can respond during the public consultation period.

4. Why are people being involved?

We are asking for people's views on the new District Plan through a formal consultation period. It is important to seek input from the wider public, as the Plan will set the strategy and allocate sites for development in the district and include planning policies that will have an impact upon both the existing and future communities of Mid Sussex.

The results of consultation will form part of the information used to finalise the strategy and policies. In order to make the consultation more meaningful, it is important that people understand the context within which the new District Plan has been drafted and that certain aspects of the Plan may not be able to be changed as a result of consultation:

- The new District Plan has been written in line with Government planning policy and guidance, set out in the National Planning Policy Framework (2021) and Planning Practice Guidance.
- The new District Plan has been written in accordance with legislation and regulations.⁵
- The new District Plan has been informed by the results of the accompanying Sustainability Appraisal. This shows which options have been considered for its strategy and policies and why the options chosen are preferred over those rejected.
- The new District Plan has been informed by background evidence. The background evidence will be made available to view on the Council's website.⁶

⁴ To receive news and updates on policy documents being prepared please sign up to our email alerts at: <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/#topic-planning-policy-email-alerts>

⁵ *Planning and Compulsory Purchase Act 2004*, and other relevant legislation.

⁶ Available at: <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review/>

5. When will people be involved?

District Plan Consultation Draft (Regulation 18)	Consultation starts week commencing 7 th November 2022 for six weeks. Consultation documents will be available online from this date with printed copies available at the venues outlined in Section 6.
Proposed Submission draft (Regulation 19)	Following agreement by Council, the Council will 'publish' the Proposed Submission District Plan for a six-week period, anticipated Summer/Autumn 2023. During this time the public can make further representations on the District Plan and these will be considered by the Planning Inspector appointed to carry out the Examination in Public. The Council may make minor changes to the District Plan following publication. A further Community Involvement Plan will be produced at this stage.
Adoption	The new District Plan is due to be adopted 2024. No consultation is legally required at this stage although it will be widely advertised.

Further details of the timetable are available within the Council's Local Development Scheme: <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/>

6. How will people be involved?

The consultation will be open to all and we will seek to inform and receive comment from the widest possible range of people. We will:

- Send out a press release, an email alert and utilise social media;
- Put all the details and documentation on the Council's website including an on-line response form. All on-line material will be compatible with 'BrowseAloud' for people who find it difficult to read on-line;
- Utilise electronic methods wherever possible in addition to traditional methods to make it as easy as possible to advertise and respond to the consultation;
- A translation service is available to those for whom English is a second language;
- Send letters or emails to all the 'specific consultation bodies' (statutory consultees) and to all the other organisations listed in Section 2 above;
- Send letters or emails to all those who have signed up to the Planning Policy alert;
- Hold public exhibitions/drop sessions in areas of significant change, as required.

Availability of Documents

Regulation 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the requirements for documents to be made available for inspection.

35.—(1) A document is to be taken to be made available by a local planning authority when—

(a) made available for inspection, at their principal office and at such other places within their area as the local planning authority consider appropriate, during normal office hours, and

(b) published on the local planning authority's website,

In terms of criterion (a), the District Plan consultation documents will be available to view at the Mid Sussex District Council offices during normal office hours. As such, consultation materials will be available to view to those making an appointment in advance. This can be arranged by

contacting the Council's switchboard on 01444 458166 or the Planning Policy Team on PlanningPolicy@midsussex.gov.uk

In terms of "other such places" set out in criterion (a), the Council will send hard copies of the District Plan consultation material to each of the libraries and help points and provide instructions for accessing the documentation on the Council website (which could be accessed using library PCs for example). The availability of documents at these locations will be subject to Government guidance and this will be kept under close review during the consultation period and alternative or additional venues/ methods will be sought (and locations advertised) if necessary to ensure that stakeholders are able to view the documents in person during the consultation period.

The new District Plan, supporting documentation and evidence base will be available to view on the Council's website at <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review/>

Submitting Responses

Comments must be submitted in writing (physical or digital) and cannot be accepted as anonymous. All information received is public information, subject to relevant data protection legislation.⁷

Comments can be submitted via the website, email or by post. Electronic submissions are encouraged to lessen paper consumption. A response form will be made available which can be completed and submitted on the MSDC website. Where hard copy responses must be submitted these can be sent to:

Planning Policy, Mid Sussex District Council, Oaklands, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS

E-mail to: policyconsultation@midsussex.gov.uk

⁷Such as the *Data Protection Act (2018)*

7. What happens to the results?

All comments will be treated equally, although it will be up to the Council to balance any conflicting opinions when considering the final document.

The effectiveness of the consultation and the level of involvement by people, particularly those classified as having ‘protected characteristics’⁸ and requiring particular consideration as detailed in the Equalities Assessment, will be monitored. This information will be used to inform future consultation work⁹.

A consultation report summarising who was consulted, how this was done, the issues raised by the consultation and how these comments have been used will be published on the Council’s website and will be considered by the Council.

Notification that the summary report has been published will be sent to all statutory consultees, Planning Policy email alert subscribers and respondents who submitted a response and expressed a wish to be notified of the next stages of the District Plan.

If you have any comments or queries on this Community Involvement Plan, please contact the Planning Policy team on PlanningPolicy@midsussex.gov.uk or 01444 477053.

If you have a comment or concern with your experience of a Council-led community involvement exercise, you should in the first instance contact the team using the details above. Alternatively, you can contact the Customer Services and Communications Team by phone (01444) 477478 or by writing to Customer Services and Communications, Mid Sussex District Council, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS.

⁸ Defined by Equalities Legislation

⁹ This information will be used solely for this purpose. Equalities information will be kept strictly confidential. All data is subject to the relevant Data Protection Legislation.

MID SUSSEX DISTRICT COUNCIL

Equality Impacts Assessment (EqIA) – 2022

Title of Policy/Service/Contract: Mid Sussex District Plan Review (2021 –2039) Development Plan Document (DPD) (Regulation 18)

Division: Planning Policy and Housing Enabling

Lead Officer: Andrew Marsh

Date Assessment completed: 29/09/2022

What is Equalities Impact Assessment?

An Equalities Impact Assessment (EqIA) is a way of ensuring that the Council fulfils its obligations to promote equality of opportunity, and that it does not discriminate between people who have a protected characteristic, or characteristics, and those who do not. In the UK, it is illegal to discriminate against people because of the following protected characteristics:

- Age;
- Being or becoming a transsexual person;
- Being married or in a civil partnership;
- Being pregnant or having a child;
- Disability;
- Race including colour, nationality, ethnic or national origin;
- Religion, belief or lack of religion/belief;
- Sex; and
- Sexual orientation.

These protected characteristics are defined in the Equalities Act 2010 ([Equalities Act 2010](#)). This protects people from discrimination at work, in education, as a consumer, when using public services, when buying or renting property and as a member or guest of a private club or association. People who are associated with someone who has a protected characteristic, e.g. a family member or friend, and people who have complained about discrimination or supported someone's claim are also protected.

1. Scope

1.1 What are the aims of the policy, service/service change or contract?

Mid Sussex District Council is currently reviewing the District Plan 2014 – 2031 (Adopted March 2018) As part of this process, the Equality Impact Assessment (EqIA) is produced and acts as a tool to assess the implication of planning policies on the whole community, with the aim to eliminate discrimination and tackle inequality.

Local Planning Authorities are required to review their Local Plan every 5 years, with a subsequent update if and where necessary. The Council is currently at Regulation 18 stage of the District Plan (2021 –2039) preparation, which the first formal consultation stage.

The Local Plan is being prepared under the terms of the 2004 Planning and Compulsory Purchase Act and will provide a strategic planning framework for the District, guiding

development to 2039. The Local Plan is the key strategic planning document, and performs the following functions for the area of Mid Sussex outside of the South Downs National Park:

- Defines a spatial vision for Mid Sussex to 2039;
- Sets out a number of objectives to achieve the vision;
- Sets out a spatial development strategy to meet these objectives;
- Sets out strategic policies to guide and control the overall scale, type and location of new development and infrastructure investment and;
- Indicates the numbers and locations of new homes to be built over the plan period and;
- Provides policies which guide the determination of planning allocations.

The review of the District Plan policies will result in the following status of each policy:

- policies that remain ‘in-date’ and will not require amendment
- policies that require minor update rather than a full review; and
- Policies that require a full review
- new policies to supplement existing policies

1.2 Purpose of the EqIA

The purpose of this EqIA report is to enable a transparent decision making process. It informs public consultation and assesses the draft policies within the District Local Plan 2021-2039 (Regulation 18) to ensure that they do not discriminate against particular people or groups. This report considers the likely impact of the Local Plan’s Vision, Objectives and Policies on the nine Protected Characteristic groups identified within the Equality Act 2010.

An EqIA will be published alongside each stage of public consultation of drafting of the Local Plan. Following close of consultation, responses will be reviewed by Council officers and any issues raised that may impact on equality and fairness will be assessed and where necessary actioned or mitigation measures put in place through later stages of Local Plan production.

1.3 Who does the service/policy/contract affect? Who are the main customers (internal or external)?

Regulation 18 of the Local Plan preparation sets out specific bodies or persons that a local planning authority must notify and invite representations from in developing its Local Plan. The DPD will be published for six weeks consultation to allow members of the public, Town or Parish Councils, Statutory bodies and other interested stakeholders and organisations to provide any comments to assist in the preparation of the document.

The draft policies contained within the DPD have the potential to affect current and future residents, workers and visitors to Mid Sussex and also those nearby, who are outside the administrative boundaries of the District but may still be impacted by planning policies in Mid Sussex.

The main customers of the DPD are expected to be:

- Council Officers;
- Members of the public;
- District, Town and Parish Councillors;
- Those involved in the development industry such as developers, landowners, agents;
- Organisations and individuals that provide services to residents and organisations;
- Organisations and individuals that represent groups of people.

1.4. What equality information is available, including any evidence from engagement and analysis of use of services?

In the adopted Mid Sussex District Council Statement of Community Involvement (SCI) (2019), the Council commits to 'front load' consultation activity, to identify potential issues and options. Stakeholder engagement is being sought from the very start of the process of producing the DPD. This work assists in the formulation of policies and informs and updates the evidence base.

Engagement with stakeholders is vital and has already commenced. Engagement will continue throughout each stage of producing the DPD, including:

- Town and Parish Council briefings
- A Developers Liaison Group, which includes representatives from across the development industry, was also established and consulted in relation to the SHELAA and methodology for site selection.
- Neighbouring Local Authorities and County Authorities; The District Council will seek to enter into Statements of Common Ground (SoCGs) with neighbouring authorities.
- External organisations, such as the High Weald AONB Unit. It is the Council's intention to invite relevant public bodies to enter into SoCGs.
- Consulting other statutory consultees, such as Historic England, the Environment Agency and Natural England.

There has also been extensive engagement with internal MSDC officers, including:

- Officers from both Planning Policy and Economic Development, and Development Management;
- Urban Designer;
- Sustainability Officer;
- Heritage Officer;
- Tree Officer;
- Housing Services;
- Waste and Outdoor Services;
- Community Services, Policy and Performance.

In order to support the review of the District Plan the evidence base has been updated. This includes commissioning of specialist studies to assess whether an update is required, and if so, to establish new requirements. The following studies have informed production of this updated District Plan:

- **Strategic Housing Market Assessment (SHMA)** – to establish the district's housing need, including affordable housing and older persons' accommodation and inform the need for potential site allocations
- **Gypsy and Traveller Accommodation Assessment (GTAA)** – to establish the district's need for Gypsy and Traveller pitches and inform the need for potential site allocations
- **Economic Growth Assessment (EGA)** – to establish needs for office, industrial and storage and distribution uses and inform the need for potential site allocations
- **Retail and Town Centre Study** - to establish requirements for retail, leisure and town centre uses and to inform the need for potential site allocations
- **Urban Capacity Study** – to assess the potential supply of housing from brownfield sites within the district's main urban areas
- **Transport Study** – to assess potential site allocations for their impact on the transport network

- **Air Quality** – to assess the impacts of additional traffic movements on Ashdown Forest SAC/SPA and Stonepound Crossroads AQMA
- **Water Cycle Study** – to assess the potential issues relating to future development and the impacts on water supply, wastewater collection and treatment and water quality.
- **Viability Assessment** - to assess the implications of the Plan on viability of development, to confirm Plan is deliverable in viability terms.
- **Sustainability Appraisal (SA)** – a legal requirement, to appraise options for strategy, policies and sites against sustainability criteria and assess impacts on social, environmental and economic objectives
- **Habitats Regulations Assessment (HRA)** – a legal requirement to test whether a plan could significantly harm the designated features of a European site; for the District Plan this relates to Ashdown Forest SAC/SPA.

Updates of the above and additional specialist studies may be commissioned as the plan progresses to review and inform each iteration of plan review.

1.5 What does this information tell us about the equality issues associated with the service and implications for the protected groups?

Consultation with a variety of groups and interested parties ensures a broad range of opinions have input into the production of the DPD from an early stage. Representations made during each stage of public consultation will be reviewed to ensure that any equality issues raised are appropriately considered and resolved where necessary.

Consultation will be open to all and seeks to inform and receive comment from the widest possible range of people, including the protected groups, by using a variety of consultation methods.

More information on the consultation will be available in the Community Involvement Plan which accompanies the DPD. This document will detail how and when the consultation will be undertaken. Importantly, the Community Involvement Plan will be informed by the findings of the following assessment to ensure there are no barriers preventing the involvement of protected groups, and where necessary, provision is made to support involvement.

1.6 Are contractors or partnerships used to deliver the service? No

If No go to section 2.

2. Assessment of Impacts: Analysis and Action Planning

This assessment considers the impact of both the proposed content of the DPD and the upcoming consultation. Opportunities have been identified, where it is anticipated that the DPD may be able to promote equality, good relations and/or address barriers to service/differential impact. The current practices and resources available for addressing the opportunities are assessed, and then where necessary, further actions are identified where the DPD may be able to take action to support the identified equalities objective.

This assessment will be reviewed, and if necessary revised, for each stage of the DPD.

The Council's vision is for Mid Sussex to be a thriving, attractive and resilient District, which is a highly sustainable and desirable place to live, work and visit. Our aim is to maintain, and where possible, improve the social, economic and environmental well-being of our District and the quality of life for all, now and in the future.”

The vision is underpinned by three priority themes that promote the development of sustainable communities:

- Environment: Protecting and enhancing the natural, built, and historic environment;
- Economy: Promoting economic vitality; and
- Social: Ensuring cohesive, safe and healthy communities

Opportunity for DPD to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these, including existing policies and consultation best practice	Further actions required by the DPD and timescales	Lead Officer	How will impact be measured
The needs of different ethnic groups including white minorities, but also established white communities				
<p>The DPD has no identified impacts upon particular needs of different ethnic groups.</p> <p>Note that engagement methods must be responsive of potential barriers that exist for those where English is not their first language.</p>	<p>Engagement with representative organisations.</p> <p>A translation service is provided by the Council.</p> <p>Implementation of District Plan Draft Policy, <i>DPH29: Gypsies, Travellers and Travelling Showpeople</i>, aims to ensure that a sufficient amount of permanent culturally suitable housing for settled Gypsies, Travellers and Travelling Showpeople is delivered to meet identified needs within an appropriate timescale.</p>	None identified.	-	-
The needs of men and women, including taking account of pregnancy and maternity				
<p>The DPD has no identified impacts upon particular needs of men and women.</p> <p>Note that engagement methods must be accessible to those who are expecting and those with very young babies to ensure that this is not a barrier to engagement and to ensure that they can positively input into the plan-making process.</p>	<p>Implementation of District Plan Draft Policy <i>DPH36: Accessibility</i> helps meet the access needs of not only older and disabled people, but of the whole community, including parents with pushchairs.</p> <p>Consultations of all planning documents aim to be open to all and accessible to pregnant women and those with young children to ensure that this is not a barrier to engagement; there are always multiple ways of viewing planning documents and responding to consultations. The document will be available to view digitally on the Mid Sussex District Council website, and hard copies will be available to view at deposit points around the District.</p>	None identified.	-	-
The needs of disabled people				
<p>To provide the policy framework to ensure:</p> <ul style="list-style-type: none"> - That there is adequate provision of community facilities and local services, and Infrastructure; 	<p>Engagement with Access Groups.</p> <p>Implementation of draft DPD policy <i>DPH35: Dwelling Space Standards</i> seeks to set minimum space standards for all dwellings</p>	<p>Implement DPD policies on housing site allocations within the identified indicative phasing period to ensure development is responsive to the needs of disabled people, including in regard to design, accessibility,</p>	Andrew Marsh	<p>Monitor in line with the DPD Monitoring Schedule.</p>

<p>- The location and design of development is accessible to all including open spaces, the public realm and transport infrastructure.</p> <p>Note that engagement methods must be accessible to disabled people to ensure that disability is not a barrier to engagement.</p>	<p>to ensure that the floor area of new homes and associated storage space is sufficient in size to secure a satisfactory standard of accommodation for their residents.</p> <p>Implementation of existing District Plan policies on design, accessibility, transport, community facilities and local services, infrastructure and housing mix aim to ensure development is responsive to the needs of disabled people.</p> <p>Implementation of existing Development Infrastructure and Contributions SPD sets out a requirement for accessible and adaptable dwellings in both market and affordable housing and identifies the Building Regulations standards these dwellings should meet.</p> <p>The consultation processes of all planning documents aim to be open to all and accessible disabled people.</p> <p>Supporting material is made available on the website which is equipped with 'browse aloud' for those with visual impairments.</p> <p>Consideration given to font size and design layout.</p> <p>Documents written in plain English and terminology used explained in the clearest possible terms.</p> <p>Officers are available to explain the process in person, over the phone and via email.</p>	<p>transport, community facilities and local services, infrastructure and housing mix.</p>		
<p>The needs of people with a religion or belief</p>				
<p>None identified at this time.</p>	<p>Existing District Plan policies on community facilities and local services and infrastructure.</p>	<p>None identified at this time.</p>	<p>-</p>	<p>-</p>
<p>The needs of gay men, lesbians, bisexuals and heterosexual people</p>				
<p>None identified at this time.</p>	<p>None identified at this time.</p>	<p>None identified at this time.</p>	<p>-</p>	<p>-</p>

Issues from marriage and civil partnership				
None identified at this time.	None identified at this time.	None identified at this time.	-	-
The needs of different age groups, for example older and younger people				
<p>To provide the policy framework to ensure:</p> <ul style="list-style-type: none"> - A suitable housing offer is provided, including affordable housing, particularly in rural locations, to enable people to continue to live in suitable accommodation in their locality. For instance, there are barriers to younger people getting on the housing ladder and to older people who cannot 'downsize' and/or move into more suitable local accommodation. - That there is adequate provision of community facilities and local services, and infrastructure. - That the location and design of development is accessible to all including open spaces, the public realm and transport infrastructure. - The provision or improvement of community facilities and local services. <p>Note that different age groups may engage with the consultation process in different ways. Consideration should be given to engaging with people of different age groups to ensure that they can positively input into the plan-making process.</p>	<p>Engagement with representative organisations.</p> <p>To ensure that a sufficient amount of older persons' housing and specialist accommodation is delivered to meet identified needs, the older persons' accommodation is allocated part of the following site allocations, as part of a care community:</p> <ul style="list-style-type: none"> • DPSC1: Land at west of Burgess Hill • DPSC2: Land south of Reeds Lane, Sayers Common • DPSC3: Land at Crabbet Park • DPH13: Land to west of Turners Hill Road, Crawley Down <p>In addition, two sites are allocated specifically for older persons' specialist accommodation:</p> <ul style="list-style-type: none"> • DPH27: Land at Byanda, Hassocks • DPH28: Land at Hyde Lodge, London Road, Handcross <p>Implementation of existing District Plan policies on affordable housing, design, accessibility, transport, community facilities and local services, infrastructure and housing mix.</p> <p>Consultations of all planning documents aim to be open to all and accessible to people of all ages; there are always multiple ways of viewing planning documents and responding to consultations. The document will be available to view digitally on the Mid Sussex District Council website, and hard</p>	<p>Implement DPD policies on housing site allocations within the identified indicative phasing period to ensure development is responsive to the needs of different age groups, including in regard to design, accessibility, transport, community facilities and local services, infrastructure and housing mix.</p>	<p>Andrew Marsh</p>	<p>Monitor in line with the DPD Monitoring Schedule.</p>

	<p>copies will be available to view at deposit points around the District.</p> <p>Supporting material is made available on the website which is equipped with 'browse aloud' for those with visual impairments.</p> <p>Consideration given to font size and design layout.</p> <p>Documents written in plain English and terminology used explained in the clearest possible terms.</p> <p>Officers available to explain the process in person, over the phone and via email.</p>			
The needs of transgender communities				
None identified at this time.	None identified at this time.	None identified at this time.	-	-
The needs of people who are disadvantaged by socio-economic factors such as low incomes, skill or living in a deprived area				
<p>To provide the policy framework to ensure:</p> <ul style="list-style-type: none"> - The correct amount and distribution of housing and employment development to enhance the economic prosperity of all the district's towns and villages. - A suitable housing offer is provided, including affordable housing, to enable people to live in suitable accommodation and continue to live in their locality. - The integration of affordable housing with open market housing. - That there is adequate provision of community facilities and local services, and infrastructure. - That the location and design of development is accessible to all including open spaces, the public realm and transport infrastructure. - The provision or improvement of community facilities and local services. <p>Note that engagement methods must be accessible to those who are disadvantaged by their socio-economic background to</p>	<p>Engagement with voluntary services, registered social landlords and the business community.</p> <p>Draft policy <i>DPH32: Affordable housing seeks to deliver</i> the amount and type of housing which meets the needs of all sectors of the community which is a key objective of the District Plan.</p> <p>Implementation of existing District Plan policies on housing, including affordable housing and housing mix, and economic development that provide for a range of employment types, community facilities and local services and infrastructure, accessibility and transport.</p>	<p>Implement DPD policies on housing site allocations within the identified indicative phasing period which aim to support the provision of homes for people from all backgrounds in the District, and employment site allocations that aim to improve employment opportunities in the district and support the local economy.</p>	<p>Andrew Marsh</p>	<p>Monitor in line with the DPD Monitoring Schedule.</p>

ensure that they can positively input into plan-making process.				
The needs of people who live in a rural area				
<p>To provide the policy framework to ensure:</p> <ul style="list-style-type: none"> - The correct amount and distribution of housing development to enhance the economic prosperity of all the district's villages. - A suitable housing offer is provided in rural locations, including affordable housing, to enable people to live in suitable accommodation and continue to live in their locality. - The integration of affordable housing with open market housing where possible. - That there is adequate provision of community facilities and local services, and infrastructure. - That the location and design of development is accessible to all including open spaces, the public realm and transport infrastructure. - The provision or improvement of community facilities and local services. 	<p>Engagement with Parish Councils, representative groups and local communities.</p> <p>Implementation of draft policy <i>DPC3 New Homes in the Countryside</i>; recognises that exceptional circumstances may exist that justify new homes in the countryside.</p> <p>Implementation of District Plan Draft Policy <i>DPH34: Rural Exception Sites</i> allows for the provision of rural exception sites, and <i>DPE8: Sustainable Rural Development</i> and the Rural Economy allows for new small scale economic development in the countryside.</p>	<p>Implement DPD policies on housing site allocations within the identified indicative phasing period that support sustainable development in rural locations.</p>	<p>Andrew Marsh</p>	<p>Monitor in line with the DPD Monitoring Schedule.</p>

3. Mid Sussex District Council Equality Impacts Assessment Summary

Key findings	Future actions
<p>Existing engagement methods are responding to needs of protected groups.</p> <p>Consultations are managed to ensure that engagement reaches as wide as possible audience, including protected groups.</p> <p>The DPD has the opportunity to provide policies that aim to create safe and attractive places that are responsive to the needs of all, including protected groups.</p> <p>In regards to the protected groups, the consultation of and policies in the DPD have no identified negative impacts that are not remedied through future actions.</p>	<p>Continued promotion of consultation exercises that are inclusive of all, engagement with representative organisations and monitoring of consultation.</p> <p>Continue to implement existing District Plan policies until the 2021-2039 DPD is adopted, which respond to the needs of protected groups.</p> <p>Implement DPD policies which aim to support the provision of homes to meet the identified housing need for Mid Sussex.</p> <p>Monitor delivery of site allocations in order to assess their effect on the needs of protected groups.</p>

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MID SUSSEX NET ZERO TARGETS

REPORT OF: DEPUTY CHIEF EXECUTIVE
Contact Officers: Sally Blomfield, Assistant Director Planning and Sustainable Economy
sally.blomfield@midsussex.gov.uk
Wards Affected: All
Key Decision: Yes
Report to: Council
2nd November 2022

Purpose of Report

1. In accordance with the objectives of the Mid Sussex Sustainable Economy Strategy (April 2022) specialist consultants have prepared an evidence base to inform the setting of net zero targets for both the Council and District. On the 5th October 2022, the Scrutiny Committee for Housing, Planning, Economic Growth and Net Zero unanimously agreed to recommend that the Mid Sussex Net Zero Targets set out in the report be approved by Council.
2. The purpose of this report is to ask the Council to consider the evidence base; consider and approve the proposed net zero targets.

Summary

3. This Report:
 - Summarises the purpose of setting net-zero targets and their links to the Sustainable Economy Strategy and Action Plan (2022-2025);
 - Describes the process of preparing the net-zero target recommendations, including preparation of the evidence base;
 - Summarises the recommended net zero targets and the justification for these;
 - Summarises the consideration by Scrutiny Committee; and
 - Sets out next steps to achieving delivery of the proposed targets.

Recommendations

4. That the Council:
 - (i) Approves the following recommended net zero targets:
 - a. A District-wide net zero target aligned to the national target.
 - b. A Council-only net zero target of 2040 for emissions the Council can directly control.
 - c. A Council-only net zero target aligned to the national target for emissions the Council can only indirectly influence.
-

Background

5. In June 2019 the UK became the first major economy in the world to pass laws to end its contribution to global warming by 2050. The target will require the UK to bring all greenhouse gas emissions to net zero by 2050.
6. Net zero means achieving a balance between the greenhouse gases emitted into the atmosphere and the greenhouse gases removed from the atmosphere. If the emissions and removals balance out, net-zero has been achieved.

7. In August 2021 Mid Sussex District Council appointed specialist consultants Ricardo AEA to undertake a detailed analysis of carbon emissions and net zero target options for both the Council and the wider District of Mid Sussex. This evidence base will enable the Council to make an informed decision when committing to a net zero target for both the Council and District.
8. A cross party Member working group drawn from the Scrutiny Committee was established to lead and inform the development of the Sustainable Economy Strategy (SES). SES Objectives and Actions will support delivery of net zero. Due to the close links to the SES, this working group also provided leadership on the initial stages of the carbon emissions and net zero target options analysis.
9. In January 2022 Ricardo presented the initial findings of their analysis to the working group. This presentation focused on the analysis of the Council and District-wide carbon emissions baseline.
10. In April 2022 the Council approved the Sustainable Economy Strategy and Action Plan (2022-2025) to support sustainable economic growth in Mid Sussex. This included Objective 13: Reduction in Carbon Emissions and 7 actions to achieve this Objective in the short and long term. One of the actions was to use the Ricardo analysis to create a Mid Sussex Net Zero Carbon Programme. The first step in delivering this action is to agree net zero targets for both the Council and District.

Development of the Targets

11. In line with industry best practice, the development of a net zero carbon programme follows three stages, the first two are now complete:
 - (i) Carbon Emissions Baselineing: Identify how much carbon is emitted and from which sources.
 - (ii) Carbon Pathway Modelling: Identify the technical feasibility of transitioning to carbon net zero by a hypothetical target date or dates.
 - (iii) Action Planning: Identify the actions required to achieve net zero by the target date agreed by the Council.
12. Ricardo has completed the Baselineing work (Stage i) and the Pathway Modelling work at both a Council-only and District-wide level (Stage ii). See the Net Zero Carbon Emissions Feasibility and Options Report in Appendix 1.
13. In September 2022 Ricardo presented the analysis of the Council and District-wide carbon reduction pathway to all Members.
14. Ricardo has modelled the technical feasibility of transitioning to net zero by a 2040 and 2050 hypothetical net zero target date. In addition, and again in line with good practice, Ricardo reviewed the implications for a business as usual (or do-nothing) approach.
15. Stage (iii) cannot begin until the Council has agreed a net zero target.

Carbon Net Zero Target Recommendations

16. The Net Zero Carbon Emissions Feasibility and Options Report identifies, at both a Council and District-wide level, that a 2050 target is technically feasible, but delivery is heavily reliant on external factors.
17. The Report identifies, at both a Council and District-wide level, that a 2040 target is also technically feasible, but the pace of change is significantly increased and successful delivery is again heavily reliant on external factors which are not within this Council's control.

18. It is important to note that when assessing technical feasibility, the carbon pathway models make the following necessary assumptions:
- (i) That the necessary funding and resources (e.g. a skilled supply chain) are available.
 - (ii) That the Government's future net-zero legislation happens on-time and has the anticipated impact.
 - (iii) That key low-carbon technologies and fuels are proved feasible, commercially viable and become widely available.
 - (iv) No unforeseen major events occur that changes the political calculus.
19. In recommending the net zero target a wide range of issues that could impact deliverability have been considered. The key consideration being that the Council only directly controls a very small percentage of its own carbon emissions (2.6%) and an even smaller percentage of the District's emissions (0.03%).
20. Therefore, the Council is heavily reliant on national legislation to successfully achieve net zero. While that national legislation is being phased in over future years, the Government's target is currently 2050. Officers would not recommend that the Council adopts an earlier target for emissions it has no control over as changes at a national level would significantly impact the deliverability of such a target.
21. Having taken these considerations into account, Scrutiny Committee considered and unanimously agreed that the following net zero targets be recommended to Council for approval:
- (i) A District-wide net zero target aligned to the national target.
 - a. This target is recommended because:
 - i. MSDC only directly control 0.03% of the Districts emissions
 - ii. In most areas MSDC can showcase/influence but rarely exert direct control.
 - iii. The Government has committed to a 2050 national target.
 - iv. The most impactful net-zero policy is controlled nationally.
 - v. It is sensible to align to the national net-zero target.
 - vi. The pathway analysis suggests that a 2050 target is feasible.
 - vii. The scope of change is massive, as is the potential cost to the District.
 - (ii) A Council-only net zero target of 2040 for emissions the Council can directly control.
 - a. This target is recommended because:
 - i. The pathway analysis suggests that a 2040 target is feasible for direct emissions.
 - ii. MSDC can control its direct emissions.
 - (iii) A Council-only net zero target aligned to the national target for emissions the Council can only indirectly influence.
 - a. This target is recommended because:
 - i. The pathway analysis suggests that a 2050 target is feasible.
 - ii. The emissions are outside MSDC's direct control and are therefore included in the District target.
 - iii. They represent 97% of MSDC's carbon emissions. 84% of that 97% are emitted from goods and services the Council buys through a Shared Procurement Service.

Next Steps

22. Subject to Council approval of the targets Ricardo will prepare an Action Plan.

23. The SES (Objective 13) includes an action to use the Ricardo analysis to create a Mid Sussex Net-Zero Carbon Programme. The preparation of the Programme will build on the Action Plan to create an operational, and internal delivery programme to help achieve the agreed net zero targets. This SES identifies that this work will be complete by 2023.

Risk Management Implications

24. There are no risk management implications associated directly with this report.

Equalities Implications

25. An Equalities Impact Assessment has been completed and can be found in Appendix 2.

Sustainability Implications

26. The net zero targets aim to reduce the carbon emissions of both the Council and the District as part of the UK Government's strategy to combat climate change.

Financial Implications

27. The budget for the Ricardo work was £50,940 and this will cover stages i, ii and iii identified in paragraph 11.

28. Ricardo has also been commissioned to undertake a deep-dive analysis of the Council's emissions from procured goods and services that can only be indirectly influenced. These emissions make up a large percentage (~80%) of the Council's emissions but cannot be directly controlled by the Council. Therefore, additional analysis is required to help inform how the Council can most effectively influence its supply chain.

29. The cost of this additional commission is £11,015 and will be funded from the Sustainability Climate Change Reserve.

30. To track carbon reduction progress, it will be necessary to periodically re-baseline both the Council-only and District-wide emissions. The indicative costs and frequency are set out below:

- (i) Council-only (directly controlled): once a year = £1,500
- (ii) Council-only (indirectly influenced): every two years = £8,500
- (iii) District-wide: every three years = £1,500

31. Therefore, the indicative total cost to the Council for the next three years is £14,500. A budget for this work will needed to be included in the Council's budget in coming years.

Background Papers

[Mid Sussex Net Zero Targets Report](#) to Scrutiny Committee for Housing, Planning, Economic Growth and Net Zero: 5th October 2022

Appendices

Appendix 1: Net Zero Carbon Emissions Feasibility & Options Report For Mid Sussex (Ricardo)

Appendix 2: Net Zero Target Policy Equality Impact Assessment



NET ZERO CARBON EMISSIONS

Feasibility and options

Report for: Mid Sussex District Council

Ricardo ref. ED15049

Issue: 3

20 September 2022

Customer:

Mid Sussex District Council

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Ricardo reference:

ED15049

Contact:

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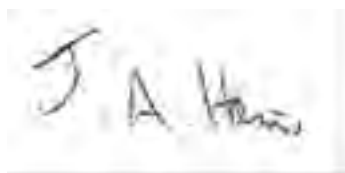
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Approved by:

James Harries

Signed**Date:**

20 September 2022

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1 INTRODUCTION

1.1 BACKGROUND

Mid Sussex District Council (MSDC) is looking to understand the implications of the net zero carbon agenda for the district and the delivery of council services. It has commissioned Ricardo Energy & Environment to carry out a feasibility study to provide the evidence needed to understand the scale of the challenges and the key actions required to achieve net zero, both for the council's own emissions and for the district as a whole. The first step in this work is to carry out an assessment of current greenhouse gas (GHG) emissions, both for the Council's own emissions and for emission across the whole District. An influence mapping exercise was carried out that looked at the drivers of GHG emissions and which organisations/teams could influence them. A set of net zero pathways were then developed that showed how the Council's own emissions, and emissions across the whole district, could be reduced to net zero. A plan was then prepared, indicating the actions that need to be taken to deliver this, who needs to take them and by when.

1.2 DEFINITIONS AND SCOPE

Net zero, also known as carbon neutrality, simply means achieving a balance between emissions of GHGs to the atmosphere and removals of GHGs (mainly CO₂) from the atmosphere, for example by nature-based solutions such as tree planting or by technological means such as carbon capture and storage (CCS). If the emissions and removals balance out, carbon neutrality has been achieved.



When looking at the emissions side of the equation, we are considering all GHGs, so not just carbon dioxide from combustion of fuels, but also other gases such as methane emissions from waste or nitrous oxide emissions from agriculture.

1.3 REPORT STRUCTURE

This report considers net zero for both the Council's own GHG emissions and for the GHG emissions across the whole district. Chapters 2.1 and 3.1 look at GHG emissions from the Council's own activities and from across the whole district respectively, setting out what latest emissions are, what the key drivers of emissions are and developing a couple of net zero scenarios for both levels. Chapters 2.3 and 3.3 then sets out a plan and routemap for net zero for both the Council's own emissions and the emissions across the whole district, detailing who should do what, by when to deliver it.

2 A NET ZERO COUNCIL

This section looks at GHG emissions for the Council. It starts with the GHG baseline for the Council's activities, then considers which stakeholders have influence over emissions and finishes by outlining two possible net zero pathways that the Council could take.

2.1 GHG BASELINE

2.1.1 Definitions and scope

A GHG baseline was developed for the Council's own emissions in the financial year 2019/20. This was the latest year for which data was available and has the additional benefit that it provides a recent picture of emissions that is relatively unaffected by the Covid-19 pandemic, and therefore reflects typical activity levels as closely as possible. The inventory has been produced covering scopes 1, 2 and 3 as set out in the World Resources Institute's 'GHG Protocol Corporate Accounting and Reporting Standard'¹. It therefore includes:

- Scope 1 (direct emissions): Emissions produced from sources linked to a company's assets.
- Scope 2 (indirect emissions): Emissions produced by the generation of electricity purchased from third parties and consumed in the company's assets.
- Scope 3 (indirect emissions): Emissions that arise as a consequence of the activities of the company, but occur from sources not owned or controlled by the company.

The emissions sources that are included in these scopes depend on the specific methodology used. For this study we have used the concept from the GHG Protocol Corporate Accounting and Reporting Standard called 'Operational Control'. This is defined as:

"A company has operational control over an operation if the former or one of its subsidiaries has the full authority to introduce and implement its operating policies at the operation".

Ricardo often summarises this as: "Who has responsibility for making changes to improve the properties energy efficiency or performance?" This definition of "Operational Control" is important for MSDC when it comes to the reporting of emissions from an organisation's properties. Only the sites that MSDC have operational control over were included in the baseline assessment, meaning the following:

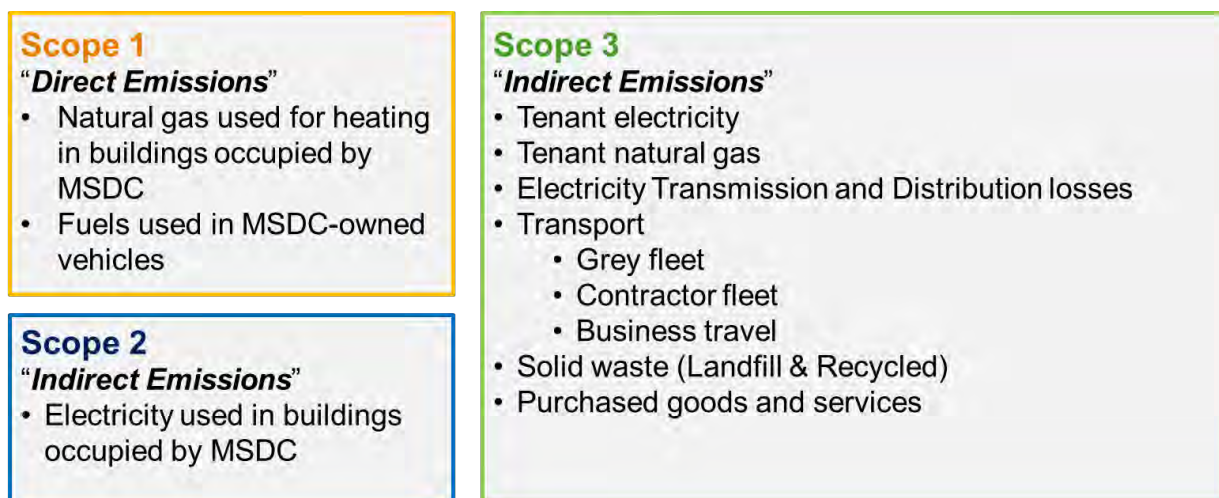
- Properties directly occupied/operated by MSDC will have their emissions reported as Scope 1 (for direct emissions) and Scope 2 (for indirect emissions) as MSDC have direct control over the energy/utilities used at these properties. This includes properties that are owned and occupied by MSDC and that are leased by MSDC from someone else.
- Properties that are not directly operated by MSDC (e.g., owned by MSDC but then tenanted or hired out) will have their emissions reported as Scope 3, as MSDC have indirect control over their emissions. In other words, the emissions are being produced by the tenants' activities, but MSDC can make changes to the properties to reduce these emissions.
- Properties that MSDC do not have operational control over (i.e., owned by MSDC but they are not responsible for making changes to the property to reduce emissions) have been excluded from the baseline assessment.

A complete list of MSDC's properties was compiled by MSDC's staff and their assignment to the above categories discussed with Ricardo.

What this means is that the following emissions sources were included in scopes 1, 2 and 3.

¹ <https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf>

Figure 1: scopes and emissions sources included in the GHG baseline assessment for Mid Sussex District Council



Mid Sussex District Council owns the head lease of Orchard Shopping Centre and is also the freeholder of the site. It was intended to include the emissions from gas and electricity consumption in common/landlord areas of the shopping centre in the Council’s emissions baseline. However, it has not yet been possible to get data to allow this. Should this data become available, the baseline emissions data could be updated accordingly in future.

Ricardo’s Net Zero Gap Analysis Tool (NZGAT) tool has been used for the council level assessment and so the approach was consistent with the district level assessment.

2.1.2 Baseline results

Looking at emissions under scopes 1, 2 and 3, scope 3 is by far and away the largest portion of GHG emissions, representing over 97% of total GHG emissions from the Council’s own operations, as shown in Table 1.

Table 1: MSDC total emissions summary

Scope	tCO ₂ e	% total
Scope 1	138	1.4%
Scope 2	114	1.2%
Scope 3	9,555	97.4%
Total	9,807	100.0%

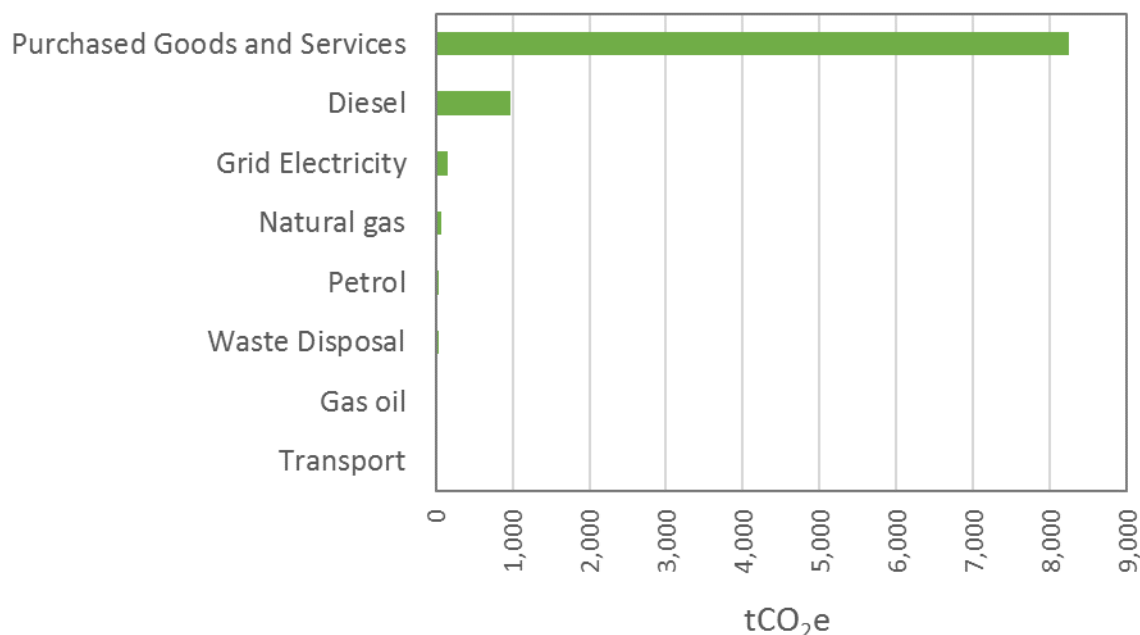
As can be seen in Table 2 and Figure 2, the majority of Scope 3 emissions come from “Purchased Goods and Services”. This means all upstream (i.e., cradle-to-gate) emissions from the production of products purchased or acquired by the Council. This includes maintenance of properties, purchases of electrical/IT equipment and paper. The emissions from purchased goods and services have been calculated from MSDC accounts records using an external tool. This methodology, although the best that is currently available, has inherent uncertainties in both the categorisation of expenditure into different broad categories, and is based on spend data from 2012 in the USA. As such, the resulting

emissions that are calculated need be used with caution and further work outside of the scope of this project is suggested to validate these figures. Therefore, Ricardo has been commissioned to undertake a deep-dive analysis of the Council-only Scope 3 emissions from procured goods and services. This work is ongoing and is not featured in this report.

Table 2: scope 3 emissions from MSDC

Emissions Source	Scope 3 emissions	%
Transport (<i>Business Travel Public Transport</i>)	4	0.0%
Gas Oil (<i>Contractor vehicles</i>)	25	0.3%
Waste Disposal	33	0.3%
Petrol (<i>Fleet and contractor vehicles</i>)	36	0.4%
Natural Gas	69	0.7%
Grid Electricity	160	1.7%
Diesel (<i>Fleet and contractor vehicles</i>)	977	10.2%
Purchased Goods and Services*	8,251	86.4%
Total (tCO₂e)	9,555	100%

Figure 2: scope 3 emissions from MSDC



The second most significant emissions source for scope 3 emissions is diesel used in contract fleet vehicles: Waste collection, grounds management and tree surgeons.

