

COUNCIL

13 DECEMBER 2023



5 December 2023

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, 13TH DECEMBER, 2023** 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 be agreed by general affirmation the Minutes of the previous meeting held on 20 September 2023. | 5 - 12 |
| 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. | District Plan 2021-2039 - Regulation 19. | 13 - 854 |

Working together for a better Mid Sussex



8. Treasury Management Strategy Statement and Annual Investment Strategy 2024/25 to 2026/27. **855 - 898**
9. Recommendations from Cabinet held on 13 November 2023. **899 - 900**
10. To receive the Leader's Report.
11. Report of Cabinet Members, including questions pursuant to Council Procedure Rule 10.1
12. Questions from Members pursuant to Council Procedure Rule 10.2

To: **Members of Council:** Councillors R Jackson (Chairman), J Henwood (Vice-Chair), M Avery, A Bashar, R Bates, J Belsey, M Belsey, A Bennett, K Berggreen, P Brown, G Casella, L Carvalho, P Chapman, C Cherry, R Clarke, AM Cooke, M Cornish, J Dabell, J Edwards, D Eggleton, R Eggleston, S Ellis, A Eves, L Farren, I Gibson, S Hatton, S Hicks, J Hitchcock, T Hussain, C Hobbs, M Kennedy, P Kenny, J Knight, P Lucraft, G Marsh, M Miah, J Mockford, D Pascoe, A Peacock, A Platts, E Prescott, C Phillips, A Rees, J Russell, D Sweatman, R Whittaker, C Wood and G Zeidler

Minutes of a meeting of Council held on 20 September 2023 from 7.00 pm

Present: R Jackson (Chairman)
J Henwood (Vice-Chair)

A Bashar	J Dabell	J Knight
R Bates	J Edwards	P Lucraft
J Belsey	R Eggleston	M Miah
M Belsey	A Eves	J Mockford
A Bennett	L Farren	D Pascoe
K Berggreen	I Gibson	E Prescott
G Casella	S Hatton	C Phillips
L Carvalho	S Hicks	A Rees
P Chapman	J Hitchcock	J Russell
C Cherry	T Hussain	R Whittaker
R Clarke	C Hobbs	C Wood
AM Cooke	M Kennedy	G Zeidler
M Cornish	P Kenny	

Absent: Councillors M Avery, P Brown, D Eggleton, S Ellis, G Marsh,
A Peacock, A Platts and D Sweatman

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.

Question from Mr Kenward – presented in his absence.

A recent Freedom of Information request revealed that there is a substantial amount of Section 106 money that was gained as a result of the property developments on Perrymount Road in Haywards Heath that is still unused and remains available. These contributions are to support community and social infrastructure. Will any of this money along with the existing money that was originally set aside for Clair Hall in 2019 that hopefully still remains unused be allocated to any successful community group looking to refurbish and re-open the venue.

The following response was provided by the Cabinet Member for Finance, Revenues and Benefits

S106 monies have indeed been secured from the development along Perrymount Road for a whole range of infrastructure. £68,038 was secured for 'Clair Hall or replacement building.'

This money is still available for the Clair Hall site.

Question from Mr Lewis

Following approval of the SA13 south of folders Lane development by MSDC. Planning committee I would like to ask that if the Chair, as others on the committee, SHOULD be impartial and make decisions based on clear planning guidelines and not any other potential risk such as legal challenge, why did the chair deem it appropriate to direct members towards approval by strongly directing them that if it was rejected it would leave the council open to possible appeal with all the costs associated with that in effect pressurising members to vote one way based on his personal view?

The following response was provided by Monitoring Officer

The Council has no role to consider questions on decisions which it has made in its various regulatory roles, as it cannot change a decision once it is made. The question which has been raised does, however seek clarity on the role of Chairman - particularly in the Council's regulatory committees- which, in the interests of transparency, should be addressed.

Planning Committee has a regulatory role which it must carry out within tightly defined statutory, policy and established legal principles. The role of the Chairman is to ensure debate on an item which is before the committee remains relevant to the matters which are properly within the scope of the committee to consider. This can include chairing the debate and providing summary or concluding remarks before a vote.

The Chairman will also seek advice for the committee from officers (in addition to that set out in the report), and at appropriate points during the debate, again to ensure that the committee is considering those matters which are relevant to the decision being made.

It is entirely proper that a committee is made aware of the potential consequences of a decision which it is to make, and this is an approach which has been approved by the Courts. The relevant planning considerations are set out in the officer's report and in the advice those officers give at the committee. The purpose of the committee is to determine the weight to be given to those considerations and, in doing so, determine whether planning permission should be granted.

I have watched the meeting and I have no concerns. The Chairman acted appropriately and was very careful to indicate that if the Committee wished to reject the application it had to do so based on material planning considerations. This is correct as a matter of law. The reference to the appeal decision merely emphasised the consequences of failing to do so.

Supplementary Question from Mr Lewis

If that was deemed appropriate, why was no such direction given to a smaller development DM21/3875 in Haywards Heath which was rejected despite similar objections that were raised for SA13? There was no mention of legal consequences of a rejection on that albeit smaller development.

The Monitoring Officer agreed to provide a written response.

3. TO BE AGREED BY GENERAL AFFIRMATION THE MINUTES OF THE PREVIOUS MEETING HELD ON 26 JULY 2023.

The minutes of the last meeting were agreed as a correct record and signed by the Chairman.

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

Councillor Russell declared an interest in Motion B as she is the West Sussex County Council Cabinet Member for Children, Young People, Learning and Skills.

Councillor Gibson declared an interest regarding Agenda item 11 as he is a West Sussex County Councillor.

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 recent engagements and announced that collection boxes are available for Members to take and distribute in support of his chosen charity Winston's Wish. He also confirmed plans for a Civic Service to be held in December 2023.

7. RECOMMENDATIONS FROM CABINET HELD ON 11 SEPTEMBER 2023.

Councillor Eggleston moved the item noting that despite experiencing inflationary pressures to the budget, the Council has benefited from a significant increase in treasury management income due to an increase in interest rates.

The item was seconded by Councillor Bennett.

The Chairman took Members to a vote on the recommendation as set out in the report which was approved unanimously.

RESOLVED

That Council approves that the balance of interest (including additional Dividend income) totalling £715,000 is transferred to the General Reserve and set aside to support the forecast budget gap in 2024/25.

8. STANDARDS COMMITTEE ANNUAL REPORT.

Councillor Cornish moved the item, which was seconded by Councillor Wood.

The Chairman took Members to a vote on the recommendation as set out in the report which was approved unanimously.

RESOLVED

Council noted the contents of the report.

9. TO RECEIVE THE LEADER'S REPORT.

The Council received the Leader's update. In response to a question on initiatives to support local traders in Burgess Hill, he noted that the most significant steps taken are recent activities to encourage that the redevelopment of the Martlet's Shopping Centre is brought forward by New River Retail before the current planning permission expires.

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

The Council received the Deputy Leader and Cabinet Member for Communities and Communications update during which she agreed to circulate details of the Council's current work as signatories to the Armed Forces Covenant.

The Council received the Cabinet Member for Finance, Revenues and Benefits update. In response to questions on Clair Hall she agreed to consider the request for suitable parking provision and confirmed that the Clair Hall site remains an asset of Mid Sussex District Council.

The Council received the Cabinet Member for Leisure and Customer Services update. In response to a question related to the East Grinstead Sports Council he confirmed that a positive meeting had taken place with discussions around the ambitions for the site. The Cabinet Member also responded to a number of questions related to the maintenance of parks, paths and playgrounds, acknowledging that the new contract for maintenance of these areas will bring many benefits in the long term. He confirmed that a report setting out the plan for the next 10 years re investment across park areas will be brought to a Cabinet meeting in October. In response to specific queries over the state of maintenance at several parks and paths in Burgess Hill, the Cabinet Member agreed to provide a written response.

He also responded to a question related to the food waste trial, confirming that there is a need to consider recent Government announcements, the outcome of the detail associated with the implementation of the Environment Act and assessment by West Sussex County Council before the trial could be considered for expansion to a District wide scheme. Regarding comments around an increase in the number of people becoming homeless, he acknowledged the variety of factors affecting this including mortgage repossession, the cost of living and increased pressure on temporary accommodation.

The Council received the Cabinet Member for Sustainable Economy and Housing update during which he agreed to provide a link to the work carried out by Beam (an organisation supporting people in danger of becoming homeless) in the next Member Information Bulletin.

11. MOTIONS ON NOTICE.

Motion A – Active Travel

Councillor Cornish proposed the motion, setting out many positive benefits of prioritising the movement of people using sustainable transport modes. This was seconded by Councillor Eves who noted that supporting the delivery of a multi-function route is referenced in the District Plan under policy DP7.

Members debated the motion. Discussion was held on a variety of areas including the need for a cycle route between Haywards Heath and Burgess Hill, the need to accommodate those walking, and equestrian routes, a link through to Gatwick, and the need to balance any changes with those travelling by car so unintended traffic issues are not created. Members broadly supported the motion and acknowledged that the Highways Authority at West Sussex County Council was the delivering authority for active travel.

The Chairman took Members to a vote on the motion as set out in the agenda which was approved unanimously.

RESOLVED

This Council,

Recognising, as declared in its Net Zero Carbon Emissions Report prepared for Council by Ricardo in September 2022, that vehicular transport accounts for 36% of all carbon emissions in this district;

Noting that 46% of short trips in towns and cities should be walked, wheeled or cycled by 2025 (Active Travel England 2023-2025);

Having declared, in Objective 6 of its Sustainable Economic Strategy, that it will “promote sustainable travel options and initiatives, including green travel plans, to businesses, schools and residents;”

Recognising that modal shift is essential to reduce carbon emissions and to ease congestion and air pollution, and that people are far more likely to use bicycles if cyclists are as far as possible separated from main roads, making walking, wheeling and cycling an attractive choice for everyday trips;

Noting that a multifunctional network to facilitate active travel between Haywards Heath and Burgess Hill is included in the Site Allocations - Development Plan Document under section SA37: “The Council continues to support the delivery of a dedicated multifunctional network, within the lifetime of this plan and will work with key stakeholders to ensure opportunities to deliver the scheme are prioritised and maximised”.

Recalling the report commissioned by MSDC: BH-HH Greenways Options Appraisal by CJ Founds: <https://burgesshill.net/images/msdc-pnc-options-appraisal-report-v04.pdf> and noting that, of the 16 routes identified, 12 were found to be unfeasible, and the remaining four depended on agreement with a private landowner through which part of the route may have to pass;

Noting that a secondary school is being built between the two towns for 900 pupils and 70 staff, with cycling/walking access available from the south but not from Haywards Heath;

Recalling that a Local Cycling and Walking Infrastructure Plan (LCWIP) study, ref 05136 by PJA, was signed off on 7th March 2023;

1. Asks MSDC's Leader to write to WSCC to urge them to work with developers, as part of the District Plan review, to identify on-site and financial contributions to deliver active travel routes between towns, and connecting towns to villages;
2. Asks MSDC's Leader to report back to MSDC Full Council on the response from WSCC;
3. Commits to participate in the forthcoming WSCC Active Travel Strategy Consultation taking account of the foregoing studies.
4. Urges Members and residents to contribute to the eight-week WSCC Active Travel Strategy Consultation.
5. Encourages landowners to engage with Highways Authority and Planning Authority to make land available to deliver sustainable travel opportunities, such as the routes between Burgess Hill and Haywards Heath.