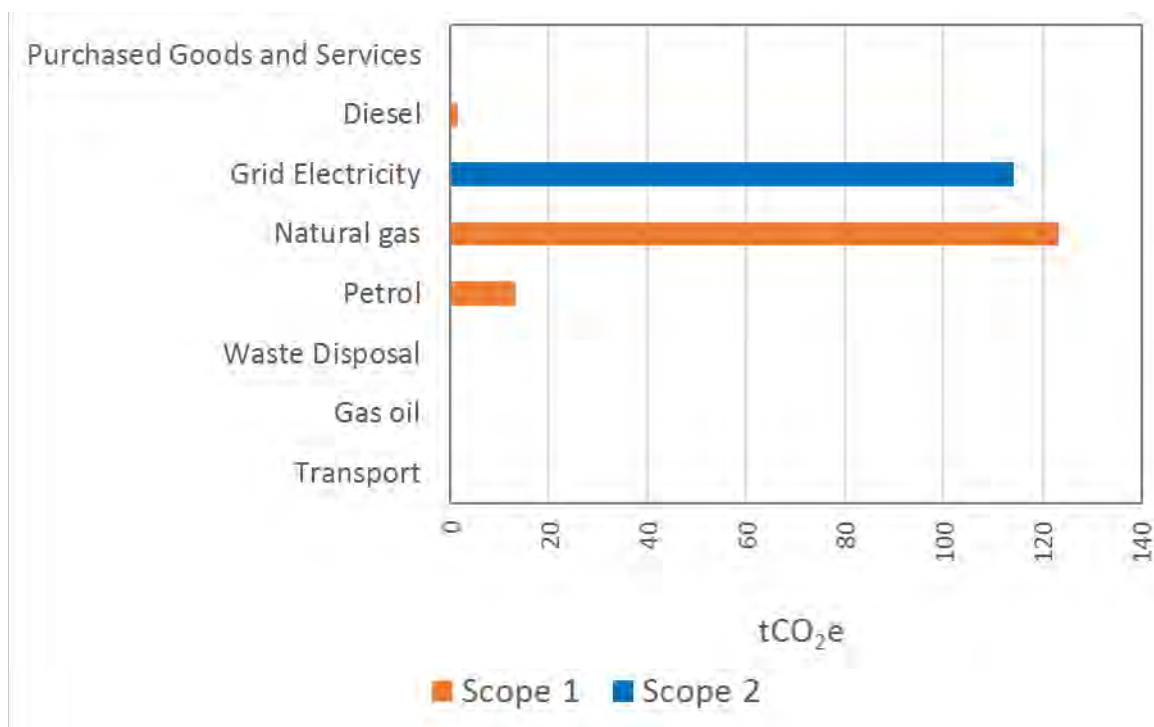
Focusing specifically on scope 1 and 2 emissions, Table 3 and Figure 3 show these emissions from the Council. It can be seen that most of the emissions are from use of natural gas in buildings (scope 1)

and use of electricity (scope 2), with a much smaller share coming from the Council’s fleet of vehicles. This therefore immediately gives a sense of the priorities for achieving net zero on the Council’s own estate, with a clear need for the focus to be on energy use in buildings.

Table 3: scope 1 and 2 emissions from MSDC

Emissions Source	Scope 1	Scope 2	Total	%
Transport (<i>Business Travel Public Transport</i>)	0	0	0	0.0%
Gas Oil (<i>Contractor vehicles</i>)	0	0	0	0.0%
Waste Disposal	0	0	0	0.0%
Petrol (<i>Fleet and contractor vehicles</i>)	13	0	13	5.2%
Natural Gas	123	0	123	49.2%
Grid Electricity	0	114	114	45.6%
Diesel (<i>Fleet and contractor vehicles</i>)	1	0	1	0.0%
Purchased Goods and Services*	0	0	0	0.0%
Total (tCO₂e)	136	114	250	100%

Figure 3: scope 1 and 2 emissions from MSDC



2.1.3 Conclusions and observations

Scope 1 & 2 emissions sources (under MSDC's direct control) make up ~3% of the total carbon footprint. Of these, the largest emissions sources are natural gas used in heating systems (49%) and grid electricity (46%) used in properties for which MSDC have "operational control". Therefore, these two emissions sources should be a focus for decarbonisation efforts as follows:

- To reduce emissions from natural gas, strategies involve encouraging the sustainable use of heating or implementing alternative renewable heat sources such as: Renewable biofuels, solar heating, geothermal heating, and heat pumps.
- There are multiple routes for reducing emissions from grid electricity, such as: Efficient HVAC (heating, ventilation, and air conditioning), using energy efficient appliances (e.g., LED lighting), or sourcing electricity from on-site renewables such as rooftop solar or purchasing green tariff electricity.

Scope 3 emissions sources (not under MSDC's direct control) are the largest source of reported emissions (97%), with the main contributors being purchased goods & services (86%) and diesel used in contractor fleets (10%).

- An effective net zero strategy should implement sustainable procurement mechanisms as an effective route to reduce emissions from purchased goods and services.
- Incentivising contractors to reduce diesel consumption can reduce emissions by promoting the use of ZEVs (Zero Emission Vehicles) or ULEV (Ultra Low Emission Vehicles) and alternative low carbon fuels.

2.1.4 Comparison with other Councils

It is helpful to compare these results with the GHG emissions from other Council's own operations, in particular second tier local authorities in the region.

Adur and Worthing Councils don't report their scope 3 emissions, but in their most recent report for 2019/20² their scope 1 and 2 emissions were split between vehicles (39%), gas use in buildings (32%) and electricity use (28%). It can therefore be seen that the emissions from their fleet is much greater than in Mid Sussex.

Arun Council's carbon footprint is similar to that of Mid Sussex, with 98.1% of total emissions being scope 3 in 2019-20 and 2020-21³ (the data therefore covers the period of the Covid-19 pandemic). The split of scope 1 and 2 emissions is also similar to Mid Sussex, with only 11% coming from petrol and diesel use, and much larger shares coming from gas and electricity use. And nearly all of the scope 3 emissions come from purchased goods and services, even more so than in Mid Sussex (86%).

Chichester Council reports on scopes 1, 2 and some scope 3 emissions. As can be seen in Appendix 2 of their Climate Emergency Action Plan⁴, 2019-20 scope 1 emissions were 47% of the total, scope 2 10% and scope 3 43%. However, it should be noted that only very few scope 3 sources were included - fuel- and energy-related activities not included in Scopes 1 & 2, business travel and downstream leased assets. They have excluded purchased goods and services, capital goods, upstream transportation and distribution, waste generated in operations and end-of-life treatment of sold products (would include emissions from trade waste collected by the Council). It might be expected that with all scope 3 sources included, the estimate for scope 3 might be similar to that of Mid Sussex in percentage terms.

Horsham District Council estimated their GHG emissions in 2018/19 to be 11% from scope 1, 8% from scope 2 and 81% from scope 3⁵.

² <https://www.adur-worthing.gov.uk/media/Media,158900,smxx.pdf>

³ <https://www.arun.gov.uk/download.cfm?doc=docm93jjjm4n18057.pdf&ver=18990>

⁴ <https://www.chichester.gov.uk/climatechange>

⁵ https://www.horsham.gov.uk/_data/assets/pdf_file/0006/77685/Carbon-Footprint-Report.pdf

2.2 INFLUENCE MAPPING

This section looks at what the key drivers are that affect the Council's own GHG emissions and which parties have most influence and control over them. This will then inform the development of the net zero plan.

2.2.1 Drivers of change

As a first step in influence mapping, it is helpful to consider what the drivers of changes in emissions are.

2.2.1.1 Policies, plans and strategies

Many of the national, regional and local-level drivers of change set out in the influence mapping for the district will also apply to the Council's own emissions. Please refer to Section 3.2 for more details on these. As an example:

- The national phase out on the sale of petrol and diesel vehicles by 2030/35 will lead to a decarbonising of the Council's vehicle fleet.
- National-level grid decarbonisation will continue to drive down the Council's emissions from its own electricity use.
- The Future Homes Standard will ensure that any new build Council buildings will not have gas connections from 2025.

But there are also certain other more specific drivers for Councils in terms of reporting on and managing their carbon footprint, which are outlined below.

2.2.1.2 Emissions reporting

Reporting of emissions will always be a key driver for climate action. By transparently reporting on their emissions, Councils provide the tools needed for interested parties to hold them to account over their emissions levels and to challenge their plans for emissions reductions. Previously, National Indicator 185, the percentage CO₂ reduction from local authority operations, required local authorities to calculate the carbon emissions of their buildings and services on a yearly basis and report the results to Government. However, these indicators were abolished in 2011 and there is now no requirement for local authorities to set or negotiate targets to reduce their own or area-wide emissions. This gap has led to patchy and inconsistent reporting of emissions, although some support is now being provided, for example the Local Government Association, with Local Partnerships and CDP, have recently launched a free GHG Accounting Tool for Scope 1 and 2 emissions and basic Scope 3 emissions. A small number of local authorities report emissions through the CDP.

GHG emissions reporting by local authorities still takes place but on a less mandatory basis, with a memorandum of understanding in place with various key milestones, including "to develop and agree an approach for sharing information on greenhouse gas emissions from councils' own estate and operations"⁶.

2.2.1.3 Public expectation/pressure

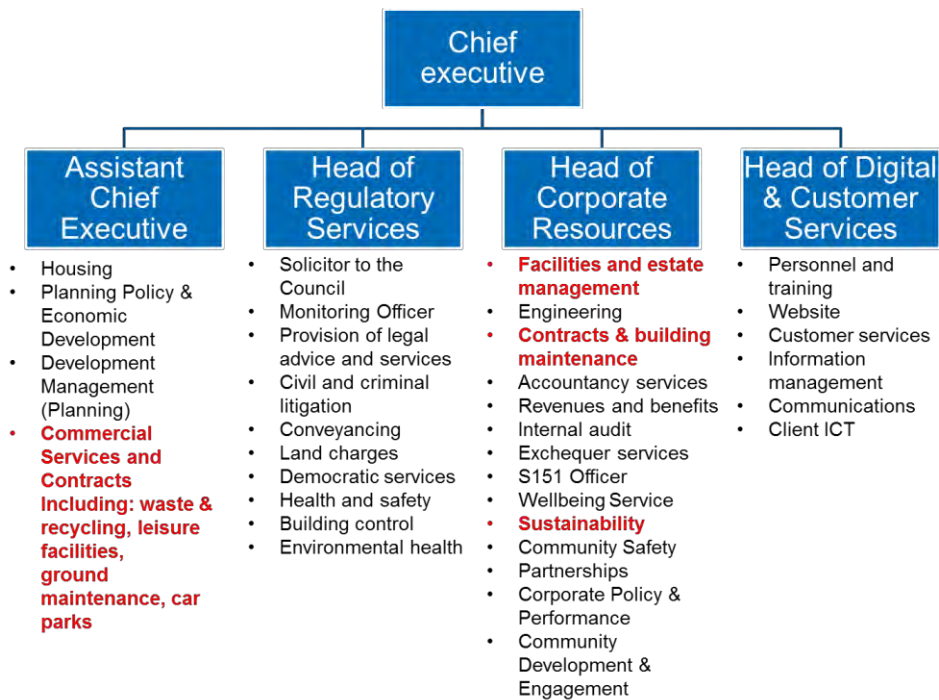
One of the key factors behind the recent drive of local authorities to declare climate emergencies has been public pressure and campaigning. It is hard to predict how this will change over time. On the one hand, we can expect that pressure to act on climate change will not go away and will likely only intensify, especially if local climate events (e.g., flooding) raise awareness of the issue. On the other hand, as local authorities develop more detailed plans for climate action, and publish the evidence base behind it, this could provide ammunition to those concerned about the transition to net zero, for example because of possible impact on lifestyles, cost of living, jobs etc.

⁶ <https://www.gov.uk/guidance/sharing-information-on-greenhouse-gas-emissions-from-local-authority-own-estate-and-operations-previously-ni-185>

2.2.2 Key stakeholders

We can see from the data in Section 2.1 that of the emissions that the Council can more easily control (scopes 1 and 2), nearly all (around 95%) comes from gas use in buildings and electricity use (most of which will be from buildings). Clearly then the Council teams responsible for the management and operation of the buildings will be key to achieving net zero for scope 1 and 2 emissions, specifically the Facilities and Estate management team and the Contracts and Building Maintenance team (see below for an organogram of the Council structure, although it should be noted that this will shortly change).

Figure 4: Mid Sussex District Council organogram



These teams should look for opportunities and funding to upgrade the Council’s building stock, improving energy efficiency and switching away from gas boilers towards decarbonised heating systems (e.g., heat pumps). They may also be able to maximise opportunities for rooftop solar PV to be installed on Council-owned buildings, in particular large roof spaces such as car parks.

2.2.2.1 Level of influence

Of the different emissions sources set out in Section 2.1, the Council and other key stakeholders (e.g. contractors) will have varying degrees of influence.

Emissions source	Degree of Council influence (high, medium, low)	Actions	Other key stakeholders
Scope 1 natural gas (buildings occupied by MSDC)	High	Should look to replace boilers with low carbon heating systems, e.g. heat pumps	
Scope 3 natural gas (tenant gas use – natural gas used by tenants in temporary housing, halls and	Low	Could make replacement of heating systems with low carbon a precondition of the lease? Could try to engage directly with tenants – however it is very difficult to work around tenants to	The organisations/individuals to which the buildings are being leased

community centres, and residential)		introduce alternative low carbon heating systems into properties e.g. tenant convenience, health and safety, etc.	
Scope 1 transport (fuels used in Council-owned vehicles)	High	Should look to replace vehicles with electric ones Introduce appropriate infrastructure e.g. electric charging points	
Scope 2 electricity	Medium	Switch suppliers to procure more renewable energy	Laser
Scope 3 electricity (tenant electricity yes)	Low	Could engage with tenants on the benefits of on-site renewables e.g. solar PV	Tenants
Scope 3 transport (business travel on public transport)	Medium	Could introduce policies to favour use of public transport. But convenience may often be a limiting factor e.g. cycle to work scheme, car share, reduced bus fare, etc.	Staff
Scope 3 transport (contractor vehicles)	Medium	Could ensure that requirement to move to a low carbon fleet is set out in contracts – will be a legal requirement for all cars from 2030 anyway	Contractors
Waste disposal (scope 3)	Low		Waste contractors
Purchased goods and services	Medium	Can use procurement policy to favour low carbon goods and services, but ultimately reliant on what the market can offer	Other councils (could joint procurement help increase influence?)

Not surprisingly, the Council tends to have more control over scope 1 emissions and less over scope 2 and then 3 emissions. But we can see that even within scope 3 emissions, the level of influence can vary. It is possible for a local authority to set a target that does not include all scope 3 emissions (although there is a risk that some stakeholders would view this as insufficient). But in Scotland, local authorities are given guidance to set a zero direct emissions target (for scope 1) and to aim to reduce scope 2 and 3 emissions but to mainly focus on those emissions sources over which it has most control. The Scottish Government points out that it “may be more appropriate to have a range of targets covering specific categories of indirect emissions, instead of one overarching target”.

2.3 NET ZERO PATHWAYS

2.3.1 The BAU scenario

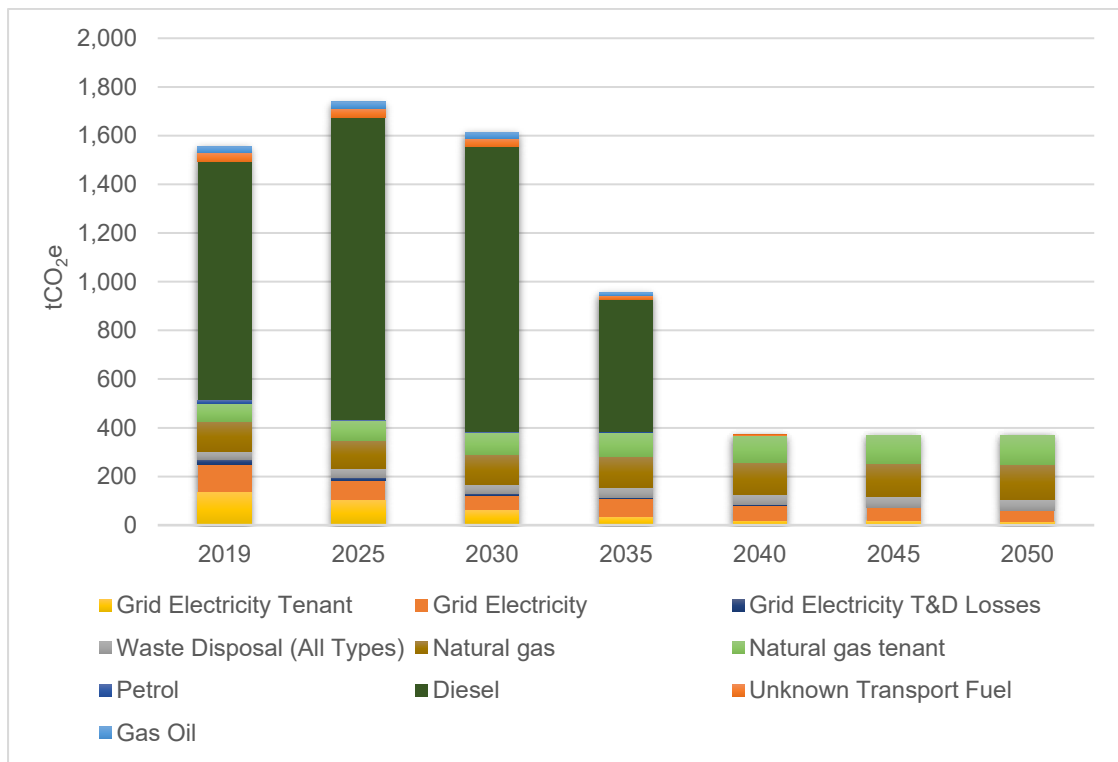
Projecting the baseline emissions to 2050 in line with the predicted business as usual (BAU) scenario provides an assessment of the gap compared to a net-zero scenario. This gap shows the scale of the intervention(s) required to achieve net-zero. It should be noted that this scenario only accounts for activities and events that are planned and are highly probable to occur.

As part of the BAU modelling, we looked to capture any information that will affect MSDC’s carbon emissions under business-as-usual conditions. This includes known plans for building stock, projects confirmed and in the pipeline that will affect the emissions sources included within the baseline as well as growth in emissions sources due to external factors and efficiency trends. These are summarised below:

- **Known internal factors:** Known internal factors/changes that will impact on the baseline emissions, e.g., increasing temporary housing by 100% by 2040.
- **Known external factors:** Known external factors/changes that will impact on the baseline emissions, e.g., ongoing decarbonisation of the national grid, UK Government ban on sales of fossil fuel cars after 2030.
- **Confirmed pipeline projects:** Projects that impact emissions that have been signed off on or are very close to being given the go-ahead, e.g., plans to install a building management system (BMS) at Oaklands Bolstro Road to provide more control of heating.
- **Growth rate:** This growth rate will be used by the model to indicate how emissions will grow year-on-year due to multiple affects. E.g., MSDC have suggested a conservative estimate of 1% annual growth within the council's operations.
- **Efficiency rate:** This rate counteracts the growth rate and is due to ongoing improvements in efficiency (energy/utility use) in the way the council is run. E.g. vehicle fleet will become more fuel efficient with time as vehicles are replaced with modern variants.

2.3.2.1 BAU modelling results

The outputs of the BAU modelling are shown below in [Figure 5](#), [Figure 6](#), [Figure 7](#), [Figure 8](#), [Figure 10 – BAU emissions by source \(excluding purchased goods and services\), 2019-2050](#)



and

Figure 10.

The main factors already committed by MSDC that will contribute to the projected emissions under BAU are:

1. The removal of all old light fittings and replacement with LED lightings at Orchards. It has been assumed that lighting accounts for approximately 20% of the overall electricity consumption at Orchards. We have modelled a 75% reduction in energy consumption from LED lighting within that proportion of electricity consumption.
2. MSDC have introduced a building management system (BMS) at Oaklands Bolstro Road to provide more control of heating. Estimated 10% savings in natural gas consumption.

3. MSDC have replaced an inefficient single pipe system with a twin pipe system, which combined with a BMS, has the potential to accumulate an additional 1% saving in heating demand.
4. MSDC are currently in the process of transitioning away from conventional fossil fuel vehicles to electric vehicles (EVs). The council has currently replaced three out of five petrol vehicles with EVs and plans to replace one more in 2022.
5. Increased delivery in contracted services as a result of food collection in 2024. We have assumed a 26% proportional increase above the current quantity of fuel used for contracted services.
6. All grey fleet, public transport and taxis will be replaced with EVs by end of 2040 due to UK Government policy of halting sales of new fossil fuel vehicles from 2030. Modelled as gradual change over next 25 years.
7. Decarbonisation of the national grid. BEIS projected emission factors for UK electricity generation have been used to model a gradual decrease in emissions intensity.

Modelling shows that under a BAU scenario, total emissions (scopes 1, 2 and 3) will increase by around 14% by 2050 without any further intervention from MSDC. The remaining emissions gap that will need to be addressed to achieve net-zero in 2050 is 11,177 tCO₂e. The increase is driven by an expected increase in scope 3 emissions. When looking at scopes 1 and 2 only, emissions are expected to fall by 25% by 2050.

Figure 5 – BAU emissions by scope 1, 2 and 3, 2019-2050

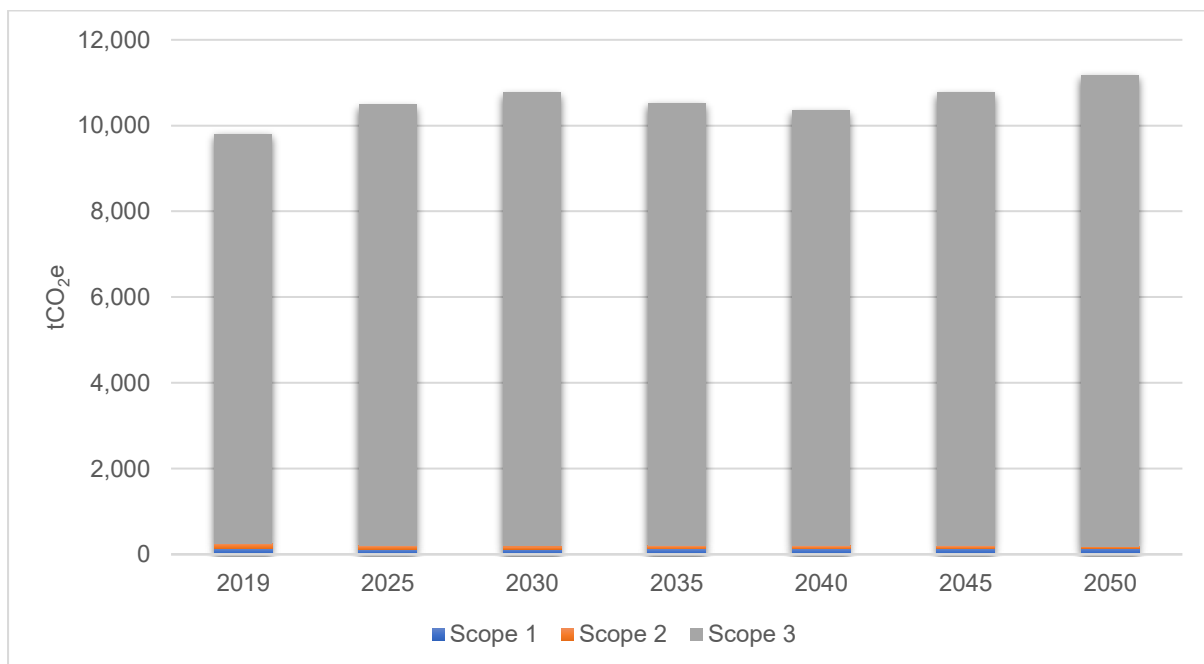


Figure 6 – BAU emissions by scope 1 and 2, 2019-2050

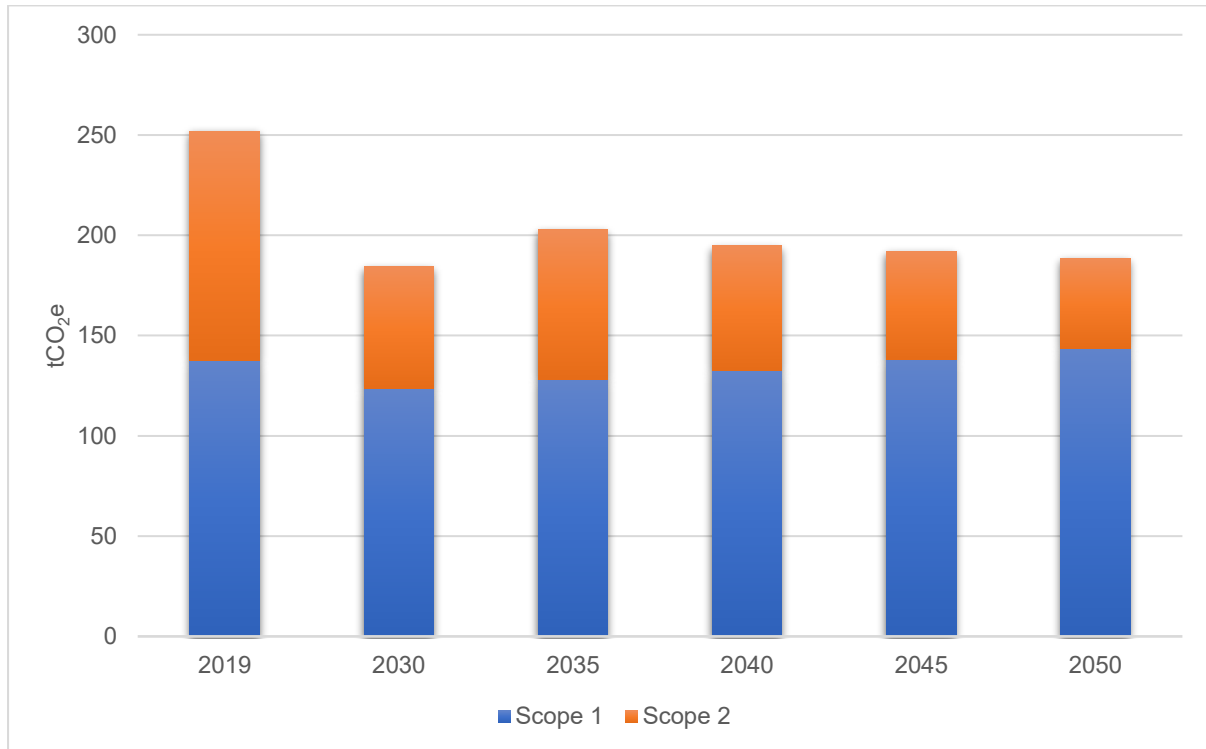


Figure 7 – BAU emissions by area, 2019-2050

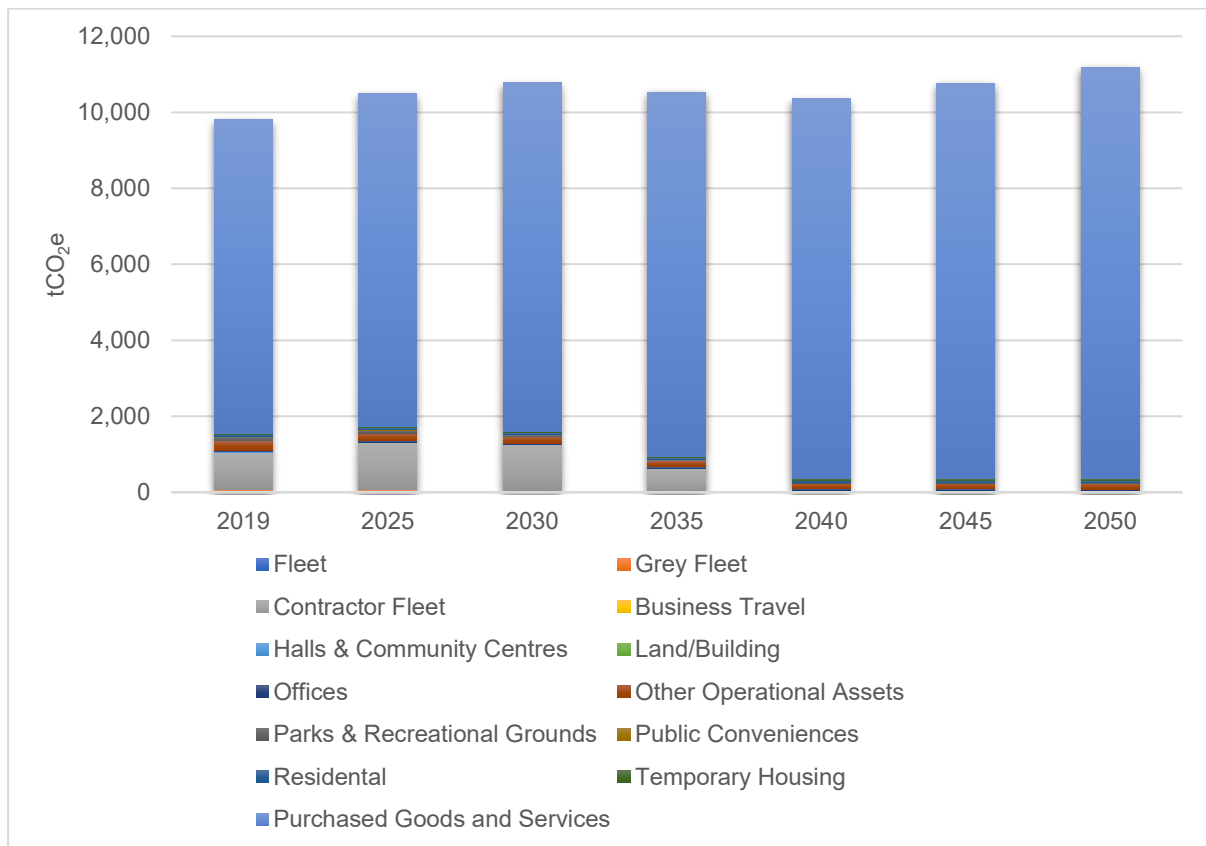


Figure 8 – BAU emissions by area (excluding purchased goods and services), 2019-2050

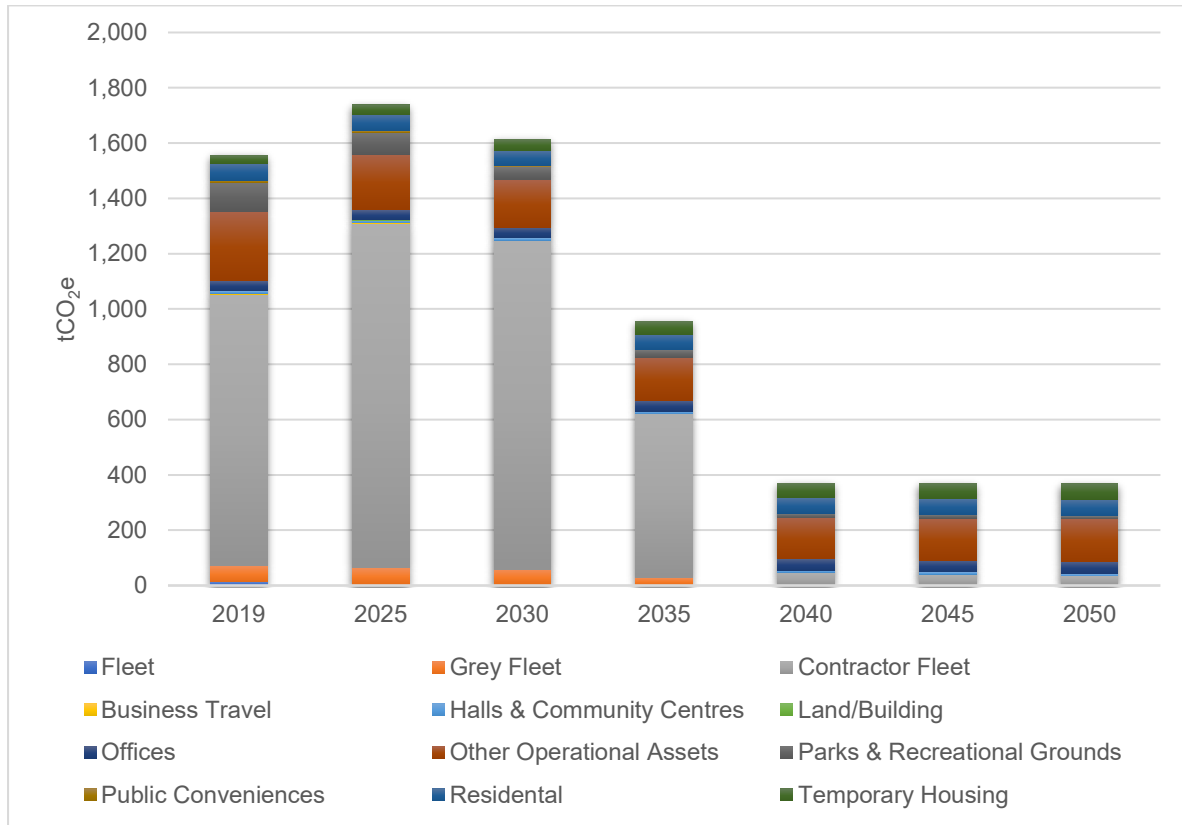


Figure 9 – BAU emissions by source, 2019-2050

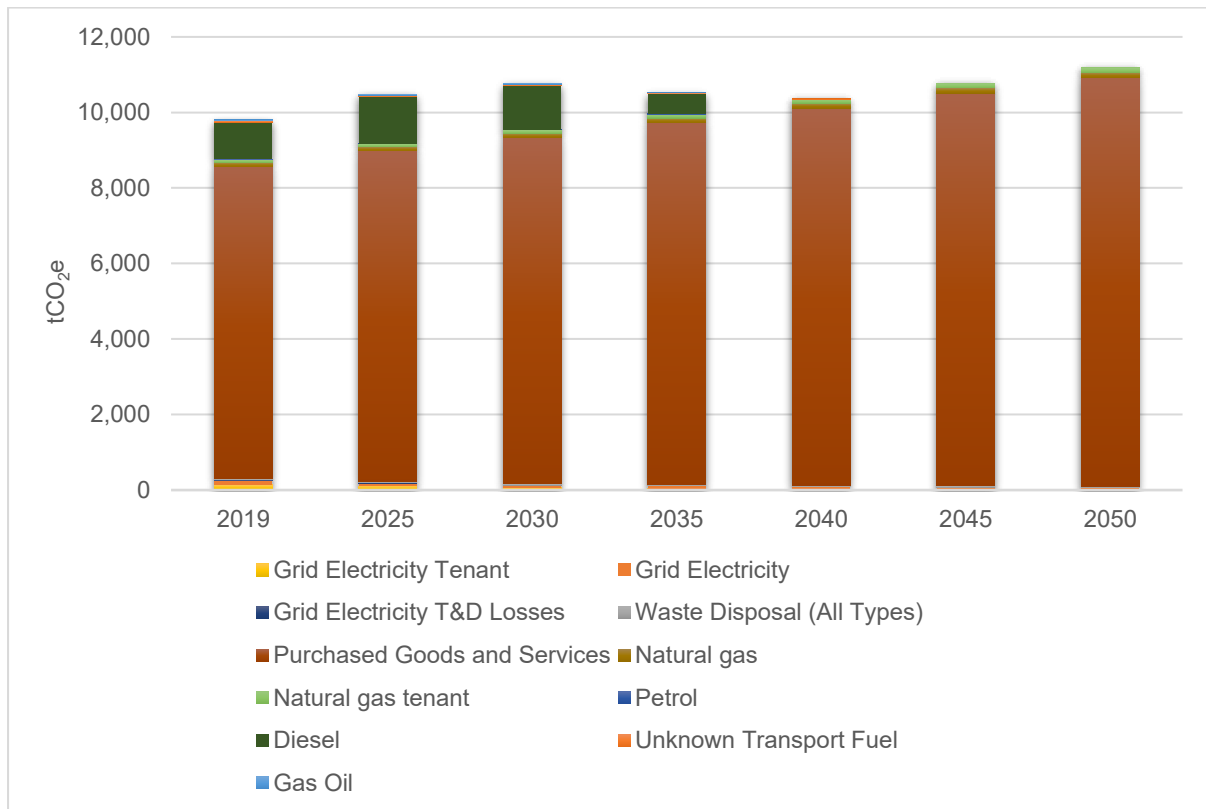


Figure 10 – BAU emissions by source (excluding purchased goods and services), 2019-2050

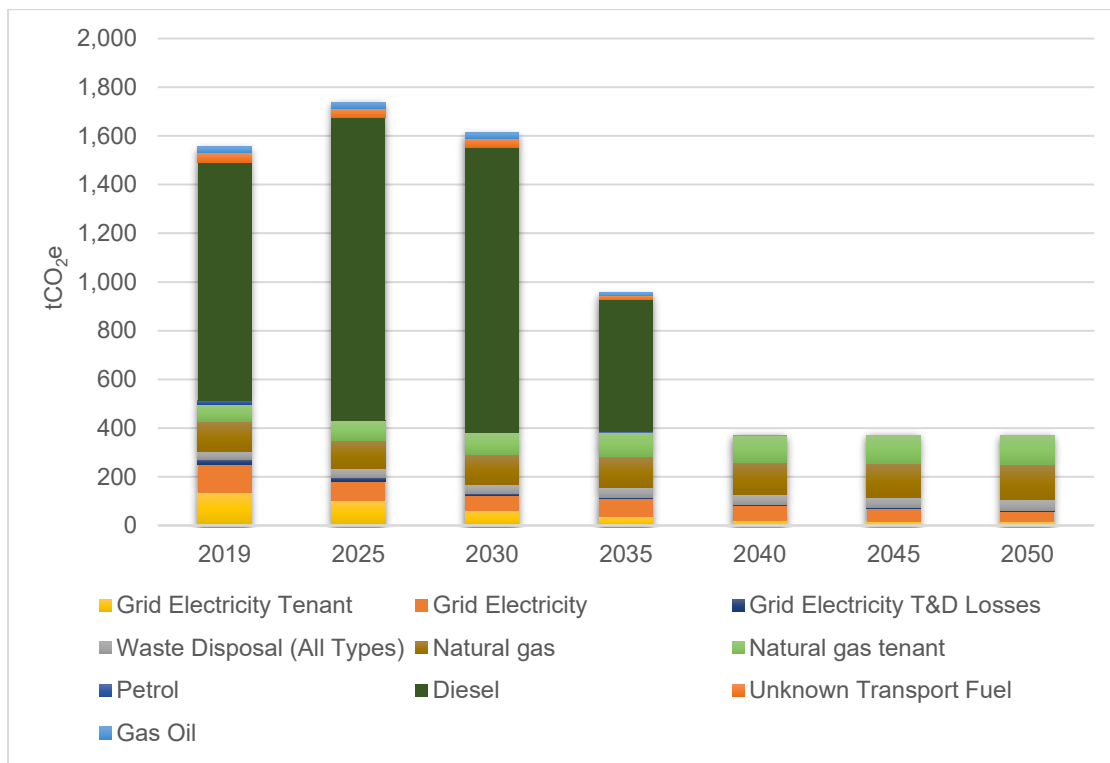


Figure 7 demonstrates that the purchase of goods and services are projected to be the largest proportion of emissions remaining in 2050, accounting for 96.7% of the overall total. The second largest is natural gas at 1.2%. The expected decarbonisation of the UK national grid means that electricity emissions are expected to fall year-on-year at a faster rate than the growth rate and efficiency rate account for. All other emission factors remain static across the modelled period, and, as such, any changes reflect growth and efficiency rates as well as any modelled BAU changes.

By 2050, the remaining emissions for MSDC are from a range of emissions sources, including grid electricity, electricity transmission and distribution losses, waste, water, natural gas, and emissions from purchased goods and services.

After accounting for planned business-as-usual activities and changes, the largest challenges for MSDC to address by 2050 if it is to achieve net-zero are:

1. Reducing emissions associated with the purchase of goods and services as much as feasibly possible.
2. Divesting from all fossil fuel use across all sites e.g., identifying alternative options for heating sites that currently use conventional gas boilers.
3. Establishing off-grid sources of renewable electricity and/or purchasing green electricity.

2.3.2 2050 net zero scenario

2.3.2.1 Overview of implementation pathway

When analysing the timeline and aspiration for implementation of decarbonisation measures, the following 2050 net zero pathway assumes that sufficient resources and budget are made available to allow the rapid implementation of decarbonisation measures while taking account of current contractual

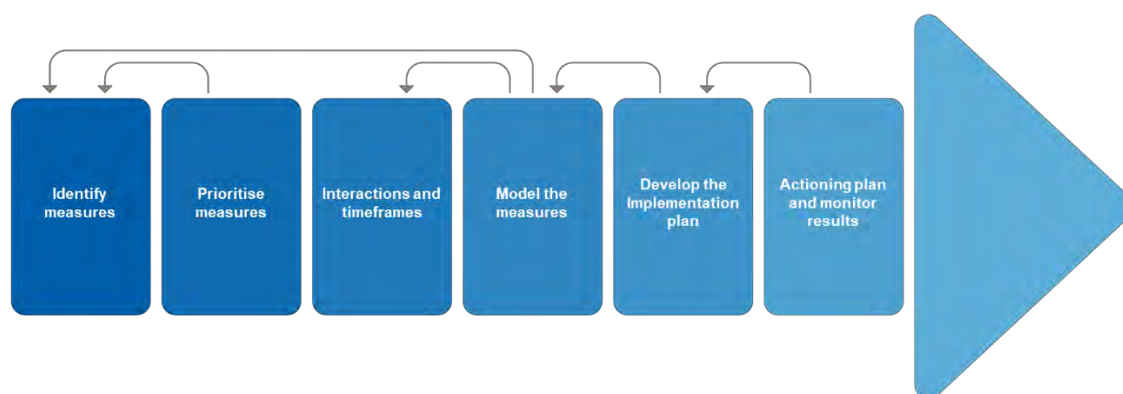
constraints. Importantly, this approach collectively applied by the public sector can support the required market transformation of buildings and energy use across the UK. This approach would also minimise cumulative carbon emissions which, in turn, will reduce the impact of climate change and the associated health implications on the global population.

However, there may be negative cost implications as it is possible that a premium will be paid because of early adoption of these solutions before market forces drive down costs. There is also a risk that MSDC could invest in solutions which are made redundant by later technological developments. On the other hand, this proactive approach could avoid a situation where MSDC finds itself approaching the 2050 target and having to pay a premium for low-carbon solutions because demand exceeds availability. This situation could be exacerbated by a late rush to adapt to net zero by the private sector, which ultimately could lead to MSDC missing the 2050 target.

2.3.2.2 Introduction to decarbonisation measures

Identifying decarbonisation interventions and developing emissions reduction plans is an iterative process that has generated a live document for MSDC that will evolve over time. The feedback loops are shown in Figure 11 below, and the following sections of this report reflect some of the identification, prioritisation, interactions and modelling loops that took place during the project.

Figure 11 - Workflow to develop decarbonisation interventions



A long list of decarbonisation measures to reduce MSDC’s emissions were identified by the Ricardo technical leads across the following categories:

- Heating systems.
- Waste management.
- Energy efficiency.
- Renewable energy generation.

The measures were entered into Ricardo’s modelling tool, taking account of factors such as:

- Fuel type and kWh (before and after each measure is implemented).
- Which year the measure is undertaken, and the number of years needed to implement.
- Fuel and cost savings associated with the net zero audit undertaken by Ricardo⁷.

Note: Costs indicated are based on a high-level desk-based assessment of potential measures, with all information on current systems and practices provided by MSDC. As such, full financial and technical feasibility studies will need to be carried out before measures are implemented.

⁷ Note: Projected cost savings do not take into account any future government policies (such as a levy on natural gas) that may impact fuel costs to drive people towards low carbon fuels, or other incentive schemes such as RHI payments that will impact the financial feasibility of a move to low carbon heating systems.

Factors around site suitability, technical feasibility and financial feasibility were considered to inform the modelling. It is noted that all measures will need to be installed in compliance with standard MSDC operating procedures and health standards.

A description of each short-listed measure has been provided in **Appendix C** of this report, a summary which is provided in [Table 4](#).

Table 4: Modelled MSDC decarbonisation measures

Mitigation Measure
Installing air source heat pumps (ASHP)
Improving energy management and controls
Energy sub metering / reporting systems
Installing LED Lighting
Optimising the operation of existing plant
Installing new roof-mounted solar photovoltaics
External / internal wall insulation, and loft / roof insulation
Improved waste segregation and recycling rate
Reduction in waste arisings due to prevention management

This 2050 net zero pathway model assumes that MSDC is supported in funding to prioritise the reduction of carbon emissions ahead of cost implications. It assumes that budget could be secured to allow rapid investment in measures that reduce carbon emissions.

2.3.2.3 Net zero audit

As part of this study, a net zero audit was undertaken by Ricardo to inform the measures that were entered into the modelling tool and discussed in this section. The sites that were selected for the audit were chosen as a representative sample of MSDC’s broader site portfolio. These include:

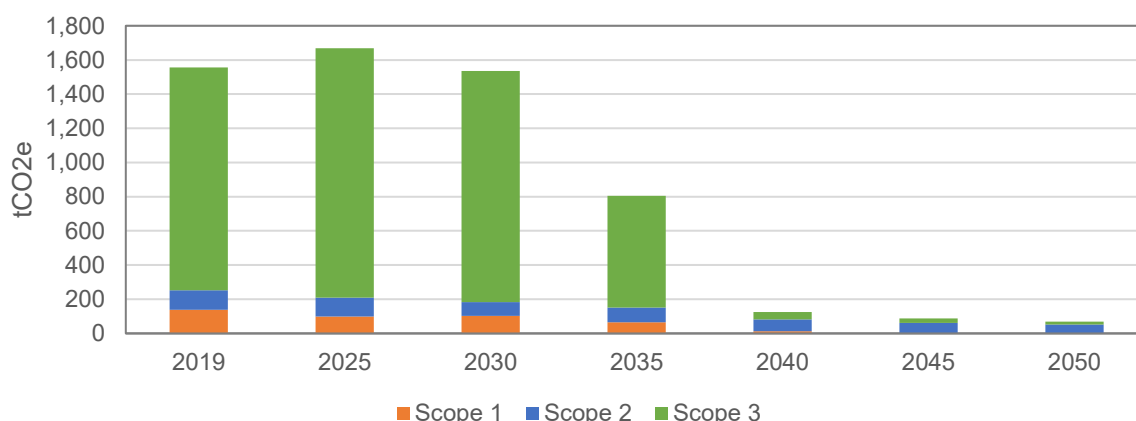
- Oaklands Main Office
- St Johns Pavilion
- Sheddingdean Community Centre

The scope of this audit was to investigate potential decarbonisation measures that could be applied to each site and scaled in order to support a reduction in emissions. The audit has been carried out in line with the requirements of BS EN 16247-2:2014 Buildings and included a site visit with inspection of the premises and discussions with staff, plus off-site analysis examining energy data. The energy and cost savings identified during this audit can be found in **Appendix B**.

2.3.2.4 Pathway mitigation potential

The following charts illustrate the mitigation potential for a net zero pathway to 2050. Please note that this net zero pathway excludes the purchase of goods and services due to its significant proportion of emissions within the baseline, accounting for 86% of the overall emissions.

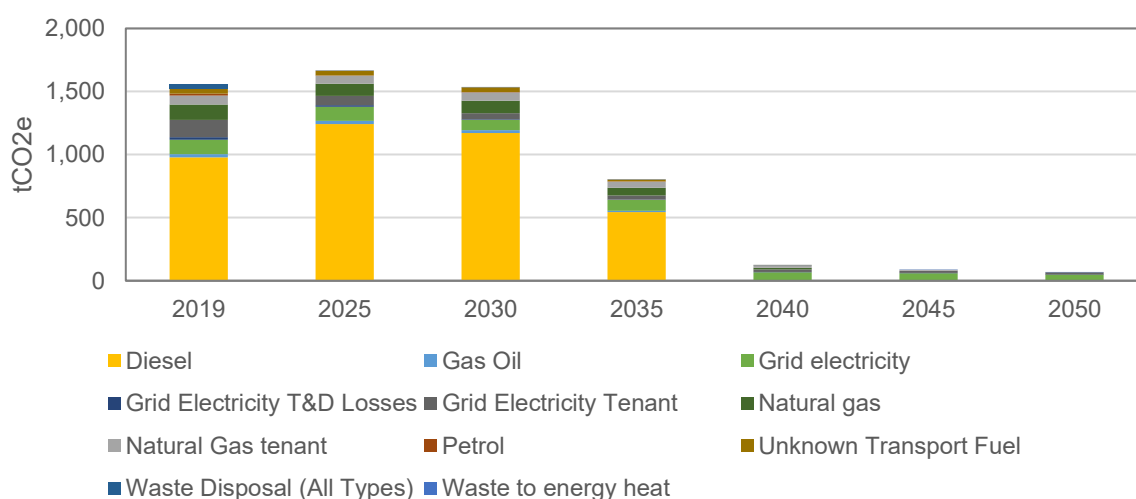
Figure 12 - Impact of net zero pathway split by emissions scope



Scope	2019	2025	2030	2035	2040	2045	2050
Scope 1 (tCO ₂ e)	138	98	103	65	13	2	2
Scope 2 (tCO ₂ e)	114	112	80	85	68	59	49
Scope 3 (tCO ₂ e)	1,304	1,459	1,352	655	44	27	17
Total (tCO₂e)	1,556	1,669	1,535	806	125	89	69
% change	0%	7%	-1%	-48%	-92%	-94%	-96%

Figure 12 shows the impact of the net zero pathway on total baseline emissions, as well as each individual emissions scope. The overall reduction in emissions seen between 2019 and 2050 is 96%. The residual emissions in 2050 are 25% attributed to scope 3, 71% to Scope 2, with the remaining 4% in Scope 1.

Figure 13 - Impact of net zero pathway split by emissions source

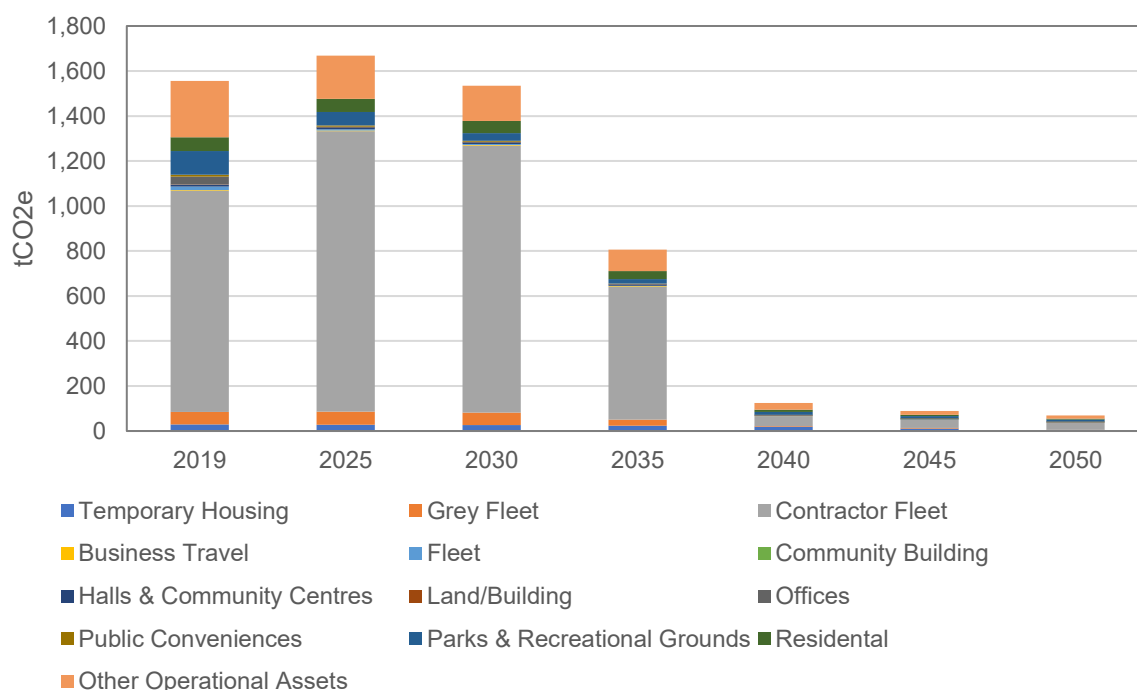


Emissions source	2019	2025	2030	2035	2040	2045	2050
Diesel	978.9	1,242.2	1,170.7	543.8	0.0	0.0	0.0
Gas Oil	24.8	25.9	24.4	11.3	0.0	0.0	0.0

Grid Electricity	114.1	111.7	79.6	85.5	68.1	58.9	49.0
Grid Electricity T&D Losses	21.2	11.1	6.7	3.8	2.2	1.9	1.5
Grid Electricity Tenant	135.9	75.7	47.4	31.3	20.7	18.6	15.6
Natural Gas	123.1	94.6	99.0	62.1	10.8	0.0	0.0
Natural Gas tenant	70.7	64.5	66.5	47.7	20.1	6.8	0.0
Petrol	15.5	2.8	2.6	1.2	0.0	0.0	0.0
Unknown Transport Fuel	37.9	38.6	35.8	17.1	0.8	0.0	0.0
Waste Disposal (All Types)	33.4	0.0	0.0	0.0	0.0	0.0	0.0
Waste to energy heat	0.0	2.0	2.1	2.2	2.3	2.3	2.4
Total (tCO₂e)	1,555.6	1,668.9	1,534.8	806.0	125.0	88.6	68.6
% change	0%	7%	-1%	-48%	-92%	-94%	-96%

Figure 14 shows how the net zero pathway impacts each of the emissions sources that contribute to the total footprint. Notably, the impact of switching from fossil fuels such as natural gas used in conventional boilers can have a significant impact on the reduction on emissions. For example, when switching natural gas used for space heating with heat pumps, this will initially result in an uplift in emissions associated with electricity. However, this is more than compensated by the reduction in emissions associated with gas use. In addition, as the UK grid decarbonises its electricity generation, the emissions per kWh of electricity usage decreases. For instance, in 2019/20 the emissions per kWh of electricity was 0.2556 kg of CO₂e. This decreased by 17% to 0.21233 kg of CO₂e in 2020/21. As a result, emissions from electricity will level off and start to fall overall.

Figure 14 – Impact of net zero pathway split by emissions area

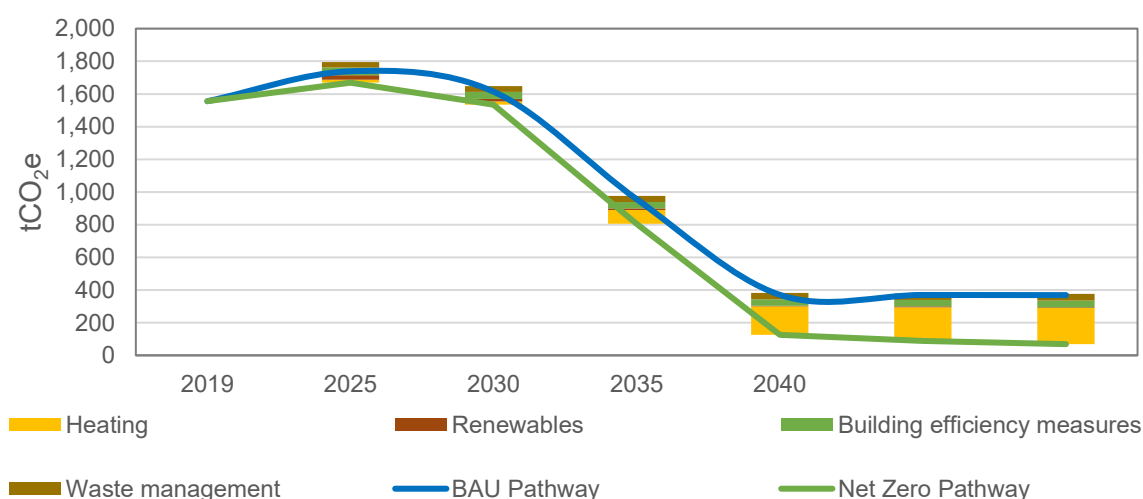


Emissions area	2019	2025	2030	2035	2040	2045	2050
Temporary Housing	28.9	28.0	26.0	23.4	19.5	11.5	4.2
Grey Fleet	56.3	58.6	55.9	27.8	2.1	1.9	1.6
Contractor Fleet	982.2	1,245.7	1,186.8	590.6	44.2	38.6	32.3
Business Travel	3.9	3.4	2.7	1.9	0.9	0.2	0.1
Fleet	14.6	4.9	3.7	2.0	0.7	0.6	0.5

Community Building	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Halls & Community Centres	9.0	8.6	7.7	5.0	1.6	0.8	0.7
Land/Building	1.4	0.9	0.6	0.3	0.2	0.2	0.1
Offices	34.5	2.8	2.8	2.6	2.4	2.4	2.5
Public Conveniences	8.1	5.3	3.1	1.8	1.0	0.9	0.7
Parks & Recreational Grounds	105.4	59.7	35.3	20.2	11.5	9.7	7.9
Residential	60.3	57.8	53.2	35.3	11.0	5.7	4.7
Purchased Goods and Services	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Other Operational Assets	250.7	193.1	157.0	95.2	29.8	16.1	13.1
Total (tCO₂e)	1,555.6	1,668.9	1,534.8	806.0	125.0	88.6	68.6
% change	0%	7%	-1%	-48%	-92%	-94%	-96%

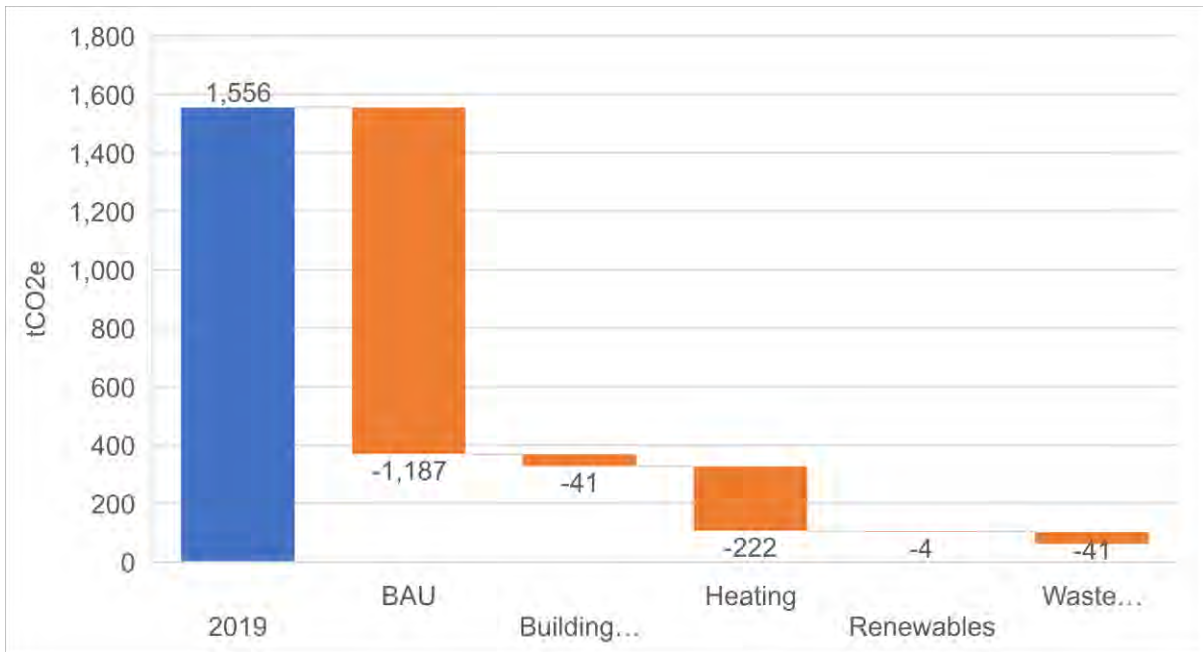
Figure 14 shows that under a 2050 net zero scenario, mitigation measures implemented across temporary housing, residential areas, parks and recreational grounds, and other operational assets (e.g., Oaklands Main Office) can be seen to have the largest cumulative reduction in emissions. The breakdown of these emissions is shown in the table above.

Figure 15 - Comparing the net zero pathway to business as usual



Under the 2050 net zero pathway, baseline emissions are reduced by 96% compared to 76% under a business-as-usual scenario. Figure 15 shows the contribution of groups of measures compared to the significantly reduced emissions profile of the net zero pathway. Emissions can be seen to initially increase as a result of the council's plans to 1) double temporary housing by 2040, and 2) increase delivery in contracted services as a result of food collection planned in 2024. The reduced emissions profile is also shown as a waterfall diagram in Figure 16 below. This highlights the substantial opportunity available through low or zero emissions properties to significantly address MSDC's primary source of emissions.

Figure 16 - Carbon savings by measure for the 2050 net zero pathway, cumulative from 2019/20 baseline to 2049/50



2.3.2.5 Residual emissions

Regardless of the implementation plan MSDC chooses to adopt, there will be residual emissions remaining in 2050. A breakdown of scope and categories of residual emissions is provided below in Figure 17 and the supporting table.

Figure 17: Residual emissions in 2050, split by scope

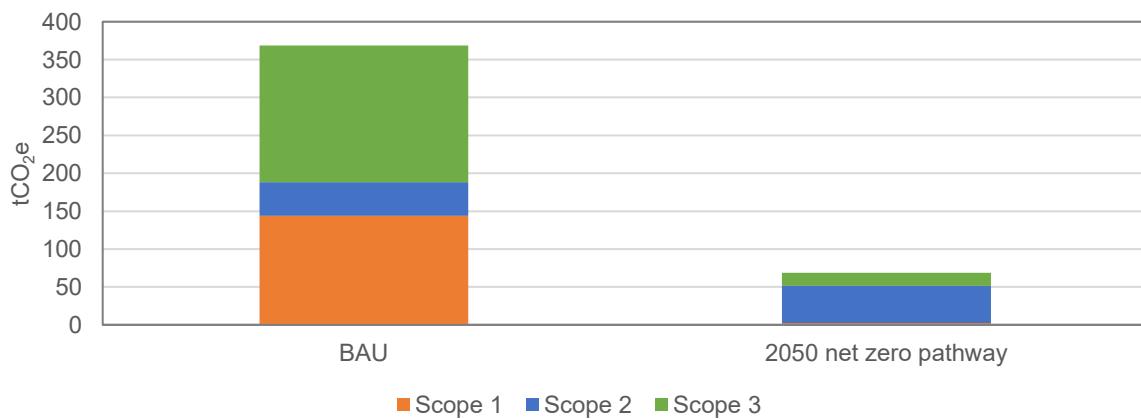
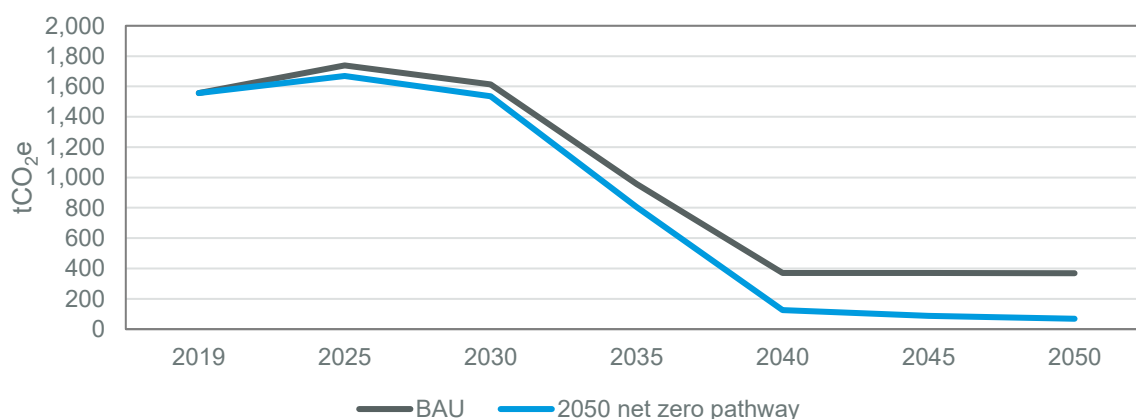


Figure 18: Residual emissions in 2050, split by pathway



tCO ₂ e	2019	2025	2030	2035	2040	2045	2050
BAU	1,556	1,739	1,614	956	371	370	369
2050 net zero pathway	1,556	1,669	1,535	806	125	89	69

Emissions area	BAU (tCO ₂ e)	2050 pathway (tCO ₂ e)
Diesel	0.0	0.0
Gas Oil	0.0	0.0
Grid electricity	44.6	49.0
Grid Electricity T&D Losses	2.1	1.5
Grid Electricity Tenant	14.2	15.6
Natural gas	143.8	0.0
Natural Gas tenant	120.1	0.0
Petrol	0.0	0.0
Unknown Transport Fuel	0.0	0.0
Waste Disposal (All Types)	43.8	0.0
Waste to energy heat	0.0	2.4
Total	368.7	68.6
% of 2019/20 baseline	23.7%	4.4%

2.3.2.6 Offsetting

While outside of the project scope, it is useful to understand the scale and potential cost of offsetting residual emissions to achieve net-zero emissions in 2050. We have estimated the cost of offsetting residual emissions in mid-century at £160/tCO₂ based on a recent assessment by the Grantham Institute⁸. This sets the carbon price at a level equivalent to the projected marginal abatement cost, the price signal considered necessary to deliver net-zero in UK industry.

Based on the modelled pathways, the cost of off-setting residual emissions for the year 2050 would be:

- BAU: £58,985
- 2050 net zero pathway: £10,969

⁸ http://www.lse.ac.uk/GranthamInstitute/wp-content/uploads/2019/05/GRI_POLICY-REPORT_How-to-price-carbon-to-reach-net-zero-emissions-in-the-UK.pdf

It is important to note that there are more options than offsetting to tackle residual emissions such as inssetting emissions reduction projects within the supply chain and downstream activities. **Of particular relevance to MSDC is the option to offset grid electricity emissions by purchasing renewables tariff electricity, which accounts for approximately 17% of all residual emissions in the BAU, and 96% in the 2050 net zero pathway.** This enables climate-related expenditure to remain within value creation cycle and reduces heavy spend on transactional costs for offsets.

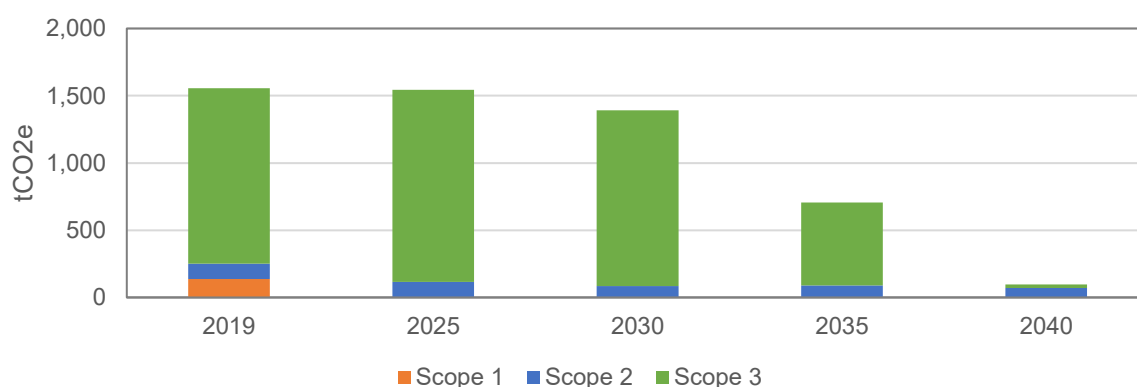
2.3.3 Accelerated net zero scenario (2040)

When analysing the timeline and aspiration for implementation of decarbonisation measures, the notable difference between a 2040 and 2050 pathway is the budget made available to allow the rapid implementation of decarbonisation measures and rate at which measures can be implemented. This scenario assumes that significant resources and budget will be made available to MSDC, meaning that the implementation plan can be brought forward to 2040 for achieving net zero emissions.

2.3.3.1 Pathway mitigation potential

The following charts illustrate the mitigation potential for a net zero pathway to 2040. As with the 2050 net zero pathway, this projection excludes the purchase of goods and services due to its significant proportion of emissions within the council’s estate.

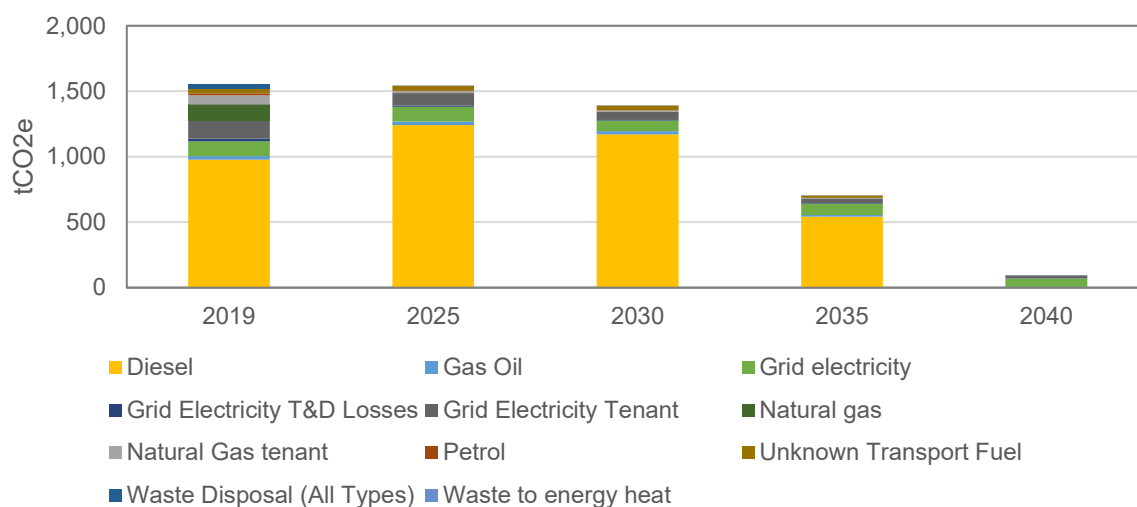
Figure 19 - Impact of net zero pathway split by emissions scope



	2019	2025	2030	2035	2040
Scope 1 (tCO ₂ e)	138	4	4	3	2
Scope 2 (tCO ₂ e)	114	112	80	86	68
Scope 3 (tCO ₂ e)	1,304	1,428	1,308	618	25
Total (tCO₂e)	1,556	1,544	1,392	706	96
% change	0%	-1%	-11%	-55%	-94%

Figure 19 shows the impact of the net zero pathway on total baseline emissions, as well as each individual emissions scope. The overall reduction in emissions seen between 2019 and 2040 is 94%. The residual emissions in 2040 are 26% attributed to scope 3, 71% to Scope 2, with the remaining 2% to Scope 1.

Figure 20 - Impact of net zero pathway split by emissions source



Emissions source	2019	2025	2030	2035	2040
Diesel	978.9	1,242.2	1,170.7	543.8	0.0
Gas Oil	24.8	25.9	24.4	11.3	0.0
Grid Electricity	114.1	111.9	79.7	85.5	68.1
Grid Electricity T&D Losses	21.2	11.1	6.7	3.8	2.2
Grid Electricity Tenant	135.9	95.8	60.5	37.0	22.2
Natural Gas	123.1	0.0	0.0	0.0	0.0
Natural Gas tenant	70.7	13.8	9.3	4.3	0.0
Petrol	15.5	2.8	2.6	1.2	0.0
Unknown Transport Fuel	37.9	38.6	35.8	17.1	0.8
Waste Disposal (All Types)	33.4	0.0	0.0	0.0	0.0
Waste to energy heat	0.0	2.0	2.1	2.2	2.3
Total (tCO₂e)	1,555.6	1,544.0	1,391.8	706.3	95.6
% change	0%	-1%	-11%	-55%	-94%

Figure 20 shows how the net zero pathway impacts each of the emissions sources that contribute to the total footprint.

As with the 2050 net zero scenario, the impact of switching from natural gas used for space heating to heat pumps is crucial for reducing emissions. However, this pathway assumes that new technologies such as heat pumps will be installed across the site portfolio at a much quicker rate. For example, the model assumes that natural gas will be completely phased out from temporary housing by 2040 (compared to 2050 in the 2050 net zero scenario). Funding is therefore essential for this technology to be rolled out. Moreover, residents will therefore need some form of engagement to understand the socio-economic implications of installing a heat pump for this to be viable.

Figure 21 – Impact of net zero pathway split by emissions area

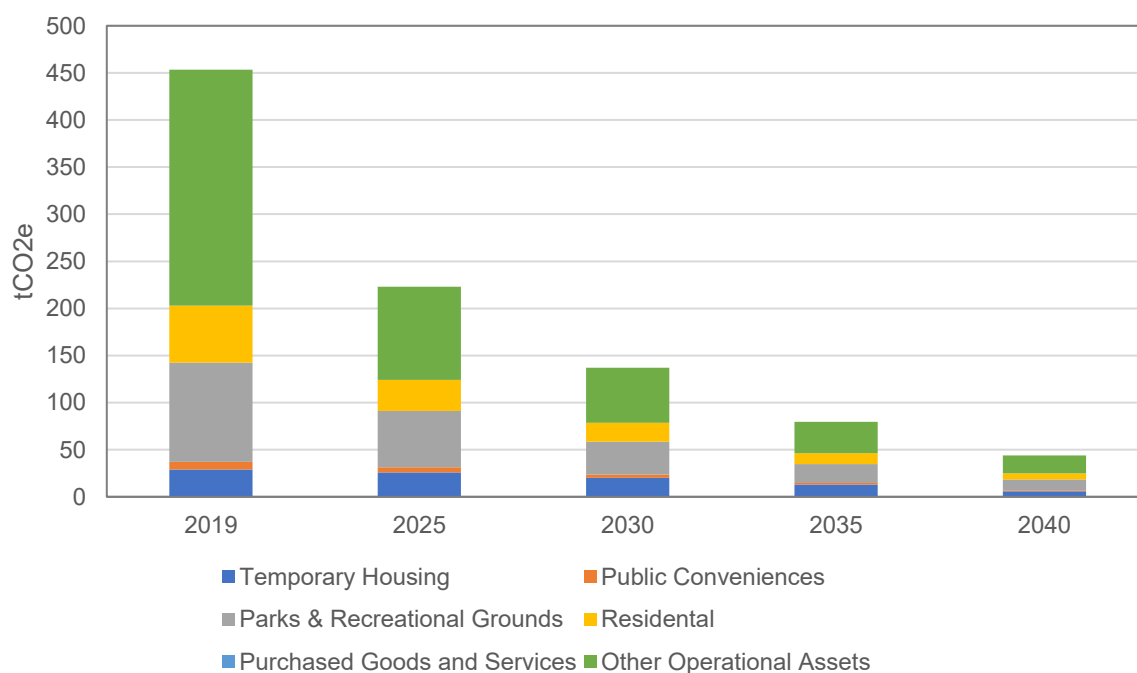
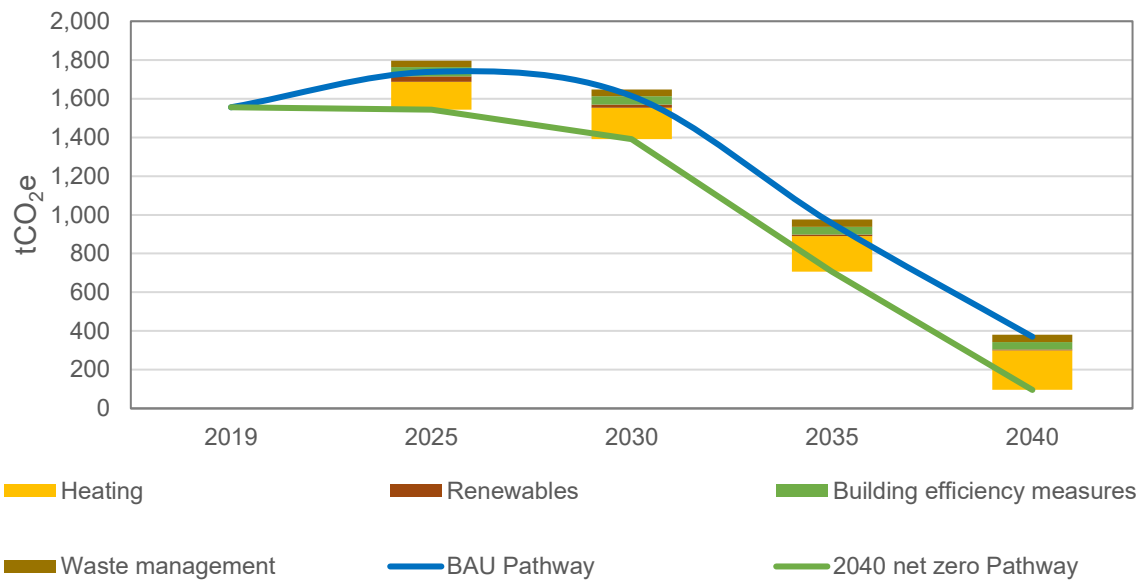


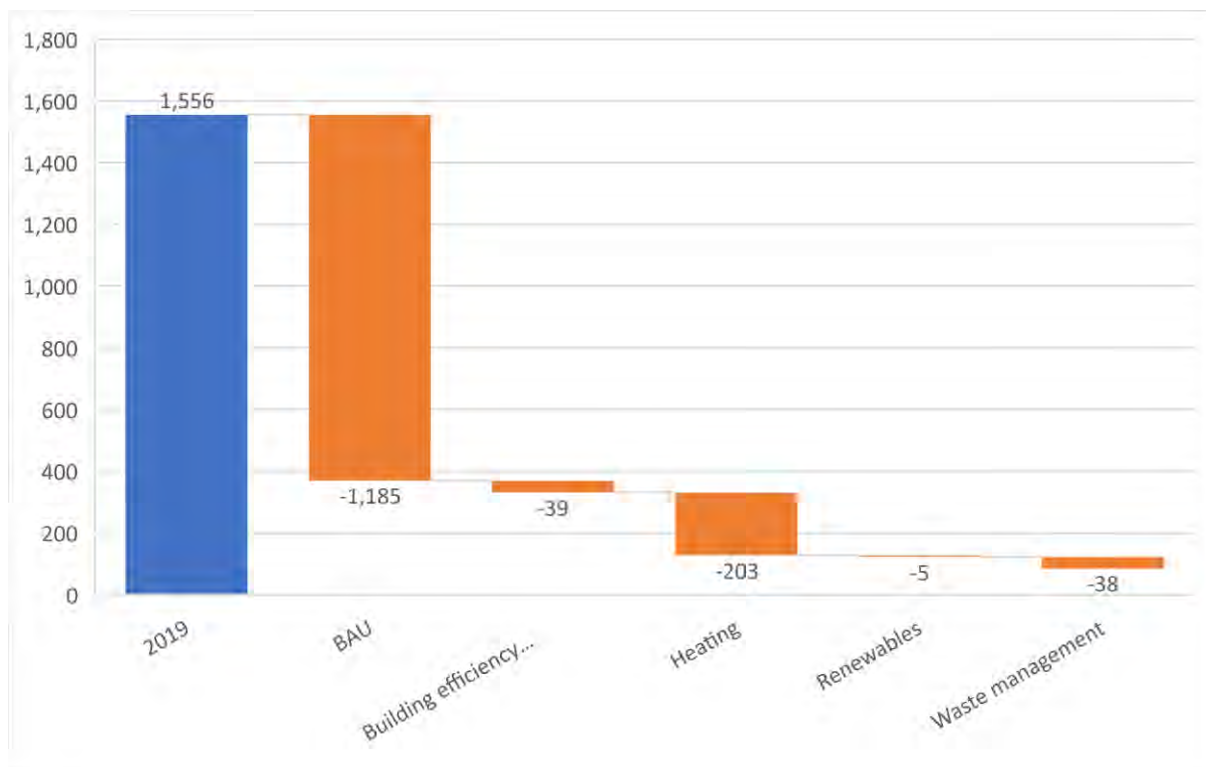
Figure 21 shows that under a 2040 net zero scenario, mitigation measures associated with other operational assets (e.g. Oaklands Main Office), and parks and recreational grounds can be seen to have the largest cumulative reduction in emissions.

Figure 22 - Comparing the net zero pathway to business as usual



Under the accelerated net zero pathway, baseline emissions are reduced by 94% compared to 76% under a business-as-usual scenario. Figure 22 shows the groups of measures which present a significantly reduced emissions profile within the 2040 net zero pathway. This is also shown as a waterfall diagram in Figure 23 below. This highlights the substantial opportunity available through low or zero emissions properties to significantly address MSDC’s primary source of emissions.

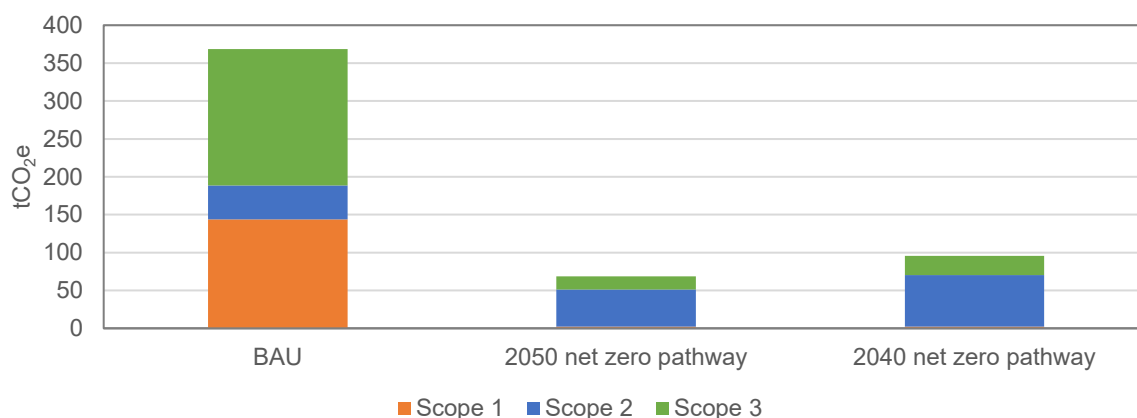
Figure 23 - Carbon savings by measure for the net zero pathway, cumulative from 2019/20 baseline to 2039/40



2.3.3.2 Residual emissions

Similar to the 2050 net zero pathway, regardless of the implementation plan MSDC chooses to adopt, there will be residual emissions remaining in 2040. A comparison breakdown of scope and categories of emissions is provided below in Figure 24 and the following table.

Figure 24: Residual emissions in 2040 and 2050, split by scope



tCO ₂ e	2019	2025	2030	2035	2040
BAU	1,556	1,739	1,614	956	371
2040 net zero pathway	1,556	1,544	1,392	706	96

Emissions area	BAU (tCO ₂ e)	2040 pathway (tCO ₂ e)
Diesel	0.0	0.0
Gas Oil	0.0	0.0
Grid electricity	44.6	68.1
Grid Electricity T&D Losses	2.1	2.2
Grid Electricity Tenant	14.2	22.2
Natural gas	143.8	0.0
Natural Gas tenant	120.1	0.0
Petrol	0.0	0.0
Unknown Transport Fuel	0.0	0.8
Waste Disposal (All Types)	43.8	0.0
Waste to energy heat	0.0	2.3
Total	368.7	95.6
% of 2019/20 baseline	23.7%	6.1%

2.3.3.3 *Offsetting*

As outlined in the previous section, we have estimated the cost of offsetting residual emissions in mid-century at £160/tCO₂ based on a recent assessment by the Grantham Institute⁹.

Based on the modelled pathways, the cost of off-setting residual emissions for the year 2050 would be:

- BAU: £58,985
- 2040 net zero pathway: £15,296

Of particular relevance to MSDC is the option to offset grid electricity emissions by purchasing renewables tariff electricity, which accounts for approximately 17% of all residual emissions in the BAU, and 97% in the 2040 net zero pathway. This enables climate-related expenditure to remain within value creation cycle and reduces heavy spend on transactional costs for offsets.

⁹ http://www.lse.ac.uk/GranthamInstitute/wp-content/uploads/2019/05/GRI_POLICY-REPORT_How-to-price-carbon-to-reach-net-zero-emissions-in-the-UK.pdf

3 A NET ZERO DISTRICT

Chapter 3 looks at GHG emissions across the whole of the Mid Sussex district. It starts with the GHG baseline for the whole district, then considers which stakeholders have influence over emissions and what the role of the Council can be and finishes by outlining two possible net zero pathways that the district could take.

3.1 GHG BASELINE

This section of the report establishes the baseline situation regarding fuel consumption and GHG emissions in Mid Sussex. Consideration is also given to the energy efficiency of the building stock, deployment of local renewable energy technologies, and electrical vehicle (EV) uptake. These factors provide useful context to inform the assessment of potential future trends in later sections of this report.

Key messages

- Buildings and transport – specifically, homes and cars – account for the vast majority of both fuel use and GHG emissions in Mid Sussex.
- Fuel consumption has decreased by around 10% since 2005, while CO₂ emissions have decreased by 32%. This is primarily due to the decarbonisation of grid electricity, which is the result of using less coal and more renewable technologies to generate power in the UK.
- Total GHG emissions for Mid Sussex in 2019 were approximately 736 ktCO₂e. This figure includes carbon dioxide (mostly associated with energy use), methane (mostly associated with waste and agriculture), nitrous oxide (mostly associated with fertiliser), and f-gases (used in refrigeration technologies). Around 80% of emissions are from CO₂ alone. This is consistent with the national average.
- The energy efficiency of the building stock in Mid Sussex is broadly in line with the national average. New buildings are significantly more efficient than older buildings. The Government aims to increase the minimum EPC rating that buildings must achieve in order to be rented, which should help to promote energy efficiency measures – but this will present a considerable challenge given the current performance of the building stock.
- There are a range of renewable technologies in Mid Sussex producing both electricity and heat. The majority are roof- or ground-mounted solar photovoltaic (PV) installations. There is also a significant amount of electricity produced by a single sewage gas facility. The amount of renewable electricity generated is equivalent to around 23 GWh per year. For context, electricity use in 2018 was around 509 GWh.
- Uptake of ultra-low emissions vehicles (ULEVs) has increased exponentially since 2011, and as of 2020 there were nearly 1,000 licensed ULEVs within the District, along with 35 public charging points. While this is an encouraging trend, uptake will need to increase nearly 100-fold by 2050 for Mid Sussex to reach net zero emissions.

3.1.1 Overview of the methodology

The baseline information presented in this section draws from a wide range of public datasets. In particular, it includes information about fuel consumption and CO₂ emissions which is disaggregated to a Local Authority level and published by the Department for Business, Energy and Industrial Strategy (BEIS). This core data has been supplemented, where relevant, with additional local data and further analysis in order to provide a more detailed sectoral breakdown of the results.

Note that, due to the publication schedule of these datasets, a mix of 2018 and 2019 data has been used. In particular, at the time of writing, 2019 data on CO₂ emissions at local authority level has been published, whereas 2019 fuel consumption data at local authority level has not. This is not expected to

affect any of the key take-home points, assuming that there were no radical changes in fuel consumption patterns in that time period.

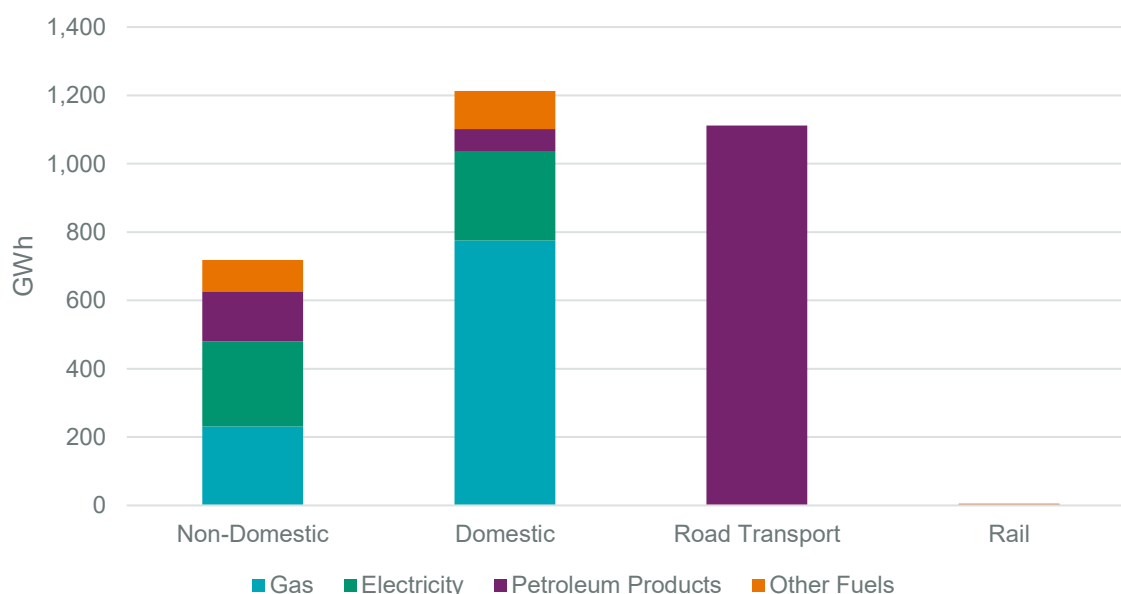
3.1.2 Fuel consumption

The most recent fuel consumption data published by BEIS is for 2018.¹⁰ Results are shown in the table below and illustrated in Figure 25. (Note that the ‘Non-Domestic’ category includes the following categories reported in the BEIS dataset: ‘Industrial’, ‘Commercial’, ‘Public Sector’ and ‘Agriculture’. ‘Other Fuels’ includes ‘Coal’, ‘Manufactured Fuels’ and ‘Bioenergy & Wastes’.)

Table 5. Fuel Consumption by Sector, 2018

	Gas (GWh)	Electricity (GWh)	Petroleum Products (GWh)	Other Fuels (GWh)	Total (GWh)	% of total
Non-Domestic	231	250	145	92	718	24%
Domestic	776	260	66	111	1,213	40%
Road Transport	0	0	1,112	0	1,112	36%
Rail	0	0	2	3	5	<1%
Total	1,007	509	1,326	207	3,048	100%
% of total	33%	17%	43%	7%	100%	

Figure 25. Fuel Consumption by Sector, 2018



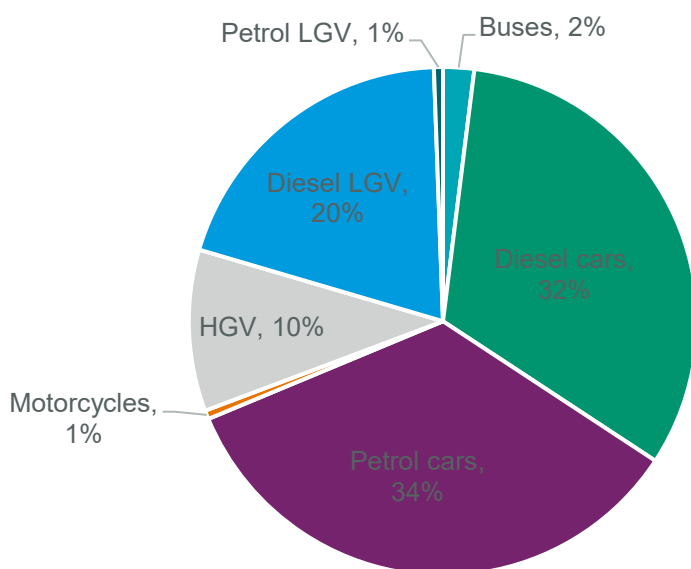
These statistics show that 40% of the fuel used in Mid Sussex in 2018 was associated with domestic buildings. Within the domestic sector, the majority of fuel used was natural gas, which typically supplies space heating and hot water, followed by electricity. Non-domestic buildings and processes/activities accounted for around 24%. This sector exhibits a more diverse mix of fuels compared to the domestic sector. The road transportation sector accounted for around 36% of total fuel consumption. There was also a very small amount of coal and petroleum use associated with rail transportation.

¹⁰ BEIS, ‘Sub-national total final energy consumption data 2005-2018’ (published 2020). Available at: [Sub-national total final energy consumption data - data.gov.uk](https://www.gov.uk/government/statistics/sub-national-total-final-energy-consumption-data)

When considering fuel consumption by fuel type, petroleum products were the largest contributor, accounting for 43% of all fuel used in 2018. The majority of petroleum use was attributed to road transportation (petrol and diesel), although some petroleum products are also used in industrial, commercial, and domestic buildings. Considering that Mid Sussex is a rural district, this could reflect a greater reliance on private transport and a higher proportion of homes that are off the gas grid compared with more urban areas. Natural gas accounted for around 33% of total fuel consumption while electricity accounted for 17%.