Motion B – Support for West Sussex Care Leavers

Councillor Russell proposed the motion, highlighting the need for strong collaboration between Districts, Boroughs and wider community sectors to ease the issues faced by children when leaving care. She acknowledged the positive partnership projects that are already underway and supported by Mid Sussex District Council such as the West Sussex House Project and the project team to remodel the West Sussex offer for 16 to 25 year olds in terms of a supported accommodation. The motion was seconded by Councillor J Belsey.

Members debated the motion. Discussion was held on areas including the progress made by the County Council in this subject over recent years, the role of 'Corporate Parent' and the wish for further training on this for District Councillors, and a request for the Care Leavers Board to speak with District Councillors about the work they do. Personal experience was shared on the importance of the opportunities for care leavers, as well as the work that Beam carry out within the District. A suggestion was raised around the potential of having a District Council Care Leavers Champion.

The Chairman took Members to a vote on the motion as set out in the agenda which was approved unanimously.

RESOLVED

The Care Leavers service in West Sussex supports young people to exit care successfully as they move towards independence, and operates under a clear legislative framework provided by the Children (Leaving Care) Act 2000 and the Children and Social Work Act 2017.

The most recent Children and Young People's Scrutiny Committee held on the 13th September 2023, included a paper on 'Leaving Care in West Sussex' which was in direct response to the recent comments in the full inspection by Ofsted back in March 2023 with respect to meeting the needs of care leavers.

The Children and Social Work Act 2017 introduces corporate parenting principles which comprise seven needs that local authorities in England must have regard to. The West Sussex Care Leavers service and increasingly our partners, operate in line with these principles which centre around the promotion of physical and mental

health and wellbeing of those children and young people; to encourage those children and young people to express their views and to take those views into account; to help children and young people gain access to and make the best use of services provided by the local authority and its relevant partners; to promote high aspirations and seek to secure the best outcomes for those children and young people; for those children and young people to be safe and have stability in their homelives, relationships and in education or work, and ultimately to prepare those children and young people for adulthood and independent living.

Whilst it is accepted that corporate parenting is not the statutory responsibility of the District Council, as District Councillors we should acknowledge that we are all corporate parents, particularly given that the West Sussex House Project Partnership Agreement was recently signed by all seven of the District and Borough Council partners, endorsing this view.

But as Mid Sussex District Councillors, we could be the first to go further and support the further aspirations of the West Sussex Care Leaver service through initiatives such as;

- Providing a shopfront facing community base for our Care Leavers – providing a communal space to meet, laundry facility, life skills, WiFi and a place to meet Leaving Care Personal Advisors
- Linking to the above objective, a space for the County Council's Youth Emotional Support Service for meeting with children from across the county.
- To offer free access to local gym/leisure centre/swimming pool to support young people's health and wellbeing.
- An apprenticeship or work-based opportunity provided by the District and Borough for any Care Leaver who wanted to explore this as an alternative Employment Education and Training option.

This Council therefore calls upon the Leader and Cabinet to instruct officers to explore these initiatives, by engaging directly with the West Sussex Care Leavers Service, to proactively help the service move towards Good and onto Outstanding status through the implementation of these initiatives for the benefit of our young people leaving care.

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

None.

The meeting finished at 8.29 pm

Chairman

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DISTRICT PLAN 2021-2039 – REGULATION 19

REPORT OF: Deputy Chief Executive – Judy Holmes
Contact Officer: Sally Blomfield, Assistant Director - Planning & Sustainable Economy
Sally.Blomfield@midsussex.gov.uk
Andrew Marsh, Head of Planning Policy and Housing Enabling
Andrew.Marsh@midsussex.gov.uk
Wards Affected: All
Key Decision: Yes
Report to: Council
13th December 2023

Purpose of Report

1. The purpose of this report is to ask Council to consider the submission draft District Plan (Regulation 19) and supporting material. The draft District Plan (Regulation 18) has been amended following consideration of the representations made following consultation in November/December 2022, updates to the evidence base, the outcomes of the cross-party Members Working Group meetings, further engagement with Town and Parish Councils and recommendations from the Scrutiny Committee for Place and Environment. The submission draft District Plan is attached at **Appendix A**.

Summary

2. This report:
 - Summarises the purpose of the submission draft District Plan and the work carried out in its preparation.
 - Outlines the outcomes of the additional work that has taken place since public consultation (Regulation 18).
 - Sets out the amendments that have been made to the draft District Plan as a result of consultation and the additional engagement.
 - Sets out the amendments that have been made to the draft District Plan following consideration by the Scrutiny Committee for Place and Environment on the 22nd November 2023.
 - Outlines the next steps towards Regulation 19 stage and beyond.

Recommendations

3. **Following consideration by the Scrutiny Committee for Place and Environment on the 22nd November 2023, Council are recommended to:**
 - (i) **Consider and comment on the submission draft District Plan (attached in Appendix A) and supporting documentation including the Sustainability Appraisal, Habitats Regulations Assessment, the Equalities Impact Assessment and the Community Involvement Plan (attached in Appendices C to F);**
 - (ii) **Approves the submission draft District Plan, along with all supporting documentation, for six-weeks public consultation starting on 12 January 2024;**

- (iii) **Agree that, after the conclusion of the public consultation, the submission draft District Plan, along with supporting documentation and all the representations (including those to all the supporting documentation), is submitted to the Secretary of State for examination;**
 - (iv) **Authorises the Assistant Director Planning and Sustainable Economy, in consultation with the Leader as the appropriate Cabinet Member, to make any necessary minor typographical and factual changes to the submission draft District Plan prior to public consultation; and**
 - (v) **Authorises the Assistant Director Planning and Sustainable Economy, in consultation with the Leader as the appropriate Cabinet Member, to suggest any necessary modifications to the submission draft District Plan during the examination process to help secure its soundness (pending further public consultation as required).**
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Background

Why prepare a Plan?

4. The Mid Sussex District Plan 2014 – 2031 was adopted in March 2018. The adopted District Plan contained a commitment (policy DP4: Housing) to start a review of the Plan in 2021.
5. The planning system should be plan-led, in accordance with the National Planning Policy Framework (NPPF). An up-to-date District Plan should be in place to provide a positive vision for the future and address housing needs and other economic, social and environmental policies. An up-to-date plan means that the Council can:
 - demonstrate that it can meet its housing need and identify deliverable sites sufficient to provide 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 development. When the Council did not have an adopted Plan, this resulted in over 3,000 unplanned homes being approved, at a cost of £720k to the taxpayer at appeal attempting to prevent speculative development;
 - impose policy requirements to ensure sites deliver site-specific mitigation, infrastructure and facilities required to support housing development;
 - provide certainty and ensure statutory providers know where, when and how much development will be delivered;
 - place full weight on its policies when determining planning applications.
6. The importance of plan-making was emphasised in the recent appeal decision at Land south of Henfield Road, Albourne. In concluding that the Council currently has a five-year supply of housing, the Inspector noted that the Council approaches the issue of housing in a positive and proactive manner and that the plan-making process is positive and continuing to progress. This provided the Inspector with confidence that housing delivery will persist as planned and was a sound basis for the five-year supply position put forward by the Council. The appeal decision can be found at planninginspectorate.gov.uk

Work to Date

7. The review of the District Plan started in 2021. This involved a 'Call for Sites' and evidence base gathering. The first formal stage of plan-making is to prepare and consult on a draft plan, known as the Regulation 18 stage. Following a recommendation made by Scrutiny Committee, Council approved the draft District Plan for Regulation 18 consultation at its meeting on 2 November 2022, with a six-week consultation taking place between 7 November and 19 December 2022.
8. At its meeting on 15 March 2023, Scrutiny Committee for Planning, Economic Growth and Net Zero noted the comments received during the Regulation 18 consultation and the additional work required ahead of the Regulation 19 consultation. The Committee Report (see Background Papers) included a Summary of Consultation Responses. The report also set out a summary of the next steps required including further work on the evidence base; assessment of evidence submitted in support of omission sites and review of the sites in the light of this; review of proposed allocations and policies in light of responses; and agreement to continue to work with infrastructure providers and neighbouring authorities.
9. At this meeting, Scrutiny Committee noted the next steps but also recommended that the cross-party Members Working Group was reconvened to review the work outlined above and that further engagement be carried out with Town and Parish Councils.
10. As a result of this additional work and engagement, the draft District Plan has been revised. The revised version of the District Plan is known as the "submission draft District Plan" also known as Regulation 19. Subject to Council approval, this version of the Plan will be subjected to a further six-week consultation after which it will be submitted to the Secretary of State for examination.
11. Scrutiny Committee for Place and Environment met on 22 November 2023 to consider the content of the submission draft District Plan, Sustainability Appraisal, Habitats Regulations Assessment, Equalities Impact Assessment and Community Involvement Plan. The Committee unanimously recommended to Council that these documents should be published for Regulation 19 consultation subject to some minor but important amendments. These are set out below in paragraphs 48-50.
12. This report provides Council with details of the work that has taken place since Regulation 18, how the District Plan has been revised as a result and sets out the next steps.

The Implications of the Levelling Up and Regeneration Act

13. The Government introduced a Levelling Up and Regeneration Bill to Parliament in May 2022. This received Royal Assent on 26th October 2023 thus becoming the "Levelling Up and Regeneration Act" (LURA).
14. The Act proposes changes to the planning system including a new system for plan making. However, this will require secondary legislation, change to national policy and new guidance. It is not expected that these will be in place until the end of 2024. This means there is significant uncertainty on the content, timing and implications of secondary legislation, national policy, and guidance.

15. For Local Plans currently in progress such as this submission draft District Plan, transitional arrangements are in place. These plans are submitted under the current planning system until 30 June 2025, and they must be adopted by 31 December 2026. It is anticipated that the submission District Plan will be submitted in spring 2024 and adopted by the end of 2024 and will be fully compliant with the transitional arrangements.
16. The Government has urged local authorities to continue plan-making, and currently 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. Given this and the need for secondary legislation and changes to national policy and guidance before the new planning arrangements are in place it is crucial that the Council continues to submit the District Plan for examination.
17. As a separate matter, the Government consulted on its “Levelling-up and Regeneration Bill: reforms to national planning policy” between December 2022 – March 2023. This related to an interim update to National Planning Policy ahead of the new system coming into force. As yet the Government has not provided a response to the “Levelling-up and Regeneration Bill: reforms to national planning policy” consultation.
18. A revised NPPF was published in September 2023 however the only policy amendment related to on-shore windfarms. It was anticipated that a revised NPPF would be published in November 2023 that deals with the remaining proposed amendments, however this has not yet been published. An update will be provided to Council should this occur ahead of its meeting. Any amendments would take effect immediately save for any transitional arrangements.
19. A number of respondents to the Regulation 18 draft Plan suggested that the Standard Method would no longer be mandatory in the light of possible changes to government policy, and that taking an alternative approach would lead to a reduced housing requirement. It is important to note that the consultation did not suggest amendments to the Standard Method formula, and the recently enacted Levelling-up and Regeneration Act (October 2023) does not amend or remove it.
20. Current National Policy and Planning Practice Guidance (PPG) is clear that whilst the Standard Methodology is not mandatory, deviation is only permitted in exceptional circumstances. Whilst no such examples are provided in current guidance, the LURB Consultation suggested that these may be confined to instances such as “islands with a higher percentage of elderly residents or university towns with an above-average proportion of students”. The evidence base supporting the submission draft District Plan concludes there are no such exceptional circumstances for Mid Sussex. Whilst the Council has lobbied for alternative population projection data to be used in the Standard Method calculation, this is still not supported in current policy or guidance. We are not aware of any Councils that have successfully argued exceptional circumstances resulting in a reduction in their housing number post-examination.
21. The Government has reiterated its intention to deliver 300,000 homes per year nationally in light of the pressing requirement for new homes and urges authorities to continue with plan-making to achieve this. Given this and the proposals set out in the consultation, it is not expected that Mid Sussex housing need will significantly change. At this stage, the Council must continue to prepare the District Plan on the basis of the current Standard Method figure.

Outcomes from Regulation 18 Consultation

22. At its meeting on 15 March 2023 the Scrutiny Committee for Planning, Economic Growth and Net Zero considered the responses to the Regulation 18 consultation. (See background papers). A total of 2,881 comments were received from 1,365 respondents during the Regulation 18 consultation. This includes responses from Town and Parish Councils, neighbouring authorities, infrastructure providers, individuals, developers, site promoters and organisations/action groups. All consultation responses received were published in full on the Council's website at www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-plan-review.
23. All of the comments have been carefully considered and many have led to proposed changes which are included in the submission draft District Plan. A track change version of the submission draft District Plan and an Appendix detailing the Council's response to representations were considered by Scrutiny Committee for Place and Environment on 22 November 2023 (see Background Papers).

Members' Working Group – Role and Outcomes

24. At its meeting on 28 June 2023, Scrutiny Committee for Place and Environment established a cross-party, politically balanced Members' Working Group for the Regulation 19 stage. The objectives of the Working Group are set out in the Terms of Reference agreed by the Committee (see Background Papers).
25. The Working Group met on two occasions, including a full day. Members of the Working Group were provided with an opportunity to submit comments in writing for consideration by officers. For transparency, the work of the group was observed by other interested Members, including Cabinet Members.
26. With respect to the Working Groups review of Policies, the submission draft District Plan incorporates suggestions by the Members Working Group including:
 - Additions and amendments to policy wording to provide clarity.
 - Additions to supporting text to the Policies to provide further detail, and explanation to justify policy content.
 - Additional supporting text in the Infrastructure chapter to more clearly explain the Council's role and responsibilities in securing infrastructure delivery.
27. With respect to the sites that were not allocated in the draft Plan and the new sites promoted to the Council during the consultation, the Working Group reviewed the sites in the context of the representations, site selection criteria and the evidence base supporting the Plan. The Working Group considered the sites proposed for allocation, including proposed wording changes. No proposed site allocations were suggested for removal and no additional housing sites were proposed for allocation.

Town and Parish Council Engagement – Role and Outcomes

28. At its meeting on 26 July 2023, Council resolved to positively engage with Town and Parish Councils prior to the Regulation 19 consultation.

29. A series of meetings with Town and Parish Councils and Ward Councillors with sites proposed for allocation in their area were held during September and October 2023. The purpose of these meetings was to discuss issues raised by the Town and Parish Council during the Regulation 18 consultation and to seek views on proposed on-site and off-site infrastructure that would accompany the proposed sites, particularly focusing on Local Community Infrastructure. The Town and Parish Councils and Ward Councillors were provided with an opportunity to shape the policy requirements for each site, and to input into the Infrastructure Delivery Plan.
30. The meetings form the starting point for ongoing engagement. As a result of the initial meetings, further meetings have taken place with Bolney, Hurstpierpoint & Sayers Common, Albourne and Twineham parishes. Further sessions will continue to be held to support Parishes where requested.
31. This engagement with Town and Parish Councils and Ward Councillors has been valuable in shaping the submission draft District Plan and Infrastructure Delivery Plan. Important amendments have been made to site allocation policy wording to reflect local knowledge such as strengthening policy requirements and mitigation for sites and refining the infrastructure requirements. This will ensure that growth is supported by the necessary infrastructure to address local needs.

Further Evidence Work – Update

32. The report to Scrutiny Committee on 15 March 2023 (paragraph 50) set out a series of evidence base updates that would take place ahead of Regulation 19 stage. An update on these is provided below:

Transport

33. The submission draft District Plan is supported by the Mid Sussex Transport Study. The role of the Transport Study is to document assessment of the impact of development proposals in the Plan using the approved transport model, testing the proposals against a baseline ‘reference case’ (which includes current traffic levels and growth already permitted, for example planning permissions and allocations in the adopted District Plan and Neighbourhood Plans as well as neighbouring areas). In accordance with the NPPF, development should only be prevented or refused on highways grounds where the additional impact of proposals in the submission draft District Plan would lead to a ‘severe’ impact on the road network.
34. The transport model and report were produced by transport consultants SYSTRA in accordance with good practice as set out in the Department for Transport’s (DfT) transport analysis guidance. The model was validated by West Sussex Council (the Highways Authority) and has been developed in close co-operation with them and National Highways.
35. The transport modelling and reporting is an iterative process which evolves during production of the plan. At Regulation 18, the transport modelling identified 10 junctions which could potentially lead to a ‘severe’ impact on the network as a result of proposed allocations. Further work has taken place to investigate whether these severe impacts could be mitigated and the transport modelling updated as follows:
 - Updating the reference case to include new permissions and mitigations approved since Regulation 18;

- Updated the modelling in line with the West Sussex Local Transport Plan and latest guidance on transport modelling, adopted since Regulation 18 consultation including taking account of matters such as increased home working and the effects of providing schools on the significant sites.
36. As a result, the transport model has been re-run and the summary results of this work have been published – see Background Papers. The results are positive and show a reduction in the number of ‘severe’ impacts to only three junctions:
- **N8: B2110/B2028 Turners Hill.** Only 1 arm of 4 is impacted in the AM peak.
 - **C7: A272/B2036.** Only 1 arm of 3 is impacted in the PM peak.
 - **S8: A273/B2116 Hassocks.** Only 1 arm of 4 is impacted in the AM peak.
37. Whilst the current transport model indicates there are potential ‘severe’ impacts at these junctions, the impacts are within the reasonable limits of capacity, and it is therefore considered that these impacts could be addressed through a combination of sustainable travel measures and highway mitigation. These results are not sufficiently severe for development to be resisted. Additionally, there is no evidence to suggest the impacts at these junctions are related to any one site, it is likely reflective of overall growth and potential re-routing.
38. Initial indications suggest that as a result of congestion at the Hickstead junction, drivers are seeking alternative routes onto more minor roads initially through Stonepound Crossroads to the south and Ansty to the north and joining the A23 elsewhere. The same is considered to be happening at Turners Hill where traffic is re-routing away from the congested A22/ A264 corridor.
39. Advice from WSCC, in line with the adopted Transport Plan, is that once the impacts of proposed sustainable mitigation measures have been taken into account in the modelling, including those proposed by the Significant Sites (DPSC1 – DPSC3), any necessary highway mitigation should be focused on the Major Road Network (MRN).
40. Focusing physical highway improvements on the MRN may involve delivering capacity improvements at Hickstead, over the more minor routes of Ansty and Stonepound Crossroads to ensure traffic is encouraged along the MRN instead. Similarly, any necessary mitigation to address impacts at Turners Hill should focus on the A22/A264 corridor at the MRN. This route is currently the focus of a capacity and safety study led by Surrey and West Sussex County Council Highway Authorities to determine a package of strategic measures to address issues associated with highway congestion and improved safety.
41. As the submission draft District Plan progresses towards examination work will continue to refine this position and identify any necessary mitigation. Overseen by West Sussex County Council and with National Highways input, further work will take place to:
- Determine the impacts of sustainable mitigation, informed by detailed evidence work with the Significant Site promoters (DPSC1 – DPSC3) which looks at active and sustainable travel proposals to reduce reliance on car-based journeys.
 - Better understand the impacts of re-routing and determining the most appropriate location and measures for highway mitigation to encourage traffic along MRN away from more minor routes.

42. At this stage, there are no indications that the remaining severe impacts cannot be mitigated or that the proposals should not proceed to Regulation 19.

Sustainability Appraisal and Habitats Regulations Assessment

43. It is a legal requirement for the District Plan to be accompanied by a Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment) and a Habitats Regulations Assessment (HRA).
44. The SA and HRA are iterative, with updates published at each formal stage. The draft District Plan was accompanied by SA and HRA at Regulation 18 stage which were both considered by Scrutiny Committee and Council. Comments were invited during the consultation. These comments have informed updated versions of the SA and HRA.
45. The SA assesses all reasonable alternative options (for strategy, policies and sites) against sustainability criteria. The SA at Regulation 18 concluded that the draft District Plan was sustainable given all reasonable alternatives. As a result of the consultation responses, assessment of reasonable alternatives and changes made to the Plan since Regulation 18, the SA has been updated to accompany the Regulation 19 District Plan.
46. As a result of the consultation responses and changes made to the Plan, the Regulation 19 Habitats Regulations Assessment report also draws the same conclusions as the Regulation 18 HRA in that there are no significant impacts arising from the Plan.
47. The Regulation 19 SA (Appendix B) and HRA (Appendix C) are attached to this report and will be subject to consultation alongside the submission draft District Plan.

Recommendations from Scrutiny Committee for Place and Environment – 22 November 2023

48. Scrutiny Committee for Place and Environment considered the submission draft District Plan, draft Sustainability Appraisal, draft Habitats Regulations Assessment, Community Involvement Plan and Equalities Impact Assessment at its meeting on 22 November 2023.
49. The Committee report included a track-change version of the submission draft District Plan which highlighted the proposed changes made to the plan since Regulation 18. The changes were informed by the representations received during consultation, evidence base updates, and the work of the Members Working Group and Town and Parish engagement sessions. It also considered further amendments to policies **DPN1: Biodiversity, Geodiversity and Nature Recovery** and **DPT4: Parking and Electric Vehicle Charging Infrastructure** which were circulated ahead of the meeting. As a result of the debate, the Committee proposed additional amendments. All significant changes to the submission draft District Plan following publication for Scrutiny Committee are summarised below.
- **DPN1: Biodiversity, Geodiversity and Nature Recovery.** Text has been inserted to footnote 14 of the policy which refers to examples of biodiversity features that must be incorporated into new developments. Additional text has been included post-Scrutiny Committee, as agreed during the discussion at Committee, which adds a reference to dormouse boxes and more clarity regarding provision of swift boxes.

- **DPT4: Parking and Electric Vehicle Charging Infrastructure.** Additional wording has been included within the supporting text to clarify that Building Regulations require all new residential buildings with associated parking to have access to electric vehicle charging points.
- **DPN4: Trees, Woodland and Hedgerows.** This policy refers to the use of buffer zones. It requires development to be positioned at least 15m from Ancient Woodland. National Planning Policy is clear that development resulting in the loss of Ancient Woodland should be refused unless there are wholly exceptional circumstances however it does not provide any policy on development within the buffer zone. Additional supporting text has been provided to clarify the position related to development within the buffer zone, this is in accordance with standing advice provided by Natural England.
- **DPI5: Open Space, Sport and Recreational Facilities.** A reference to allotments has been re-inserted in the opening paragraph of this policy for clarity.

50. In addition to these amendments, the submission draft District Plan at Appendix A also addresses any typographical/factual amendments identified since the version considered by Scrutiny Committee.

Submission Draft District Plan (Regulation 19)

51. The submission draft District Plan (Regulation 19) is at **Appendix A**. A track-changes version showing the changes made since the Regulation 18 consultation is available on the Council's website (see the link to the Scrutiny Committee Report of 22 November included in the Background Papers).
52. A summary of the content, and key changes since Regulation 18, are set out in the following sections.