Examining road transport in more detail, around 67% of fuel is used in petrol or diesel cars, as shown in Figure 26. Around 20% is used for diesel light goods vehicles (LGVs) and 10% is used for heavy goods vehicles (HGVs). The remainder is associated with buses, petrol LGVs, and motorcycles. Overall, around a third of road transport fuel is currently used for freight, with the remainder used for personal travel.¹¹

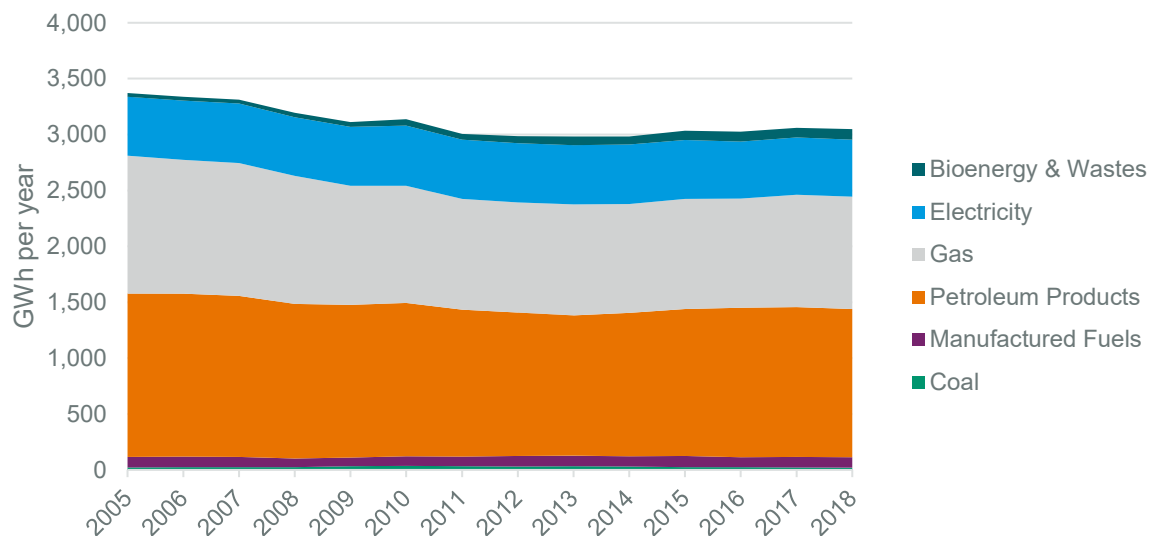
Figure 26. Split of road transport fuel use by vehicle type, 2019



As shown in Figure 27 below, total fuel consumption in Mid Sussex decreased by around 10% between 2005 and 2018 for all sectors and all fuel types, with the exception of fuels derived from bioenergy and waste. In particular, the use of natural gas decreased by around 18% in that time period. This trend is likely due to a wide range of factors but could indicate an increasing prevalence of energy efficiency measures in buildings and industry. When looking at total fuel consumption over this period, it is interesting to note that the reductions mostly occurred in the time period up to around 2011 – from that point fuel consumption has remained largely stable or has even slightly increased.

¹¹ BEIS, 'Sub-national road transport consumption data 2005-2019' (published 2021). Available at: [Sub-national road transport consumption data - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/sub-national-road-transport-consumption-data)

Figure 27. Trends in fuel consumption, 2005-2018



The maps below show the spatial distribution of domestic and non-domestic gas and electricity consumption, by Lower Super Output Area (LSOA) and Middle Super Output Area (MSOA) respectively.^{12,13}

¹² BEIS, 'Sub-national gas consumption data 2019' (published 2021). Available at: [Sub-national gas consumption data - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

¹³ BEIS, 'Sub-national electricity consumption data 2019' (published 2021). Available at: [Sub-national electricity consumption data - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Figure 28. Domestic electricity consumption by LSOA, 2019. Source: BEIS

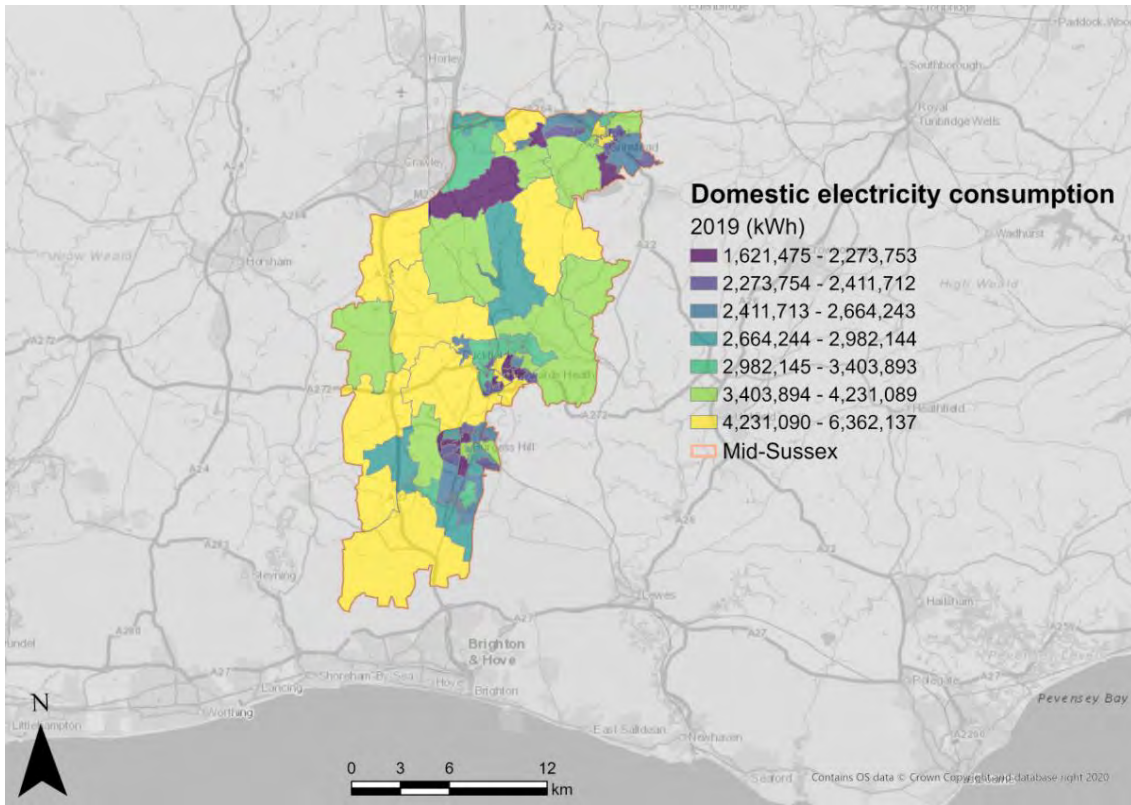


Figure 29. Domestic gas consumption by LSOA, 2019. Source: BEIS

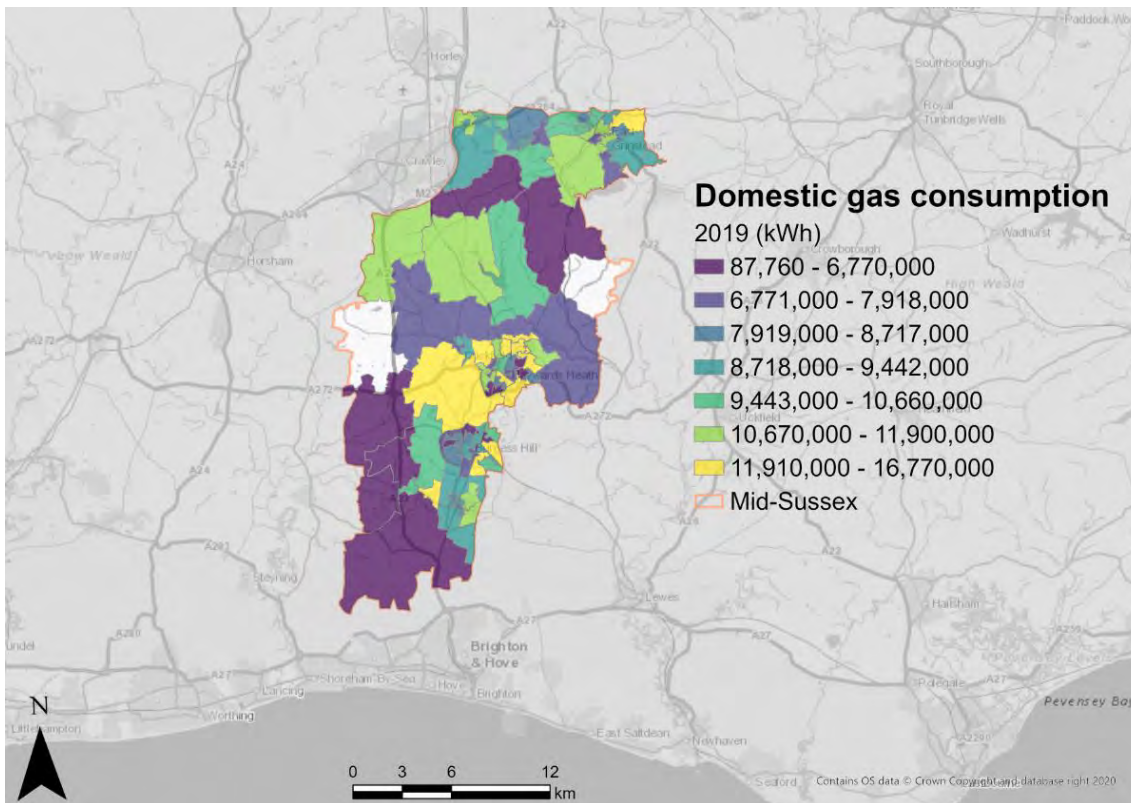


Figure 30. Non-domestic electricity consumption by MSOA, 2018. Source: BEIS

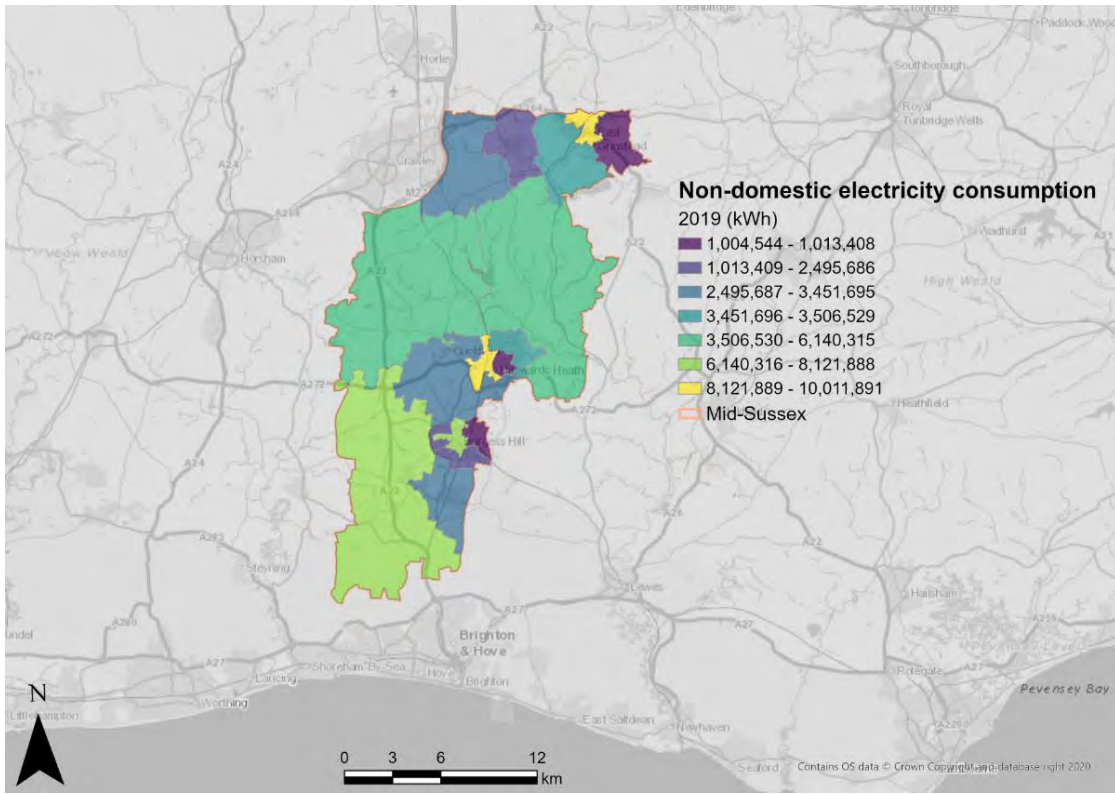
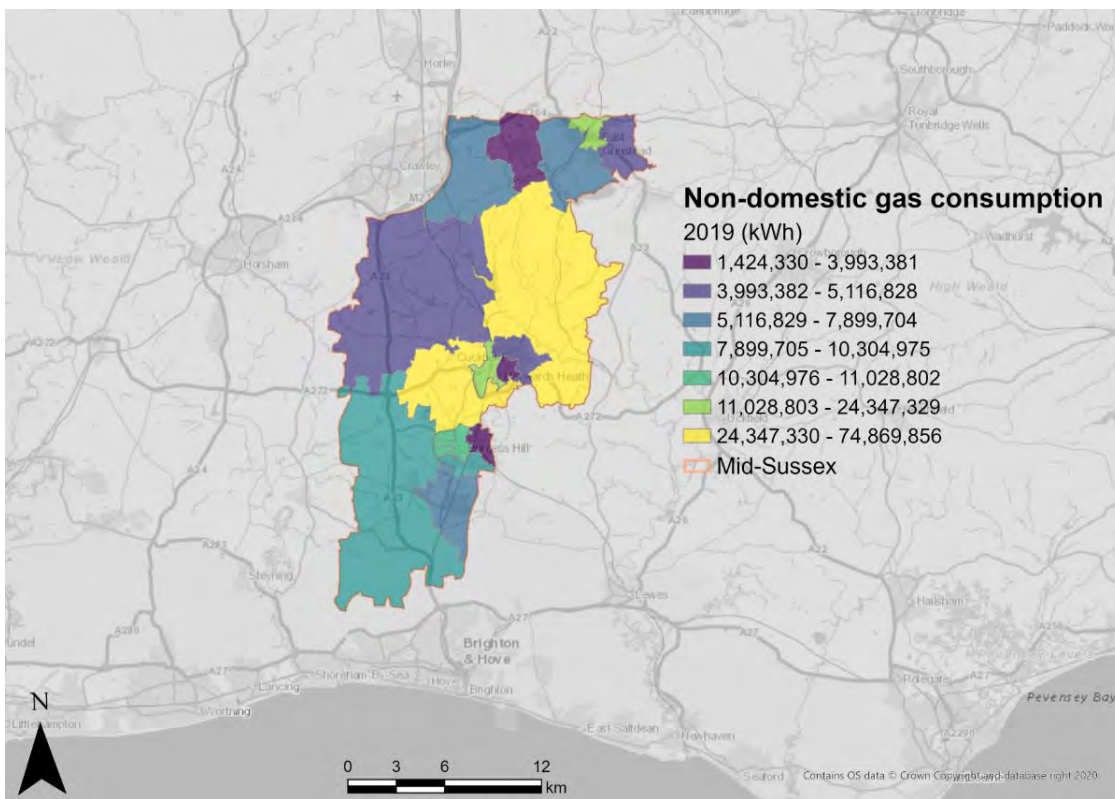


Figure 31. Non-domestic gas consumption by MSOA, 2018. Source: BEIS



3.1.3 Greenhouse gas (GHG) emissions

Information on CO₂ emissions at a local authority level is published annually by BEIS, two years in arrears.¹⁴ The dataset covers sectors and activities that emit CO₂. However, at a national level, CO₂ only accounts for around 80% of total GHG emissions.¹⁵ The remaining 20% comes from:

- Methane (CH₄), which is mostly associated with agriculture (e.g., livestock digestion) and waste management (e.g., organic waste decomposing in landfill);
- Nitrous oxide (N₂O), which is mostly associated with the use of fertilisers; and
- Fluorinated gases (f-gases), which are used in refrigerants and air conditioning systems but can leak out during the manufacturing, operation or disposal process.

Therefore, in order to provide a more comprehensive GHG emissions inventory for Mid Sussex, with a more detailed breakdown of emissions by fuel type and sector, we have taken the BEIS CO₂ data as a starting point and supplemented it with more detailed analysis based on various underlying and additional datasets such as sub-national fuel consumption, waste collection, and renewable energy statistics. These have been used to develop a CO₂e baseline for the district with our proprietary Net Zero Projections (NZP) tool. Results are presented in Table 6 below. These have been split according to sector to facilitate a like-for-like comparison with the BEIS CO₂ dataset (illustrated in Figure 32).

Table 6. GHG emissions in Mid Sussex by sector and fuel type, 2019

	Natural Gas (ktCO ₂ e)	Grid Electricity (ktCO ₂ e)	Petrol/ Diesel (ktCO ₂ e)	Other/Not Specified ^[1] (ktCO ₂ e)	Grand Total (ktCO ₂ e)
<i>Sectors in the BEIS CO₂ dataset</i>					
Light industry	13.55	18.14		32.09	63.78
Large industrial installations	5.86	3.92		9.62	19.40
Agriculture (CO ₂ from energy use) ^[2]				8.20	8.20
Commercial	17.96	27.29		1.27	46.52
Public sector	11.00	6.77		0.47	18.25
Domestic	147.48	56.05		22.93	226.46
Road transport			291.40		291.40
Railways			0.66		0.66
LULUCF net emissions ^[3]				-70.06	-70.06
Total	195.86	112.16	292.05	4.53	604.61
<i>Additional sectors</i>					
Agriculture (non-CO ₂ gases) ^[2]				40.50	40.50
F-gases ^[4]				30.37	30.37
Waste ^{[4][5]}				42.95	42.95
Domestic Aviation ^{[4][5]}				3.21	3.21
Total				117.04	117.04

Notes:

1. For some sectors, such as agriculture, emissions from energy use are not reported by fuel type, so these are listed in the 'Other/Not Specified' category, even though in reality they are likely to include some natural gas, grid electricity, petrol, or diesel. The 'Other/Not Specified' category also includes some emissions that do not result from fuel use. For example, methane emissions in the waste sector arise due to the decomposition of biological material

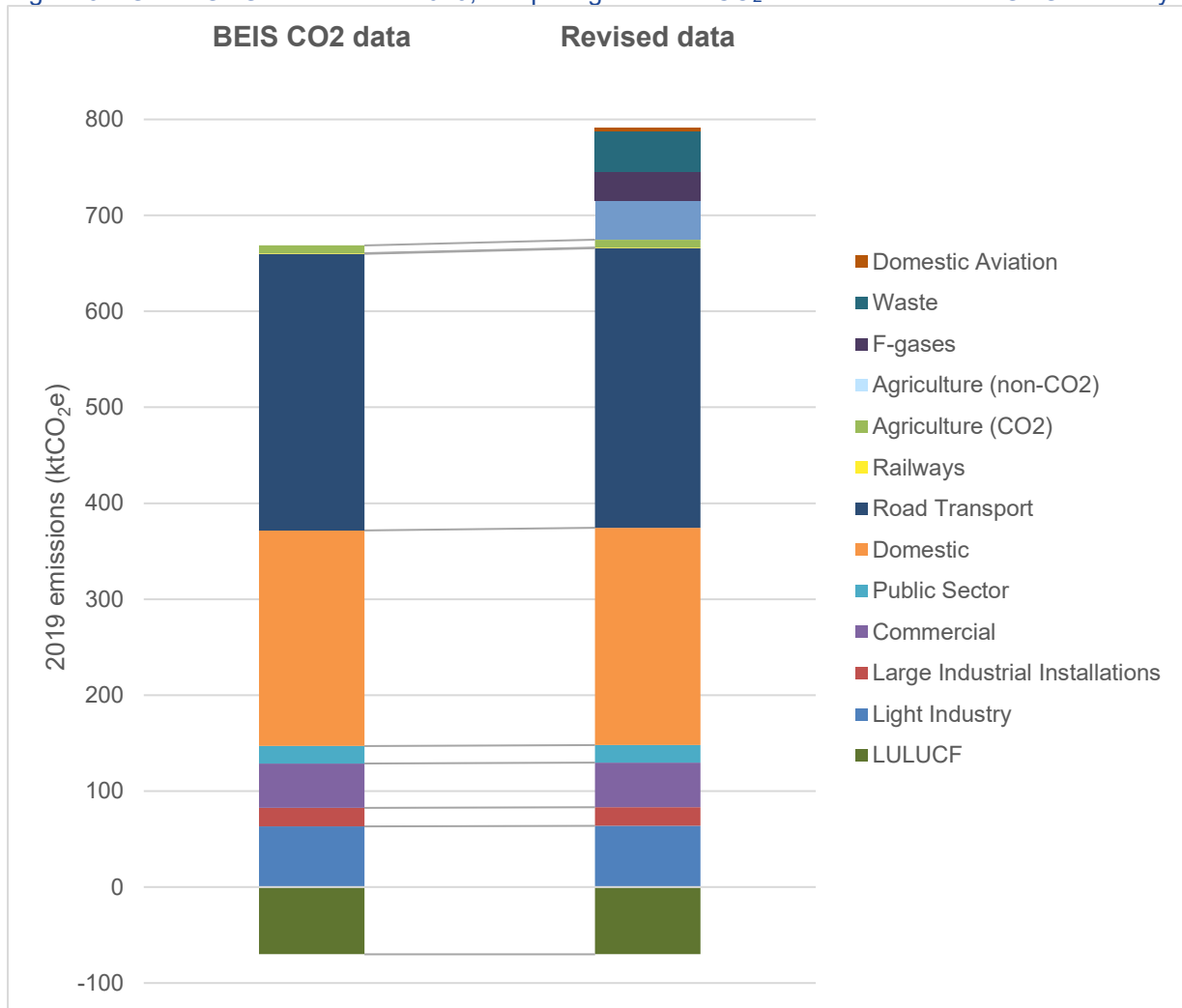
¹⁴ BEIS, 'Emissions of carbon dioxide for Local Authority Areas; (published 2021). Available at: [Emissions of carbon dioxide for Local Authority areas - data.gov.uk](https://www.gov.uk/government/statistics/emissions-of-carbon-dioxide-for-local-authority-areas)

¹⁵ BEIS, '2019 UK Greenhouse Gas emissions' (published 2021). Available at: [2019 UK Greenhouse Gas Emissions, Final Figures \(publishing.service.gov.uk\)](https://www.gov.uk/government/statistics/2019-uk-greenhouse-gas-emissions)

in landfill. Similarly, LULUCF (land use, land use change, and forestry) emissions are affected by soil and plants absorbing CO₂ during respiration.

2. The BEIS CO₂ data includes CO₂ emissions from energy use – that is, fuel use in agricultural facilities and processes – but does not include emissions from methane or nitrous oxide. In the agricultural sector, emissions are dominated by non-CO₂ gases. These were estimated by referencing the NAEI emissions map and converting units of methane and nitrous oxide to tCO₂e.
3. Stands for ‘land use, land use change, and forestry’. This category represents the movement of CO₂ between the atmosphere and different natural ‘reservoirs’ such as forests, soil, etc. Some human-induced effects, such as tilling the soil, result in CO₂ being emitted to the atmosphere, while others, such as planting trees, result in CO₂ being absorbed from the atmosphere. This category quantifies the net impact of all such activities taking place within the Local Authority boundary.
4. Estimate based on national datasets and apportioned to Mid Sussex based on population.
5. Some or all of the emissions from these categories may be classified as ‘indirect’ emissions, and therefore outside the scope of this inventory, if they occur outside of the Local Authority boundary. This would be the case, for instance, if waste generated in Mid Sussex is sent to landfill elsewhere. However, it is not possible to confirm based on available information.

Figure 32. Gross GHG emissions in 2019, comparing the BEIS CO₂ data and the revised GHG inventory



There are a few key differences between the BEIS CO₂ data and the revised inventory:

- For most sectors, there are small (<1%) differences simply due to the use of CO₂e conversion factors rather than CO₂ conversion factors.
- For agriculture, there is a large difference in the results which is due to the inclusion of methane and nitrous oxide.
- F-gases, waste, and domestic aviation are additional sources of emissions that were not included in the BEIS data.



The revised results highlight that road transport and domestic buildings contribute the most to total GHG emissions. Although the domestic sector is more energy-intensive (measured by annual fuel consumption), the rapid decarbonisation of the electricity grid in recent years means that road transport is now the highest emitting sector (see Figure 33).



The next most significant contributions come from light industry, agriculture, and the commercial sector. Energy use in public sector buildings and large industrial installations each comprise a relatively small portion of the overall total – less than the estimated emissions from f-gases, although it should be noted that the latter are based on prorated national datasets rather than locally specific information.



Emissions from waste management and domestic aviation have also been reported, although again, these are based on national datasets. Although they may fall outside the Local Authority boundary, it is possible that MSDC could exert some influence over these emissions e.g., by collaborating with waste collection contractors, or via awareness raising campaigns.

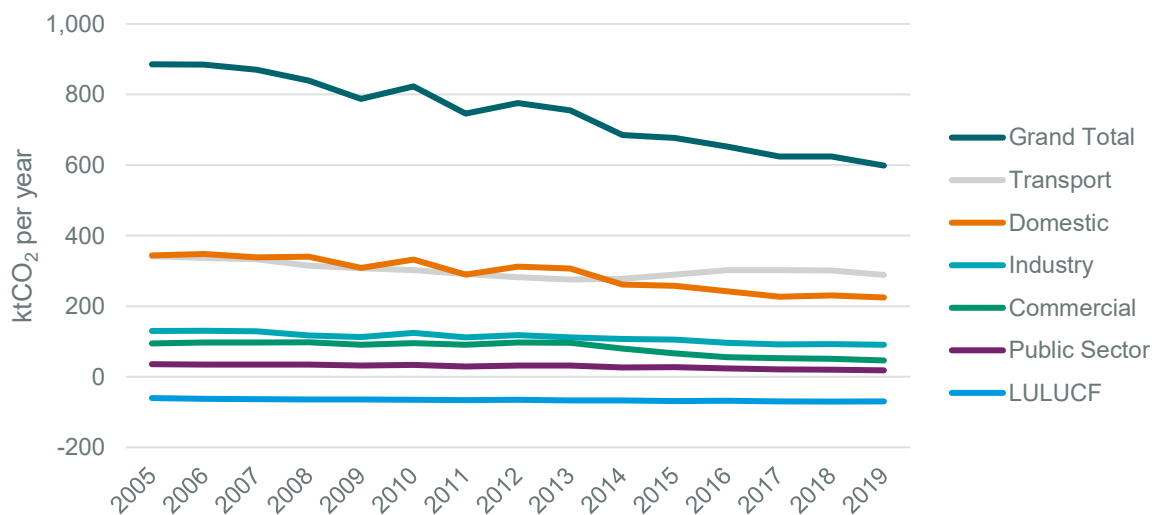


GHG reductions from the LULUCF sector reduce the total net emissions by around 10%. Although this is environmentally beneficial, it also serves as a reminder of the sheer scale of GHG emissions reductions that would need to occur in order to reach net zero emissions overall. Given that Mid Sussex is comparatively rural, and already includes important natural landscapes and national parks, there may be less scope for additional CO₂ sequestration to be achieved via 'natural' methods.

In order to consider trends over time, we have referred to the BEIS Local Authority CO₂ dataset. As stated previously, this only considers CO₂ rather than all GHGs; however, it still offers useful insight into major changes that have occurred since 2005.

As shown in Figure 33 below, total CO₂ emissions in Mid Sussex decreased by around 32% from 2005-2019. This is slightly below the national and county-wide averages, both of which saw around a 36% decrease in the same time period. By far the most significant change in emissions was due to decarbonisation of the national electricity grid, associated with the phasing out of coal and increase in renewable power generation. While electricity use in Mid Sussex decreased by around 4% in that time, CO₂ emissions per unit of grid electricity dropped by 55%. This highlights the importance that grid decarbonisation will play in the future when there is likely to be a widespread shift to the use of electricity for other purposes such as heating and transportation. Other changes in emissions are primarily associated with trends in fuel consumption, as the carbon intensity (kgCO₂/kWh) of most fuels other than electricity remains comparatively stable.

Figure 33. Trends in CO₂ emissions in Mid Sussex, 2005-2019



The maps on the following pages show the spatial distribution of CO₂, CH₄ and N₂O emissions at a 1x1km grid level, as published within the National Atmospheric Emissions Inventory (NAEI) mapping database.¹⁶

¹⁶ NAEI, 'UK Emissions Interactive Map' (2021). Available at: [UK Emissions Interactive Map \(beis.gov.uk\)](https://beis.gov.uk)

Figure 34. Total CO₂ emissions in Mid Sussex, 2019. Source: NAEI

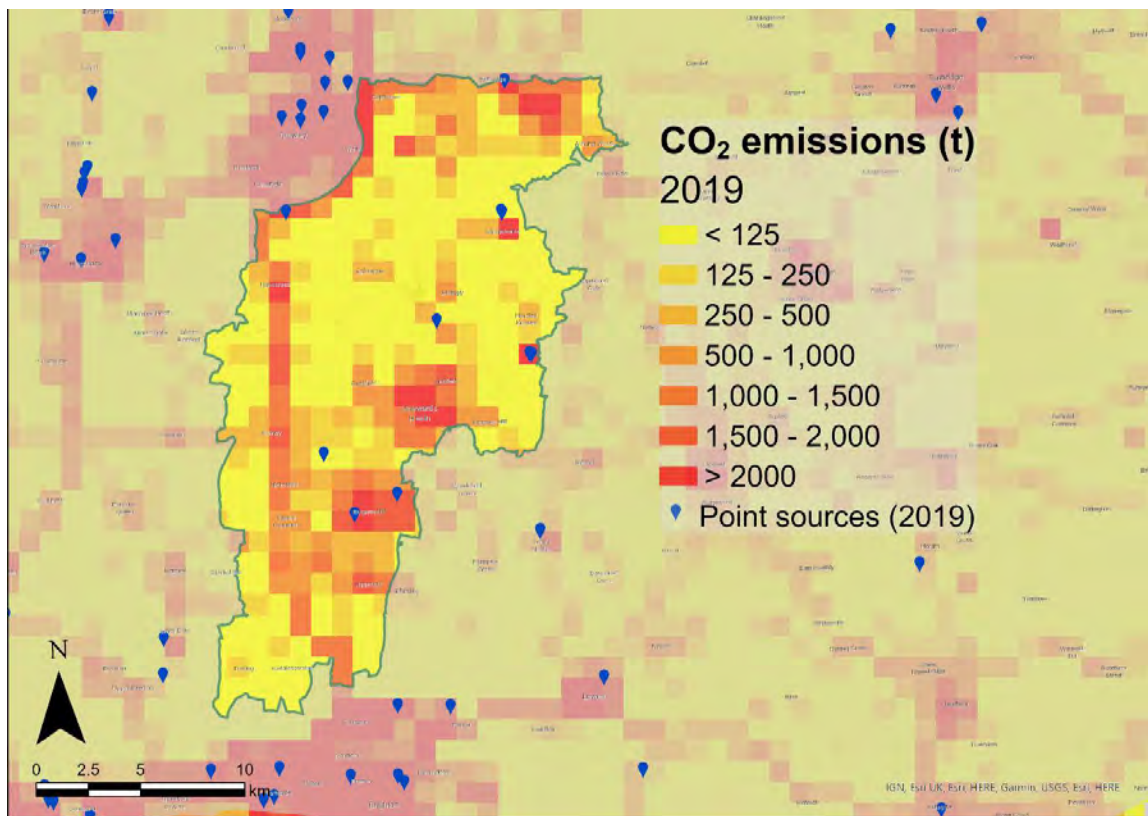


Figure 35. Domestic CO₂ emissions in Mid Sussex, 2019. Source: NAEI

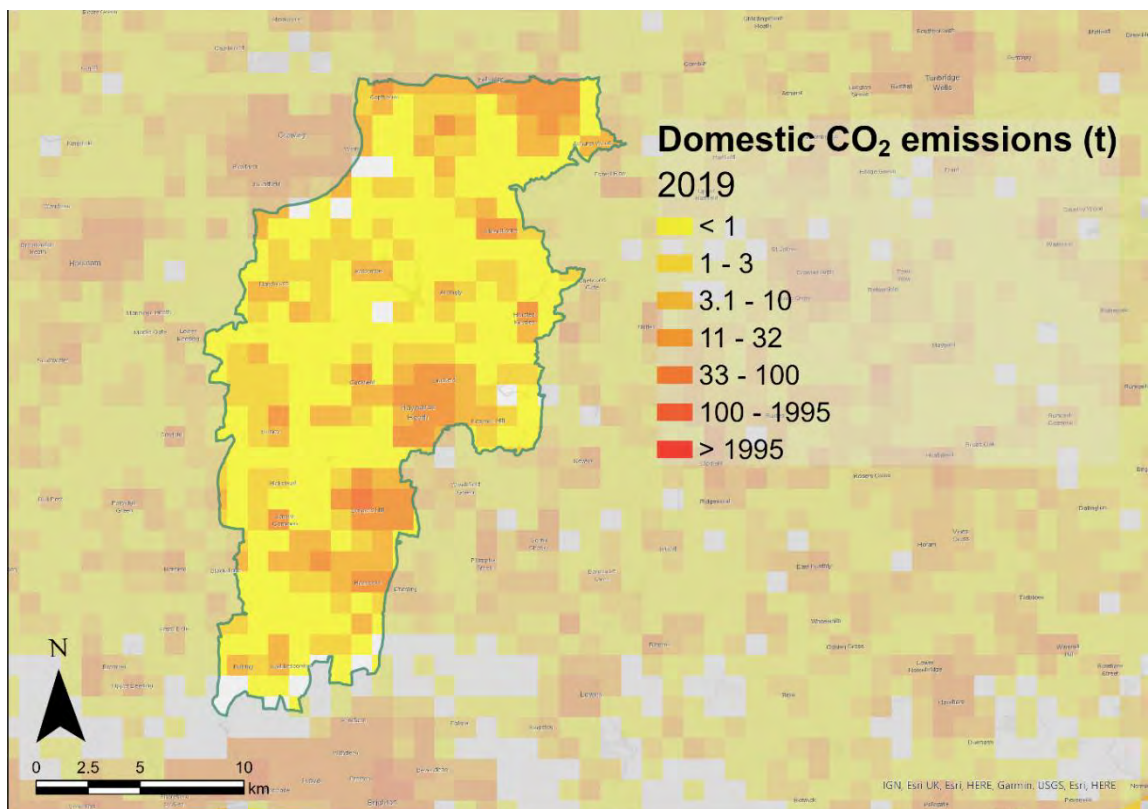


Figure 36. CO₂ emissions from road transport in Mid Sussex, 2019. Source: NAEI

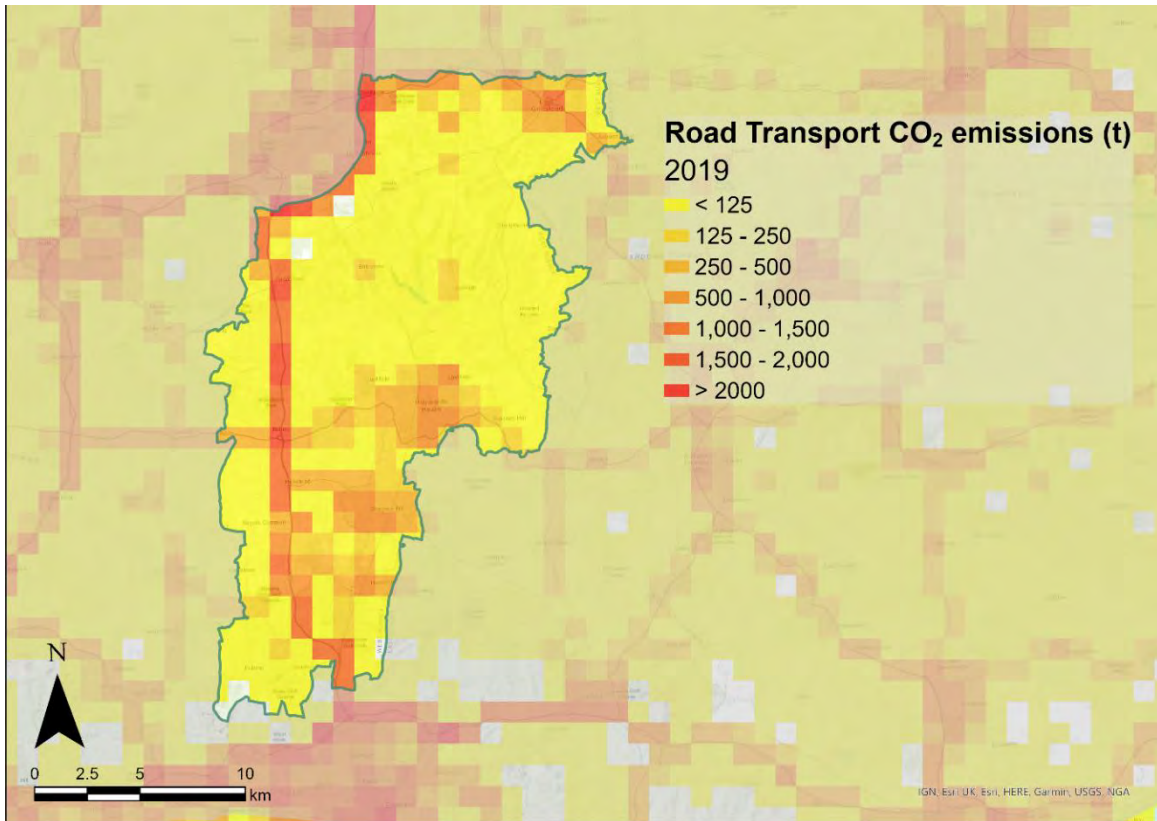


Figure 37. CO₂ emissions from manufacturing in Mid Sussex, 2019. Source: NAEI

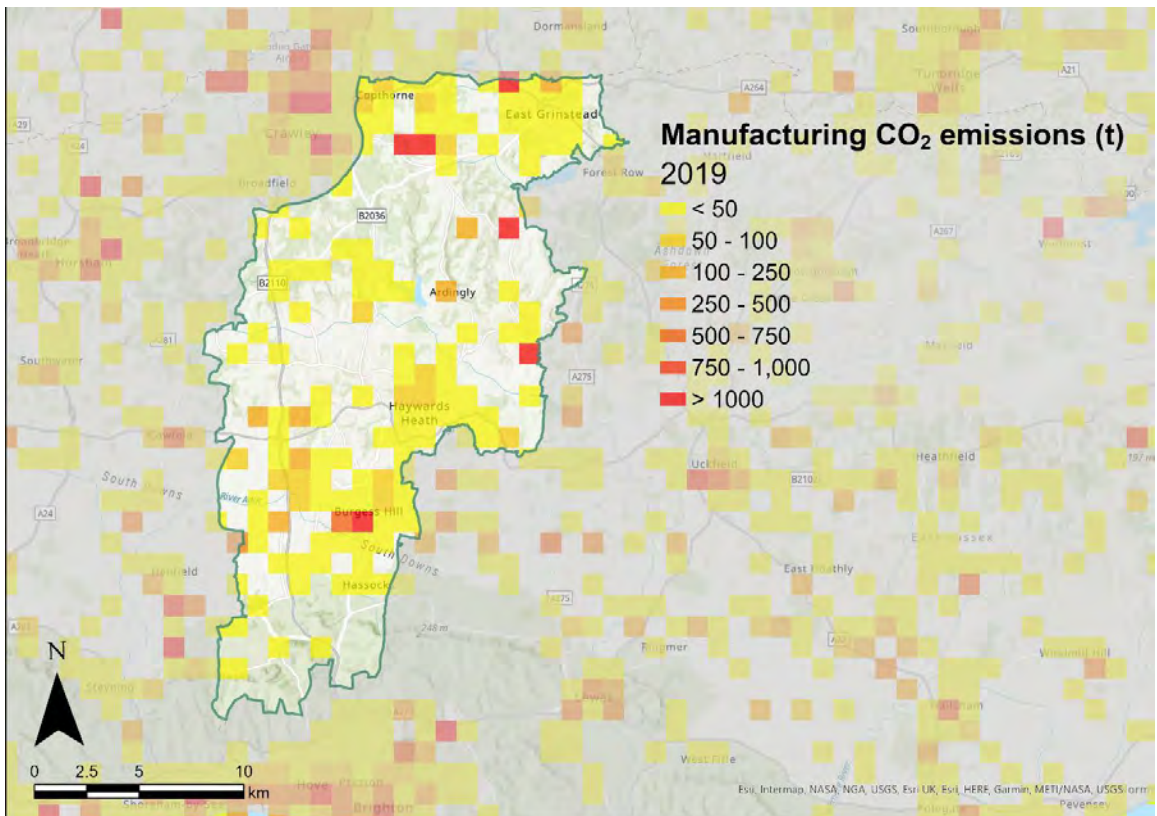


Figure 38. Methane (CH₄) emissions in Mid Sussex, 2019. Source: NAEI

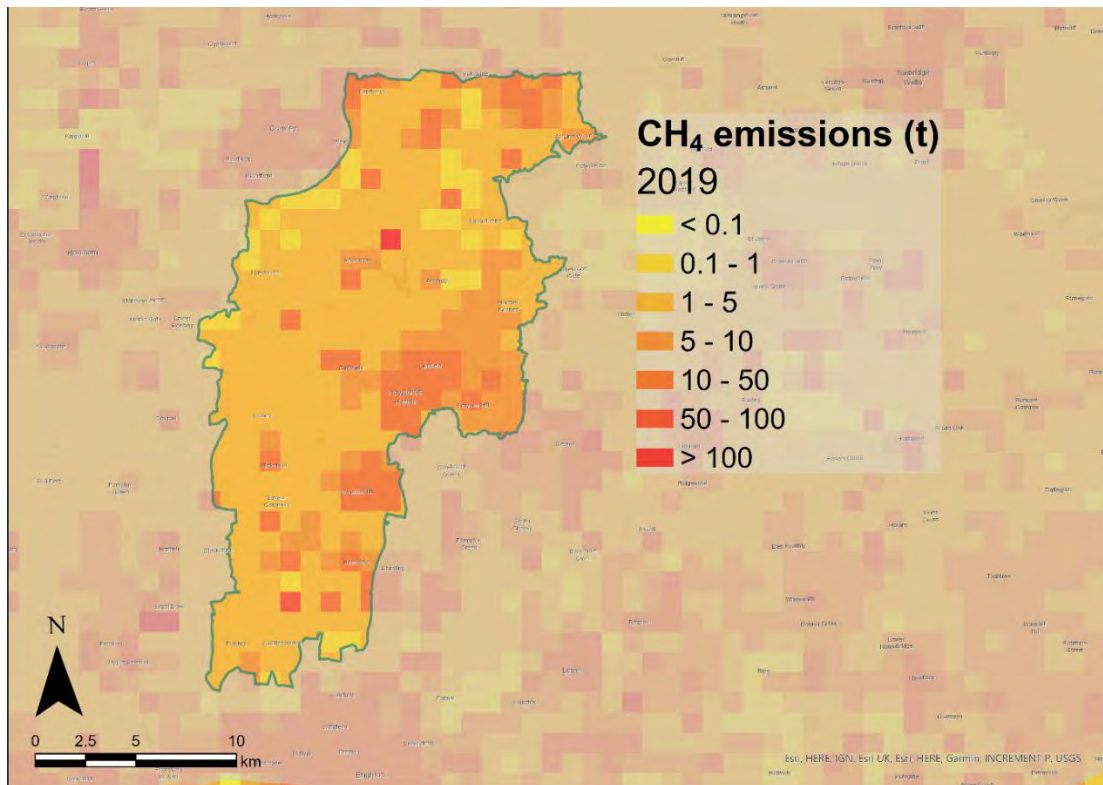
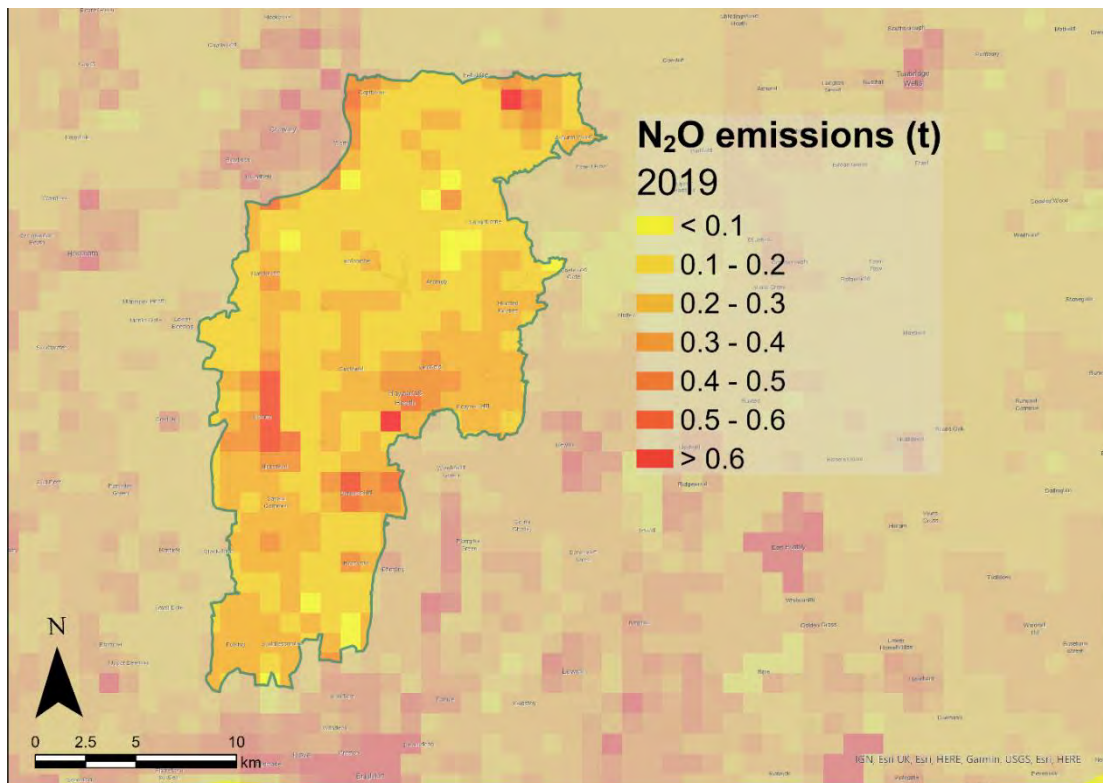


Figure 39. Nitrous oxide (N₂O) emissions in Mid Sussex, 2019. Source: NAEI



The maps indicate that CO₂ emissions are highest around the main town centres in Haywards Heath, Burgess Hill, and East Grinstead, which is not surprising given the rural nature of the district. Road transport emissions are dominated by the A23 and M23 where it encircles Crawley. The map of total CO₂ emissions shows that there are relatively few large point sources of CO₂, which typically include high energy users such as power stations, large industrial facilities, etc. The map of emissions from combustion in manufacturing also shows a small number of hotspots which correlate to these point sources' further details are available on the NAEI website. There is comparatively less spatial variation in CH₄ and N₂O emissions; these gases are predominantly associated with agricultural activities which are distributed across the district.