Plan Strategy

53. Council considered the Plan Strategy at its meeting on 2nd November 2022. (See Background Papers). In the report it was explained that it was necessary to review the adopted District Plan strategy which focuses development at the three towns (Burgess Hill, East Grinstead and Haywards Heath) with proportionate growth at other settlements.
54. When reviewing the adopted strategy, it became clear that it would not be possible to continue with this strategy given the availability and suitability of sites in the Strategic Housing and Economic Land Availability Assessment (SHELAA), increased housing requirement, and the extended plan period to 2039. A revised Plan Strategy, to guide locations for growth to meet local needs, is therefore required.
55. The revised Plan Strategy is set out in Chapter 6 of the submission draft District Plan. It is based on four themes:
- **Protection of the High Weald Area of Outstanding Natural Beauty;**
 - **Making Effective Use of Land;**
 - **Growth at existing sustainable settlements where it continues to be sustainable to do so;**
 - **Opportunities for extensions to improve the sustainability of existing settlements.**

56. Responses received during the Regulation 18 consultation, particularly from Town and Parish Councils, suggested that the change in strategy and rationale for doing so had not been made clear. Therefore, this was discussed in detail with the Members Working Group and engagement sessions with affected Town and Parish Councils and Ward Councillors. As a result of these discussion additional text is now provided in the submission draft District Plan to add clarity to the new Plan Strategy.

Housing Need

57. The NPPF (paragraph 11) 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. The starting point for determining housing need is a formula-based approach set out in national policy, known as the Standard Method.

Housing Need – Standard Method

58. The Standard Method confirms a housing need of **1,090 dwellings per annum** which totals **19,620 for the plan period 2021 – 2039**. This figure has reduced since the Regulation 18 was published (previously 1,119 dwellings per annum) due to updated affordability data which the Government has published since Regulation 18.
59. The plan periods for the adopted District Plan (2014 – 2031) and draft Plan (2021 – 2039) overlap, most of the housing need has already been planned for because it is already allocated (in the adopted District Plan, Site Allocations Development Plan Document and ‘made’ Neighbourhood Plans) or has planning permission. In addition, completions in this plan period to date (2021/22 and 2022/23) reduce the amount of housing we need to plan for.
60. Therefore, to meet Mid Sussex housing needs up to 2039, an additional **7,459** dwellings need to be found, see the table below.

Total Mid Sussex Need 2021 to 2039	19,620
Completions 2021/22	1,187
Completions 2022/23	1,053
Commitments (existing permissions, plus allocations within the adopted District Plan, Sites DPD and Neighbourhood Plans)	9,921
Total Supply	12,161
Residual “To Find” in District Plan 2021 - 2039	7,459

Table 1

Meeting Housing Need

61. Paragraph 20 of the NPPF emphasises the need to ensure that the housing supply includes a variety of different sites such as small, medium and large to ensure we are supporting the Government’s objective of significantly boosting the supply of homes and to make sufficient provision for housing, looking ahead over a minimum 15-year period from adoption (i.e. to 2039). This is to provide certainty to meet need, and to plan for long-term requirements such as infrastructure.

62. Paragraph 68 requires that local planning authorities have a clear understanding of land available in their area through the preparation of a Strategic Housing and Employment Land Availability Assessment (SHELAA). 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.

63. The draft District Plan at regulation 18 stage set out a series of site allocations to meet this need. All consultation responses received on these sites have been carefully considered against the evidence base and the conclusions reached reviewed. The sites were also discussed by the Members' Working Group. As a result, it is not proposed to change the sites proposed for allocation compared to those within the draft District Plan.

64. The draft District Plan included:

Sustainable Communities – these included 'Significant Sites' (e.g. over 1,000 dwellings) that provide on-site services and facilities such as education, health, retail, employment, community buildings and open space. The Significant Sites are the most sustainable way of providing development with the required infrastructure, as well as benefitting existing communities. Development to create Sustainable Communities reflects the Plan Strategy objectives for "*Growth at existing sustainable settlements where it continues to be sustainable to do so*" and "*Opportunities for extensions to improve the sustainability of existing settlements.*"

- **Housing Site Allocations** – additional housing site allocations ranging from 8 to 350 dwellings.

65. During engagement, Hurstpierpoint & Sayers Common, Albourne and Twineham Parish Councils raised concern that the draft District Plan did not clearly set out how the collection of sites proposed at Sayers Common would meet the "*Opportunities for extensions to improve the sustainability of existing settlements*" element of the Plan Strategy and that these sites should be considered collectively in terms of masterplanning, securing and delivering cohesive infrastructure, and sustainability.

66. In response to this, and to recognise the contribution that all the sites in Sayers Common will make towards growing a sustainable community in accordance with the Plan Strategy, it is proposed to place all the sites proposed at Sayers Common within the Sustainable Communities section of the plan. This enables them to now be supplemented by an overarching "Vision and Objectives for sustainable growth at Sayers Common".

67. As a result of this change the table of sites proposed within the submission draft District Plan are now shown as follows:

Sustainable Communities		
Policy Ref ¹	Site	Yield to 2039
DPSC1	Land to the West of Burgess Hill and North of Hurstpierpoint	1,350

¹ Note: as a result of the changes set out in paragraphs 61-62, this has led to a change to the Policy reference numbers for site allocations compared to the Regulation 18 version of the District Plan.

DPSC2	Land at Crabbet Park	1,500
DPSC3	Land to the south of Reeds Lane, Sayers Common	1,850
DPSC4	Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common	33
DPSC5	Land at Coombe Farm, London Road, Sayers Common	210
DPSC6	Land to the West of Kings Business Centre, Reeds Lane, Sayers Common	100
DPSC7	Land at LVS Hassocks, London Road, Sayers Common	200
Total		5,243

Table 2

Housing Site Allocations		
Policy Ref	Site	Yield to 2039
DPA1	Batchellor's Farm, Keymer Road, Burgess Hill	33
DPA2	Land south of Apple Tree Close, Janes Lane ² , Burgess Hill	25
DPA3	Burgess Hill Station	300
DPA4	Land of West Hoathly Road, East Grinstead	45
DPA5	Land at Hurstwood Lane, Haywards Heath	36
DPA6	Land at junction of Hurstwood Lane and Colwell Lane, Haywards Heath	30
DPA7	Land east of Borde Hill Lane, Haywards Heath	60
DPA8	Orchards Shopping Centre, Haywards Heath	100
DPA9	Land to west of Turners Hill Road, Crawley Down	350
DPA10	Hurst Farm, Turners Hill Road, Crawley Down	37
DPA11	Land rear of 2 Hurst Road, Hassocks	25
DPA12	Land west of Kemps, Hurstpierpoint	90
DPA13	The Paddocks, Lewes Road, Ashurst Wood	8
DPA14	Land at Foxhole Farm, Bolney	200
DPA15	Ham Lane Farm House, Ham Lane, Scaynes Hill	30
DPA16	Land at Ansty Fields and rear of Challoners, Ansty	30
DPA17	Land to the west of Marwick Close, Bolney Road. Ansty	45
Total		1,444

Table 3

68. Whilst the proposed sites are unchanged since Regulation 18, changes have been made to their yield, due to additional evidence work carried out by the Site Promoters.

- **DPSC1: West of Burgess Hill and North of Hurstpierpoint.** This site was proposed for 1,400 dwellings at Regulation 18 stage. As a result of detailed landscape led masterplanning by the site promoter, the yield has reduced to 1,350.
- **DPA16: Land at Ansty Fields and rear of Challoners, Ansty.** This site was proposed for 37 dwellings at Regulation 18 stage. The site promoter has now suggested a revised boundary for the site which has resulted in a reduced yield to 30 dwellings.

² At Regulation 18 stage this site was known as "Hillbrow"

DPA3: Burgess Hill Station and DPA3a: Nightingale Lane Allotments.

69. The draft District Plan included an allocation at Burgess Hill Station (DPH7, now DPA3) for a comprehensive development scheme including 300 dwellings, mixed use development and relocated station entrance and multi-modal transport hub to create a gateway to Burgess Hill. This builds on the Mid Sussex Local Plan (2004) and Burgess Hill Neighbourhood Plan (2016) allocations at this site.
70. Approximately 0.85ha of the 3.5ha site contains the Chantonbury Road allotments, with 63 pitches of various sizes. This land is owned by Network Rail and leased to Burgess Hill Town Council, however the allotments do not have statutory status and the lease can be terminated with a year's notice.
71. At Regulation 18, policy DPH7 (now DPA3) included the requirement to "secure the provision of an equal number of allotments in Burgess Hill in line with policy DPI5: Open Space, Sport and Recreation Facilities". This obligation would need to be met at planning application stage.
72. To strengthen this position and to secure the allotment provision longer-term, the Council (as landowner) has identified a site for alternative provision at Nightingale Lane which is in the Council's ownership. The site is 0.15ha larger than the Chantonbury Road allotment site which provides an opportunity to increase allotment provision at the town. These allotments would be statutory, securing its long-term future.
73. The site has been included in the submission draft District Plan as policy DPA3a: Nightingale Meadows Allotments. A change has also been made to DPA3: Burgess Hill Station to strengthen the requirement for re-provision to require that the re-provided allotments at Nightingale Meadows must be operational before any redevelopment can occur on the Chantonbury Road allotment site.
74. It is recognised that this site is within the Burgess Hill Green Circle. However, at 1ha, it is only approximately 6% of the Land south of Nightingale Lane portion of the Green Circle and only 0.7% of the Green Circle in its entirety, it does not impact on the principle of the Green Circle to create an accessible, multi-functional circle around the town. Allotments are considered Green Infrastructure and provide access to nature, health and wellbeing, nature recovery and climate change mitigation. Policy requirements have been included in DPA3a to ensure that the allotment re-provision is sympathetic to its surroundings and supports the principles of DPN3: Green and Blue Infrastructure.

Consideration of Alternative Site options: 'Omission' and 'New Sites'

75. To determine the most suitable and sustainable sites for allocation, a Site Selection Methodology was established (see Background Papers). This is based on the same methodology used for the adopted District Plan and Site Allocations DPD and developed in consultation with Town and Parish Councils, neighbouring authorities and the Mid Sussex Developer Liaison Group. The methodology was overseen by the Members Working Group at the Regulation 18 stage.

- 76. A total of 260 sites which had been promoted to the Council were assessed against the Site Selection Methodology at the Regulation 18 stage, with the results of the assessment published within the 'Site Selection: Conclusions' report. During the Regulation 18 consultation, responses were received from representatives of 56 sites who objected to their site being rejected for allocation, and therefore querying the conclusions reached, these are referred to as 'omission sites'. In addition, nine new sites not previously known to the Council were submitted for consideration.
- 77. The assessments for the 56 omission sites have been revisited in light of the comments received and evidence submitted by site promoters during the consultation. In some instances, this has led to an amendment in scoring against one or more of the assessment criteria. However, none of the amendments support a change to the overall conclusion and these sites remain rejected for allocation when considered against all criteria as a whole.
- 78. The nine new sites have been assessed against the Site Selection Methodology and Sustainability Appraisal. None of the nine new sites are considered to be suitable for allocation and therefore are rejected.
- 79. The result of this exercise was shared with the Members Working Group. In conclusion, there is no justification for allocating any of the Omission or New sites following careful consideration against the evidence base and Site Selection criteria.
- 80. The Site Selection: Conclusions paper (see Background Papers) has been re-published to include the re-assessment of omission sites, assessments of the newly promoted sites, and the Council's response to the issues raised during consultation. The changes made to site assessments are clearly set out within this report.

Housing Supply: Conclusion

- 81. As a result of the allocations in the Plan, policy DPH1: Housing sets out the updated position with regards to housing supply. It demonstrates that the Council can meet its identified housing need with an over-supply of 996. This will be necessary for resilience to ensure that housing need will still be met should site yields reduce, or sites are removed, following consultation and examination by the Planning Inspector. The same approach was taken when preparing the adopted Site Allocations DPD.

Sustainable Communities Sites DPSC1 – DPSC7	5,243
Housing Sites DPA1 – DPA17	1,444
Windfall Allowance	1,768
Total Housing Supply 2021 – 2039	8,455
Residual "To Find" in District Plan 2021 - 2039	7,459
Total Over-Supply for resilience and Unmet Need	996

Table 4

Duty to Co-Operate: Unmet Need

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

- Horsham District Council
83. There is also an overlap with the Coastal West Sussex HMA (which includes Brighton & Hove) in the southern part of the district.
84. Both Crawley and Horsham are in the process of reviewing their Local Plans. Crawley submitted their Crawley Local Plan 2024-2040 for examination in July 2023, their first examination hearing sessions commenced on 21st November 2023. The submitted plan shows an unmet housing need of approximately 7,050 dwellings. Horsham are progressing their Local Plan Review to a similar timescale as this Council, with Regulation 19 to be published for consultation in January 2024 subject to Council approval in December.
85. In July 2023, the three NWSHMA authorities agreed two Statements of Common Ground (SoCG) – the Northern West Sussex SoCG dealing with all strategic matters, and a Northern West Sussex Housing Needs SoCG focussing on housing matters. The Housing Needs SoCG confirms a priority order, based on the evidence base, for assisting with unmet need if they can meet their own need and have capacity to meet the needs of the other areas in the Housing Market Area(s).
- **Priority 1:** Northern West Sussex HMA
 - **Priority 2:** Coastal West Sussex HMA
 - **Priority 3:** Other adjacent and nearby HMAs where it is justified by each individual authority.
86. The Housing Needs SoCG also confirms an agreed approach to site selection across the HMA. This considers sustainability, environmental constraints and infrastructure constraints. The Mid Sussex Site Selection Process fully accords with this agreed approach, the SoCG confirms broad cross-authority support for the principles underpinning site assessments.
87. The suitability of sites for inclusion in the District Plan is led by the site selection process and performance against the agreed Site Selection Methodology and accompanying evidence base (including Sustainability Appraisal, Air Quality assessment and Transport modelling). Application of the methodology results in an over-supply of 996 dwellings which provides resilience through the plan-making process, this has increased from 302 set out in the draft District Plan.
88. Any provision over and above meeting Mid Sussex housing need firstly serves as a contribution towards unmet need arising in the Northern West Sussex HMA in accordance with the agreed priority order. The Council will continue to engage with the Northern West Sussex authorities on this strategic matter as plans progress towards adoption, and with all other neighbouring authorities and prescribed bodies, in order to satisfy its obligations under the Duty to Co-Operate.

Policies

Site Allocation Policies

89. All site allocations are accompanied by policy requirements that set out the infrastructure required to accompany the development (both on-site and off-site), mitigations expected, and further evidence required to support a planning application.

90. Consultation responses received during Regulation 18 identified additional mitigation requirements and other suggested changes to policy wording. In addition, the Members Working Group suggested wording changes to improve robustness and consistency and to reflect local knowledge. Ongoing engagement with Town and Parish Councils and Ward Councillors provided further advice to assist in strengthening policies and identified local infrastructure needs necessary to accompany planned growth.
91. All suggestions have been carefully considered and where feasible and justified by evidence have been incorporated into the submission draft District Plan at Appendix A.

Other Development Management Policies

92. The draft District Plan contained 58 planning policies that, on adoption, will be used in the determination of planning applications. Over 800 comments were submitted in relation to these policies during the Regulation 18 consultation.
93. All comments received have been reviewed and, where appropriate, have informed the policy wording in the submission draft District Plan. This has included strengthening policy requirements, making minor wording adjustments to improve clarity and robustness, amendments to reflect changes in the evidence base or national policy since the draft District Plan was published, to reflect suggestions from statutory consultees (such as Natural England and the Environment Agency) and advice from the Council's Kings Counsel.
94. The Members Working Group considered the proposed amendments to Development Management policies. In particular, the Working Group focussed on the following policies which have significantly changed since Regulation 18:
 - **DPS1: Climate Change** and **DPS2: Sustainable Design and Construction** – these policies have been amended to reflect the findings of the Ricardo Sustainability Study which was commissioned in 2023. Both have been strengthened to support reduction in greenhouse gas emissions, increase resilience to climate change and to improve sustainability.
 - **DPI1: Infrastructure Provision** – this policy has been significantly amended to better reflect the requirements set out in the accompanying Infrastructure Delivery Plan, strengthening wording to reflect national guidance regarding viability and to support co-location of services and joint delivery of infrastructure (also known as the 'dig once' approach).
 - **DPI2: Planning Obligations** – this policy has been significantly amended to make clear the statutory tests for securing infrastructure and the types of infrastructure that will be required to support development supported by a detailed appendix to the Plan setting out the contributions required.
95. A new policy is proposed in the submission draft District Plan. **DPS5: Water Neutrality** has been added to reflect the ongoing Water Neutrality issue arising in the Sussex North water supply zone which covers the majority of neighbouring Crawley and Horsham districts. A small part of Mid Sussex (in the Twineham area) falls within this zone. No development is planned in this area. The affected authorities have produced a joint strategy to address water neutrality, and this includes drafting a joint policy for inclusion in emerging Local Plans. **DPS5: Water Neutrality** reflects the joint policy and has been included for consistency.

96. The District Council adopted Supplementary Planning Documents (SPDs) to provide supplementary guidance on a range of matters including the District Wide Design Guide; the Town Centre Masterplans; Affordable Housing; Development and Infrastructure and Development Viability. As a result of changes to National Policy and Guidance, it has been necessary to transpose the guidance set out in the Development and Infrastructure SPD and Development Viability SPD into the submission draft District Plan. Upon adoption of the District Plan, these two SPDs will therefore have been superseded and will subsequently be revoked. The LURA sets out the government's intention to eventually replace SPD with Supplementary Documents which will have the same status as the District Plan when making planning decisions.
97. No evidence was provided during the Regulation 18 consultation to justify removal of any development management policies. However, in response to comments and to improve readability, all requirements in draft policy "DPH4: General Principles for Housing Allocations" have now been included under individual site allocations policies and **DPSC-GEN: General Principles for Sustainable Communities**.

Infrastructure

98. To ensure development is supported by the necessary infrastructure, the submission draft District Plan is accompanied by an Infrastructure Delivery Plan (IDP). This sets out the types of on-site and off-site infrastructure required and indicative costs, based on ongoing collaboration and engagement with infrastructure providers. The housing site policies in the District Plan also set out the on-site and off-site infrastructure requirements for each site, which are based on the IDP.
99. The IDP has been updated since Regulation 18 to reflect ongoing engagement with infrastructure providers, site promoters and Town and Parish Councils. Town and Parish Councils and Ward Councillors were provided with the opportunity to set out their local infrastructure needs so that these could be reflected in site allocation policies and the accompanying IDP. Where possible, these suggestions have been included in the IDP and are listed in an appendix to the IDP. Further engagement will continue between the Council, site promoters and Town and Parish Councils on this matter. In addition, there is active engagement with Crawley Borough Council regarding cumulative and cross-boundary impacts and infrastructure requirements for the proposed site at Crabbet Park (DPSC2).
100. The IDP is an organic document which will evolve between now and submission of the Plan for examination. It is intended to maintain a live IDP so that it reflects any changes to infrastructure demand and need in the future.

Conclusions

101. The Council must only submit a Plan to the Secretary of State for examination when it believes it has a sound plan that meets all legal requirements.
102. Officers are confident that the submission draft District Plan has been prepared in accordance with all legal requirements. This includes the Duty to Co-operate, statutory consultation in accordance with the adopted Statement of Community Involvement, prepared in general accordance with the Local Development Scheme and accompanied by a full and robust evidence base (including Sustainability Appraisal and Habitats Regulations Assessment).
103. The Plan will be examined against the Tests of Soundness set out in the NPPF:

- **Positively Prepared:** the submission draft District Plan sets out a strategy to meet the district's housing need in full, meets other needs, and makes a contribution towards unmet need arising in the Northern West Sussex Housing Market Area in accordance with agreed Statements of Common Ground.
- **Justified:** the submission draft District Plan proposes an appropriate strategy which has been considered against alternatives and is accompanied by a full and robust evidence base.
- **Effective:** the submission draft District Plan is deliverable over the plan period as set out in the evidence base, and is based on effective joint working with neighbouring authorities and statutory bodies. Additional Statements of Common Ground will be prepared ahead of submission to set out the effective processes and outcomes reached.
- **Consistent with national policy:** the content of the submission draft District Plan enables delivery of sustainable development in accordance with the policies in the NPPF and other statements of national policy and guidance.

104. Subject to Council approval, and Regulation 19 consultation, Officers are confident that the submission draft District Plan is sound and compliant with legal requirements and therefore should be submitted to the Secretary of State for examination.

Next Steps

105. Subject to Council approval, the submission draft District Plan will be subject to a 6-week consultation commencing on 12th January 2024 in accordance with the approach set out in the Community Involvement Plan (Appendix E). Although the Regulation 18 consultation is about helping to shape the content and scope of the District Plan, the Regulation 19 submission draft District Plan is the version of the Plan that the Council believes meets legal requirements and is 'sound' in accordance with the Tests of Soundness set out in National Planning Policy Framework (and above in paragraph 103). As such there is limited scope at this stage of the plan-making process to influence the content of the Plan, and responses at this stage must focus on whether the Plan meets legal and soundness tests set out in National Planning Policy. Further detail is set out in the CIP.
106. Responses received will be collated by the District Council and submitted to the independent Inspector appointed by the Secretary of State alongside the submission District Plan, statutory documentation, and full evidence base. At Regulation 19, responses must follow the format required by the Planning Inspectorate and be framed around the Tests of Soundness and legal compliance. More details are provided in the CIP. Following consultation, it is anticipated that Submission will take place in April 2024.
107. The Council's approach to consultation is set out in the Statement of Community Involvement (SCI), which is a 'code of practice' for how the council will engage in planning processes. The SCI can be viewed at <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/#topic-the-statement-of-community-involvement>

108. The SCI commits the Council to prepare a 'Community Involvement Plan' for all planning policy documents. The Community Involvement Plan sets out how the document will be produced, how and when community involvement will take place and what happens to the results of community involvement. There are a number of statutory actions which the Council must take at this stage, and these are identified in the list below. However, in line with the SCI, the Council goes further than these statutory requirements. The consultation methods include:
- Press release;
 - Email alert to subscribers to the Planning Policy alert list and those who made a response at Regulation 18;
 - Social media;
 - Documentation available on Council website including an on-line response form (A Statutory Requirement);
 - The publication of an interactive document and Policies Map;
 - Hard copies of documents available at the district's libraries, District, Town and Parish Council offices and help points (A Statutory Requirement);
 - Letters or emails to specific consultation bodies (statutory consultees) and to other organisations listed in the Community Involvement Plan (A Statutory Requirement);
 - All District and Town and Parish Council briefings, as well as individual briefings where requested;
109. Examination of the District Plan commences upon Submission. The Planning Inspectorate will appoint the Inspector, who will hold examination hearings in public. The timescale for this is dependent on the Planning Inspectorate, however it is anticipated that the hearing sessions will take place in summer/autumn 2024. Following the close of the hearings, the Inspector will write their report. Subject to the Inspector finding the District Plan sound and legally compliant, the Council will be recommended to adopt the District Plan. It will then have full weight in decision making.