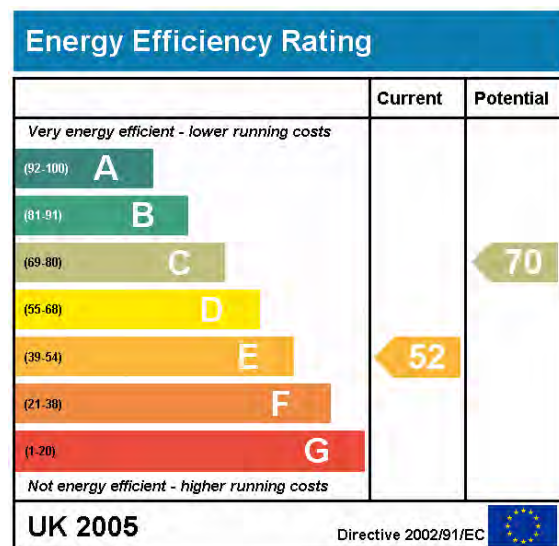
Note: Separate maps have been provided for CO₂, CH₄ and N₂O because the NAEI does not include f-gases which form part of Mid Sussex's total GHG footprint. Emissions of f-gases are assumed to correlate spatially with buildings, particularly non-domestic buildings which are more likely to use refrigerants and air conditioning systems.

3.1.4 Energy efficiency in buildings

In order to understand the relative level of energy efficiency of the existing building stock, energy performance certificate (EPC) data was retrieved from the Ministry of Housing, Communities and Local Government website.¹⁷

What are EPCs?

EPCs provide a modelled estimate of the annual fuel consumption and CO₂ emissions from buildings, based on observations about their size, layout, and construction. Although the results do not necessarily indicate the actual fuel consumption or emissions from a given building – this depends on many factors including occupant habits – EPCs allow a like-for-like comparison between buildings with equivalent geometry. EPCs present an energy efficiency ranking for the building, based on a scale from A (best) to G (worst), as illustrated in the image on the right. Note that domestic EPCs show the potential rating that could be achieved if energy efficiency measures were introduced, but this is not the case for non-domestic EPCs.



The publicly available datasets are updated regularly and, at the time of writing, span the time period from 2008 through March 2021. Collectively, they cover the majority of the existing stock, as all buildings are required to undergo an assessment to obtain an EPC when they are constructed, sold, or rented; however, it is likely to exclude buildings constructed prior to 2008 that have not been sold or rented in that period. The dataset also contains some duplicate entries, where buildings have undergone multiple assessments. Duplicates were removed after being sorted by date, to ensure that only the most recent assessment was included in this analysis.

EPC ratings are not only useful to get a sense of the overall energy efficiency levels of existing buildings, but also because they underpin the Minimum Energy Efficiency Standards (MEES) regulations that came into effect in 2018. The MEES regulations are intended to encourage property owners and landlords to improve the energy performance of their buildings by making it unlawful to grant new tenancies for properties with an EPC rating less than 'E'.¹⁸ (Exemptions apply and consideration is given to the maximum improvement that can be achieved via cost-effective measures.) The requirement was extended to all (new and existing) domestic tenancies in 2020, and it is expected that the same will

¹⁷ <https://epc.opendatacommunities.org/>

¹⁸ [Minimum Energy Efficiency Standards \(MEES\) for Landlords \(elmhurstenergy.co.uk\)](https://www.elmhurstenergy.co.uk/minimum-energy-efficiency-standards-meets-for-landlords/)

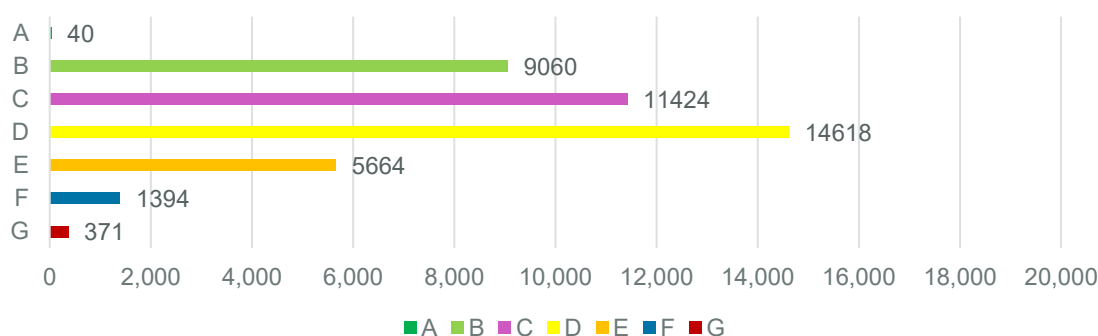
apply for commercial tenancies from April 2023. Over time, the minimum EPC rating will progressively increase. The Government has set out an ambition that, by 2030, most rented non-domestic properties will be required to achieve a 'B' rating and homes will achieve a 'C' rating.^{19,20} Local Authorities are responsible for ensuring compliance in the domestic sector and have the ability to issue fines for non-compliance with MEES. Responsibility for the non-domestic sector lies with the Local Weights and Measures Authorities.

The MEES regulations are relevant to this study because, as shown in Section 3.1.3, existing buildings account for a large proportion of total GHG emissions, and there are relatively few other mechanisms for Local Authorities or the Government to influence the energy performance of such buildings.

3.1.4.1 Domestic buildings

As shown in Figure 40, the median 'current' EPC rating for buildings in Mid Sussex is D, which is the same as the national average. The median 'potential' EPC rating is B. Although it is not possible to directly translate this into an equivalent carbon saving, for context, the National Energy Efficiency Database indicates that adopting common, cost-effective energy efficiency measures can result in a c. 5-15% reduction in heating demands.²¹ More ambitious retrofitting schemes can achieve much greater improvements, reducing heating bills by 80% or more. This suggests that there is considerable scope for improvement within the domestic stock.²²

Figure 40. Current domestic EPC ratings



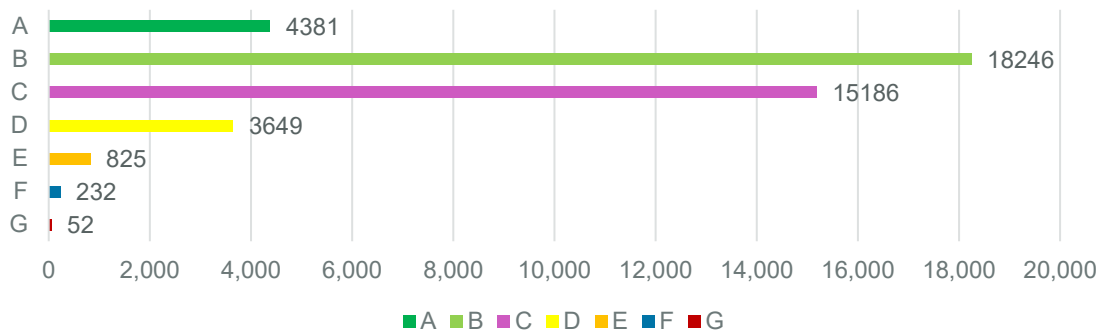
¹⁹ [Improving the energy performance of privately rented homes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/improving-energy-performance-of-privately-rented-homes)

²⁰ [Non-domestic Private Rented Sector minimum energy efficiency standards: EPC B implementation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/non-domestic-private-rented-sector-minimum-energy-efficiency-standards)

²¹ EPCs provide recommendations for energy efficiency measures that are tailored to each building. These include measures such as wall, roof, or floor insulation; upgrading to double or triple glazing; upgrading the heating system; installation of PV or solar thermal technologies, etc.

²² The actual carbon savings would depend on which energy efficiency measures are implemented. In practice, these modifications are often costly, and uptake has historically been low in the absence of government or Local Authority funding / subsidies. Local Authorities generally have limited influence over the existing building stock, although it is possible to reduce barriers via permissive Local Plan policies and permitted development rights.

Figure 41. Potential domestic EPC ratings

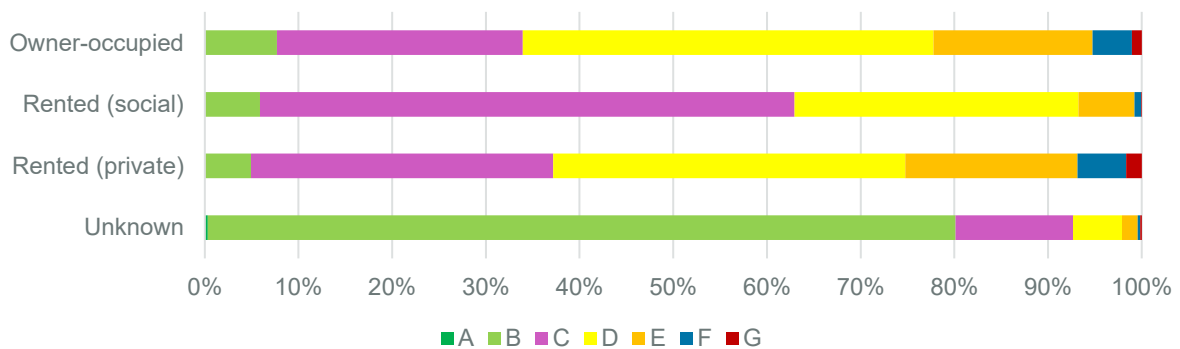


EPC data for England and Wales indicates that there is considerable variation between EPC ratings for buildings of different types and age of construction, and this is also the case for Mid Sussex. Larger properties, and those that are detached or semi-detached, tend to use more energy than smaller ones. New buildings are more energy efficient than older buildings, due to the progressive increase in standards set out within the Building Regulations; statistics for 2019 suggest that energy costs for new build homes are roughly half that of existing homes.²³ This indicates that significant effort would be required to achieve the Government’s aim of bringing as many buildings as possible up to a ‘C’ rating by 2035.

Considering energy efficiency by tenure, the domestic EPC data for Mid Sussex suggests that social rented housing tends to be more efficient than owner-occupied or private rentals. This is also true across the country as a whole, due to a variety of factors, which are likely to include differences in the typical type and age of property but could also relate to the availability of funding for energy efficiency improvements.

(Note that the ‘Unknown’ category includes EPCs where there is no record of tenure, but mostly comprises new buildings where the tenancy is not yet determined. This likely explains the higher level of energy efficiency in this category.)

Figure 42. Current domestic EPC ratings by tenure

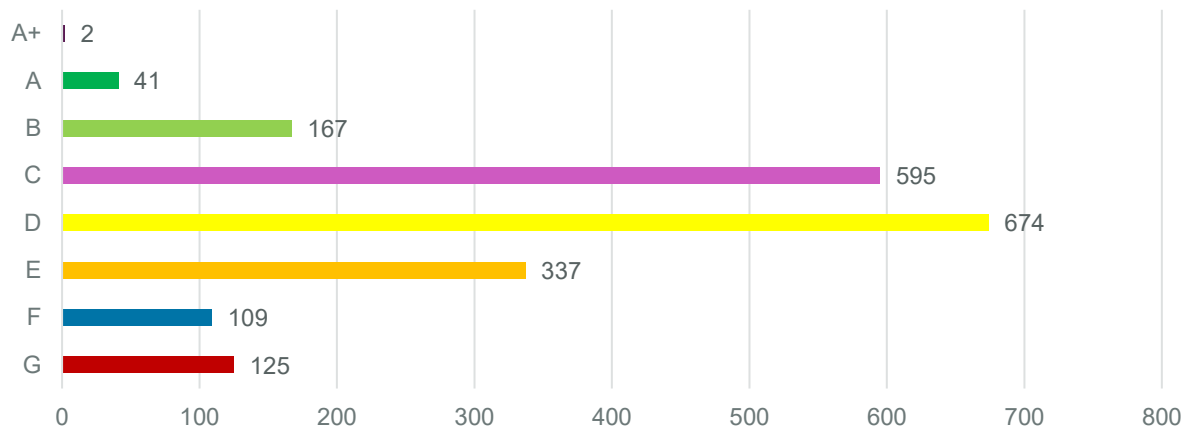


3.1.4.2 Non-domestic buildings

The median non-domestic EPC rating in Mid Sussex is D, and the majority (over 60%) have either a C or a D rating. Perhaps unsurprisingly, the distribution is not symmetrical; there are more buildings with lower ratings than higher ratings. As with the domestic stock, this broadly mirrors the national picture.

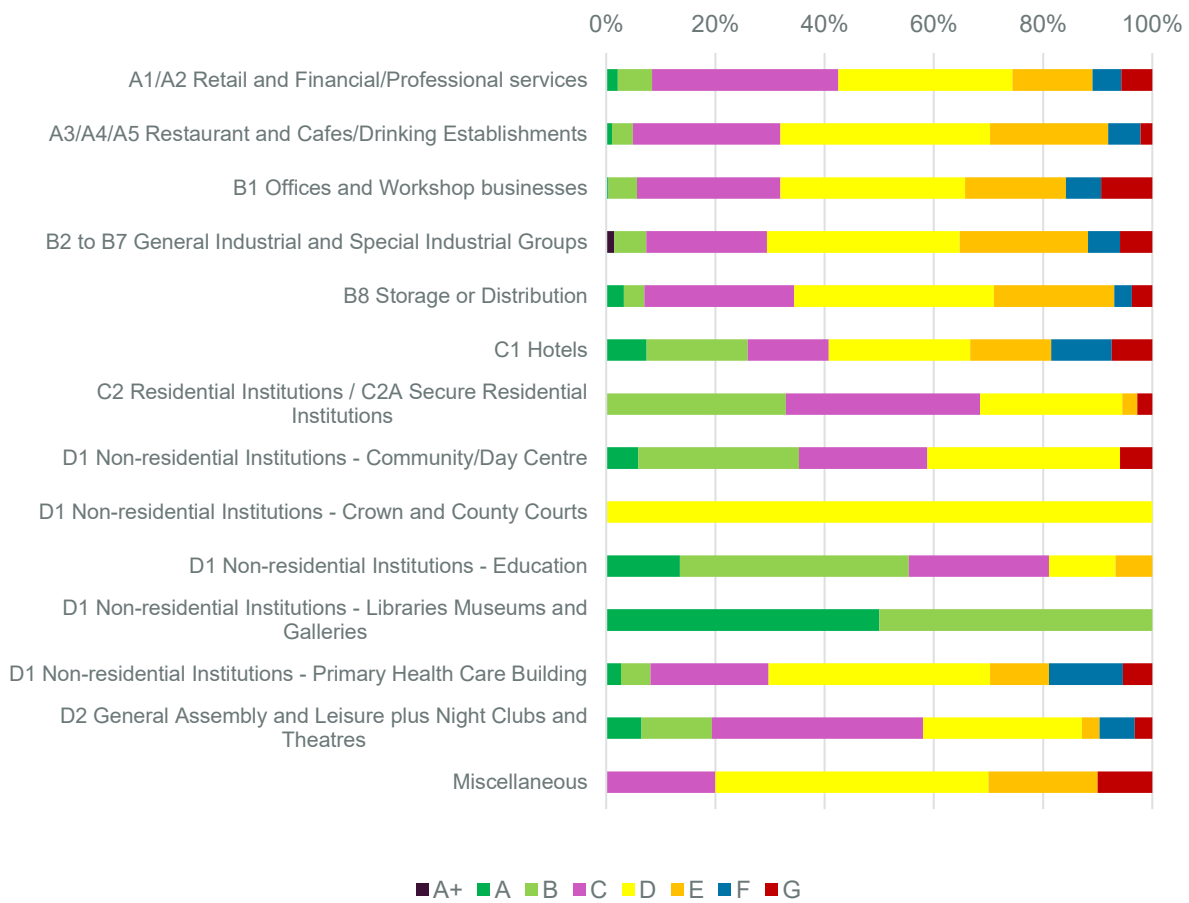
²³ Office for National Statistics, ‘Energy efficiency of housing in England and Wales’ (2021). Available at: [Energy efficiency of housing in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/housing/articles/energy-efficiency-of-housing-in-england-and-wales)

Figure 43. Non-domestic EPC ratings



Non-domestic EPCs report the planning use category of a property, rather than tenure. Figure 44 shows a breakdown of results by use, indicating the proportion of buildings that achieve different ratings. (Note that this is affected by how many buildings of each type are included in the dataset. For instance, the result for ‘D1 Non-residential institutions – Crown and County Courts’ is based on the EPC record for just one building.) These results reinforce one of the key messages of the domestic EPC analysis, which is that a significant portion of the existing stock would need to be upgraded by 2030 in order to meet the Government’s ‘B’ rating requirement.

Figure 44. Non-domestic EPC ratings by use category



3.1.5 Renewable energy

To estimate the number, size, and type of renewable energy installations within Mid Sussex, we have referred to the following sources:

- The Regional Renewable Statistics (RRS) – Published annually by BEIS, this dataset only includes renewable electricity technologies and excludes those that only produce heat. The most recent data is for the end of 2019.
- Renewable Heat Incentive (RHI) statistics – This dataset covers technologies that provide renewable heat, including ground and air source heat pumps, biomass, and solar hot water.
- The Renewable Energy Planning Database (REPD) – An up-to-date list of renewable energy planning applications published quarterly by BEIS.

Results are shown in Table 7 below.

As at the end of 2019, there were 2,138 electricity-producing renewable energy installations in Mid Sussex. The vast majority of these, in terms of number of installations, were solar photovoltaics (PV). It is likely that most PV installations are small, roof-mounted systems, although the REPD indicates that there are four operational ground-mounted PV farms in the district as well.

In addition to PV, there are five onshore wind turbines with a total capacity of around 0.02 MW. The small capacity suggests that these are small- or micro-scale turbines, which may reflect the fact that much of the district is located within the sensitive landscapes of the High Weald AONB and South Downs National Park.

There is also one sewage gas plant within Mid Sussex. Because this technology has a comparatively high output (MWh per unit of installed capacity), the single sewage gas plant generates around a third of the renewable electricity in the district.

Table 7. Renewable electricity technologies in Mid Sussex, as at end of 2019

	Number of Installations (#)	Installed Capacity (MW)	Generation (MWh per year)
Photovoltaics	2,132	19.61	17,753
Onshore Wind	5	0.02	44
Sewage Gas	1	0.8	5,388
Total	2,138	20.44	23,186

Source: BEIS, RRS

The RRS indicates that there are no hydropower, anaerobic digestion, wave, tidal, landfill gas, municipal solid waste, animal biomass or plant biomass installations in Mid Sussex. However, because the RRS only records technologies that produce electricity, we have referred to other sources for information on renewable heat technologies:

- The REPD indicates that there has been one planning application submitted for an air source heat pump (ASHP) based communal heating system that would supply care home residences in the Downlands Park Care Home in Hayward Heath.
- RHI statistics suggest that there are 45 non-domestic RHI installations in Mid Sussex, with a total installed capacity of around 8MW, and 206 domestic RHI installations, for which the capacity is not reported.

While it is impossible to confirm the types and sizes of individual RHI installations in Mid Sussex based on public data, for context, Table 8 and Table 9 present information based on the nation-wide RHI statistics. For non-domestic RHI installations, the vast majority of applications (over 80%) are for biomass boilers, mostly small (<200kW) or medium (200-1000kW) scale. Most of the other applications are for water or ground source heat pumps (GSHPs). For domestic RHI installations, the majority of applications are for ASHPs, with the remainder roughly evenly split between GSHPs, biomass boilers and solar thermal systems.

Table 8. Split of technology types among non-domestic RHI applications

Technology Type	% of nationwide total
Small Solid Biomass Boiler (< 200 kW)	62%
Medium Solid Biomass Boiler (200-1000 kW)	19%
Large Solid Biomass Boiler (> 1000 kW)	1%
Solar Thermal (< 200 kW)	2%
Small Water or Ground Source Heat Pumps (< 100 kW)	7%
Large Water or Ground Source Heat Pumps (>100 kW)	2%
Biomethane	<1%
Biogas	4%
Air Source Heat Pumps	3%
CHP	<1%
Deep Geothermal	<1%

Source: BEIS, RHI Deployment Data April 2021, Table 1.1

Table 9. Split of technology types among domestic RHI applications

Technology Type	% of nationwide total
Air source heat pump	62%
Ground source heat pump	14%
Biomass systems	14%
Solar thermal	10%

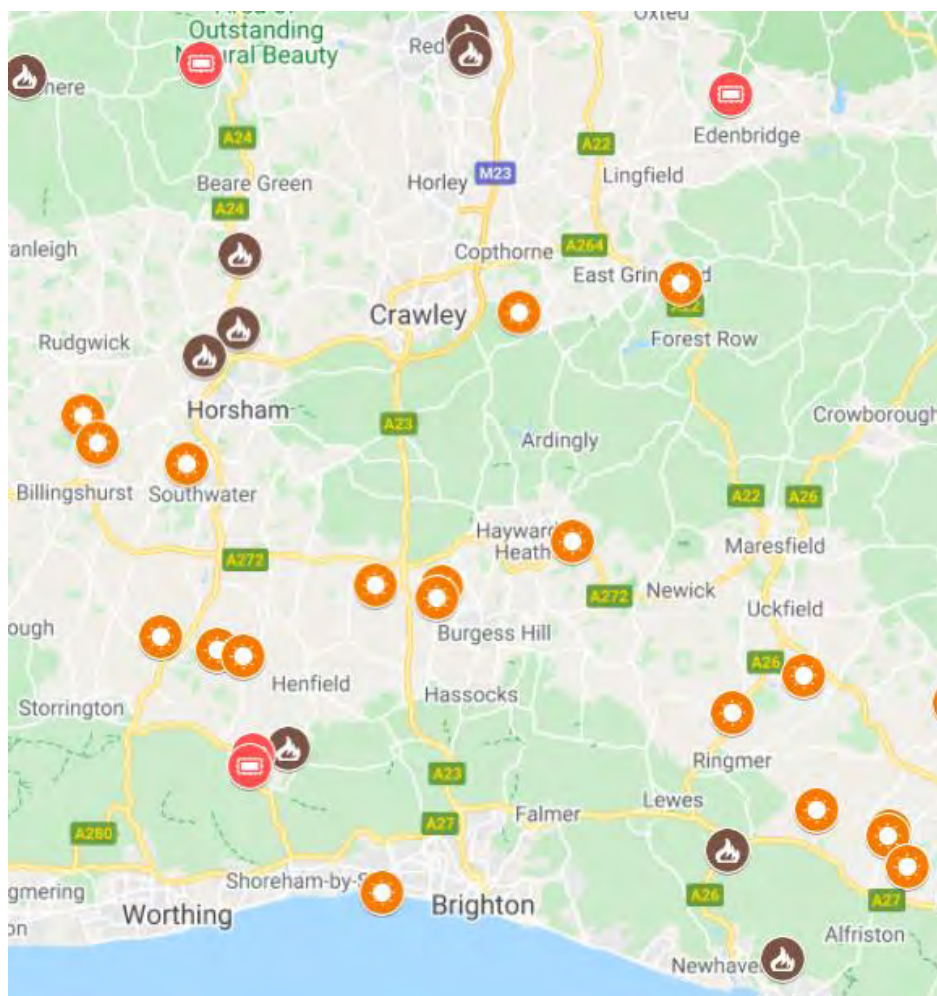
Source: BEIS, RHI Deployment Data April 2021, Table 2.1

The table below summarises the large-scale renewable energy installations in Mid Sussex, both electricity and heat, that are listed within the REPD. A map of these renewable energy installations, based on data collected by the UK Renewables Map website, is provided in Figure 45.

Table 10. Large-scale renewable energy installations, as listed in the REPD

Operator (or Applicant)	Site Name	Type	Capacity (MWelec)	Development Status
INRG Solar	Land Parcel North of Goddards	PV	5	Operational
REPOWER	Balcombe & Chiddinglye Solar Park	PV	5	Operational
Haymaker Energy	Majors Hill/Turners Hill Solar Farm	PV	1.1	Operational
S4N Worsted	Worsted Farm	PV	5	Operational
British Solar Renewables	Coombe Solar Farm	PV	15.3	Planning Permission Granted
Dacorar Southern	Goddard's Green	PV	4.4	Planning Permission Granted
Kingscote Valley Ltd.	Moatlands	GSHP	0.12	Planning Application Submitted
Eden (Downlands) Limited	Downlands Park	Heat Network (ASHP)	N/a	Planning Application Submitted

Figure 45. Locations of renewable energy technologies in Mid Sussex. Source: UK Renewables Map

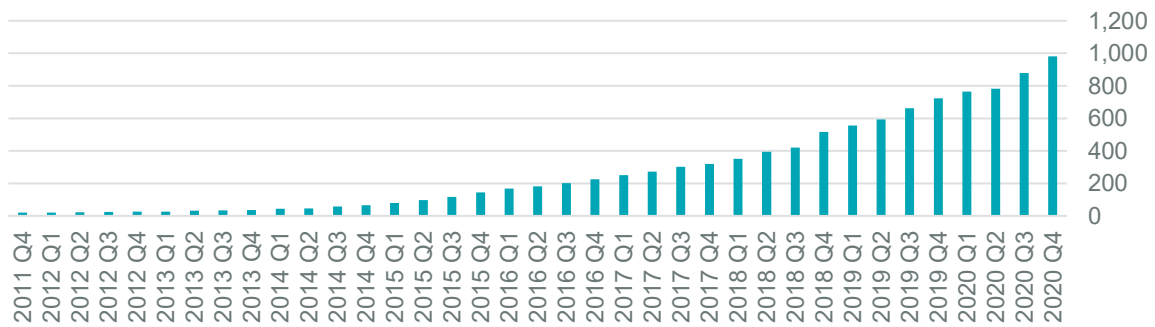


To put these figures into context, it is helpful to consider the annual electricity demand of Mid Sussex, which was roughly 509 GWh as of 2018. Renewables therefore provide the equivalent of 4-5% of the district’s annual electricity demands. In practice, some of this electricity feeds into the national grid, so it is not possible to state the exact proportion of demand that is met through renewables. Although it is not necessary for each Local Authority to meet all of its own electricity needs via technologies that are installed within the red line boundary, it is nonetheless clear that energy demands would need to reduce significantly, and renewable uptake would need to radically increase, in order for Mid Sussex to achieve net zero emissions.

3.1.6 Ultra-low emission vehicles (ULEVs)

ULEV uptake has increased exponentially in recent years across the UK, albeit from a low base, and Mid Sussex is no exception. As shown in Figure 46, by the end of 2020 there were 982 licensed ULEVs in the district, compared with just 20 in 2011. Around half of these (486) were battery electric vehicles (BEVs).

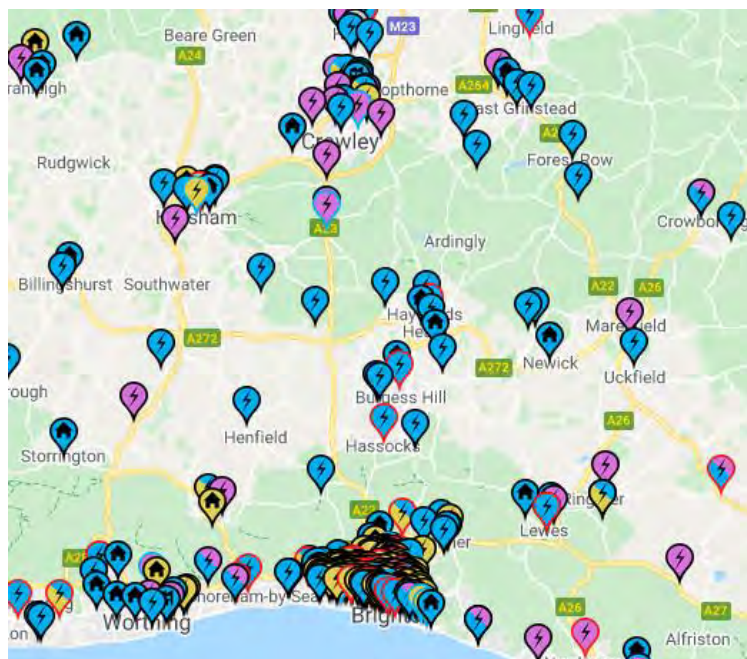
Figure 46. Licensed ULEVs in Mid Sussex, 2011-2020



Although this is an encouraging trend, ULEVs still represent a tiny proportion (<1%) of licensed vehicles in Mid Sussex. The UKPN Future Energy Scenarios envision that there could be nearly 100,000 EVs in Mid Sussex by 2050 – which would require not only a transformation in the use of renewable electricity and hydrogen powered vehicles, but also a decrease in the number of journeys travelled, and the rate of private vehicle ownership.

As of April 2021, there were 35 public charging points in Mid Sussex, including 5 rapid charging points. These are shown in Figure 47 below.

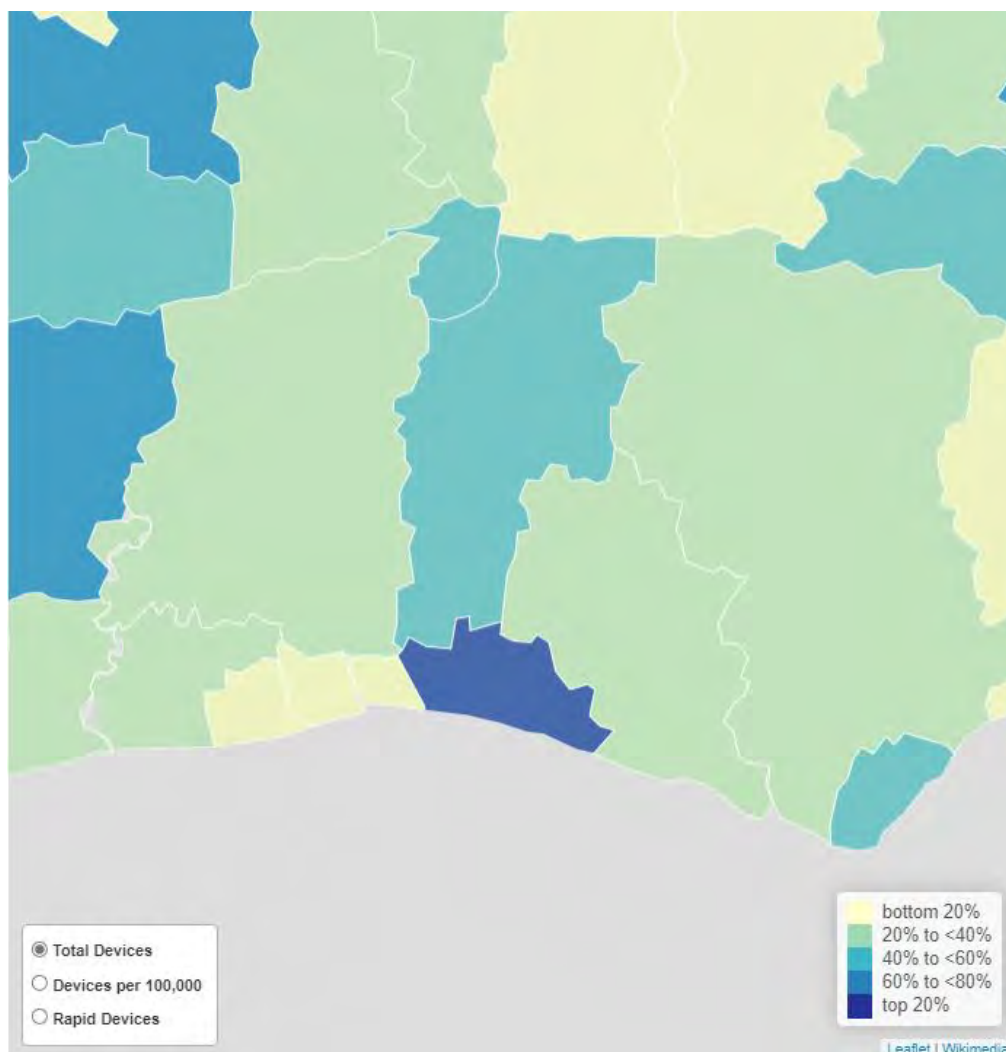
Figure 47. Locations of public charging points in Mid Sussex and surrounding area. Source: Zap-Map



Considering the district’s population, this equates to around 23 public charging points per 100,000 head of population.²⁴ As illustrated in Figure 48, this is roughly equivalent to other local authorities in the UK, and higher than several of the more rural surrounding local authorities.

²⁴ maps.dft.gov.uk/ev-charging-map/

Figure 48. Density of public charging points by Local Authority. Source: DfT



It is anticipated that the price of EVs could converge with that of traditional combustion engines within the next few years. This would create a ‘tipping point’ in consumer choices and require a huge increase in EV infrastructure and renewable energy provision within a very short timescale. West Sussex County Council has published an EV Strategy that envisions 70% of cars to be electric by 2030 and identifies ways that the Council can support the transition.²⁵ One of the key factors of the Integrated Action Plan for Mid Sussex will be to identify ways that MSDC can similarly play its part.

3.2 INFLUENCE MAPPING

This section looks at what the key drivers are that affect GHG emissions across the whole district and which stakeholders have most influence and control over them. This will then inform the development of the net zero plan.

3.2.1 Drivers of change

The UK is committed to achieving a 100% reduction in net GHG emissions by 2050. This is a legal requirement as per the Climate Change Act 2008. The previous 80% reduction target was revised

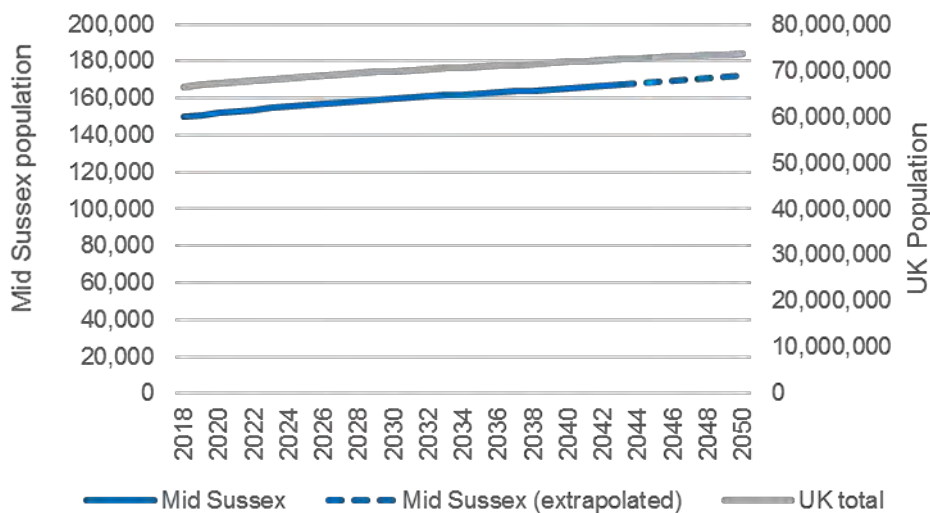
²⁵ [Electric vehicles - West Sussex County Council](#)

upwards in 2019. The Climate Change Committee (CCC) provides evidence and advice on how this can be achieved.

In 2019, MSDC pledged to take local action on climate change in order to support the national net zero target. Building on the Sustainability Strategy produced in 2018, the Council voted to establish a sustainability and climate change panel to provide advice on these topics. Section 3.1 identifies all sources of GHGs in the district, which is a first step towards being able to mitigate, or reduce, those emissions.

Achieving GHG emissions reductions, while also responding to the needs of a growing population, and maintaining economic development, is a significant challenge. The ONS predicts that the population of Mid Sussex, similar to the rest of the UK, could increase by c. 14-15% in the next three decades (see Figure 49). Higher incomes, new buildings and greater use of electronic appliances all tend to increase energy demands. Although improvements in technology, energy efficiency measures, and better awareness of environmental issues can help to reduce energy demand in some sectors, these are likely to be offset without further policy interventions.

Figure 49. Population projections for 2018-2050 (source: ONS)



Of course, there are many unknowns – factors such as energy prices and weather changes, for example, are hard to predict and can influence energy demand in either direction. However, the general picture includes significant headwinds.

Figure 50. common drivers of change for GHG emissions

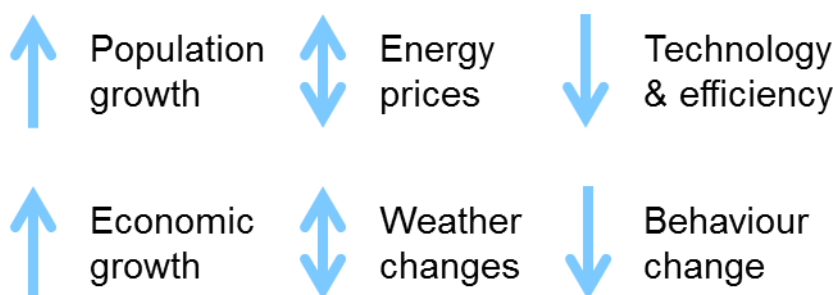
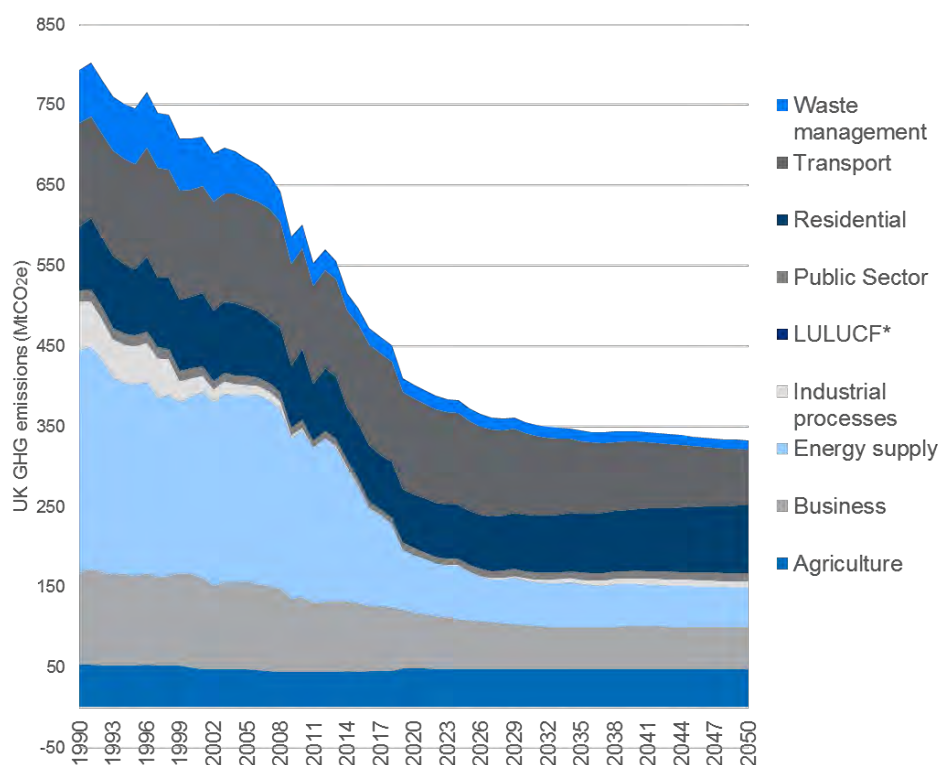


Figure 51 shows projections of UK-wide GHG emissions based on a 'Reference Scenario' produced by BEIS, which accounts for population and economic growth, fuel prices, and other national trends.

Figure 51. Projections of UK-wide GHG emissions (Source: BEIS Energy and Emissions Projections - Reference Scenario)



It shows that, in a Business-as-Usual (BAU) scenario, emissions at a national scale would fall fairly rapidly in the coming years despite rising energy demands, largely due to the electrification of heating and vehicles, and a switch towards renewable electricity, but the reductions will then tend to level off. By 2050, there would be marginal improvements, with a significant 'gap' to net zero emissions. Bridging the gap to net zero by 2050 will require urgent action to be taken in all sectors, across all policy areas. This can only be achieved through close collaboration among national, regional, and local governments, public, private, and voluntary sector organisations, communities, individuals, businesses, researchers, and innovators.

Many of the changes that will take place are outside of MSDC’s direct control, but this report is intended to highlight the main drivers of emissions in Mid Sussex, and who has influence/powers to tackle GHG emissions in different sectors. These are broken down by topic area as follows:

- Buildings
- Transport
- Energy & Utilities
- Waste
- Land Use & Environment

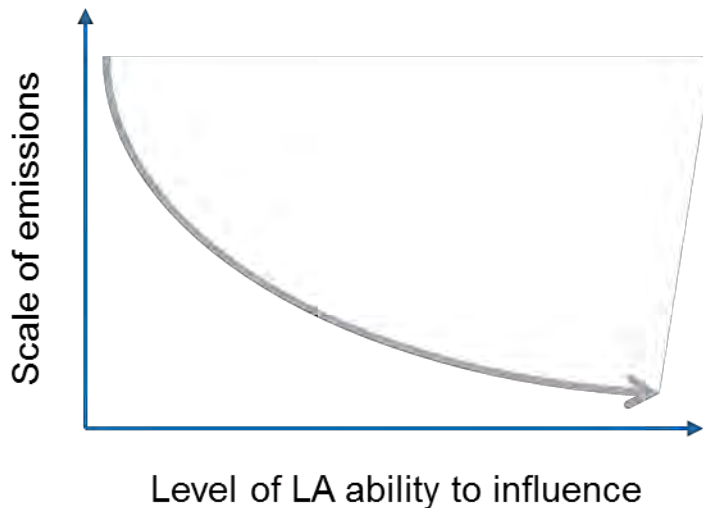
Future emissions will also be dictated by the policy landscape. This includes policies at the national, regional (e.g., county-level, the Southeast region) and local (i.e., district) level. A number of national-level policies have been announced in the last year, including the Government’s Net Zero Strategy, Industrial Decarbonisation Strategy, Transport Decarbonisation Strategy and Heat and Buildings Strategy. Key plans and policies at the regional level include the West Sussex Energy Strategy, Bus Strategy and Transport Plan. At the local level, key documents include the Mid Sussex District Plan, Sustainability Strategy and the Sustainable Economic Strategy currently being developed. More information on these can be found at **Appendix A**.

3.2.2 Opportunities for local authorities to influence GHG emissions

Typically, UK local authorities are only directly responsible for a small proportion of GHG emissions. In Mid Sussex, as explained in the Section 3.1, public sector emissions account for roughly 2-3% of the total, and this proportion is fairly typical (note: these are Scope 1 and 2 emissions which are predominantly associated with buildings (council offices, public buildings, and housing) and don't include scope 3 emissions, which may take place outside the area boundary).

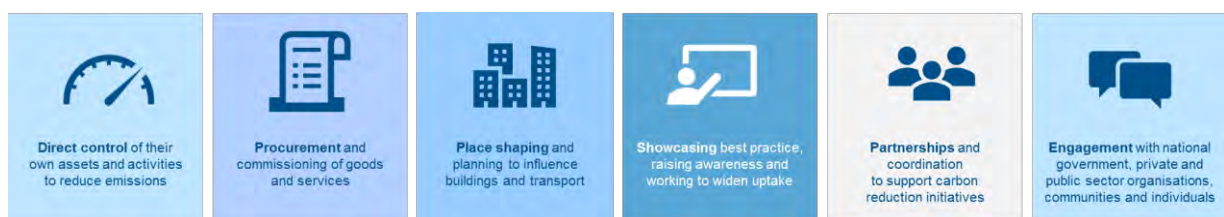
As a result, there is often an inverse relationship between the level of control they exert, and the scale of emissions reduction that they can achieve (see Figure 52).

Figure 52. Diagram illustrating the inverse relationship between level of control and scale of emissions



However, Local Authorities have a wide range of options for exerting indirect influence over emissions that they do not directly control, as set out in Figure 53.

Figure 53. typical options for councils to influence area wide GHG emissions (source: Adapted from Local Authorities and the Sixth Carbon Budget, 2020²⁶)



The division of responsibility between district and county council affects where district-led decarbonisation is feasible and effective. Figure 54 below illustrates how responsibility is generally shared between English district and county councils, in policy areas which are most relevant to decarbonisation.

²⁶ <https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget>

Figure 54. Responsibilities of a district council in relation to a county council (responsibilities with potential environmental impact). Adapted from: Institute for Government, 2021²⁷.