Policy Context

110. The review (and subsequent update) of the District Plan is a corporate priority identified within the Corporate Plan and Budget 2023/24 and Service Plan for Planning and Sustainable Economy. It aligns with the Council's priorities for Sustainable Economic Growth and Strong and Resilient Communities.

Other Options Considered

111. 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 maintain a five-year supply and to implement a plan-led approach to development leading to unwanted speculative development. There is potential for development to be brought forward on appeal, without delivering the benefits set out in Plan (such as infrastructure provision, site-specific mitigation or meeting proposed sustainability standards).

Financial Implications

112. Preparation of the District Plan review and update is funded by a specific reserve, as agreed in the Corporate Plan and Budget 2023/24. 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.

Risk Management Implications

113. 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 policies would be deemed out-of-date and could not be used when determining planning applications.
114. Implications associated with the recent Levelling-up and Regeneration Act and potential changes to the planning system have been set out in paragraphs 12-20 above.

Equality and Customer Service Implications

115. An Equality Impact Assessment has been prepared to ensure opportunities to promote equality and/or barriers to service are considered and addressed. This is at Appendix D.

Other Material Implications

116. There are no other material implications.

Sustainability Implications

117. The submission draft District Plan (Section 3) outlines the sustainability considerations taken into account during the drafting, which includes alignment with the UN Sustainable Development Goals and national policy requirements related to social, economic and environmental impacts.
118. The site selection process includes sustainability criteria, including the rejection of sites that would not contribute to sustainable development. The submission draft District Plan includes a range of sustainability policies. 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 as sustainable as possible given all reasonable alternatives.

Appendices

- Appendix A – Submission Draft District Plan (Regulation 19)
Appendix B – Sustainability Appraisal (SA)
Appendix C – Habitats Regulations Assessment (HRA)
Appendix D – Equalities Impact Assessment (EQIA)
Appendix E – Community Involvement Plan (CIP)

Background Papers

[District Plan 2021-2039: Evidence Base](#)

[Site Allocations Evidence Library](#) (note: this will be maintained and updated between now and the examination)

Previous Reports:

[Scrutiny Committee – 5 October 2022](#): Strategy and Non-Housing Site Policies.

[Scrutiny Committee – 18 October 2022](#): Consultation Draft District Plan (Regulation 18)

[Council – 2 November 2022](#): Consultation Draft District Plan (Regulation 18)

[Scrutiny Committee – 15 March 2023](#): Summary of Responses to the Regulation 18 Consultation.

[Scrutiny Committee - 28th June 2023](#): Establishment of a Members Working Group

[Scrutiny Committee – 22 November 2023](#): Submission Draft District Plan (Regulation 19)

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Mid Sussex District Plan 2021 - 2039

Submission Draft (Regulation 19)

Council - 13th December 2023

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 District Plan 2021 – 2039 contains an updated vision, strategy, site allocations and policies and will supersede the 2018 District Plan upon its adoption. Site allocations within the 2018 District Plan, Site Allocations DPD (2022) and Neighbourhood Plans which have not yet been completed will remain part of the Council's land supply and contribute towards meeting the housing need identified within this Plan.

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 September 2023) 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).

The 2018 District Plan is now more than 5 years old. However, it 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”.

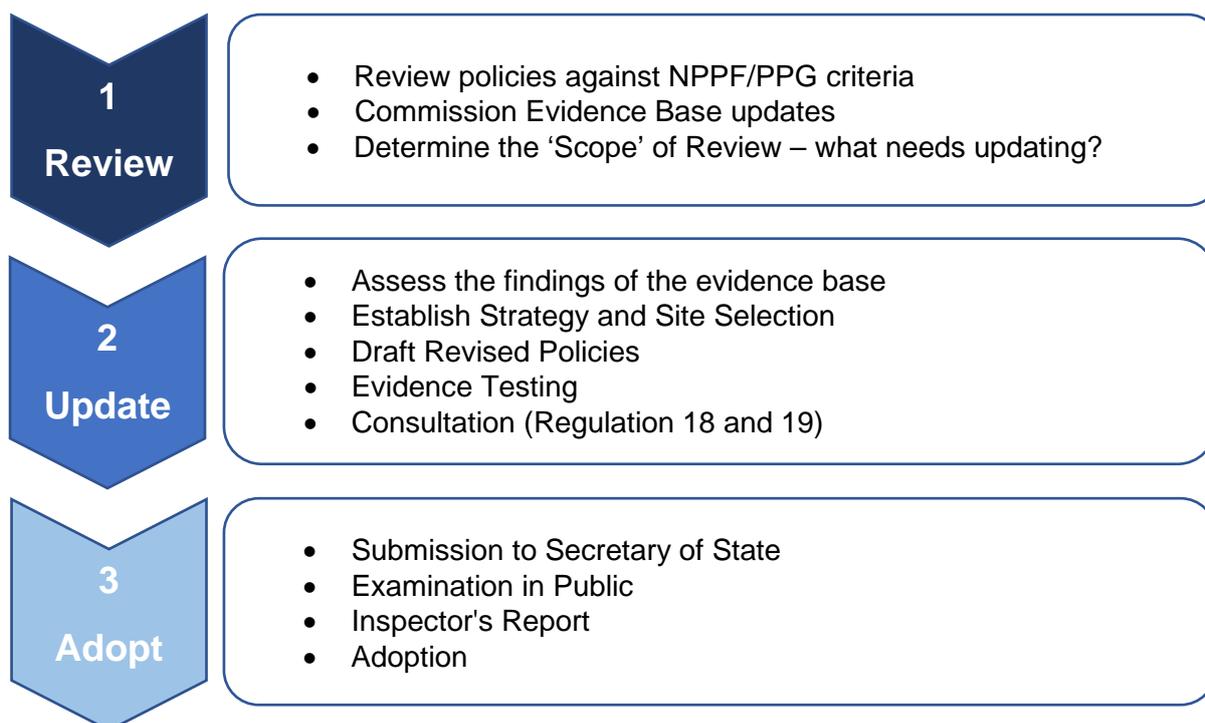
In reviewing plans, the NPPF states that the following needs to be considered:

- 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 2018 District Plan

All 2018 District Plan 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 District Plan 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 2018 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 Submission Draft (Regulation 19) District Plan and will be subject to stakeholder consultation in accordance with the regulations and the Council's adopted Statement of Community Involvement. It also takes into account comments made to the draft District Plan (Regulations 18) which was published for consultation in November 2022.

3. Adoption

Following the Regulation 19 consultation period 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 comprise the following: ¹

- Mid Sussex District Plan 2021 – 2039
- Saved policies in the District Plan 2014 - 2031 (2018)
- Saved policies in the Site Allocations Development Plan Document (2022)
- Saved policies in the Small Scale Site Allocations Development Plan Document (2008)
- Saved policies in the Local Plan (2004)
- Supplementary Planning Documents – full list available at www.midsussex.gov.uk/SPDS
- Made Neighbourhood Plans – full list available at www.midsussex.gov.uk/NeighbourhoodPlans
- West Sussex Joint Minerals Local Plan (2021) (adopted by the County Council)
- West Sussex Waste Local Plan (2014) (adopted by the County Council)

¹ Saved policies are listed in Chapter 18

2. Background

Mid Sussex Context

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

The district contains three towns – Burgess Hill, East Grinstead and Haywards Heath, which account 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. This reflects 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 District Plan area 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 has been 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.

The three North West Sussex Housing Market Area authorities have agreed two Statements of Common Ground (SoCG) – the Northern West Sussex SoCG and a Northern West Sussex Housing Needs SoCG. The Housing Needs SoCG confirms a priority order for assisting with the unmet need should an authority have the ability to do so after meeting their own needs.

- Priority 1: Northern West Sussex HMA
- Priority 2: Coastal West Sussex HMA
- Priority 3: Other adjacent and nearby HMAs where it is justified by each individual authority.

Sussex Coast

The south of the district (south of Burgess Hill) overlaps with the Sussex Coast HMA and FEMA which consist 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.
- 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, September 2023) 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 interconnected 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 Special Area of Conservation).
- 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 Sustainable Drainage DPS5: Water Neutrality DPS6: Health and Wellbeing
Natural Environment and Green Infrastructure	DPN1: Biodiversity, Geodiversity and Nature Recovery DPN2: Biodiversity Net Gain DPN3: Green and Blue 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 DPB4: Aerodrome Safeguarding Requirements (Air Safety)

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	DPT1: Placemaking and Connectivity DPT2: Rights of Way and Other Recreational Routes DPT3: Active and Sustainable Travel DPT4: Parking and Electric Vehicle Charging Infrastructure DPT5: Off-Airport Car Parking
Economy	DPE1: Sustainable Economic Development DPE2: Existing Employment Sites DPE3: Employment Allocations DPE4: Town and Village Centre Development DPE5: Within Town and Village Centre Boundaries DPE6: Development Within Primary Shopping Areas DPE7: Smaller Villages and Neighbourhood Centres DPE8: Sustainable Rural Development and the Rural Economy DPE9: Sustainable Tourism and the Visitor Economy

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.
- As a result of the ageing population, this has the potential to increase 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 makes 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 capacity of education facilities.
- 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 GEN: Significant Site Requirements DPSC1: Land west of Burgess Hill/ North of Hurstpierpoint DPSC2: Land at Crabbet Park, Cophorne DPSC3: Land to the south of Reeds Lane, Sayers Common
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	<p>DPSC4: Land at Chesapeake and Meadow View, Reeds Lane. Sayers Common</p> <p>DPSC5: Land at Coombe Farm, London Road, Sayers Common</p> <p>DPSC6: Land to the West of Kings Business Centre, Reeds Land, Sayers Common</p> <p>DPSC7: Land at LVS Hassocks, London Road, Sayers Common</p>
Housing	<p>DPH1: Housing</p> <p>DPH2: Sustainable Development – Outside the BUA</p> <p>DPH3: Sustainable Development – Inside the BUA</p> <p>DPH4: Older Persons Housing and Specialist Accommodation</p> <p>DPH5: Gypsies, Travellers and Travelling Showpeople</p> <p>DPH6: Self and Custom Build Housing</p> <p>DPH7: Housing Mix</p> <p>DPH8: Affordable Housing</p> <p>DPH9: First Homes</p> <p>DPH10: Rural Exception Sites</p> <p>DPH11: Dwelling Space Standards</p> <p>DPH12: Accessibility</p>
Sites Allocations	<p>DPA1-17: Housing Site Allocations</p> <p>DPA3a: Nightingale Lane Allotments</p> <p>DPA18-19: Older Persons Housing and Specialist Accommodation Allocations</p>
Infrastructure	<p>DPI1: Infrastructure Provision</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: Water and Wastewater Infrastructure</p> <p>DPI8: Viability</p>

20-Minute Neighbourhoods and Local Living

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' and 'local living'². A strategic objective of this Plan is to create places that encourage a healthy enjoyable lifestyle supporting provision of high-quality services and facilities with the opportunity to walk, wheel, cycle or use public transport to common destinations.

The 20-minute neighbourhood concept is a useful tool for informing the design of schemes and the assessment of planning applications and will help create places in which most people's daily needs can be met within a short walk or cycle.

The Mid Sussex Design Guide Supplementary Planning Document (SPD) sets out a series of characteristics of well-designed places and demonstrates what good design means in practice. Many of these principles are directly relevant to 20-minute neighbourhood principles and will help deliver places that connect communities to each other and what they need; a place where people can thrive without having to rely solely on the car.

What is a 20-minute neighbourhood?

The Town and Country Planning Association (TCPA) has produced a 'Guide to 20-minute Neighbourhoods' (March 2021)³ 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 Heathier, Active, Prosperous Communities' (March 2021).

² Term used in West Sussex Local Transport Plan 2022-2036 Vision and Objectives strategy approach to reduce the need to travel by car, prioritising active and sustainable travel interventions and other targeted measures: <https://www.westsussex.gov.uk/media/17428/wstp.pdf>

³ The Town and County Planning Association 'Guide to 20-minute Neighbourhoods – Creating Heathier, Active, Prosperous Communities' (March 2021) - https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf

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. Interest in the 20-minute concept has grown over the years since the phrase was first coined. This interest was accelerated as a result of the COVID-19 pandemic which forced people to spend more time in their immediate neighbourhoods and as a result highlighted the importance to support people to be able to have access to goods and services at a local level.

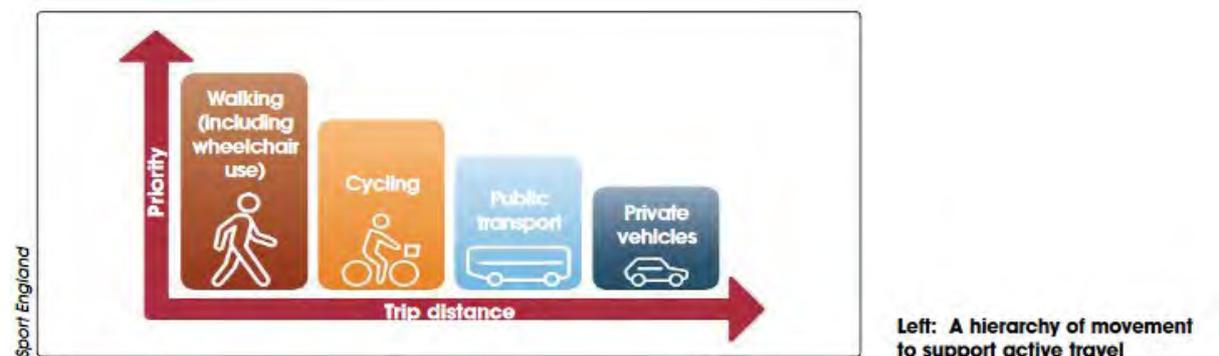
Research⁴ has shown that 20 minutes is the maximum time that people are willing to walk to meet their daily needs. However, where the concept is being taken up across the UK and elsewhere in the world, communities are defining the concept in various ways – ‘20-minute neighbourhoods’, ‘15-minute cities’, ‘liveable neighbourhoods’ and ‘local living’. The concept however remains in principle the same and is about creating complete, compact and connected neighbourhoods. This will be different depending on the individual context of the site and the development proposed and the Council will seek to develop further guidance which will help deliver these goals in the differing landscapes which make up the district.

The 20-minute travel concept sets out an aspiration to meet our day to day needs within a short journey by active/ sustainable means. In addition to specific requirements set out in the plan and the Mid Sussex Design Guide SPD, and until such time that the Council develop their own guidance, best practice guidance, including the TCPA 20-Minute Neighbourhoods Guide (2021 and subsequent iterations) will be used to inform consideration of planning applications.

What are the characteristics of a 20-minute neighbourhood?

The 20-minute neighbourhood concept 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. Developers will be required to demonstrate that they have designed their proposals in line with the movement hierarchy below.

<https://www.westsussex.gov.uk/media/17428/wstp.pdf>



The 20-minute neighbourhood concept does not form a rigid set of requirements. Every community has its own plans and aspirations for the future, and any plans to create a 20-

⁴ <https://www.planning.vic.gov.au/guides-and-resources/strategies-and-initiatives/20-minute-neighbourhoods>

minute neighbourhood should be based on what the community wants. However, as set out in the TCPA guidance⁵, there are certain features that are likely to feature, which include:

- Diverse and affordable homes.
- Well-connected paths, streets and spaces.
- Schools at the heart of communities.
- Good green spaces in the right places.
- Local food production.
- Keeping jobs and money local.
- Community health and wellbeing facilities.
- A place for all ages.

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 achieving this aspiration.

Key challenges the district face include the need to:

- Reduce carbon emissions and 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. The Plan will seek to facilitate the creation of compact and connected neighbourhoods in which people can meet the majority of their daily needs within a reasonable distance of their home, preferably by walking, wheeling or cycling, or using sustainable transport options. The 20-minute neighbourhood concept will help to deliver communities 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 and local living 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

⁵ https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf

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 support development within towns (for Mid Sussex this would be Burgess Hill, Haywards Heath and East Grinstead) which helps them become complete and compact 20-minute neighbourhoods. The benefit of which would mean that although people from nearby villages might have to drive 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, which is more suited to the more rural areas of the district characterised by smaller villages more remote from the three towns, is to encourage the 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.

How can we maximise the benefits of settlement extensions?

New extensions to existing settlements provide an opportunity to take a holistic approach to an area, focusing on how a new development can be designed to improve connectivity and provide much needed local facilities in locations that can benefit both existing and new members of the community. These developments also offer the opportunity to link into existing infrastructure networks, including employment, transport and social infrastructure and it is essential they are designed to be well integrated and avoid being isolated additions which further compound issues of car dependency. Positively engaging with the existing communities is key to understanding what an area needs and how the development should respond to the communities' aspirations for the area.

Access to Services and Facilities - Site Selection Process

Building on the concept of 20-minute Neighbourhoods and 'Local Living', access to services and facilities forms an important part of the Site Selection Process which has been used to determine the most suitable and sustainably located sites for allocation within this District Plan.

The Site Selection Methodology involves assessing sites against a range of environmental, developability and accessibility criteria. Sites have been assessed for their accessibility to services and facilities that meet day-to-day needs: public transport, main service centres, primary school, health/GP surgery and local convenience retail. Sites which include on-site

facilities or can access such facilities within a 10-minute walk achieve a 'very positive' score against these criteria, with those greater than a 20-minute walk achieving a 'negative' score. The overall performance against all criteria informs the conclusions reached on suitability for allocation.

To ensure consistency, the Council has used specialist mapping software "TravelTime" to determine the distance, most efficient route/method, and time taken. This is measured from the central co-ordinate of the site. It is recognised that this is only a tool and therefore has limitations e.g. it may not be reflective of all ground conditions, abilities or circumstances. However, it is sufficiently accurate to provide a robust assessment that has been applied consistently to all sites assessed. More detail is available within the Site Selection Methodology and Site Selection: Conclusions papers available on the Council's website.

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.

- **Strategic Flood Risk Assessment (SFRA)** – to identify areas at risk of flooding, now and in the future.

These additions to the evidence base complement the existing substantial evidence base that supported the 2018 District Plan. The Evidence Base is available to view on the District Plan web page (www.midsussex.gov.uk/DistrictPlan).

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) and has been prepared in accordance with relevant legislation, national policy and guidance, and best practice. It is a legal requirement for SA/SEA to be carried out when producing Local Plans.

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 through ongoing dialogue between authorities during production of respective Local Plans and Local Plan Reviews. The Council is aware of the 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 briefing with neighbouring and nearby authorities on the purposes and review of the District Plan. 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.

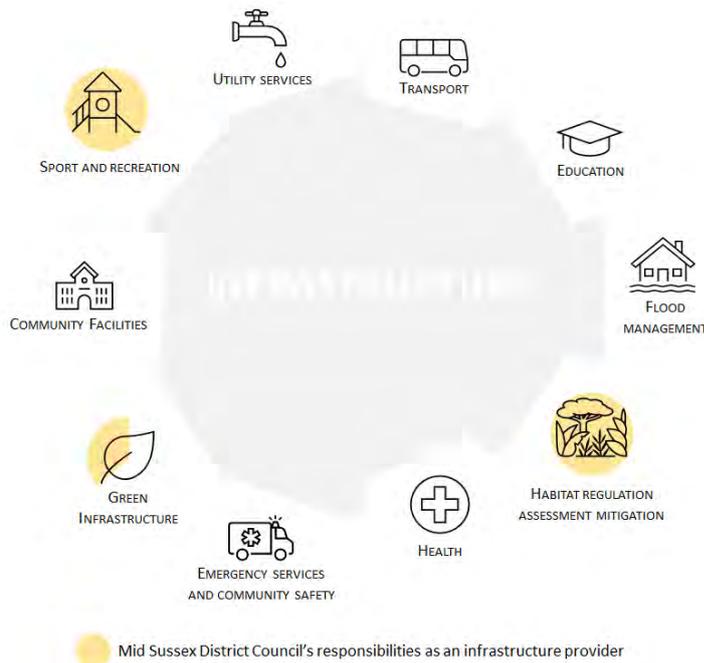
The duty to co-operate is an ongoing process and further co-operation will occur as the draft Plan progresses. In accordance with the NPPF, Statements of Common Ground will be prepared to capture cross-boundary matters and document progress in co-operating to address these, as the Draft Plan progresses 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 2022/23 the Council collected almost £2m from planning obligations to be spent on infrastructure. The total amount of money spent in 2022/23 was over £777,000. The IFS sets out details of where this money is allocated and spent. Over the last three years, over 60%

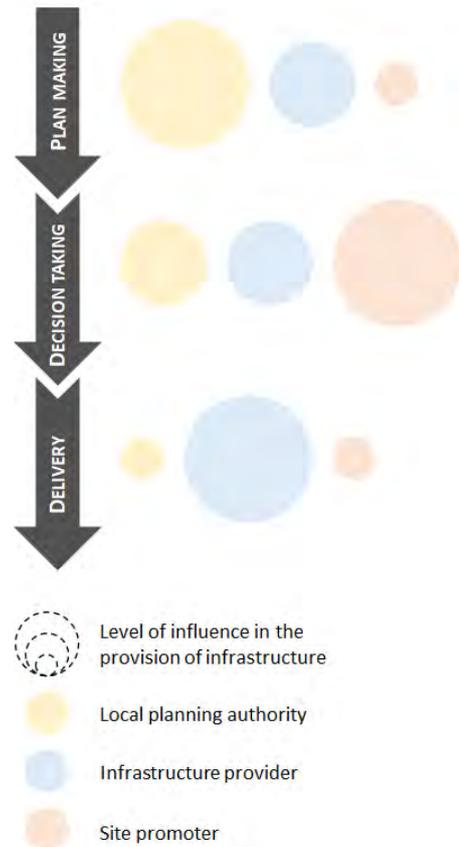
of funds secured through new development was directly collected and managed by other providers.

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

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 2018 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.
- **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 are based upon those set out in the 2018 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 create and maintain easily accessible high quality green and blue infrastructure in the right places to encourage active travel, improve physical and mental health, support biodiversity, and address climate change mitigation and adaptation.**
2. **To promote development that embodies the 20-minute neighbourhood principles and makes the best use of resources and increases the sustainability of communities within Mid Sussex, and its ability to adapt to climate change.**
3. **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.**

Economy
Protecting economic vitality

- 4. To protect valued landscapes for their visual, historical and biodiversity qualities.
- 5. To protect valued characteristics of the built environment for their historical and visual qualities.
- 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.

- 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, including through good digital connectivity.
- 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 embody the 20-minute neighbourhood principles and are complete, compact and well connected, 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

The 2018 District Plan Strategy

The 2018 District Plan spatial strategy focused development towards the three towns (Burgess Hill, East Grinstead and Haywards Heath) and encouraged 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 2018 District Plan and subsequent Site Allocations DPD.