Responsibility	District	County
Arts and recreation	Yes	No
Building regulations	Yes	No
Community safety	Yes	Yes
Council tax and business rates	Yes	No
Economic development	Yes	Yes
Education and skills	No	Yes
Emergency planning	Yes	Yes
Environmental health	Yes	No
Highways and roads	No	Yes
Housing	Yes	No
Licensing	Yes	No
Planning	Yes	Yes
Transport	No	Yes
Waste collection and recycling	Yes	No
Waste disposal	No	Yes

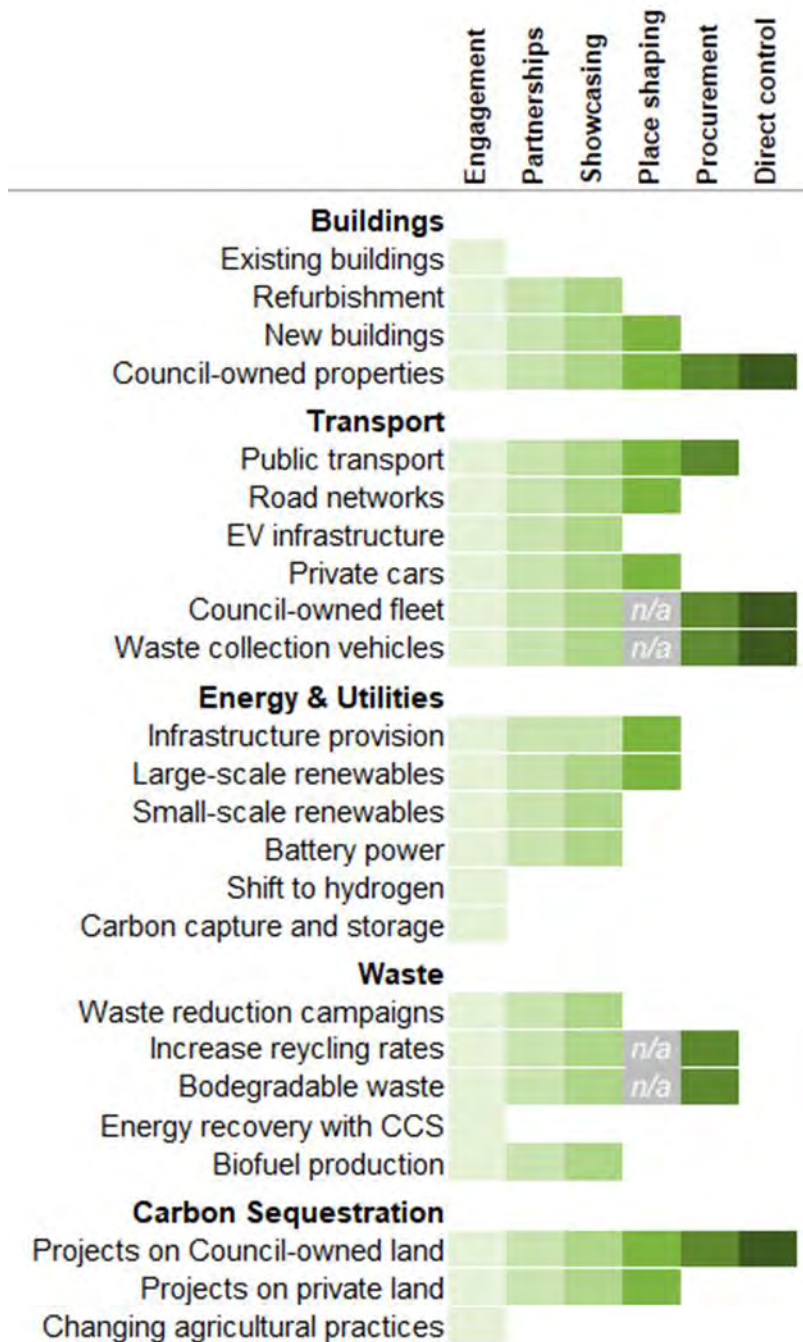
To summarise:

- District Councils are responsible for building regulations and planning, which would impact carbon emissions from the built environment (and, to a lesser extent, transport). They also have influence over carbon emissions from council housing that they own and/or operate. They can indirectly support carbon reduction through business support activities and licensing. Although responsibility for highways and roads is more within the remit of the Highways Agency, Local Authorities do have the power to establish Clean Air Zones and Low Emission Zones.
- County Councils are responsible for more strategic road and infrastructure planning, so have more influence over transport emissions. They are responsible for waste disposal whereas District Councils are in charge of waste collection and recycling; this means that District and County Councils can collaborate on waste reduction initiatives, awareness campaigns, and so on. Both can influence emissions from waste via waste contracts and procurement and would play a role in approving energy from waste or anaerobic digestion projects that can produce low carbon energy.

Figure 55 below summarises more specifically how MSDC can influence decarbonisation across key policy areas. The colour coding is used to indicate the ways that the Council can play a role. Indirect methods of influence are shown in lighter green and direct methods in darker green. Grey shading with 'n/a' means that a method is not applicable or not likely to be used.

²⁷ <https://www.instituteforgovernment.org.uk/explainers/local-government>

Figure 55. MSDC influence over district-wide emissions



The figure highlights that the Council has the most control over its own properties and vehicle fleet, although it is understood that not all of these are both owned and operated by MSDC (for more information, see Section 2.2 on influence mapping within MSDC).

MSDC also has an influential role in its capacity as a Local Planning Authority (LPA), setting planning policy and determining the spatial strategy for the district. This is primarily relevant to energy and sustainability standards for new developments but can also affect longer-term development in existing towns and villages. It is also one of the key ways that the Council can contribute towards electricity grid decarbonisation and increasing carbon sequestration – by identifying suitable areas for large-scale renewable energy installations and afforestation.

Overall, however, much of the Council's influence will be more reliant on engagement with stakeholders to promote carbon reduction projects, showcasing best practice, raising awareness, partnerships and lobbying for change.

The following sections of this chapter provide more detail on each of the policy topic areas, describing the types of changes that need to occur to reach net zero, key policy drivers, major challenges, and important stakeholders. This will be used to inform the development of future carbon pathways for MSDC and a feasibility assessment of reaching net zero.

3.2.3 Other key stakeholders

The sections above clearly show that the Council cannot deliver net zero across the district by itself but will need to work closely with a range of other stakeholders to make net zero a reality. These stakeholders are listed in Figure 56, and expanded on in subsequent sections focusing on different sectors.

Figure 56. Key net zero stakeholders at the national, regional and local level

	Domestic	Commercial	Industrial	Public Sector	Agriculture	Waste & Wastewater	Road transport	Other transport	Land use / Environment	Power & Utilities
National	MHCLG (Building Regs)	MHCLG (Building Regs)	MHCLG (Building Regs) BEIS	MHCLG (Building Regs)	DEFRA Environment Agency	DEFRA Environment Agency	Department for Transport National Highways (Highways England) Office of Rail and Road Traffic Commissioner, DVLA (regulator for commercial bus services)	Department for Transport Office of Rail and Road Network Rail	DEFRA Environment Agency National Park Authorities	National Grid Ofgem Ofwat HNDU
Regional/ County-wide	-	C2C LEP	C2C LEP	C2C LEP	C2C LEP	West Sussex County Council (waste disposal) Serco (contractor)	West Sussex County Council Bus operators: Compass Bus, Metrobus, National Express, etc.	Govia Thameslink Railway	South Downs National Park Authority High Weald AONB	UKPN Southern Water Southern Gas Scotie Gas Networks
Local (public sector)	MSDC Building Control MSDC Planning Dep't MSDC Housing	MSDC Building Control MSDC Planning Dep't MSDC (Licensing & Business)	MSDC Building Control MSDC Planning Dep't MSDC (Licensing & Business)	MSDC Building Control MSDC Planning Dep't NHS, schools, etc. Neighbouring LAs	MSDC Planning Dep't MSDC Environmental Health	MSDC (waste collection) MSDC Environmental Health	MSDC (parking and licensing)	-	MSDC Environmental Health Parish Councils	-
Local (other)	Private individuals Tenants' associations Landlords/ Landowners	Local businesses Business associations	Local businesses Business associations Industry groups/bodies	Private individuals Community groups	Local businesses Business associations	Private individuals Local businesses Landlords/ Landowners	Private individuals Local businesses Landlords/ Landowners	Private individuals Local businesses Landlords/ Landowners	Private individuals Local businesses Landlords/ Landowners People and Nature Network (PANN)	Private individuals Local businesses Landlords/ Landowners Community energy groups Solar Together
Cross-cutting	NGOs, charitable organisations, academic and research organisations, community groups, etc.									

3.2.3.1 Buildings

What needs to happen to reach net zero?

- Energy demand in all buildings needs to decrease significantly – including both new and existing buildings. This will require much higher levels of insulation and airtightness and more efficient building services (e.g., heating, ventilation, hot water, and cooling), along with smart controls and energy management systems. It is also likely to require changes in user behaviour.
- All buildings will need to be capable of operating with 100% renewable energy, which will involve replacing all heating systems and other building services that rely on fossil fuels. Until and unless hydrogen gas is commercialised, it is likely that heat pumps and district heating will be the main options for heat decarbonisation. Uptake of small-scale renewables and battery storage will also need to be radically scaled up.
- The construction industry as a whole, which is currently responsible for around 60% of waste produced in the UK, will need to adapt to new methods of design and construction that prioritise refurbishment, design for disassembly, and contribute towards a circular economy.

Key policy drivers of emissions in the sector are set out in Table 11.

Table 11. Key policies and strategies for emissions reduction in the buildings sector

National	Regional	Local
<p>The Future Homes Standard:</p> <ul style="list-style-type: none"> • 2021: c. 31% reduction in regulated CO₂ compared to current standards • 2025: Zero-carbon ready homes <p>Future Buildings Standard: c.27% reduction in regulated CO₂ compared to current standards (tbc)</p> <p>Net Zero Strategy & Heat and Buildings Strategy:</p> <ul style="list-style-type: none"> • Reach 600,000 heat pump installations per annum by 2028 • No new gas boilers sold by 2035 • Upgrade all rented properties to EPC Band C by 2028 and all homes to EPC Band C by 2035 	N/a	<p>‘Mid Sussex District Plan 2014 – 2031’</p> <ul style="list-style-type: none"> • Minimum provision of 16,390 homes in the 17-year period 2014 – 2031 • Policy DP39: “minimise energy use” and “use renewable sources of energy” <p>‘Mid Sussex Economic Recovery Plan 2020 – 2021’</p> <ul style="list-style-type: none"> • Promote the Green Homes Grants (local authority delivery) <p>‘Mid Sussex Sustainability Strategy 2018 – 2023’</p> <ul style="list-style-type: none"> • Install energy efficiency measures for the Oaklands modernisation project

The key challenges and major players are as follows:

Key challenge	Major players
Reducing energy demand in the existing building stock	Owner-occupiers, landlords and (to a lesser extent) building tenants have the greatest ability to influence energy demand. The Government has introduced the Minimum Energy Efficiency Standards (MEES) to encourage uptake of energy efficiency measures in the private rented stock and Local Authorities are responsible for enforcement. National, regional, and local governments can have an impact via energy efficiency advice, loans, and grant funding (where available).
Decarbonising heat and switching away from natural gas and other fossil fuels	BEIS is responsible for setting energy policy at a national level. National, regional, and local governments can play a role by offering financial incentives to switch heating systems such as the Renewable Heat Incentive.
Ensuring that new buildings are compatible with a net zero future	The Department for Levelling Up, Housing & Communities (DLUHC) is responsible for UK Building Regulations on energy and carbon emissions, and Local Authorities are responsible for enforcement. LPAs can currently set higher performance standards, but this may change in the future.
Adopt Circular Economy principles across the entire construction industry	County Councils are responsible for waste management, but in practice there are few levers to achieve this type of fundamental shift in construction practice. LPAs can play a role through planning policy but most of the influence lies with industry bodies, developers, construction companies, manufacturers, and designers.

The areas that MSDC can most influence are as follows:

- The Council will need to rely primarily on engagement and partnerships to reduce emissions in existing housing stock, e.g., continuing to provide energy saving advice. Local Authorities can enforce MEES regulations, although to date very few have done so due to lack of resources, local opposition, and other issues.
- It has more influence over new buildings and major refurbishments via the Local Plan and building control, and direct influence over council-owned properties or developments.
- MSDC can also play a coordinating role in helping to deliver heat networks (e.g., feasibility studies and engaging with stakeholders), and developing a spatial strategy that facilitates the use of waste heat, where available.

3.2.3.2 Transport

What needs to happen to reach net zero?

- All vehicles will need to utilise 100% renewable energy – whether that is renewable electricity, hydrogen, or biofuels. Based on current technologies, electric vehicles (EVs) are likely to be the first choice for cars, vans, and most other vehicles, except for heavy goods vehicles (HGVs), which are more likely to run on biofuels or hydrogen.
- This transition will require a massive increase in the provision of EV charging facilities, along with much more renewable electricity generation. The only way this will be achievable is by radically reducing demand for travel, which includes changes in consumer habits and also switching towards walking, cycling, car clubs/ridesharing, e-scooters (where appropriate) and public transport.

Key policy drivers of emissions in the sector are set out in Table 12.

Table 12. Key policies and strategies for emissions reduction in the transport sector

National	Regional	Local
<p>'The Transport Decarbonisation Plan'</p> <ul style="list-style-type: none"> • Ambition for half of journeys in towns/cities to be walking or cycling by 2030 • Delivery of 4,000 zero emission buses and associated infrastructure • Phase out diesel trains by 2040 and achieve a net zero rail network by 2050 • Increase average road vehicle occupancy • National e-scooter trials • Local Authority toolkit on sustainable transport expected to be released in 2022 • Ban sale of new petrol and diesel cars and vans by 2030, and all new cars and vans to be zero emission at tailpipe by 2035 • Consult on phase-out of internal combustion engine HGVs 	<p>'Electric Vehicle Strategy', West Sussex County Council</p> <ul style="list-style-type: none"> • Increase charging points from 89 to 3,305 by 2025, and 7,346 by 2030 <p>'West Sussex Transport Plan', West Sussex County Council</p> <ul style="list-style-type: none"> • Maintain roads and public rights of way • Encourage sustainable travel • Complete the A272 Haywards Health Relief Road to support delivery of new development 	<p>'Mid Sussex District Plan 2014 – 2031'</p> <ul style="list-style-type: none"> • Create a sustainable transport network <p>'Mid Sussex Sustainability Strategy 2018 – 2023'</p> <ul style="list-style-type: none"> • Burgess Hill Business Parks Promoting good sustainable transport practice <p>'Mid Sussex Economic Recovery Plan 2020 – 2021'</p> <ul style="list-style-type: none"> • Deliver Burgess Hill Place and Connectivity Programme (including upgrades to sustainable transport) • Install 26 new Electric Vehicle Charing Point Operators • Develop a local walking and cycling infrastructure plan

The key challenges and major players are as follows:

Key challenge	Major players
Influencing consumers to choose low emission vehicles	National and local governments can play a role via awareness campaigns, but this is largely down to market forces. Analysis by organisations such as Cambridge Economics, Element Energy and Deloitte indicates that the price of traditional fuel vehicles and EVs will converge in the next few years. Uptake could be accelerated through local business owners which incorporate ULEVs into their own fleet.
Behaviour change and travel habits	As above, the role of local government may involve awareness campaigns, but they can also have an influence by delivering towns and places that facilitate sustainable travel (see below).
Design of towns, cities and roads to facilitate sustainable travel	Urban planning is within MSDC's remit as an LPA, while responsibility for the road network lies primarily with National Highways. The DfT plays a strategic role in setting transport policy nationally while Local Transport Plans are produced by West Sussex County Council.
Providing renewable electricity and other supporting infrastructure	West Sussex County Council is responsible for the roll-out of EV infrastructure locally.

The areas that MSDC can most influence are as follows:

- MSDC will need to rely on showcasing, partnerships, and engagement to successfully encourage uptake of private EVs. This will include working with the County Council and National Highways to make sure that the road network prioritises pedestrians, cyclists, and public transport. The Council could incentivise uptake through parking charges.
- Ensure that all new developments are located and designed to reduce demand for travel and encourage active/sustainable transport options. This could involve, for example, setting maximum rather than minimum parking standards, and identifying sites for consolidation centres to reduce the number of commercial goods vehicles operating in town centres. (This would have co-benefits for air quality, public health, etc.)
- For assets directly controlled by MSDC, introduce EV charging (co-located with renewable power generation and battery storage) and make sure the vehicle fleet is 100% low emission.

3.2.3.3 *Energy and utilities*

What needs to happen to reach net zero?

- A fundamental transformation of the UK energy system is needed to phase out fossil fuels by 2050 at the latest. In the Energy White Paper (2020) the Government envisions that electricity use could double by then, meaning that the deployment of renewable technologies – along with battery storage and improvements to grid infrastructure – will need to scale up at an unprecedented rate.
- The Government has announced an ambition to deliver 40GW of offshore wind power by 2030, potentially enough to power all homes in the UK. However, to ensure security of supply, it will be important to work towards a diverse system that includes large- and small-scale solar, wind, tidal power, hydropower, and bioenergy, among other technologies. This will require a shift in thinking such that there is a presumption in favour of renewable energy projects.

Key policy drivers of emissions in the sector are set out in Table 13.

Table 13. Key policies and strategies for emissions reduction from energy and utilities

National	Regional	Local
<p>'Net Zero Strategy: Build Back Better' HM Government (2021)</p> <ul style="list-style-type: none"> Fully decarbonise the power system by 2035 Increase offshore wind from 10GW (2019 levels) to 40GW by 2030 Support renewables with nuclear power including small modular reactors 	<p>'West Sussex Energy Strategy Action Plan', West Sussex County Council</p> <ul style="list-style-type: none"> Reduce energy consumption Develop the commercial provision of low carbon energy Develop new financial provision of low carbon energy <p>UKPM Green Action Plan</p> <p>South2East Local Energy Strategy</p>	<p>'Mid Sussex District Plan 2014 – 2031'</p> <ul style="list-style-type: none"> Policy DP40: "Proposals for new renewable and low carbon energy projects [...] will be permitted provided that any adverse local impacts can be made acceptable" Wind energy developments not permitted unless they are on allocated sites

The key challenges and major players are as follows:

Key challenge	Major players
Reducing costs and financial barriers to enable further uptake	At a national level, Ofgem regulates gas and electricity markets and funds certain types of energy infrastructure projects. It also manages financial incentive schemes such as the Renewables Obligation, Renewable Heat Incentive, and the Smart Export Guarantee. BEIS provides funding for emissions reduction projects (SALIX), heat network feasibility studies (via the Heat Network Deployment Unit), and other research.
Upgrading existing grid infrastructure	National Grid is in charge of transmission of both electricity and gas. The distribution network operator (DNO) for electricity in Mid Sussex and surrounding areas is UKPN, while the DNO for gas is Scotia.
Identifying and allocating areas for large-scale renewable energy projects	MSDC plays a role by identifying suitable areas for renewable energy projects within the district and setting planning requirements. Other key players include community energy groups, along with organisations and businesses that deliver renewable energy projects. Historically there has been community opposition to some technologies (particularly wind) so the general public is also a key stakeholder in this regard.

The areas that MSDC can most influence are as follows:

- MSDC has relatively limited influence over the decarbonisation of the national grid, but can play an indirect role through engagement, partnerships and in its capacity as an LPA. For example:
 - Demonstrating and showcasing the feasibility and benefits of projects, particularly small-scale renewable energy and battery power projects on council-owned land or properties, or innovative pilot projects
 - Playing a coordinating role (e.g., through Solar Together Sussex or community energy projects)
- In terms of infrastructure provision and large-scale renewables, the Council will need to work with UKPN, energy companies and landowners to identify suitable locations and support infrastructure improvements. It can facilitate this via permissive Local Plan policies.
- Providing funding where possible and lobbying the Government for additional support.

- There are limited opportunities for MSDC to influence the use of some technologies such as hydrogen gas and carbon capture usage and storage, initiatives which will be driven predominantly at the national level.

3.2.3.4 Waste

What needs to happen to reach net zero?

- At present there are no technologies that entirely mitigate the GHG effects of methane, a gas that is emitted by landfill and sewage treatment. Waste is therefore a sector that may need to rely on negative emissions technologies to reach net zero by 2050 – technologies that are not yet commercialised. Therefore, to avoid these emissions, it will be necessary to radically reduce food waste, stop sending biodegradable waste to landfill in the 2025-2030 timescale, and separate all remaining waste to enable much higher recycling rates of c. 70%, according to the CCC.
- Some waste products can be used to provide bioenergy, thus displacing fossil fuels. Energy recovery with carbon capture and storage will need to be deployed to any waste incineration facilities (EfW) to make sure that all available resources are used.

Key policy drivers of emissions in the sector are set out in Table 14.

Table 14. Key policies and strategies for emissions reduction from waste

National	Regional	Local
<p>'Resources and Waste Strategy for England'</p> <ul style="list-style-type: none"> • Ambition for 55% recycling rate by 2025, rising to 65% by 2035, from the 2018/2019 level of 47%. • Aim for “eliminating avoidable waste of all kinds by 2050.” • Strategy hopes to achieve this by measures such as: requiring LAs to collect a consistent set of recyclables and food waste, introducing mechanisms to ensure that the ‘polluter pays’ for the cost of collecting and processing waste that they place on the market, introduction of deposit return schemes, etc. 	<p>'West Sussex Local Waste Plan', West Sussex County Council</p> <ul style="list-style-type: none"> • “The strategy is to plan for a declining amount of capacity over the plan period so that there is so that there is ‘zero waste to landfill’ by 2031” 	<p>'Mid Sussex District Plan 2014 – 2031'</p> <ul style="list-style-type: none"> • Policy DP39: “Maximise efficient use of resources, including minimising waste and maximising recycling/re-use of materials through both construction and occupation”

The key challenges and major players are as follows:

Key challenge	Major players
<p>Changing behaviour to reduce the amount of waste generated</p>	<p>DEFRA is responsible for policy and regulations on waste, while the EA plays a role in issuing permits for waste disposal and treatment and dealing with waste crime and pollution. District Councils are responsible for household waste collection and some commercial waste collection while County Councils are responsible for waste disposal; MSDC has contracted Serco to deliver waste management services. Collectively they can influence recycling rates and biodegradable waste at different stages of the</p>
<p>Increasing recycling rates and diverting</p>	

biodegradable waste from landfill	supply chain, and deliver awareness campaigns to change people's behaviour, although ultimately this relies on cooperation from consumers and businesses.
Deployment of energy recovery with carbon capture and storage (CCS)	The Government is leading on CCS technologies nationally, but District and County Councils may have a role linked to their responsibilities for waste management, environmental services, planning powers and community consultation. However, this will also rely on technological improvements and industrial R&D.

The areas that MSDC can most influence are as follows:

- The main options are:
 - Engagement with residents, businesses, the County Council, waste contractors and Government to promote waste reduction measures
 - Considering options for future carbon emissions reduction when renewing waste contracts
 - Continuing to provide separate collections for different waste streams, including food and green waste
 - Showcasing best practice by setting targets for reducing waste within operations that MSDC directly controls. The CCC suggests that Local Authorities ‘introduce a zero-waste procurement policy that bans single-use plastics, excess packaging, specifies recycled content, favours appliances and goods that can be repairable and recyclable.’
- Where appropriate, supporting organisations applying to generate energy from waste e.g., anaerobic digestion facilities – provided that waste minimisation plans are in place – and keeping abreast of developments in EfW CCS.

3.2.3.5 Land use and environment

What needs to happen to reach net zero?

- According to the CCC some reduction in GHG emissions can be achieved through diet change and by adopting low carbon farming practices e.g., better soil and livestock management, less use of fertilisers, and increased diversification. However, the CCC also states that a net zero future will require a large increase in natural carbon sequestration through afforestation, peatland restoration, and similar projects. This can only be achieved if large areas of agricultural land are released for alternative uses – which, in turn, would rely on shifts in consumer behaviours and diets, reducing food waste, and new farming technologies to maintain per capita food production.
- Land use policies will therefore need to recognise the value of natural capital and reward activities that deliver environmental benefits.

Key policy drivers of emissions in the sector are set out in Table 15.

Table 15. Key policies and strategies for emissions reduction in the land use sector

National	Regional	Local
‘The Environment Act’ ‘The 25 Year Environment Plan’ • Embed environmental net gain as a principle for development (including	‘Climate Change Adaptation Plan and Strategy’, South Downs Park Authority • “We need to balance the push for increase tree planting with the need to	‘Mid Sussex District Plan 2014 – 2031’ • Policy DP37: “The District Council will support the protection and enhancement of trees,

<p>housing and infrastructure)</p> <ul style="list-style-type: none"> • Improve soil health and expand tree cover • Green towns and urban areas <p>'The England Trees Action Plan 2021-2024'</p> <ul style="list-style-type: none"> • 12% woodland cover by mid-century <p>Note, the CCC and Woodland Trust both recommend 19% tree cover Agriculture Bill (2020)</p>	<p>protect other priority habitats and avoid unintended consequences"</p> <ul style="list-style-type: none"> • The South Downs Local Plan requires a 10% gain in biodiversity as a planning condition, which "could support actions such as tree planting, carbon sequestration and work on climate change resilience" 	<p>woodland and hedgerows, and encourage new planting."</p> <p>'Tree Management Policy', Mid Sussex District Council</p> <ul style="list-style-type: none"> • "The Council wishes to maintain and increase high level of tree cover across the District."
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The key challenges and major players are as follows:

Key challenge	Major players
<p>Protecting existing carbon sinks, while also protecting ecosystems, natural habitats, and biodiversity</p>	<p>DEFRA is responsible for Government policy on a range of environmental topics including but not limited to land management, conservation, biodiversity, and climate adaptation. Natural England is responsible for designating and managing certain nature reserves, parks, and other areas of the countryside. The Environment Agency (EA) is responsible for protecting the environment which includes regulating environmental pollution. Other stakeholders are the South Downs National Park Authority and the High Weald Joint Advisory Committee.</p>
<p>Low carbon agricultural practices (livestock and land management)</p>	<p>Policy, regulations, and enforcement are primarily the responsibility of DEFRA and the EA, but the decision to exceed minimum standards and adopt low carbon practices would largely fall to landowners. Farming tenants are key stakeholders but have less influence over land use.</p>
<p>Increasing tree cover and ensuring it is sustainably managed in the long term</p>	<p>Policy is set at a national level by DEFRA, although MSDC can contribute indirectly via its role as an LPA.</p>
<p>Releasing agricultural land for alternative uses e.g., woodland or rewilding projects</p>	<p>As above, the spatial strategy for the district can have an impact; however, the major players include consumers (whose dietary and lifestyle habits influence production), private landowners, businesses, industry bodies, communities, and researchers/innovators in the field of agricultural production.</p>

The areas that MSDC can most influence are as follows:

- Engage with local businesses, industry groups, conservation groups, the High Weald AONB and South Downs Park Authorities to raise awareness of sustainable land use and showcase best practice on land that it owns.
- Provide business support to landowners and farmers to enable them to adopt low carbon practices, and support research initiatives or pilot projects on these topics as appropriate.
- There is scope for MSDC to partner with other local governments or organisations to deliver projects within (or outside of) the district such as woodland creation.
- Promote tree cover and other green infrastructure via the Local Plan and spatial strategy, although in practice this would primarily impact new developments. Note that biodiversity should be given equal importance to carbon emissions and energy use in planning policy, although that is not the focus of this report.

3.3 NET ZERO PATHWAYS

This section of the report describes potential future GHG emissions trajectories for Mid Sussex, based on three different scenarios that consider various possible mitigation measures, levels of ambition, and implementation rates. These findings indicate the scale and direction of possible changes over time, which helps to identify and prioritise GHG mitigation actions.

Key messages

- A **'Business as Usual' (BAU) scenario has been modelled** to show the potential scale of emissions reduction that would be achieved if no additional mitigation measures are adopted beyond those that are already likely to occur. This takes the BEIS Energy and Emissions Projections as a starting point and tailors them to reflect local circumstances where needed. The BEIS projections account for future economic, population and technological trends, along with adopted and funded Government policies and initiatives. Relative to the 2019 baseline, **the BAU scenario would result in a roughly 17% decrease in emissions by 2030 and 33% decrease by 2050**. This leaves a significant shortfall against the target that would need to be addressed through other means.
- **Two additional pathways have been modelled** using Ricardo's Net Zero Projections (NZP) tool. These scenarios **explore the impact of additional behavioural and technological measures aimed at mitigating energy use and GHG emissions**. They represent different levels of ambition, and contribute towards an understanding of key risks, sensitivities, and opportunities for Mid Sussex.
- **Around 90% of emissions can be addressed using known technologies if supplied with 100% renewable electricity (which can come from the grid in theory)**. However, there are no silver bullets. It is important to deliver demand reduction measures as well for a wide variety of reasons, including minimising pressure on grid infrastructure, reducing impacts of energy price rises, and avoiding unsustainable pressure on other resources such as land, materials, and water.
- **Of the remaining emissions, around half are from the industrial sector**. These would likely rely on technological changes such as availability of green hydrogen or bioenergy with carbon capture and storage (BECCS), which is a risk – although in theory could be feasible by 2040. MSDC can take local actions to support the development of those technologies by providing renewables and bioenergy crops where appropriate.
- **The remaining emissions are mostly from the waste and agricultural sectors**. These are, in some ways, the most challenging to address as they rely not only on technological advancement, but also wider changes in consumer behaviour, waste and land management, and so on.
- The path to net zero is challenging, and all of the potential solutions involve risks and trade-offs to consider. **However, compared with some UK Local Authorities, there are more opportunities in Mid Sussex to achieve carbon reduction measures**. This is a positive message, and a useful starting point for developing a net zero roadmap.

3.3.1 Overview of the methodology

3.3.1.1 Modelling approach

Future GHG pathways were modelled using the Ricardo Net Zero Projections (NZZ) tool, which enables users to model the impact of implementing mitigation measures on a Local Authority's GHG emissions over time. It is a flexible tool that can be quickly configured to model the change in energy use and GHGs emissions (including non-energy related emissions) by specifying the breakdown structure of the energy and non-energy related emissions that aligns with the area's base year datasets and reporting requirements, and factoring in changes in demand (e.g., due to growth) and emission factors over time.

The tool is designed to enable the development of scenarios for reaching net zero by any given target year and allows the users to define mitigation measures for each line in the energy and emissions inventory. These scenarios can be used to build a baseline projection, assess the likely impact of planned measures, and model the impact of alternative strategies to reaching net zero. The scenarios can also be used to undertake sensitivity testing around the impact of changes in assumptions.

The tool is essentially a 'What if?' calculator tool that relies on external validation of inputs, assumptions, and outputs to ensure its projections are sensible. At its core the tool is an accounting system that calculates the change in energy use and fuel mix as a result of series of mitigation measures.

It is important to understand that this modelling is based on assumptions about the magnitude of energy or emissions reduction that is technically achievable within each sector. However, it makes no assumptions about the types of policies that would be needed to achieve this. To give an example, the NZZ tool can estimate the change in emissions that would result from a 10% reduction in miles travelled by private car, but it cannot assess the impact of specific policy measures, such as 'Introduce a workplace parking levy to discourage people from commuting in private cars' unless the user inputs an assumption about the quantitative impact this would have. That type of information must be established via separate modelling, research, case study evidence or expert judgment.

3.3.1.2 What pathways were explored and how were they developed?

This work has explored three future pathways for GHG emissions in Mid Sussex: A 'Business as Usual' (BAU) scenario, and two additional net zero pathways.



The BAU scenario is intended to show the changes that could occur if no additional local action was taken to mitigate GHG emissions in Mid Sussex, beyond those that are already planned and committed.

This primarily includes national-level economic and demographic trends, along with projected energy prices and likely technological improvements (e.g., better vehicle efficiency). Those assumptions are based on the BEIS Energy and Emissions Projections (EEP), which also considers the anticipated GHG reductions that are expected to occur due to adopted Government policies '*where funding has been agreed and where decisions on policy design are sufficiently advanced to allow robust estimates of policy impacts to be made*'.²⁸ Taking Mid Sussex' baseline emissions as a starting point, growth curves based on the EEP data were then applied to each sub-sector and fuel type in Mid Sussex. This means that the overall change in emissions reflects the baseline situation in the d.

A sense-checking exercise was carried out to assess whether it was appropriate to apply these national trends at a local level – for example, by cross-checking national population growth projections with those for Mid Sussex (see Figure 57). Adjustments were then made to reflect local factors. The main exception is for the domestic sector, where we have applied a 2031 cut-off rate for growth on the understanding that there is not an annual housing target beyond that point, and it is unclear what the patterns of development would be.

²⁸ For further information, see [Energy and emissions projections - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/103122/energy-emissions-projections-2019.pdf)



In addition to the BAU scenario, this work has explored two accelerated net zero pathways, which explore the impact of a range of behavioural and technological measures aimed at further mitigating energy use and GHG emissions.

The first net zero pathway considers changes that would need to occur in order to meet the nationwide 2050 target date. The mitigation measures in the 2050 scenario are broadly in line with the CCC’s ‘Balanced’ net zero pathway, which the CCC describes as follows: “The Balanced Pathway makes moderate assumptions on behavioural change and innovation and takes actions in the coming decade to develop multiple options for later roll-out (e.g., use of hydrogen and/or electrification for heavy goods vehicles and buildings).”²⁹

The second net zero pathway sets out an alternative, accelerated scenario which reaches net zero by 2040. The key driver for this scenario is the assumption that the Government meets its stated ambition of achieving a net zero electricity grid by 2035. If that were to occur, faster decarbonisation could potentially be achieved by prioritising electrification, particularly for buildings and transport.

The net zero pathways both include the same core assumptions about population, weather, fuel prices and economic trends as are used in the BAU scenario, which is used as the starting point for the analysis. All of the other changes are modelled as mitigation measures that would need to be adopted, whether via additional Government policies, local/regional initiatives, or through voluntary changes in consumer behaviour, business and industrial practices. The table below summarises the mitigation measures that are modelled in each scenario; further details are provided in Appendix C.

Category	Mitigation measures considered
Energy use in buildings	<ul style="list-style-type: none"> Reducing heat and electricity demand due to fabric energy efficiency, smart heating controls, uptake of LED lighting and upgrades to non-domestic heating, ventilation, and air conditioning (HVAC) systems. Connecting some buildings to heat networks, and then converting these to use renewable heat (e.g., electric heat pumps). Buildings that do not connect to heat networks are assumed to switch to electric heating, heat pumps or hydrogen gas to provide space heating and hot water.
Industrial energy use	<ul style="list-style-type: none"> Switching any remaining fossil fuel demands to electricity, hydrogen, or another zero-carbon fuel source such as bioenergy with carbon capture and storage (BECCS).
Road transport	<ul style="list-style-type: none"> Avoiding car journeys via behavioural and technological changes, e.g., working from home Replacing a proportion of remaining car journeys with walking, cycling, and public transport Reducing demand for LGV and HGV movements through trip consolidation and changes in logistics Improving HGV efficiency through technology improvements and driver training initiatives Uptake of electric vehicles (cars, vans, buses, and motorcycles) Uptake of hydrogen (buses and HGVs)
Other transport	<ul style="list-style-type: none"> Electrification of rail network
Energy system	<ul style="list-style-type: none"> Electricity grid decarbonisation taking place in line with national projections (in the 2050 scenario) or reaching net zero by 2035 (in the 2040 scenario)

²⁹ [The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf \(theccc.org.uk\)](https://www.theccc.org.uk/wp-content/uploads/2021/06/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf)

	<ul style="list-style-type: none"> • Massive increase in deployment of roof-mounted solar technologies on suitable buildings
Agriculture	<ul style="list-style-type: none"> • Reducing the consumption of meat and dairy and thereby reducing the number of livestock • Halving food waste across the supply chain by 2030 • Implementing measures to release land, such as productivity improvements • Employing low carbon farming practices in soil, livestock, and manure management • Replacing fossil fuels in agricultural machinery with biofuels and electricity
Waste	<ul style="list-style-type: none"> • Preventing waste, increasing recycling rates, and implementing landfill bans • Employing landfill methane capture technologies and utilising CCS at energy-from-waste (EfW) plants
Miscellaneous	<ul style="list-style-type: none"> • Increase in carbon sequestration via tree planting within the district and potential land use change to woodland has been discussed with MSDC but at present there is insufficient information to model interventions.

These pathways are intended to highlight the scale and direction of changes that could occur if the above measures were implemented. They are not intended as a projection or forecast of future energy use and emissions. It is also worth noting that, in reality, implementing these types of changes would almost certainly lead to dynamic impacts across different activities and sectors, thus affecting wider trends such as fuel prices. Those interactions are highly complex and have not been quantified in this study. Nonetheless, these scenarios provide a useful way to assess and prioritise potential interventions – and understand MSDC’s level of influence when it comes to achieving net zero emissions.

3.3.2 The Business-as-Usual scenario

3.3.2.1 Assumptions about future changes

The EEP data incorporates a range of information, including projections for:

- Annual growth rates for population and number of households
- Annual growth rates for economic parameters:
 - Real UK GDP
 - GDP Deflator
 - Real household disposable income
 - Industrial production
- Weather changes (winter degree days)
- Retail and wholesale energy prices, carbon prices, and exchange rates

For more information, refer to the BEIS EEP Methodology Report.

The Office of National Statistics (ONS) projections indicate that the population of Mid Sussex, which was 149,716 in 2018, could reach around 159,823 by 2030 (a 6.8% increase) and 165,394 by 2040 (a 10.5% increase). These growth rates are somewhat larger than the ONS forecasts for England as a whole (which would see population increases of 5.7% and 9.3% by 2030 and 2040, respectively), but still align closely as shown in the chart below.

Figure 57. Population growth projections for Mid Sussex and England, 2018-2043. Source: ONS

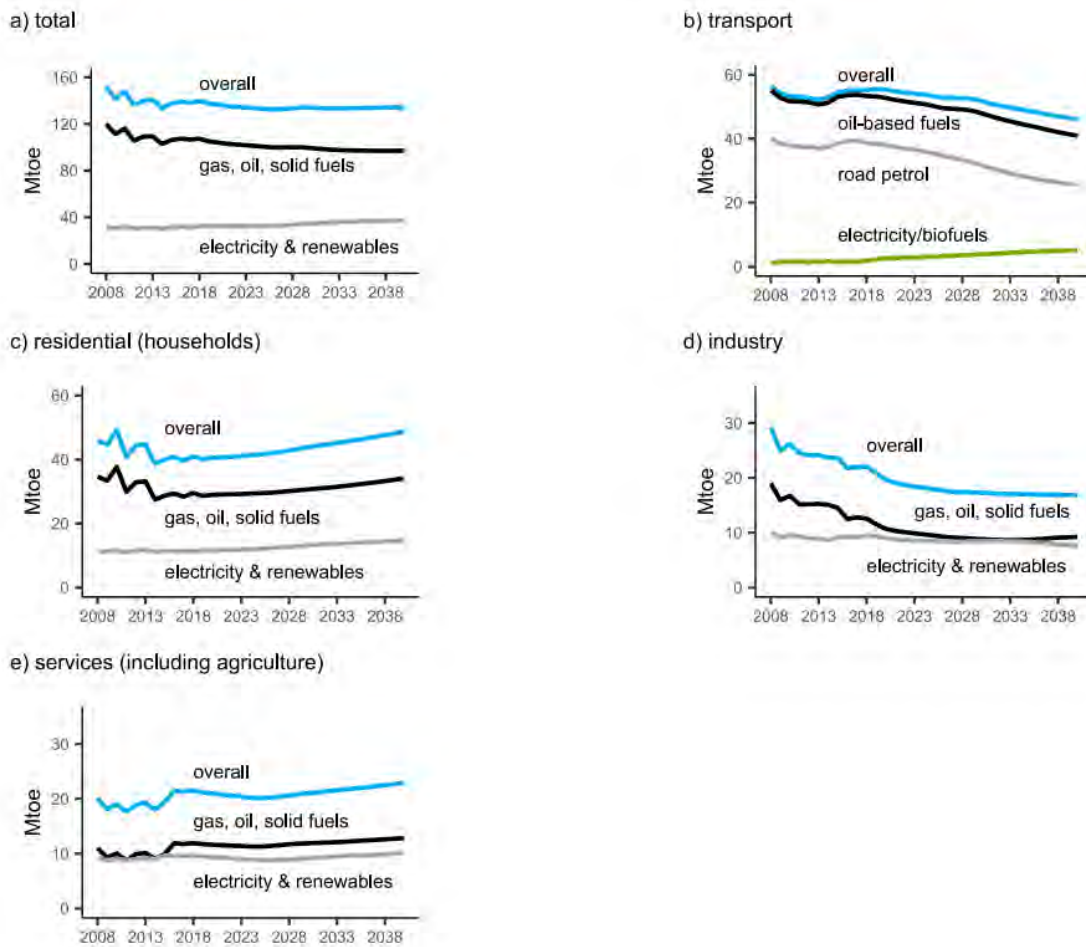


Note, the EEP data was developed prior to the publication of the Government’s Net Zero Strategy on 19th October 2021 and, as such, does not account for any of the policy proposals set out in that report. It also does not account for several policy proposals that were announced previously where there was insufficient detail available at the time to support an assessment, of which notable examples include:

- The proposed 2030 ban on the sale of new petrol and diesel vans and cars; and
- Future changes to UK Building Regulations for new developments

The charts below, which are extracted from the EEP Methodology Report, shows the future changes in fuel consumption that form the basis of the emissions projections. Broadly speaking, emissions from transport (primarily road transport) are expected to decline, emissions from the residential sector would tend to increase, and emissions from other non-residential sectors (including commercial, industrial and public sector buildings and facilities) exhibit an initial decline before tending to level out in the 2030s. Total fuel consumption would be slightly lower than it is at present, but this would lead to a proportionally larger change in GHG emissions which is primarily due to the effects of electricity grid decarbonisation.

Figure 58. Final energy demand by fuel and consumer sector. Source: BEIS



In the transport sector, there is a general shift towards the use of electric vehicles, and because these are more efficient than combustion engines, this leads to an even larger proportional reduction in the use of petroleum products. Demand for petroleum products will also tend to decrease, which is attributed to the introduction of more stringent emissions standards for cars, vans, and HGVs.

Nationally, according to the EEP, the domestic sector would see a larger increase in both fuel use and emissions, driven by changes in population, income levels, weather, and fuel prices. Note that our BAU pathway has reduced this growth rate by roughly 50% to account for the introduction of the Future Homes Standards, as well as the fact that a significant proportion of new homes would be delivered outside of the area boundary.

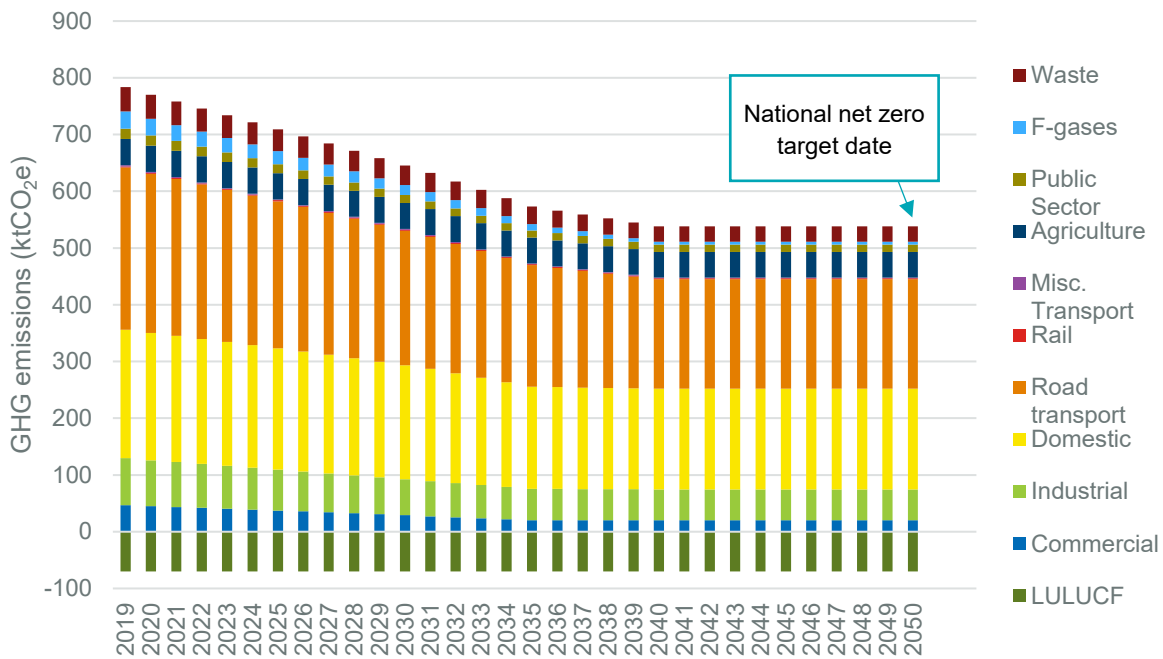
In the industrial sector, demand for electricity and renewables would rise slightly, while demand for gas, oil and solid fuels would remain roughly the same. In other non-industrial sectors (referred to as 'Services' in the chart above), demand for all fuels would increase slightly. For these sectors, economic growth, weather, energy prices and changes in industrial production are key drivers.³⁰

3.3.2.2 Impact on GHG emissions

In the BAU scenario, GHG emissions in Mid Sussex would fall by 17% by 2030, 33% by 2040, and 34% by 2050. As illustrated in Figure 59, most of the emissions reduction is projected to occur by 2040 after which it mostly stagnates without the implementation of additional measures.

³⁰ For more information, see [Energy and emissions projections: methodology overview \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/92222/energy-emissions-projections-methodology-overview.pdf)

Figure 59. Changes in GHG emissions by sector in the BAU scenario



Although some of this change is attributed to falling energy consumption, the other major factor is decarbonisation of the electricity grid, which is assumed to fall from 0.2107 kgCO₂e/kWh in 2019 to approximately 0.0888 kgCO₂e/kWh in 2030 and 0.0048 kgCO₂e/kWh in 2050. This can clearly be seen when comparing Figure 60 and Figure 61, which look at energy use and GHG emissions by fuel type. The change in emissions from grid electricity is disproportionately large compared with the change in electricity consumption.

Figure 60. Energy use by fuel type in the BAU scenario

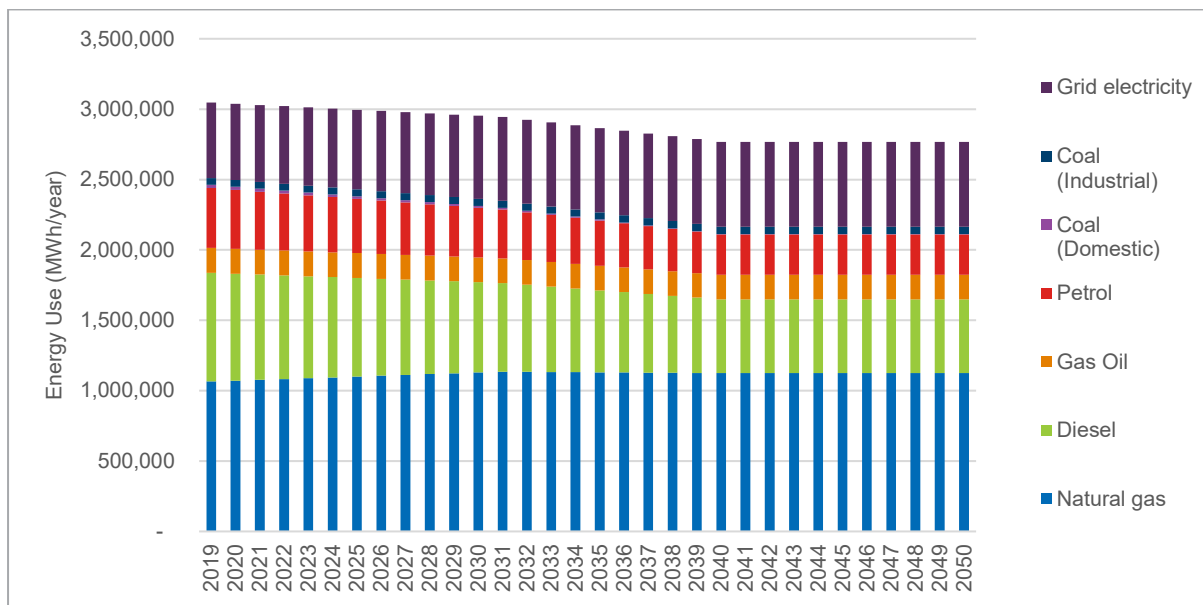
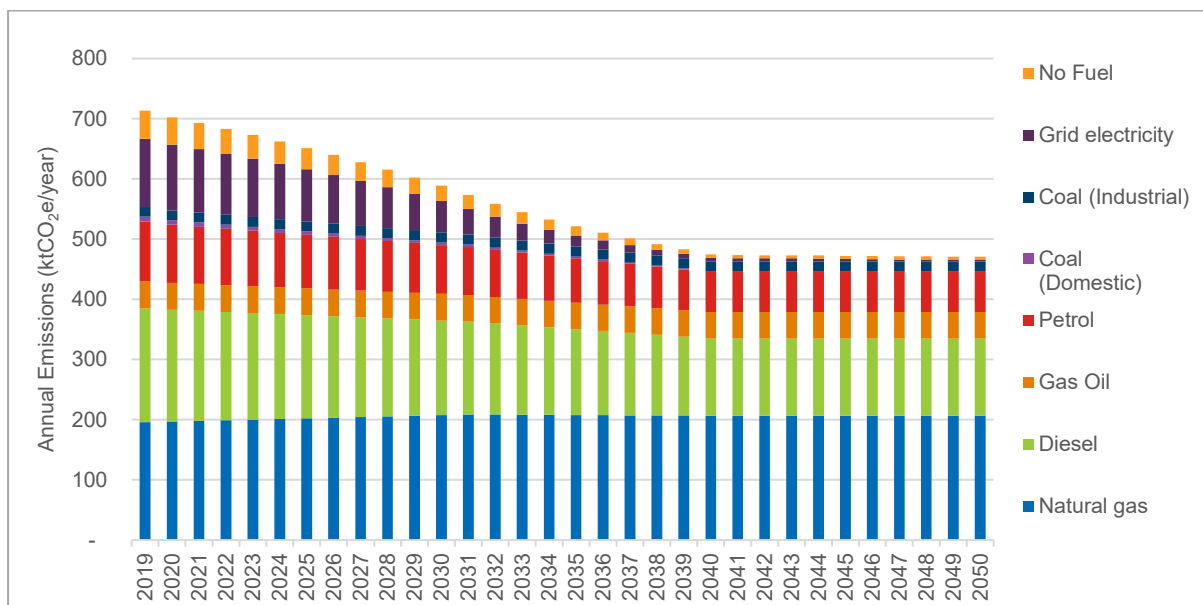



Figure 61. Emissions by fuel type in the BAU scenario





The cumulative energy-related emissions between 2020 and 2050 would be approximately 16,474 ktCO₂e. This means that the Paris-aligned carbon budget for the period through the year 2100 would be used up by 2028 if no additional mitigation action is taken.


Mid Sussex currently does not have a carbon neutrality target but aims to align their emissions reduction pathway with the Government’s overarching commitment of reaching net zero by 2050. As the BAU scenario shows (see Figure 59), the vast majority of emission reductions on the current trajectory will likely occur before 2040 – especially if the power decarbonisation target of 2035 is achieved. This means that with a target between 2035 and 2050, MSDC could maximise on the national grid decarbonisation which drives the majority of the emissions reduction in the BAU scenario and which many mitigation actions will depend on.


With this as a starting point, reaching net zero in Mid Sussex in line with or ahead of the national 2050 target date will broadly require:


- 

Reducing demand for energy and other resources as much as possible via energy efficiency, behavioural change, and technological means
- 

Switching all (or nearly all) fuel consumption to electricity instead of fossil fuels, including energy use in buildings and transport
- 

Radically decarbonising the electricity supply by increasing deployment of renewable power, phasing out fossil fuels, and delivering associated infrastructure upgrades
- 

For sectors or activities that cannot use electricity, mitigating emissions by using other renewable or low-carbon energy sources and making use of carbon capture and storage
- 

Changing agricultural practices and land uses to increase carbon sequestration and reduce emissions of other GHGs
- 

Offsetting residual emissions by delivering further GHG reductions outside the boundary of Mid Sussex – as a last resort

3.3.2.3 Uncertainties, risks, and opportunities

This section describes some of the uncertainties, risks, and opportunities highlighted by the BAU analysis. This is not a comprehensive list but summarises some of the main points.

Uncertainties in the BAU scenario	
What are they?	What are the implications?
<p>There are inherently high levels of uncertainty in any form of GHG or energy scenario modelling. Unforeseen events can have a major impact. The COVID pandemic is a good example, but others could include economic changes, major political events, extreme weather, etc.</p>	<p>It is important to acknowledge that the pathways are not forecasts. They are instead intended to highlight the scale and direction of changes that may occur, to help inform the development of local mitigation measures.</p>
<p>The Government has recently announced a range of policies and other ambitions as part of a nationwide net zero strategy that are not currently accounted for.</p>	<p>Many of the measures announced by the Government are modelled as additional mitigation measures in the subsequent sections of this report, so their effects are at least partially quantified. However, responsibility for achieving or implementing those measures may shift away from local stakeholders to the central Government.</p>
<p>Changes in fuel consumption in the commercial and industrial sectors will be more dependent on the specific types of industries and activities taking place in Mid Sussex. As discussed in the Baseline chapter, there is less information available on this topic than, for example, on domestic and road transport energy use.</p>	<p>The lack of information makes it harder to comment on the likelihood that local trends would align with the national trends in this regard. Findings relevant to the industrial and commercial sectors should therefore be treated with some additional caution.</p>
<p>The rate of national electricity grid decarbonisation in the model is based on Government figures but the speed of decarbonisation has been generally viewed as optimistic. On the other hand, this may now</p>	<p>At the time of writing (November 2021) it is too early to comment on the potential rate of future grid decarbonisation. As will be discussed throughout this report, this is a key issue</p>

change in light of recent announcements on achieving a net zero electricity grid by 2035.	because it is one of the major sensitivities in the model.
---	--

Risks to achieving net zero	
<p>What are they?</p> <p>The BAU scenario shows a very large gap to reaching net zero, which means there will be huge pressure to deliver additional mitigation measures locally or regionally.</p> <p>If national grid decarbonisation is slower than assumed, the reduction in GHG emissions would be even lower than shown.</p> <p>Weather extremes, which are expected to be more likely due to climate change, could result in both short- and long-term changes in energy use. Heatwaves are an example as they could prompt more people to install artificial cooling systems.</p>	<p>What are the implications?</p> <p>MSDC will need to collaborate with a range of stakeholders and utilise all available policy levers / areas of influence. This includes lobbying the Government for additional support.</p> <p>This is a particular challenge because there are very few ways that MSDC or local stakeholders can have an influence. MSDC should aim to maximise local renewable generation, which will help to provide zero carbon electricity locally, and facilitate this broader shift by supporting larger-scale renewables where possible.</p> <p>MSDC should consider developing strategies for considering climate mitigation and adaptation needs alongside. These will differ between the more rural and urban settings of the district. While this is a crucial consideration for Mid Sussex, detailed information on climate adaptation is outside the scope of this report.</p>

Opportunities	
<p>What are they?</p> <p>Changes in emissions in the domestic sector will depend in large part on consumer behaviour, income levels, and so on. However, the increase will also depend on the level of new housing that is delivered within the district and the energy and CO₂ performance standards that those buildings are required to meet.</p> <p>MSDC has full influence over its own assets and can therefore set an earlier net zero target for the Council compared to the entire district. Additionally, the overall net zero pathway can be supported by ambitions in the private sector and other public sector entities such as the County Council and the NHS which has a net zero target of 2045 as well as incremental reduction targets for 2036 and 2039.</p> <p>It is likely that the BAU scenario shown above underestimates the potential changes in emissions from road transportation if EV uptake happens more rapidly. This would be the case if the proposed 2030 ban on new petrol and diesel cars and vans comes into place as well as the recent proposition (21st of November 2021) of making EV charging points mandatory in new homes and buildings. Moreover, it is anticipated that the price of electric vehicles will reach parity with combustion engine vehicles in the next few years, which could have a major impact on consumer choices even without additional policy incentives.</p>	<p>What are the implications?</p> <p>MSDC can influence the design of new developments and major refurbishment projects in its role as a Local Planning Authority. This could mean limiting emissions from new developments while promoting uptake of local renewable energy technologies and enshrining this into local policies.</p> <p>Although the public sector does not contribute very much to total GHG emissions, if there are any specific commitments then these could be incorporated into the BAU scenario. In practical terms this would mean that the Roadmap could focus more on defining interventions in other sectors.</p> <p>In this instance, MSDC would not need to do as much to promote local uptake of EVs and would play more of a facilitation role by helping to provide adequate charging infrastructure. The focus would also shift towards promoting active travel modes and use of public transport.</p>

The rural nature of Mid Sussex offers considerable opportunities for carbon sequestration. This should be done with consideration of the ecological emergency and climate adaptation needs such as natural flood protections.

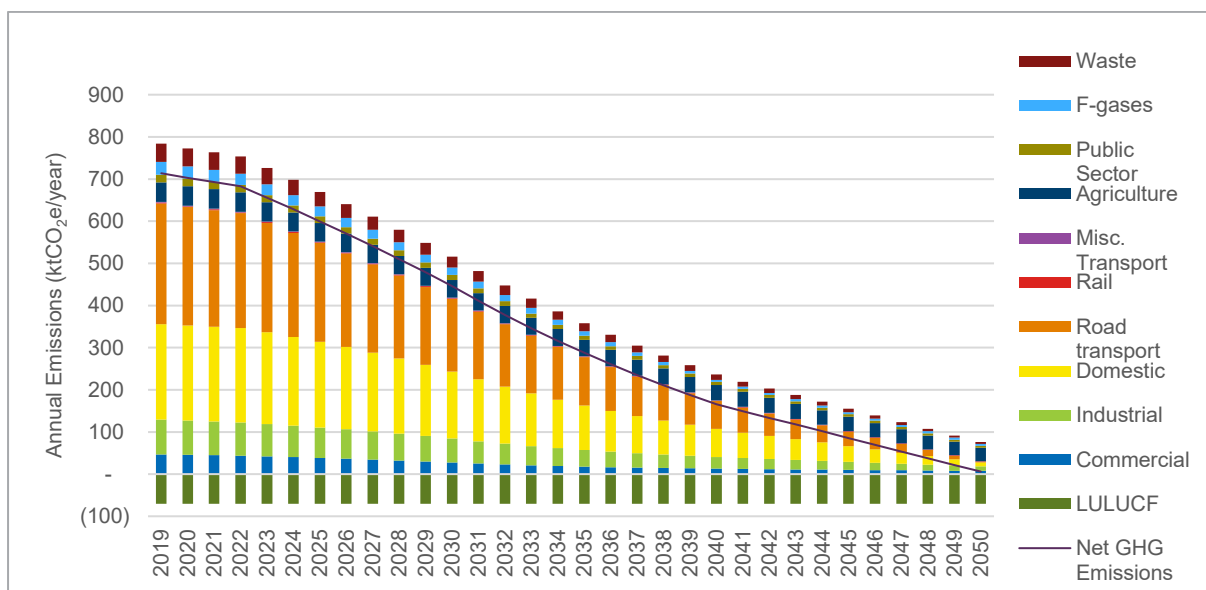
MSDC can reduce their emissions through carbon sequestration projects in existing woodlands or through afforestation projects. This will need to be done in cooperation with stakeholders who manage crucial biodiversity habitats in Mid Sussex such as the High Weald AONB or the South Downs National Park.

3.3.3 2050 net zero pathway

The BAU results clearly show that further actions will be required. This section considers the results from an ambitious pathway that aims to reach net zero by 2050. As stated previously, a key reference point for determining the type and scale of intervention measures for this scenario is the CCC’s ‘Balanced Pathway’ for UK-wide emissions. As with the BAU scenario, information specific to Mid Sussex has also been used wherever possible, with an example being the Sustainable Energy Study from 2014 which has been used to inform estimates of future renewable energy capacity.³¹

Taken together, the mitigation measures modelled in this scenario result in an emissions reduction of 38% by 2030, 77% by 2040, and 99% by 2050 compared to the 2019 baseline with residual annual emissions of 6 ktCO₂e in 2050. As illustrated in Figure 62 below, varying levels of reduction are seen across different sectors. The most dramatic changes occur in sectors where there is a complete (or near-complete) shift to the use of electricity instead of fossil fuels.

Figure 62. Emissions by sector in 2050 scenario



Considering future emissions in Mid Sussex now by sector, the largest reductions are seen in the transport and domestic sectors, which decrease by 99% and 96% respectively by 2050. The smallest reductions can be seen for agriculture and rail with 33% and 37% respectively. The agriculture sector is particularly difficult to decarbonise as it is dominated by non-CO₂ emissions from livestock and crop production (e.g., use of fertiliser), which are hard to eliminate given the inherent biological and chemical processes involved.³² The LULUCF sector currently shows no change as increases to carbon sequestration were not modelled.

³¹ [Mid Sussex Sustainable Energy Study Report](#)

³² [The-Sixth-Carbon-Budget-Methodology-Report.pdf \(theccc.org.uk\)](#)

The effect of switching to a zero-carbon energy source will, to some extent, mask the impacts of any further energy demand reduction measures such as retrofitting buildings. To understand the scale of change in energy use, Figure 63 shows the change in fuel use between 2019 and 2050, whereas Figure 64 shows the associated changes in emissions associated with those fuels. These graphs highlight the fact that neither demand reduction nor fuel switching/technological change can provide a solution on its own – both will need to play an important role.

Figure 63. Energy use by fuel in 2050 scenario

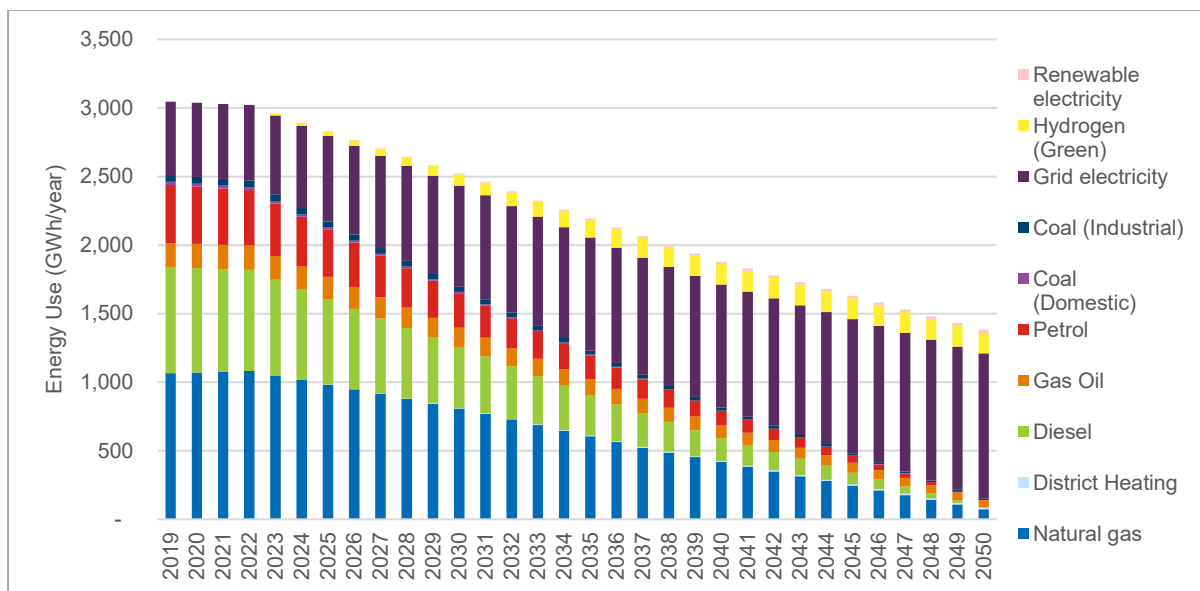
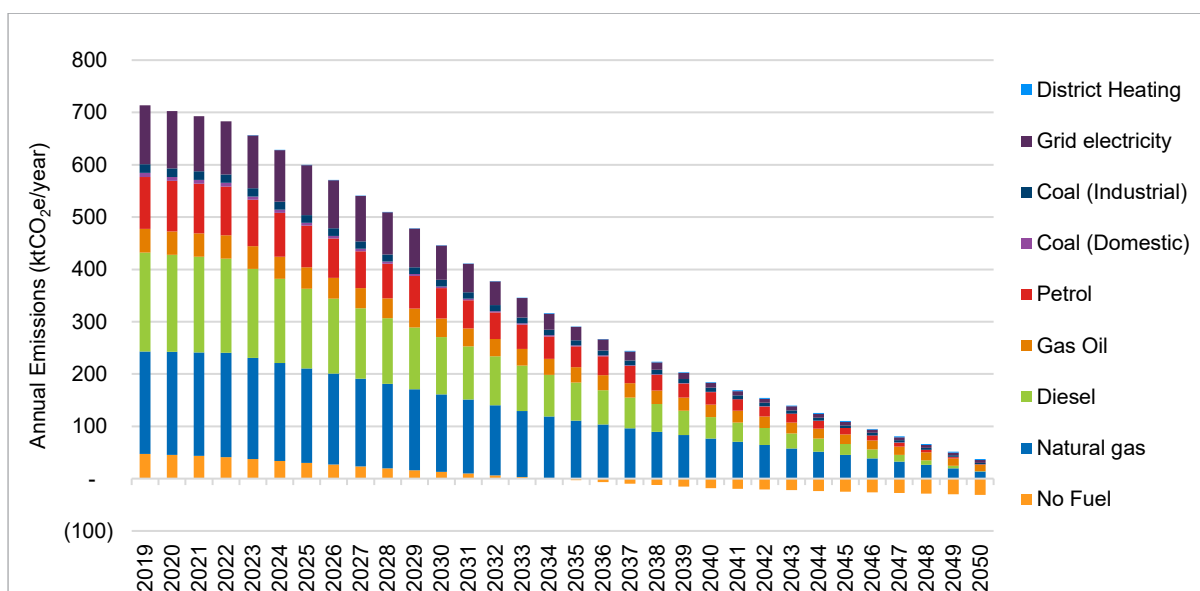


Figure 64. Emissions by fuel in 2050 scenario



Moreover, energy demand reduction should be seen as a *prerequisite* to fuel switching, for various reasons, some examples of which are given below.

- In some cases, it is a technological prerequisite. For example, although heat pumps work in poorly insulated buildings, they operate at lower efficiencies, use more energy to keep the

building at a comfortable temperature, and it will take the building longer to heat up. So, it is critical for heat pumps to be installed after or alongside energy efficiency measures. This is not only an issue of comfort, but also finances, as people will be less likely to switch to heat pumps before the gas boiler ban if this results in a substantial increase in their energy bills.

- Because it is likely that both cars and buildings will mostly utilise electricity, it is estimated that electricity demand could more than double nationally. It is therefore necessary to reduce the strain on existing grid infrastructure, which would require considerable reinforcement to expand capacity, likely resulting in higher energy costs. The electricity would also need to be supplied with renewables, such as large-scale wind and solar farms, which have implications for land use and landscape character, among other things.
- For activities where fossil fuels are not being replaced by electricity but some other alternative, in some cases it will be challenging or impossible to scale up unless demand reduces because of the limited supply of other zero carbon fuels. Examples include 'green' hydrogen (i.e., produced by electrolysis using renewable electricity) or 'sustainable' biomass (which in addition to issues of where it is sourced, would need to be accompanied by advances in carbon capture and storage technologies).
- Demand reduction is also important because it helps to mitigate the other resource requirements (materials, minerals, land, water, labour, etc.) that are required to supply the energy. It also delivers various wider co-benefits, such as improving energy security, reducing fuel bills, helping to alleviate fuel poverty, and mitigating other environmental impacts.

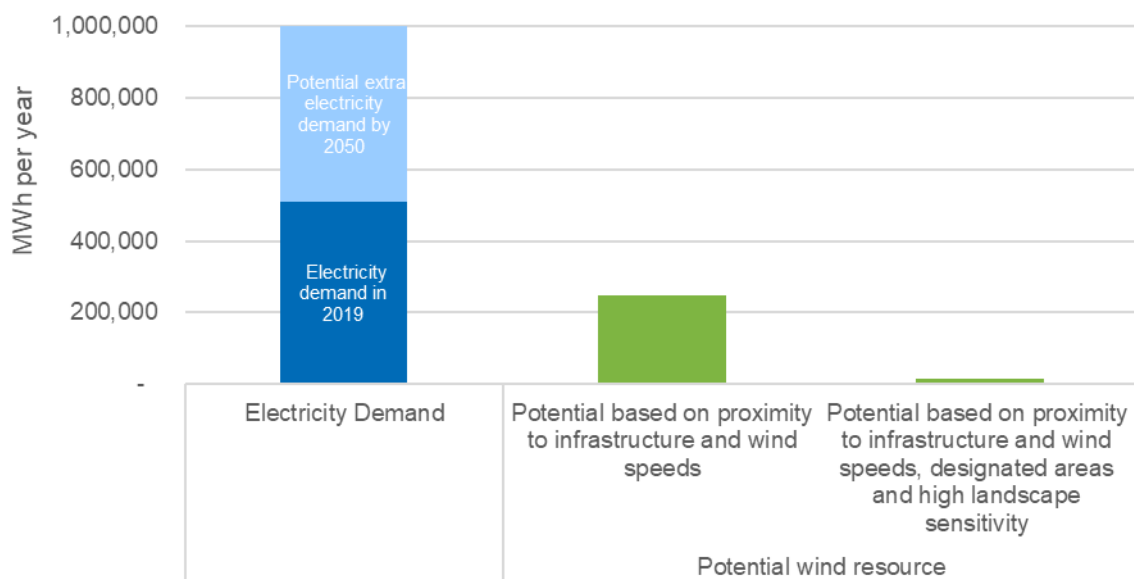
For context

If the entire electricity demand in 2050 was to be met with 100% renewable electricity, this would roughly double the annual electricity use of Mid Sussex. This could be met with *approximately*:

- 1,060 MW of PV (occupying c. 13 square kilometres, around 4% the area of Mid Sussex); or
- 505 MW of onshore wind power (c. 252 large-scale turbines).

In theory, a significant amount of this demand could be met with renewable energy developments within Mid Sussex³³ but this resource is significantly constrained by the current policy landscape, as shown in the chart below. This is just one example of why it will be so challenging to achieve net zero, and how the policy landscape – not just in Mid Sussex but across the whole country – will need to comprehensively change if the target is to be met.

Electricity demand vs. potential wind resource in Mid Sussex

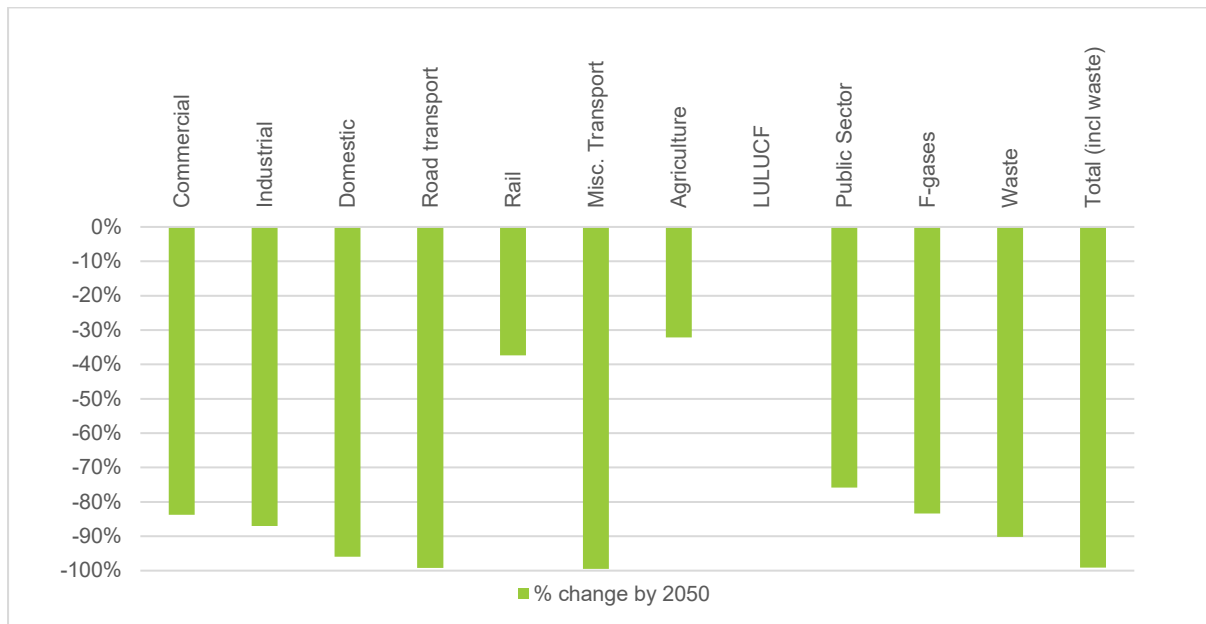


Source: Baseline Assessment (see Section 3.1) and West Sussex Renewable Energy Study (2009)

Considering future emissions in Mid Sussex now by sector, Figure 65 shows that the largest reductions are seen in the transport and domestic sectors, which decrease by 99% and 96% respectively by 2050. The smallest reductions can be seen for agriculture and rail with 33% and 37% respectively. The agriculture sector is particularly difficult to decarbonise as it is dominated by non-CO₂ emissions from livestock and crop production (e.g., use of fertiliser), which are hard to eliminate given the inherent biological and chemical processes involved.³⁴ The LULUCF sector currently shows no change as increases to carbon sequestration were not modelled.

³³ <https://www.midsussex.gov.uk/media/2600/west-sussex-renewable-energy-study.pdf>

Figure 65. Change in emissions by sector between 2019 and 2050



By 2050, the residual annual emissions would be roughly 6 ktCO₂e. To meet net zero, this would have to be compensated for either using carbon removal technologies (which are highly speculative and not yet commercialised) or via nature-based solutions such as woodland creation.

For context

According to the Woodland Carbon Code: “A new native woodland can capture 300-400 tonnes of CO₂ equivalent per hectare (tCO₂e/ha) by year 50, and 400-500 tCO₂e/ha by year 100.”³⁵ On that basis, offsetting the 6 ktCO₂e of annual emissions in 2050 would require roughly 15-20 hectares (0.15-0.20 km²) of new woodland to be created – *and then maintained for at least 100 years*.

To be clear, that would only make up for one single years’ worth of residual emissions, and there would be a time lag of roughly a century before the required amount of carbon was actually removed from the atmosphere, as it takes time for woodland to mature.

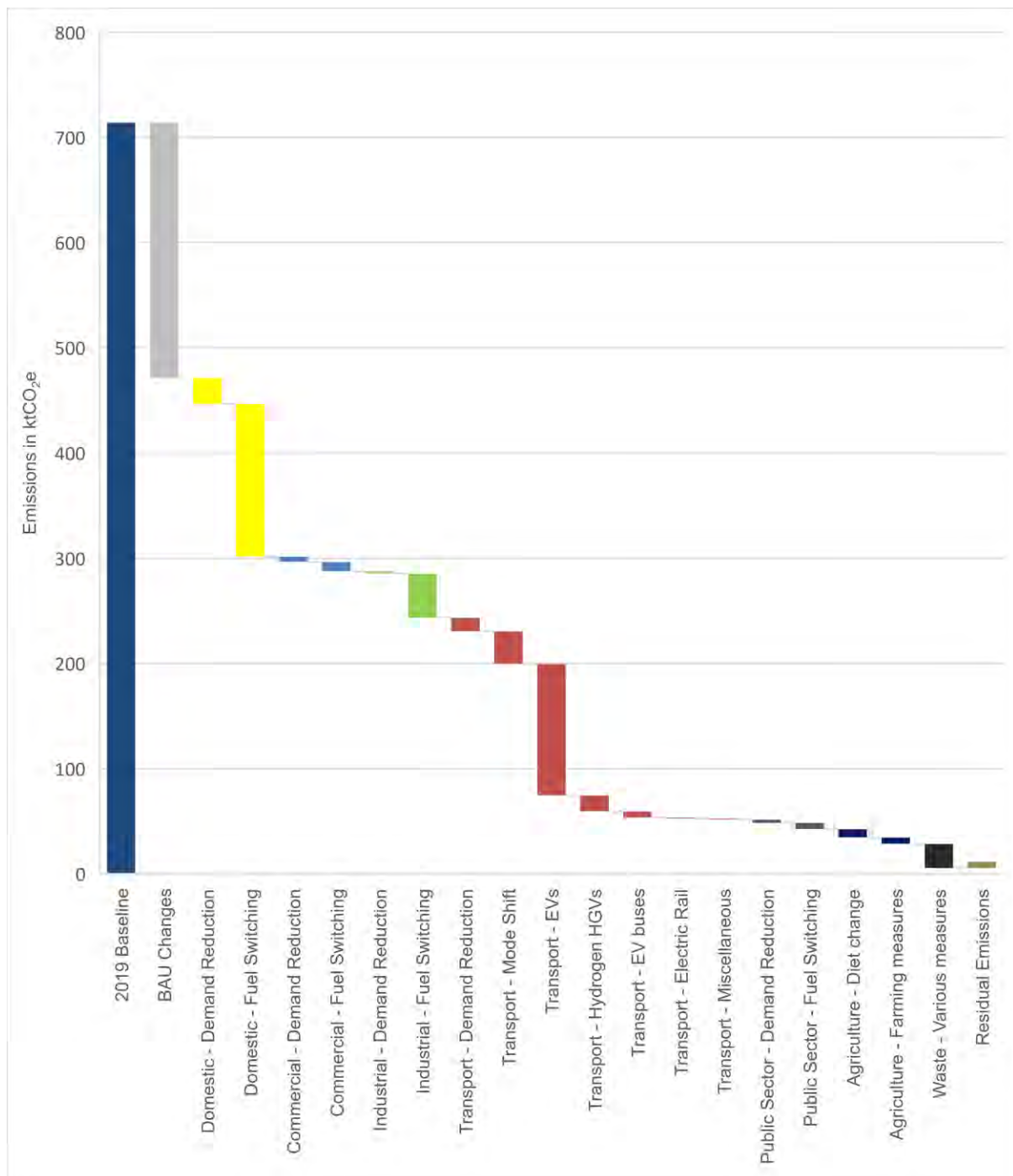
This degree of offsetting is potentially feasible but can only be done if all of the other (ambitious!) mitigation actions modelled in this scenario are implemented. A lack of action in other areas would quickly increase the carbon sequestration need to an unachievable level.

Despite those caveats, this analysis has assumed that one or both of those options (technological or nature-based solutions) would be feasible in future and therefore that net zero could be achieved in Mid Sussex by 2050.

A more detailed breakdown of the mitigation actions is provided in Figure 66 below. When interpreting this chart, note that the impact of each measure depends not only on its ambition, but also on what proportion of baseline emissions it targets. Hence, reductions in the transport sector are the largest because that is the single largest-emitting sector.

³⁵ <https://woodlandcarboncode.org.uk/>

Figure 66. Emissions reduction by type of intervention measure



Note: Due to their small impact and to keep the figure readable, PV measures were removed from the domestic, commercial, and industrial sectors, therefore showing a small gap to net zero.

The largest emissions reduction (in absolute terms) is required in the buildings and transport sectors (see Figure 62). The following sections provide more detail about the mitigation measures modelled and what they would mean in practice.

3.3.3.1 Reducing emissions from buildings

- The net zero scenario assumes a 12% reduction in demand for space heating and hot water across the domestic building stock, and a 25% reduction in the public and non-domestic sectors in line with the ‘Balanced Pathway’ of the CCC’s Sixth Carbon Budget. In practical

terms, given that different properties will be easier or harder to upgrade, this would require deep energy retrofits in at least 50% of all homes.

- Further, in line with the CCC's 'Balanced Pathway', the scenario assumes an uptake in heat pumps of 86% by 2050. A further 11% of properties switch to hydrogen boilers, leaving 3% that do not switch. It is worth highlighting that there is considerable uncertainty as to the preferred role of hydrogen in heating buildings, and it may not be a viable option. This uncertainty is highlighted by the CCC's assessment which assumed the 11% to be the most likely outcome but with a range of 0% to 71%. The government will only make a decision on the role of hydrogen in the UK's net zero journey in 2026, emphasising the need for a focus on existing technologies in the meantime, namely heat pumps.³⁶
- Finally, the scenario assumes that around 20% of heat demand within public sector buildings is met via district heat networks (DHNs), opportunities for which have been previously identified in East Grinstead, Burgess Hill, Haywards Heath, and Lindfield. This is based on a very rough estimate of the potential heat loads but in the absence of more detailed studies is intended only to reflect the potential order of magnitude.³⁷

3.3.3.2 Reducing emissions from transport

- The scenario assumes that 4% of car trips can be avoided through behaviour change, such as working from home, online shopping, and the introduction of workplace parking levies. This is consistent with the lower bound of the CCC's Balanced Pathway figure. While the Government has the ambition to switch 50% of *urban* trips to active travel by 2030 – i.e., walking and cycling –³⁸ no such target has been provided for the rural part of the country. As such, a comparatively conservative estimate of 9% (CCC) was used instead (also the lower bound of the Balanced Pathway assumption). This will mainly be realised in the district's towns where active travel can replace shorter journeys due to the relative density of amenities. The more rural areas will need to focus on an expansion and decarbonisation of the public transport network.
- The majority of emissions are avoided through a switch to fully electric vehicles, assuming that by 2050, close to 100% of cars, vans, and motorcycles are fully electric in line with Government targets.³⁹ Additionally, both bus and rail are assumed to be fully electrified by the target year while 99% of HGVs are assumed to run on hydrogen by 2050. As vehicles – other than the council-owned fleet – come from private purchases, this will mainly be realised through the free market, guided by the national sales ban of petrol and diesel vehicles by 2030. Nonetheless, the Council will play a role in ensuring that the required charging infrastructure is in place as this is currently insufficient. It should be noted that while EVs play a substantial role in reducing emissions from road transport, the behaviour change measures should not be neglected by any means as they have the potential to realise various co-benefits which cannot be achieved through a switch to EVs.

³⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf

³⁷ This assumption is based on the information provided in the MSDC Sustainable Energy Study. A rough estimate was calculated by using the information provided in Table 4.6 of that study, along with CIBSE benchmarks of typical heating fuel consumption and assumptions about typical floor areas based on analysis of DEC data for Mid Sussex. This is intended merely as a high-level estimate to compare the potential for public sector DHN connections in the district as compared with the CCC estimates of the potential across the whole UK. Note that the previous energy study is now likely to be out of date and any DHN schemes would clearly need to undergo additional feasibility assessments. <https://www.midsussex.gov.uk/media/2591/mid-sussex-sustainable-energy-study-report.pdf>

³⁸ [net-zero-strategy-beis.pdf \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf)

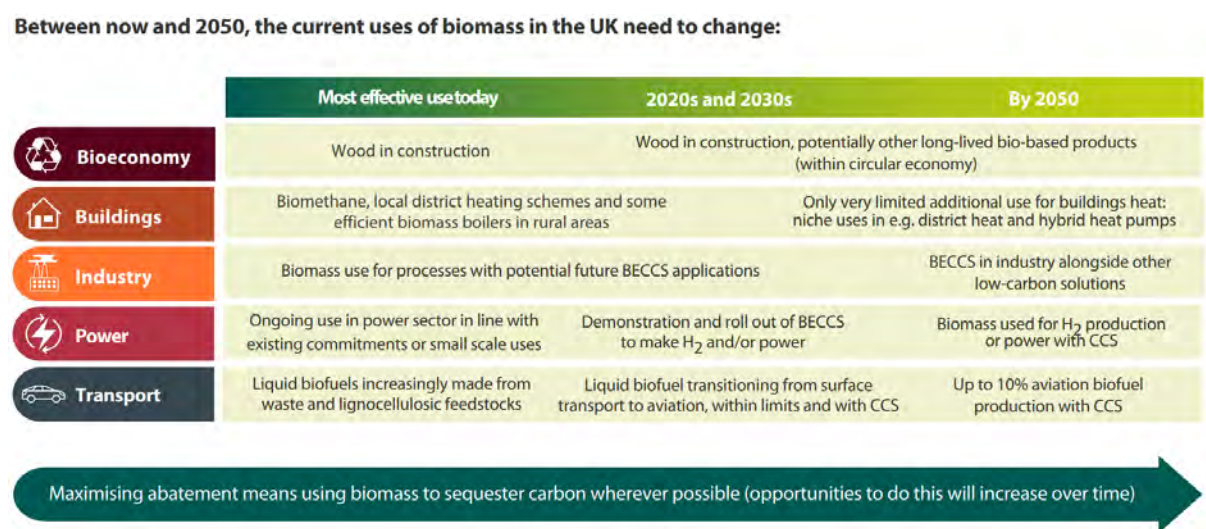
³⁹ [net-zero-strategy-beis.pdf \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf)

3.3.3.3 Reducing other sources of emissions

While buildings and transport make up the vast majority of baseline emissions and can, to a large extent, be mitigated by reducing energy demand and switching to renewable electricity using available technologies, there will be some remaining sources of emissions that are more challenging to eliminate. For Mid Sussex, the main examples are industry (particularly processes that use fossil fuels to provide heat), waste and agriculture (particularly non-CO₂ emissions whether from waste, livestock, or fertiliser applications).

Industry: At present, a significant portion of fossil fuel use in industry is used to supply heat, which is used for a variety of industrial processes. In addition to having very limited data available to support recommending specific interventions, in some cases there is no electrically powered alternative to the technologies currently in use. So, the solution will likely be a combination of some renewable electricity along with green hydrogen, bioenergy with carbon capture and storage (BECCS). This scenario assumes that 100% of fossil fuels in the industrial sector will be switched to one of these zero emission alternatives by 2050. However, it is important to acknowledge that the solutions in this regard are uncertain – and may change over time, as illustrated in Figure 67 which shows the CCC’s recommendations for the most appropriate use of biomass in a low carbon economy.

Figure 67. Role of biomass in achieving emissions reductions over time. Source: CCC⁴⁰



Waste: The CCC assumes that 75% of emissions from waste can be cut through a variety of measures including waste prevention, increased recycling rates, landfill bans, landfill methane capture, and CCS at EfW plants.



Agriculture: In the agriculture sector, the main actions are diet change (the CCC recommends a 35% reduction in meat consumption compared to today’s level for the Balanced Pathway), land release measures (such as productivity improvements and moving horticulture indoors), low-carbon farming practices (reducing emissions from soils, livestock, and waste and manure management), as well as fossil fuel use in agricultural machinery. All measures combined reduce agricultural emissions by 33% in addition to the BAU reduction of 4%. It is acknowledged that these are rough estimates, given that many of these changes would vary and have uneven impacts geographically.

⁴⁰ [Biomass-in-a-low-carbon-economy-CCC-2018.pdf \(theccc.org.uk\)](https://www.theccc.org.uk/wp-content/uploads/2018/07/Biomass-in-a-low-carbon-economy-CCC-2018.pdf)

3.3.4 Accelerated net zero pathway (2040)

Realistically, the UK’s 2050 target will mean that some Local Authorities need to make faster progress than others, and this will depend on both the scale of emissions in each area as well as the sources of those emissions, i.e., whether they are from sectors that are hard to abate. With that in mind, in addition to the 2050 scenario, consideration has been given to whether it would be possible for Mid Sussex to reach net zero in advance of the national target.

The evidence collected as part of the baseline analysis shows that there are some important reasons why it may be *easier* to reach net zero in Mid Sussex compared with some other UK Local Authorities.

	Opportunity	Further details
	A high proportion of the district’s emissions can be mitigated with existing technologies.	Emissions in Mid Sussex are dominated by the domestic sector and road transport – and there are technologies already available that can displace nearly all of the fossil fuel use in those sectors. So, once the electricity grid reaches zero emissions there would be very large emissions reductions in those sectors. The Government has stated an ambition for the grid to reach net zero by 2035. This means that a large-scale push towards electrification of heating and transport would deliver major benefits for Mid Sussex. There would be considerable practical challenges in achieving this (summarised below), but at least there is a known solution that uses proven technologies.
	Because the district is predominantly rural, there is land available for projects that can help mitigate emissions. These can provide benefits not only for Mid Sussex, but also the wider UK.	In principle, there should be more opportunities to achieve carbon reductions through changes in agriculture and land use practices, compared with more built-up areas. A key intervention would include releasing agricultural land for other uses e.g., woodland creation. This potentially offers a major opportunity for Mid Sussex and if done correctly would also deliver significant wider ecological benefits – recognising that biodiversity issues are as important as climate change. Such projects would need to be carried out in a way that avoids emissions ‘leakage’, i.e., if the same farming activities are simply relocated elsewhere. There is also more space to deliver large-scale renewable energy projects and/or bioenergy crops, albeit recognising the areas of landscape sensitivity. These interventions would not necessarily decrease emissions from Mid Sussex ‘on paper’, because renewables would contribute towards national grid decarbonisation and BECCS facilities might be located outside of the district. However, they could still deliver overall benefits to the UK that will be important for reaching the national net zero target.

To illustrate the potential impact that these opportunities could have, an accelerated carbon pathway has been developed that aims to reach net zero by 2040. This pathway assumes that the same changes occur as in the BAU scenario, but in addition:

- a) The Government delivers on its ambition for UK grid electricity to be net zero by 2035.
- b) As a result, it becomes more advantageous to push for higher levels of electrification in buildings and transport. Doing so would achieve faster emissions reductions and also minimise *cumulative* emissions over time, which is critical for achieving the Paris Agreement targets. It is therefore assumed that 100% of buildings switch to electric heating systems, and 100% of vehicles (other than HGVs) switch to EV.

- c) All other industrial fossil fuel use is displaced by green hydrogen, BECCS or some combination of the two. The rationale is that green hydrogen might be more widely available due to the large-scale increase in renewables implied by point (a). In principle, some bioenergy could also be produced within Mid Sussex to feed into a BECCS supply chain; however, at the time of writing those technologies are not yet commercialised.
- d) Similar changes in the agricultural and waste sectors are achieved as in the 2050 scenario, but these have been adjusted to reflect the shorter timeframe for uptake. In particular, the shift in the agricultural sector will likely take more time to realise and as some of the waste measures rely on new technologies such as CCS and EfW plants.

The modelling shows that a combination of (a) grid decarbonisation and (b) electrification of heat and transport alone would reduce emissions in Mid Sussex by roughly 90%. A further reduction of around 5% would be achieved if (c) industry was fully decarbonised, while (d) agriculture and waste measures would make up most of the remaining 5%. At that stage, Mid Sussex would essentially have achieved net zero for its area-wide emissions – *provided that steps are taken to avoid any other increase in emissions, whether from energy, land use, or any other sources.*

This is illustrated in Figure 68 to Figure 70 below. In particular, and as with the 2050 scenario, a comparison of energy use versus emissions by fuel type shows how the level of progress is dependent on grid decarbonisation.

Figure 68. Emissions by sector in 2040 scenario

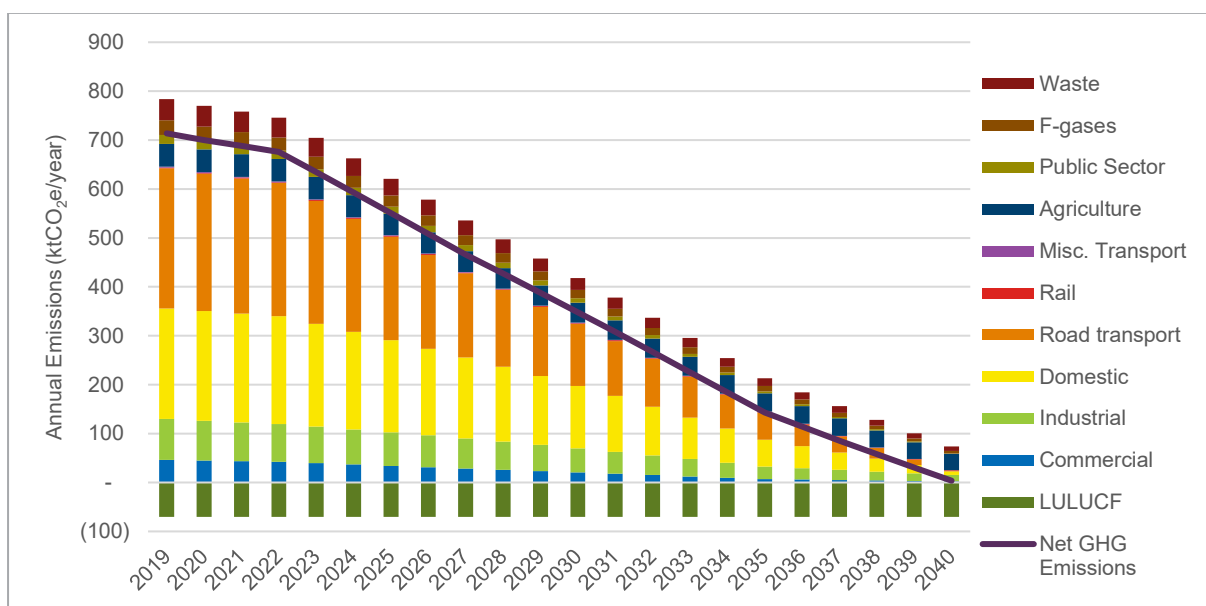


Figure 69. Energy use by fuel in 2040 scenario

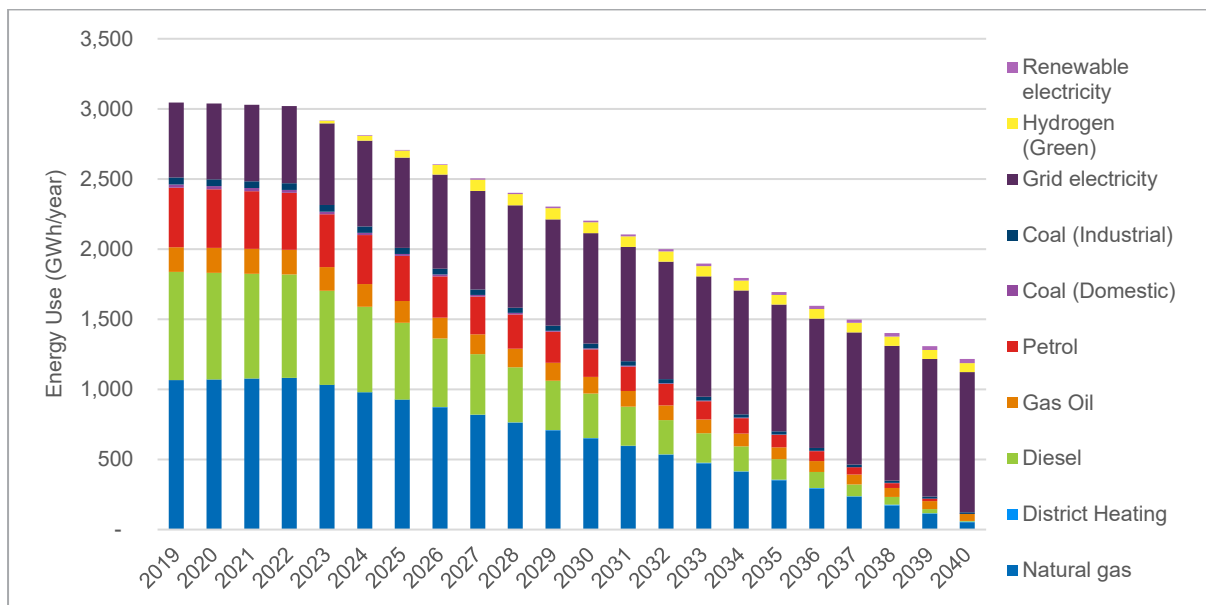
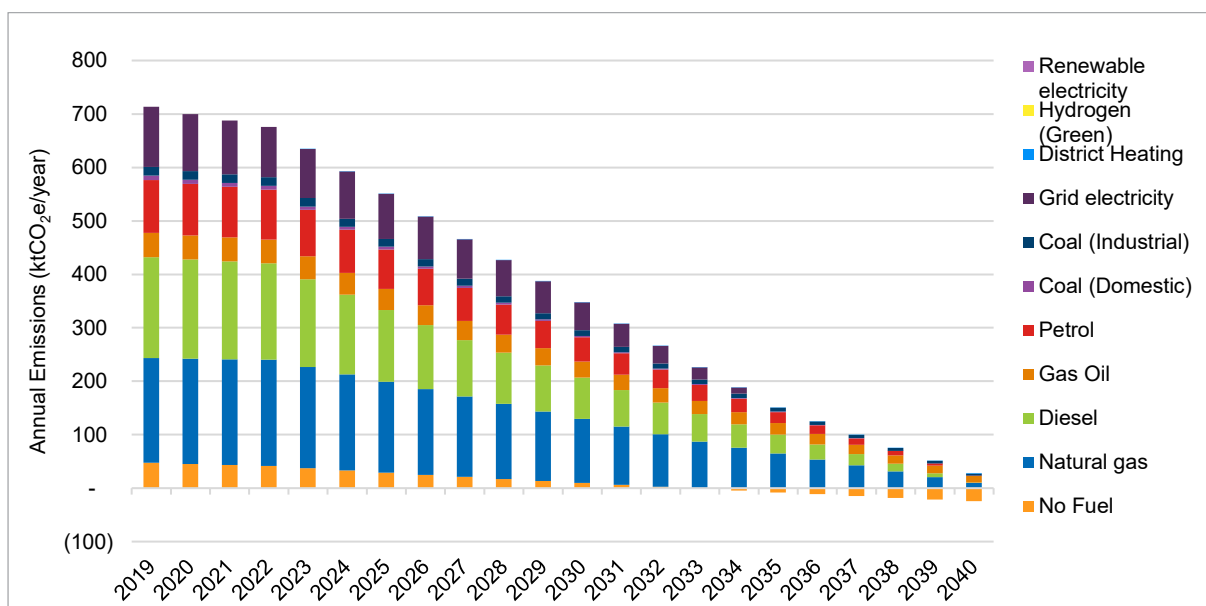


Figure 70. Emissions by fuel in 2040 scenario



It is important to acknowledge that the Government aspiration for grid electricity is not certain to be met and is considered ambitious in the context of current UK energy policy. If the rate of grid decarbonisation is lower than the Government hopes, the same measures would only reduce emissions by 50-80% by 2040. Among other things, these results reinforce the points that:

- Reaching net zero in Mid Sussex will rely on wider changes across the UK (though this in no way minimises the importance of actions taken within the district); and
- Even though there are technological solutions available, they are not a ‘silver bullet’. Again, a credible pathway to net zero will need to include other forms of demand reduction, including behaviour change.

Although electrification offers a major opportunity to decarbonise heat and transport in Mid Sussex from a purely technological standpoint, it would still require huge effort to overcome obstacles. The major challenges differ for transport versus heat and buildings, as summarised below.

- **Transport:** EVs have rapidly decreased in cost which has resulted in higher uptake. The Government has also proposed a ban on the sale of new petrol and diesel cars and vans by 2030. If implemented, then considering the average lifespan of vehicles, the majority would be EV by 2040, assuming that sufficient charging infrastructure is available.⁴¹
- **Heat and buildings:** Among the major practical challenges, three stand out:
 - **Cost:** At present, heat pumps are much more expensive than boilers and it is not certain how fast the costs will come down. The Government has promised⁴² to work towards achieving this but the specifics have not been announced.
 - **Retrofitting is a prerequisite:** Due to the impacts on fuel bills as well as system performance, electric heating systems (whether those are heat pumps or any other form) need to be installed in buildings that are already reasonably energy efficient. In other words, the rollout would need to be preceded by a large-scale retrofitting initiative. At present there is very little funding (existing or planned) available to achieve this.
 - **Natural replacement cycles:** The average lifespan of a boiler is around 15 years. So, replacing all fossil fuel heating systems by 2040 would require an almost immediate ban on new ones being sold or installed. That is not within MSDC's legal remit, and the Government is not considering introducing such a ban until c. 2035, so it is not clear how this would be achieved. Also, heating systems are usually replaced when they break, which is usually in winter (the heating season). Therefore, replacement normally needs to happen very quickly, and a like-for-like solution is often the most practical.

Furthermore, significant action will be needed to avoid any *increase* in emissions. For example:

- **New developments:** The BAU projections account for some growth in domestic emissions, but the actual change will be determined largely by future Building Regulations. The Government has announced plans for the Future Homes Standard to reduce emissions by 75-80% compared with current standards but has not yet announced how this will be achieved.
- **Land use, land use change and forestry (LULUCF):** Projections for England show that the impacts of continual deforestation, converting grassland to cropland, and new settlements will result in worsening emissions from the LULUCF sector. This risk is particularly relevant to Mid Sussex given the amount of land used for agriculture. On the other hand, there could be complicated trade-offs – and potentially net benefits – if less land is used for grazing livestock and more is used to supply people with plant-based diets. So, any actions taken to address agricultural land uses would need to take a holistic view and be done in coordination with industry bodies and other Local Authorities.

What does this mean for Mid Sussex?

These results show that, with significant tailwinds, it would theoretically be feasible for emissions in Mid Sussex to reach net zero (or get very close) prior to 2050. The vast majority of emissions can be addressed using existing technologies. The remaining 5-10% of emissions reduction would rely on changes that are less certain, such as a shift in land use and agricultural practices, waste management, behaviour, and technological advances (particularly CCS). Despite the challenges, overall, this means

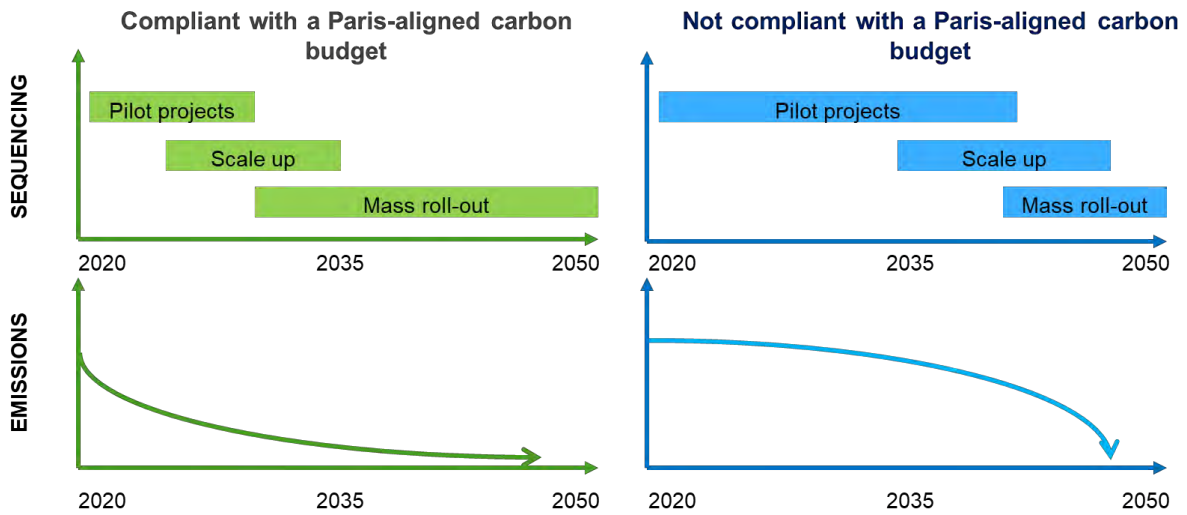
⁴¹ Due to the wider resource implications of producing battery vehicles, there must also be a large-scale behavioural shift to reduce transport demand, even though from a strict carbon accounting perspective this would have minimal or no impact on emissions within the MSDC area boundary.

⁴² In the Heat and Buildings Strategy (October 2021) the Government announced that there will be a consultation on options for working with industry to drive down costs. [Heat and buildings strategy - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/heat-and-buildings-strategy)

that Mid Sussex is at an advantage compared with some other Local Authorities. This is a positive message, and a useful starting point for developing a net zero roadmap.

Ultimately, every Local Authority will need to take urgent action to achieve carbon reduction, despite the challenges this entails. It is not only the net zero target date, but the speed of decarbonisation, that makes a difference. As shown in Figure 71 below, delaying action results in much higher cumulative emissions over time, and these need to be managed in order to stay within a carbon budget that is aligned with the Paris Agreement targets.

Figure 71. Emissions trajectory under a Paris-aligned budget



4 CONCLUSIONS

This report provides a detailed evidence base around the pathways to net zero both for Mid Sussex District Council's own GHG emissions and for the GHG emissions across the whole of the district. It shows what will be needed to deliver net zero emissions in both cases and what some of the main benefits, barriers and challenges will be. This evidence base will underpin the development of net zero action plans at the Council and district level.

APPENDIX A – KEY POLICIES, PLANS AND STRATEGIES INFLUENCING GHG EMISSIONS IN MID SUSSEX

Coverage	Target or objective	Driver / mechanism
International	Limit global temperature increase to 2°C and pursue efforts to limit global temperature increase even further to 1.5°C	Paris Climate Agreement
International	To be agreed: Protect 30% of land by 2030	Convention on Biological Diversity
National	By 2050, reduce net emissions by 100% compared with a 1990 baseline	Climate Change Act (2050 Target Amendment Order) 2019
National	By 2035, a 78% reduction in UK territorial emissions on 1990 levels	The sixth Carbon Budget
National	Drive supply and demand of ultra-low emission vehicles and ensure a fit for purpose infrastructure to support the shift to electric vehicles <ul style="list-style-type: none"> The sale of new petrol and diesel cars and vans will be prohibited by 2030 and all new cars will be fully zero emission at the tailpipe from 2035 Decarbonise the whole central government fleet of 40,000 cars by 2027 The sale of all non-zero emission HGVs will end from 2040, with lighter HGVs from 2035 	Transport decarbonisation plan
National	To successfully decarbonise the UK’s energy systems, the UK’s government has set a number of national-level targets, including to increase offshore wind from 10GW (2019 levels) to 40GW by 2030 as well as growing the installation of electric heat pumps from 30,000 per year to 600,000 per year by 2028	Energy White Paper: Powering our Net Zero Future
National	To ensure the UK’s industrial sector is aligned with net zero, the government ambition to reduce industrial emissions by two-thirds by 2035 and by at least 90% by 2050 with 3 MTCO ₂ captured through Carbon Capture, Usage and Storage and around 20TWh switching to low carbon fuels by 2030	Industrial Decarbonisation Strategy
National	Tackle long-term problems to deliver growth which creates high-quality jobs across the UK	Build Back Better: Our plan for growth

<p>National</p>	<p>2021: An interim uplift will deliver high-quality homes that are expected to produce 31% less CO₂ compared to current standards 2025: Zero-carbon ready homes. The report also aims to clarify the longer-term role of local planning authorities in determining local energy efficiency standards. 2028: 600,000 heat pump installations per year 2030: Improve around 1.5 million homes to EPC C standard</p>	<p>The Future Homes Standard</p>
<p>National</p>	<p>Double resource productivity and eliminate avoidable wastes by 2050 75% recycling rate for packaging by 2030 65% of municipal waste (by weight) to be recycled by 2035 with no more than 10% ending in landfill Eliminate food waste to landfill by 2030</p>	<p>Our Waste, Our Resources: A Strategy for England (2018)</p>
<p>National</p>	<p>Increase woodland coverage from 10.1% to 12% by 2050</p>	<p>England Trees Action Plan 2021 to 2024</p>
<p>Regional</p>	<p>Four scenarios for decarbonisation of the UK's energy system</p>	<p>Distribution Future Energy Services (UKPN)</p>
<p>Regional</p>	<p>The group of three LEPs aim to deliver clean growth, whilst continuing to provide an affordable, sustainable and secure energy supply. The plan has two main goals, 1. the tri-LEP Region will play a leading role in the UK's decarbonisation, 2. the tri-LEP region will foster clean growth by supporting public and private sector investments in novel low carbon technologies</p>	<p>'South2East Local Energy Strategy', Coast to Capital, Enterprise M3 and South East Local Enterprise Partnerships</p>
<p>Regional</p>	<p>The strategy establishes how West Sussex County Council can build upon the work completed to date and address the key issues facing the authority, whilst looking for ways to support its residents</p>	<p>'West Sussex Energy Strategy, West Sussex County Council</p>
<p>Regional</p>	<p>The strategy sets out the first actions for delivering the West Sussex Energy Strategy. It spans a three-year period, and will be monitored and reviewed regularly.</p>	<p>'West Sussex Energy Strategy Action Plan', West Sussex County Council</p>

<p>Regional</p>	<p>The West Sussex Transport Plan 2011-26 sets the strategy for guiding future investment in highways and transport infrastructure. The plan's main objective is to improve quality of life for the people of West Sussex by helping to provide; a high quality transport network, a resilient low carbon transport network, access to services, employment and housing and finally a transport network that feels, and is, safer and healthier to use</p> <p>In April 2021, there were 194 publicly accessible electric vehicle charging points in West Sussex including 43 rapid (43kw or above) chargers</p>	<p>West Sussex Transport Plan', West Sussex County Council</p>
<p>Regional</p>	<p>The strategy sets out the role of electric vehicles in West Sussex to deliver the county's vision for transport and interventions the county council will deliver to support West Sussex residents to a transition to electric transport</p> <p>Modelling conducted for the strategy estimates that across West Sussex public charging points needs to increase from 89 to 3,305 by 2025, and 7,346 by 2030.</p>	<p>'Electric Vehicle Strategy', West Sussex County Council</p>
<p>Regional</p>	<p>At least 70% of all new cars in the county to be electric by 2030. • There is sufficient charging infrastructure in place to support the vehicles predicted to be reliant on public infrastructure to charge. • Ensure a renewable energy source for all charging points on County Council land or highway.</p>	<p>Electric Vehicle Strategy (2019 – 2030)</p>
<p>Regional</p>	<p>The bus strategy aims to achieve general improvements to the bus network in West Sussex that will improve users' experience and accessibility while achieving broader social, environmental and economic benefits for the county.</p>	<p>West Sussex Bus Strategy 2018 – 2026</p>
<p>Local</p>	<p>The District Plan is the main planning document used by the Council when considering planning applications. Key considerations:</p> <ul style="list-style-type: none"> - minimum provision of 16,390 homes in the 17-year period 2014 – 2031 - Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC) 	<p>'Mid Sussex District Plan', Mid Sussex District Council (2018) – and ongoing review</p>
<p>Local</p>	<p>The Economic Recovery Plan has been prepared as a response to the Covid-19 pandemic and sets out over 30 actions which the Council will deliver in line with the government's pillars of economic recovery: Backing Business, Increasing Opportunities, Securing High Value Inward Investment, Accelerating Innovation, and, Encouraging a Green Recovery. Amongst the actions is the Council's Covid-19 Recovery Grant which offers £300k grant support to communities and businesses in addition to government support funding.</p>	<p>'Mid Sussex Economic Development Strategy', Mid Sussex District Council (2018)</p>

Local	Delivered through three themes, a sustainable council, environment and communities, the strategy aims to; embed sustainability in all corporate actions, support communities in implementing sustainable actions and becoming more resilient to a changing climate and support businesses in achieving savings through energy efficiency and other sustainability initiatives.	<i>'Mid Sussex Sustainability Strategy'</i> , Mid Sussex District Council (2018)
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APPENDIX B – NET ZERO SITE AUDIT

A net zero audit was undertaken by Ricardo to inform the measures that were entered into modelling tool. The sites that were selected for the audit were chosen as a representative sample of MSDC’s broader site portfolio. These include:

- Oaklands Main Office
- St Johns Pavilion
- Sheddingdean Community Centre

FINDINGS

The following tables summarise the identified energy saving opportunities associated with each site.

Oaklands Main Office

Opportunity ID	Title			Scope
Opportunity 1	Oaklands - Implement energy management system			1
Estimated annual savings			Other savings	ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)	
£1,986	41,902	8.8		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£100		0.1	1,986%	£6,775
Description & Assumptions	<p>Whilst energy use is monitored by the Council at a high level and a number of energy saving projects have been implemented, there are no formal management processes in place to ensure energy use is tracked and managed on a systematic basis in order to drive down energy use and associated carbon emissions.</p> <p>To this end it is recommended the Council look to implement a formal energy management system with endorsement from the most senior levels. The system should look to track energy use across the portfolio with heavy focus on the significant energy users such as the Oaklands office.</p> <p>It should consider both technical aspects of energy use and include staff engagement activities. The energy management standard ISO 50001 is useful point of reference however it should be kept in mind that the objectives should be to both reduce energy use and work toward decarbonising the Council's operations.</p> <p>It has been assumed that savings of 3% of electricity and 5% of gas use could be achieved through the implementation of an energy management system.</p>			

Opportunity ID	Title	Scope
Opportunity 2	Oaklands - Implement site wide energy sub metering with energy management software	1

Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		
£1,986	41902	8.8			
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)		NPV
		0.0	-		£6,873
Description & Assumptions					
<p>Currently there is little visibility of energy use across the council portfolio and in the significant energy using facilities there there is no visibility of energy use by key areas or processes. Through the use of automatic meter reading (AMR), smart meters and energy submetering it is possible to track and analyse energy use at a more granular level. Energy management software is a powerful tool in the analysis and management of energy where it is possible to identify patterns of use, identify deviations and work toward reduction targets. The use of such tools will become increasingly important in the drive to net zero, for reducing consumption, sustaining savings made, and informing planning and specification of low carbon infrastructure where real world consumption data is key. It is recommended the council rolls out energy sub metering with suitable management software.</p> <p>It has been assumed that savings of 3% of electricity and 5% of gas use could be achieved through the implementation of a sub metering system with energy management software.</p>					

Opportunity ID	Title			Scope																					
Opportunity 3	Oaklands - Convert heating systems from natural gas to electric air source heat pump			1																					
Estimated annual savings			Other savings		ECA/loan eligibility																				
(£)	(kWh)	(tCO ₂)	(£/yr)																						
-£26,457	396,862	40.4																							
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)		NPV																				
£800,000		-30.2	-		-£872,276																				
Description & Assumptions																									
<p>Current boiler peak capacity:</p> <table style="margin-left: 40px;"> <tr> <td>West</td> <td>Wing:</td> <td>250kW,</td> <td>76oC</td> </tr> <tr> <td>North</td> <td></td> <td>Wing:</td> <td>46kW,</td> </tr> <tr> <td>East</td> <td>Wing: 2</td> <td>x</td> <td>260kW</td> <td>=</td> <td>520kW</td> </tr> <tr> <td>Total</td> <td></td> <td>=</td> <td></td> <td></td> <td>826kW</td> </tr> </table> <p>With COP of 2.5 peak electric demand is 330kW</p> <p>Assume use of thermal stores - good space to reuse old boiler oil tank room by east wing boiler house.</p>						West	Wing:	250kW,	76oC	North		Wing:	46kW,	East	Wing: 2	x	260kW	=	520kW	Total		=			826kW
West	Wing:	250kW,	76oC																						
North		Wing:	46kW,																						
East	Wing: 2	x	260kW	=	520kW																				
Total		=			826kW																				

Opportunity ID	Title	Scope
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Opportunity 4	Oaklands - Optimise BMS and other controls			1
Estimated annual savings			Other savings	ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)	
£1,809	69,381	13.2		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£10,000		5.5	-12%	-£3,501
Description & Assumptions	<p>Optimise heating controls.</p> <p>Optimise air conditioning controls. It is assumed that savings of 10% of electricity use by HEVAC and related plant and 10% of gas could be realised. Assume costs of £10,000 are to optimise only, limited capital investment.</p>			

Opportunity ID	Title			Scope
Opportunity 5	Oaklands - Reduce consumption by computing and related IT equipment			2
Estimated annual savings			Other savings	ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)	
£442	2943	0.9		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£20,000		45.3	-56%	-£17,990
Description & Assumptions	<p>Prior to the onset of COVID the typical number of daily occupants in the office was circa 400; going forwards it is anticipated the future occupancy levels will be circa 200.</p> <p>Most desk workstations are equipped with 2 monitors whilst staff have either desktop or laptop computers.</p> <p>The majority of monitors are left on when the desks are unoccupied. There is however the opportunity to reduce energy use by implementing measures as follows:</p> <ul style="list-style-type: none"> a) use of computer energy management software to ensure computers operate in energy saving mode and shut down when left unattended. b) instruct staff / fit power sockets to desks to switch off all power to workstations out of working hours. <p>This assumes that IT and computing power accounts for 20% of site electricity and that 5% savings could be realised.</p>			

Opportunity ID	Title	Scope
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Opportunity 6	Oaklands - Implement onsite solar PV				
Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		
£22,800	152,000	46.7			
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV	
£152,000		6.7	-18%	-£69,438	
Description & Assumptions	<p>Existing system is 28.6kWp Parking space suggests enough space for over 1,000m² of panels. If 2.5m² = 1kWp then enough space for 400kWp.</p> <p>For average summer daily load of circa 1,000kWh, suggest need to expand to capacity to 180kWp (extra 152kWp) in order to minimise summer exports. This means circa 152,000kWh saved pa. Assume £1,000 / kW to install.</p>				

St John's Pavilion

Opportunity ID	Title			Scope	
Opportunity 1	St Johns Pavilion - Remote controls for night storage heating				
Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		
£638	4256	1.3			
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV	
£1,000		1.6	52%	£1,233	
Description & Assumptions	<p>St Johns Pavilion is heated by electric night storage heaters. There is limited control of the heating and being a tenanted building with multiple users it is apparent the heating is left on continuously regardless of occupancy levels.</p> <p>Installing improved controls with remote access will enable better management of the heating system and this could be coordinated with site bookings; this could be a simple system such as Nest, Hive or equivalent. It is assumed 20% of site heating could be saved with better management.</p>				

Opportunity ID	Title			Scope	
Opportunity 2	St Johns Pavilion - convert external lighting to LED with timers / light sensors			2	
Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		

£99	657	0.2		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£250		2.5	21%	£97
Description & Assumptions	Internal lighting has already been converted to LED. Some of the external wall lights are fluorescent and could be converted to LED. 5 units.			

Opportunity ID	Title			Scope	
Opportunity 3	St Johns Pavilion - Install solar thermal heating to supplement existing electric DHW heating				
Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		
£393	2619	0.8			
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV	
£3,500			-26%	-£2,056	
Description & Assumptions	<p>The shower rooms are principally used in the summer season only. The water is heated all year by electric resistance heaters in the hot water tank (calorifier).</p> <p>To reduce electricity consumption there are 2 options: 1. Fit point of use hot water heaters, or 2. Supplement heating with solar thermal heat collectors.</p>				

Sheddingdean Community Centre

Opportunity ID	Title			Scope	
Opportunity 1	Sheddingdean - Convert gas fired warm air heaters to electric air source heat pump			2	
Estimated annual savings			Other savings		ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)		
-£437	9711	1.2			
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV	
£18,000		-41.2	-	-£19,078	

Description & Assumptions	<p>The heating in Sheddingdean Community Centre is provided by 5 x wall mounted gas fired warm air heaters (5.8kW each).</p> <p>It is recommended the heating system in the main hall is replaced by air source heat pump technology such as a multi split system with 2 or 3 ceiling mounted cassettes in the main hall.</p> <p>Small infrared radiant electric heaters could be used in the toilets and storeroom. The kitchen domestic hot water boiler will have to be converted to electric point of use heater.</p>
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Opportunity ID	Title			Scope
Opportunity 2	Sheddingdean - convert lighting to LED with occupancy sensors			1
Estimated annual savings			Other savings	ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)	
£240	1601	0.5		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£1,360		5.7	-13%	-£496
Description & Assumptions	The lighting in Sheddingdean Community Centre is predominantly T8 fluorescent tube technology. This could be upgraded/swapped out to LED equivalent.			

Opportunity ID	Title			Scope
Opportunity 3	Sheddingdean - Convert domestic hot water supply from gas fired boiler to point of use (POU) electric water heaters			
Estimated annual savings			Other savings	ECA/loan eligibility
(£)	(kWh)	(tCO ₂)	(£/yr)	
-£233	-291	-0.3		
Est Capital cost (£)	Est. O&M cost (£/yr)	Simple payback (yrs)	IRR (4 years)	NPV
£2,000		-8.6	-	-£2,758
Description & Assumptions	<p>Domestic hot water in Sheddingdean Community Centre is provided by a 27kW rated domestic hot water boiler.</p> <p>To decarbonise, the facility will have to either fit electric resistance heating to the hot water tank (calorifier) or fit point of use electric water heaters. It is assumed point of use water heaters will be fitted as this will reduce energy losses</p>			

associated with maintaining a continuously heated tank.

The losses are assumed to be 20% in terms of boiler efficiency and radiated heat. A cost of £2,000 is assumed for converting to POU units.

APPENDIX C – NET ZERO DISTRICT MODELLING ASSUMPTIONS

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
Other operational assets	Electricity	Implement energy management system	3%	2022	1	2022	2	1%	0.5%
		Energy sub metering / reporting systems	3%	2022	1	2022	2	1%	0.5%
		Optimize BMS/BEMS control algorithms and setpoints	3%	2022	1	2022	2	1%	0.5%
		On site solar (car park) – Oaklands Offices - Oaklands Road, Oaklands - East Wing Boltro Road. Scaled to proportion of other operational sites.	57%	2023	2	2025	4	1%	0.5%
	Natural gas	Implement energy management system	5%	2022	1	2022	2	1%	-
		Energy sub metering / reporting systems	5%	2022	1	2022	2	1%	-

Site/Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
		Optimize BMS/BEMS control algorithms and setpoints	10%	2022	1	2022	2	1%	-
		Change technology, E.g. boilers to heat pumps	Coefficient performance (COP) 2.5	2022	2	2032	10	1%	-
Halls & community centres	Electricity	Organisation wide - Improve energy management systems / processes	3%	2022	1	2022	2	1%	0.5%
		Energy sub metering / reporting systems	3%	2022	1	2022	2	1%	0.5%
		On site solar (roof top) – Sheddingdean Community Centre Site - Maple Room	-85%	2023	2	2025	4	1%	0.5%

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
	Natural gas	Organisation wide - Improve energy management systems / processes	5%	2022	1	2022	2	1%	-
		Energy sub metering / reporting systems	5%	2022	1	2022	2	1%	-
		Change technology, E.g. boilers to heat pumps	Coefficient performance (COP) 3	2022	2	2032	10	1%	-
Parks & recreational grounds	Electricity	Organisation wide - Improve energy management systems / processes	3%	2022	1	2022	2	1%	0.5%
		Energy sub metering / reporting systems	3%	2022	1	2022	2	1%	0.5%

Site/Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
		Improved heating controls	20%	2022	1	2022	2	1%	0.5%
		On site solar (roof top) – New Pavilion - Mount Noddy Recreation Park St Johns Road East Grinsted. Scaled to proportion of parks & recreational grounds.	4%	2023	2	2025	4	1%	0.5%
Offices	Electricity	Implement energy management system	5%	2022	1	2022	2	1%	0.5%
		Energy sub metering / reporting systems	5%	2022	1	2022	2	1%	0.5%
		Upgrade to lighting to LED with occupancy sensor	25%	2022	2	2024	4	1%	0.5%
		Improve lighting controls - zones, occupancy controls, dimming	10%	2022	1	2022	2	1%	0.5%

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
		Optimise BMS/BEMS control algorithms and setpoints	5%	2022	1	2022	2	1%	0.5%
	Natural gas	Organisation wide - Improve energy management systems / processes	5%	2022	1	2022	2	1%	-
		Energy sub metering / reporting systems	5%	2022	1	2022	2	1%	-
		Change technology, E.g. boilers to heat pumps	Coefficient performance (COP) 2.5	2022	2	2032	10	1%	-
	Waste	Domestic waste prevention and reuse	30%	2022	2	2022	6	1%	-
		90% recycling rate/ 10% incineration. Waste energy heat.	-	2022	2	2022	6	1%	-
Temporary housing	Electricity	Upgrade to lighting to LED with occupancy sensor	25%	2022	2	2024	4	1%	0.5%

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
		Improve window and door sealing	5%	2022	1	2022	2	1%	0.5%
		On site solar (roof top). 33 Mocatta Way, Burgess Hill, RH15 8UR. Scaled to proportion of temporary housing.	49%	2023	2	2025	4	1%	0.5%
	Natural gas	External / internal wall insulation, and loft / roof insulation	10%	2022	1	2022	2	1%	-
		Change technology, E.g. boilers to heat pumps	Coefficient performance (COP) 2.5	2022	18	2022	28	1%	-
Residential	Electricity	Upgrade to lighting to LED with occupancy sensor	25%	2022	2	2024	4	1%	0.5%
		Improve window and door sealing	5%	2022	1	2022	2	1%	0.5%
		On site solar (roof top and car park) – Orchards Shopping Centre.	62%	2023	2	2025	4	1%	0.5%

Site/Site Category	Emissions Source	Modelled Changes	Energy savings (%)	Years applied scenario – 2040 scenario	Years to implement – 2040 scenario	Years applied scenario – 2050 scenario	Years to implement – 2050 scenario	Growth (+% y-o-y)	Efficiency (-% y-o-y)
	Natural gas	External / internal wall insulation, and loft / roof insulation	10%	2022	1	2022	2	1%	-
		Change technology, E.g. boilers to heat pumps	Coefficient performance (COP) 2.5	2022	2	2032	10	1%	-



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MID SUSSEX DISTRICT COUNCIL

Equality Impact Assessment

Title of Strategy: Net Zero Target Policy

Corporate Strategic Policy

Senior Responsible Owner: Assistant Chief Executive

Lead Officers: Sally Blomfield

Date Assessment completed: 20/09/2022

1. SCOPING

1.1 What are the aims of the policy, service/service change or contract?

The policy will set target dates by which the Council and the wider District will be carbon net zero.

The Sustainable Economy Strategy, adopted by the Council in April 2022, included an Action to prepare a Mid Sussex Net Zero Carbon Programme. The starting point for this is to set the target net zero dates.

This Equality Impact Assessment is not for the SES but for the setting of net zero targets, which is one element of the SES.

The Mid Sussex Net Zero Carbon Programme will be subject to their own EIA process and will be reviewed annually as part of the Corporate Equalities Impact Report.

The SES key themes, objectives and actions are aligned to UN Sustainability Goals.

1.2 Who does the service/policy/contract affect? Who are the main customers (internal or external)?

Achieving carbon neutrality can unlock significant economic, social and environmental benefits for all residents and businesses in Mid Sussex. These benefits are related and not mutually exclusive.

Therefore, the policy forms part of the wider Sustainable Economy Strategy (SES). The SES is designed to promote equality of opportunity and diversity to ensure that all groups are able to contribute and benefit from social well-being, environmental protection and sustainable economic growth.

1.3 What equality information is available, including any evidence from engagement and analysis of use of services?

A District wide survey of resident's views and behaviours in relation to climate change. 2,397 responses were received.

The SES is supported by an updated District Profile (2022) which forms the evidence base for the SES. It contains the following equality related information:

Population: Age, gender

Health & Well-Being: Life expectancy, mortality rates, life satisfaction, health indices

Deprivation: Barriers to housing, living environment, education and skills

Fuel Poverty

Unemployment: Age, gender

Employment: Sector, rates of employment

Earnings: Median earnings, gender

Travel to Work

<p>Education & Qualifications Apprenticeships Housing: Affordability Digital Connectivity: Access to superfast broadband Crime Rural Economy: Barriers to housing and access to services</p>
<p>1.4 What does this information tell us about the equality issues associated with the service and implications for the protected groups?</p> <p>The evidence base identifies the requirement (which the SES seeks to deliver) to transition to a low carbon and sustainable economy and infrastructure while unlocking economic, social and environmental benefits for Mid Sussex residents including the protected groups.</p>
<p>1.5 Are contractors or partnerships used to deliver the service? Y/N</p> <p>Yes If No go to section 2. If yes, please refer to the guidance notes for completing impact assessments and complete the next three questions.</p>
<p>Identify the contractors/partnerships used to deliver the service. There are a number of partner organisations and partnerships that will contribute to the delivery of the SES and Net Zero Target Policy. These include: West Sussex County Council Economic Development Team West Sussex County Council Sustainability Team Rural West Sussex Partnership Coastal West Sussex Partnership Experience West Sussex Greater Brighton Economic Board Coast to Capital Local Economic Partnership Chamber of Commerce Chichester College Group Mid Sussex Partnership (and its subgroups) Mid Sussex Voluntary Action Sussex Nature Partnership</p>
<p>What is their contribution to equality in service delivery and the promotion of equality?</p> <p>Public sector bodies are bound by the public sector equality duty contained in the Equality Act and have their own Equality and Diversity Objectives.</p>
<p>How are equality issues addressed through contractual arrangements and service level agreements?</p> <p>There are no direct contractual arrangements in place but some of the partnerships will be governed by SLAs which will contribute to reducing inequality.</p>

2. Assessment of Impact on People with a Protected Characteristic; Analysis and Action Planning

Any gaps in information or provision, opportunities to promote equalities and good relations identified above need to be translated into SMART actions and recorded here. These actions need to be delivered and monitored through the service planning process.

Opportunity to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
Age (older / younger people, children)				
The need to ensure sufficient apprenticeships are delivered to meet demand and to help school leavers develop skills that will enable them to stay in employment in a low carbon economy.	Sustainable Economy Strategy (2022 – 2025): Support and promote access to skills training apprenticeships and career pathways in key sectors, (including digital and creative industries, life sciences, land-based industries, fintech and the <u>green economy</u>) building on the Sussex Chamber of Commerce Local Skills Improvement Plan	Create a Mid Sussex Net Zero Carbon Programme that identifies further actions and timescales to achieve net-zero targets.	Regeneration and Economy Programme Manager	Maintain Mid Sussex's position as the district with the highest proportion of working age residents in West Sussex with Level 4 and Level 3 or equivalent qualifications throughout the Strategy period
Disability (people with physical / sensory impairment or mental disability, including those with a non-visible disability)				
None Identified.	Not applicable	Not applicable	Not applicable	Not applicable
Gender reassignment (a transgender person is someone who proposes to, starts or has completed a process to change his or her gender)				
None Identified.	Not applicable	Not applicable	Not applicable	Not applicable
Pregnancy & maternity (pregnancy is the condition of being pregnant & maternity refers to the period after the birth)				
None identified	Not applicable	Not applicable	Not applicable	Not applicable
Race (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)				
None Identified.	Not applicable	Not applicable	Not applicable	Not applicable
Religion & belief (religious faith or other group with a recognised belief system or not having a religion)				
None Identified.	Not applicable	Not applicable	Not applicable	Not applicable
Sex (male / female non-binary)				

Opportunity to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
None identified	Not applicable	Not applicable	Not applicable	Not applicable
Sexual orientation (lesbian, gay, bisexual, queer, questioning, heterosexual)				
None identified.	Not applicable	Not applicable	Not applicable	Not applicable
Marriage & civil partnership (marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognised for same-sex couples)				
None Identified.	Not applicable	Not applicable	Not applicable	Not applicable
Military families /veterans				
None identified	Not applicable	Not applicable	Not applicable	Note applicable
People who are disadvantaged by socio-economic factors such as low incomes, skill or living in a deprived area				
<p>The need to achieve carbon net zero by the agreed target date while unlocking significant economic, social and environmental benefits for all residents.</p> <p>The need to ensure local residents have the opportunity to acquire the necessary skills and apprenticeship opportunities to secure good quality jobs in a low carbon economy.</p> <p>The need to improve the economic wellbeing of our residents to reduce the number of residents in income and employment deprivation and fuel poverty.</p>	<p>Sustainable Economy Strategy (2022 – 2025):</p> <p>Utilise Green Home Grant funding to improve the energy efficiency of the most inefficient homes in the District. We will utilise Energy Performance Certificate (EPC) data to proactively engage with the lowest “F” and “G” EPC rated homes to maximise the reduction of carbon emissions.</p> <p>Develop a network of Community Hubs, including support for the establishment of Sustainable Food Partnerships.</p> <p>Adopt a Social Value and</p>	<p>Create a Mid Sussex Net Zero Carbon Programme that identifies further actions and timescales to achieve net-zero targets.</p>	<p>Assistant Director Planning Policy and Sustainable Economy</p> <p>Regeneration and Economy Programme Manager</p> <p>Head of Communications, PR and Community Engagement</p>	<p>Maintain employment rate above 78% in all quarters</p> <p>Increase employment rate to 83%</p> <p>Increase job density from 0.80 per working age resident to 0.85 per working age resident</p> <p>Increase Mid Sussex hourly workplace earnings from 87% to 93% of the district’s residents’ hourly amongst workers in Mid Sussex</p> <p>Maintain Mid Sussex’s position as the district with the highest proportion of working age residents in West Sussex with Level 4 and Level 3 or equivalent qualifications throughout the Strategy period</p>

Opportunity to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
	<p>Sustainability Charter to ensure that there is a commitment to support economic, environmental and social improvements from Council suppliers and contractors.</p> <p>Implement the Micro Business Grant Scheme, ensuring grant awards target businesses which can demonstrate a commitment to sustainability and green innovation.</p> <p>Promote sustainable travel options and initiatives, including green travel plans, to businesses, schools and residents.</p> <p>Co-ordinate and promote advice to help local small businesses to improve the sustainability of their organisations via delivery of a programme of Low Carbon SME support, funded through the Economic Recovery Fund.</p>			<p>Reduce the number of Lower-layer Super Output Areas that are in the top third of most deprived local areas in England by the Income domain from one to zero</p> <p>Reduce the number of areas in Mid Sussex (LSOAs) that are in the top third of most deprived local areas in England by the Employment domain from one to zero</p> <p>Maintain the Mid Sussex Life Satisfaction Score within the top two Districts/ Boroughs in West Sussex</p> <p>Reduce the carbon emissions of 20% of the districts most inefficient homes (within the SES period).</p>

Opportunity to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
	Partner with businesses and 3rd Sector organisations in the district to help them create their own net-zero carbon programme.			
People who live in a rural area				
The need to address affordable fuel options in rural communities, increase sustainable travel options and provide sustainable infrastructure while protecting biodiversity.	<p>Sustainable Economy Strategy (2022 – 2025):</p> <p>Work in collaboration with West Sussex County Council to promote rural bus networks connecting the district’s rural communities.</p> <p>Use the Council’s contracts to encourage procurement of goods and services from local SMEs and third sector organisations.</p> <p>Secure a Council-wide cultural and behavioural shift towards sustainable travel, through a range of measures including developing active travel plans; delivering Electric Vehicle (EV) charging points on the Council’s</p>	Create a Mid Sussex Net Zero Carbon Programme that identifies further actions and timescales to achieve net-zero targets.	<p>Assistant Director Planning Policy and Sustainable Economy</p> <p>Assistant Director Contracts & Services</p>	<p>Increase in EV charging points from 23.7 per 100,000 population to 38.8 per 100,000 population or above the England rate</p> <p>Increase the number of LULEV registered vehicles from 1,234 (23.2% of the West Sussex total) to 25% of the West Sussex total</p> <p>Reduce the carbon emissions of 20% of the districts most inefficient homes (within the SES period).</p> <p>Biodiversity net gain secured through the planning system (% to be agreed through the District Plan Review)</p>

Opportunity to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
	<p>campus; and changing Council fleet vehicles.</p> <p>Increase the number of electric vehicle charging points across the District via the West Sussex Electric Vehicle Partnership delivering a network of chargers that meets demand.</p> <p>Identify and agree a range of sustainable transport projects in the District's three towns to promote sustainable transport options for residents and businesses.</p> <p>Utilise Green Home Grant funding to improve the energy efficiency of the most inefficient homes in the District. We will utilise Energy Performance Certificate (EPC) data to proactively engage with the lowest "F" and "G" EPC rated homes to maximise the reduction of carbon emissions.</p> <p>Ensure that new development and land</p>			

Opportunity to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
	<p>management demonstrates significant improvements to biodiversity and nature recovery by developing and implementing policies in the District Plan Review (including Biodiversity Net Gain) and working with stakeholders to implement the Local Nature Recovery Strategy (subject to secondary legislation).</p> <p>Refresh the management plans for the Council's countryside sites to ensure they deliver maximum benefit in terms of biodiversity and environmental impact.</p> <p>Build on the success of local rewilding initiatives to oversee a managed and incremental growth in the proportion of Council-owned land managed for biodiversity under the national BLUE campaign.</p> <p>Set out how MSDC will allocate resources to meet the strengthened biodiversity duty contained</p>			

Opportunity to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
	<p>in the Environment Act 2021. Begin by contracting a consultant to deliver a short-term, desk-based natural capital mapping of Mid Sussex, that will form the basis for a Mid Sussex nature recovery network utilising WSCC's project mapping tool to ensure coherence.</p> <p>Implement a 1-2-3 collection trial, including food waste, across 3,000 homes and prepare for the new statutory responsibilities that will arise from the government's Resources and Waste Strategy.</p>			

3. Mid Sussex District Council Equality Impact Assessment Summary

Key Findings	Future Actions
<ul style="list-style-type: none"> • The main protected groups under the Equality Act with a differential impact under the SES and Net Zero Target Policy are: • Age: specifically young residents in terms of education and skills • People disadvantaged by socio-economic factors: specifically, residents without the skills and opportunity to secure high value employment and residents living in income and employment deprivation and fuel poverty. • People who live in a rural area: specifically residents that might struggle to access low carbon infrastructure. 	<ul style="list-style-type: none"> • The Net Zero Target Policy (as part of the SES) is designed to promote equality of opportunity to ensure that all groups are able to contribute and benefit from sustainable economic growth. • This includes the main protected groups with a differential impact under the SES that this impact analysis has identified. • The SES includes an action to create a Mid Sussex Net Zero Carbon Programme and measures of success and progress will be regularly reviewed. • The Mid Sussex Net Zero Carbon Programme will be subject to their own EIA process and will be reviewed annually as part of the Corporate Equalities Impact Report. • The key actions under the main protected groups are as follows: • Age: Support and promote access to skills training apprenticeships and career pathways including in a low carbon economy. • People disadvantaged by socio-economic factors (e.g., fuel poverty): Promote initiatives which reduce barriers and help individuals into work in a low carbon economy. • People who live in a rural area: strive to provide access to affordable fuel options in rural communities, sustainable travel options and sustainable infrastructure.

4. Signing off this assessment and action plan

Person undertaking the assessment:

Signature:

Sally Blomfield

Assistant Director Planning and Sustainable Economy

Date: 23 September 2022

Signature:

Judy Holmes

Deputy Chief Executive

Date: 26 September 2022

Please send your completed impact assessment to Neal Barton for publication on the website.

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