The plan periods for the 2018 District Plan and this 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 2018 District Plan strategy.

This 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 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 have indicated that, beyond existing commitments:

- There is limited further growth potential at East Grinstead, 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 2018 District Plan strategy insofar as it relates to additional growth beyond that already planned for.

Updated District Plan Strategy

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

Protection of the High Weald 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

Protection of the High Weald 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). Protection of designated landscapes is important for the landscape itself and to support nature recovery and resilience to the effects of climate change. It also has benefits by being an attractive destination for visitors.

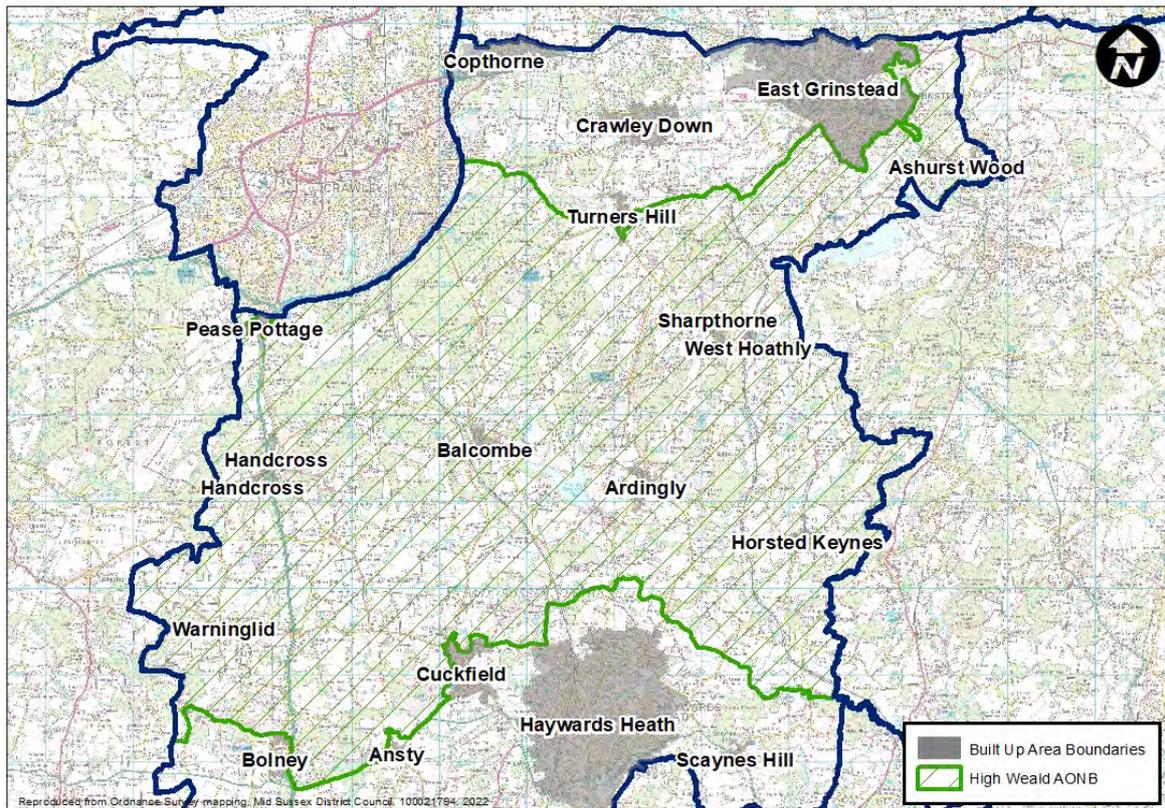
Why?

National planning policy and guidance are clear that great weight should be given to conserving and enhancing the landscape and scenic beauty of AONBs and their wildlife and

cultural heritage. These areas along with National Parks and the Broads have the highest status of protection (NPPF, September 2023: paragraph 176).

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, over 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 of this landscape, as are historic routeways.

The High Weald AONB Management Plan is the policy 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. It is also a material consideration for planning purposes.

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,

September 2023: paragraph 176). This does not preclude growth at settlements within the AONB – the Site Allocations DPD, Neighbourhood Plans and this District Plan include allocations within the AONB to meet local needs. However, these are smaller in scale and only where any impacts on the AONB have been minimised. 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 background 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 (September 2023). The national policy position is that major development should not be permitted other than in exceptional circumstances and where it is 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.

To support this, 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.

The findings from the UCS have been reflected in policies supporting and maximising brownfield development. This includes specific site allocations on brownfield land, and a brownfield allowance as part of the windfall calculation in policy DPH1: Housing.

Why?

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.

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

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. However, Mid Sussex is a largely rural district, only approximately 12% is within a designated Built-Up Area boundary. Consequently, opportunities for utilising brownfield land to meet the housing needs of the district are relatively limited.

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 non-existent. 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.

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

Strategic Objectives met	<ul style="list-style-type: none"> 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	<ul style="list-style-type: none"> DPS6: Health and Wellbeing DPC2: Preventing Coalescence DPB1: Character and Design DPT1: Placemaking and Connectivity DPT4: Active and Sustainable Travel DPH1: Housing DPI1: Infrastructure Provision DPI4: Communications Infrastructure

How?

In order to maintain and enhance existing sustainable settlements in the Plan, careful consideration has been given to the characteristics of settlements, 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.

Why?

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.

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.

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 (2018 District Plan, Site Allocations DPD and Neighbourhood Plan allocations) is consistent with the 2018 District Plan strategy, it is becoming more challenging to deliver future growth in accordance with this strategy. This limits capacity for further sustainable development 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. This 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 has assisted in determining the extent to which development can be delivered in accordance with this element of the strategy.

Opportunities for extensions, to improve sustainability of existing settlements

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 and Sustainable Travel
- DPH1:** Housing
- DPI1:** Infrastructure Provision
- 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. This 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 those of 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 could support new schools, neighbourhood centres and employment opportunities.

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 majority of the day to day needs of the community as a whole, accessed by a safe, accessible and well-connected movement network for 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.

Why?

Planning for a quantum of development which would support provision of new facilities – such as education, health, retail, employment, community and open space – 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 principles 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.

The 2018 District Plan Strategy and planning policy more generally have historically sought to resist all but small-scale growth at smaller rural settlements on the basis they are currently unsustainable. Such small scale, sometimes piecemeal development, has increased population size but not reached a critical mass to support new facilities and services. This 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.

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 an 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 their village to get the accommodation and support they need.

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.

Poor digital connectivity can 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.

Settlement Hierarchy

Mid Sussex has a distinctive settlement pattern, containing three main towns and a large number 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.

Table 1 – Settlement Hierarchy

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 relatively 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

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 2a (by Settlement) and 2b (by Parish).

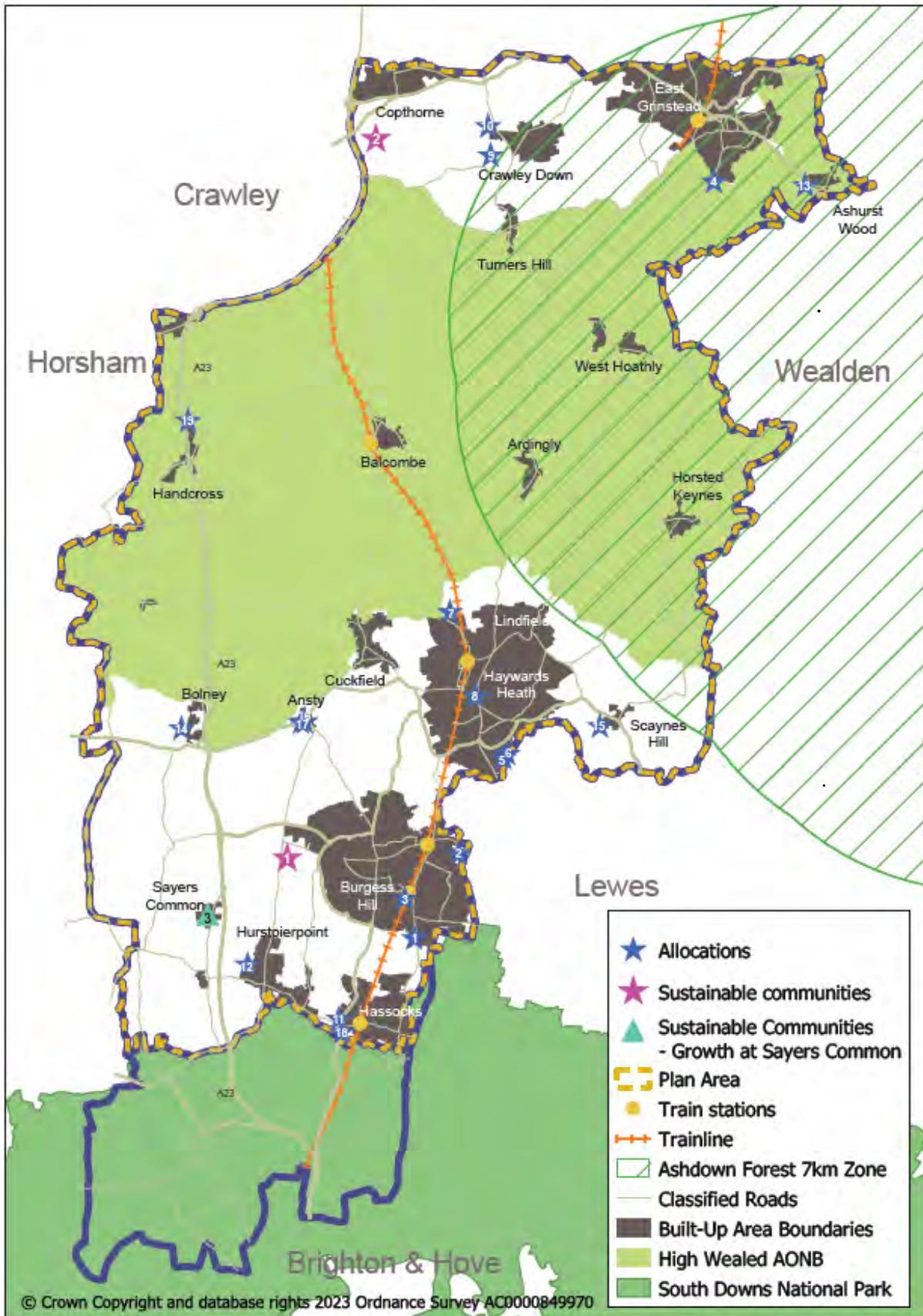
Table 2a – Commitments by Settlement

Settlement	Commitments (at 1st April 2023)	District Plan 2021 – 2039 Allocations	Total Housing Supply 2021 - 2039
Albourne	88	0	88
Ansty	16	75	91
Ardingly	42	0	42
Ashurst Wood	99	8	107
Balcombe	33	0	33
Bolney	40	200	240
Burgess Hill	5169	1,708	6877
Copthorne	260	1,500	1760
Crawley Down	124	387	511
Cuckfield	85	0	85
East Grinstead	1408	45	1453
Handcross	71	0	71
Hassocks	726	25	751
Haywards Heath	1005	226	1230
Hickstead	0	0	0
Horsted Keynes	55	0	55
Hurstpierpoint	13	90	103
Lindfield	224	0	224
Pease Pottage	217	0	217
Sayers Common	85	2,393	2478
Scaynes Hill	21	30	51
Sharphorne	47	0	47
Slaugham	8	0	8
Staplefield	1	0	1
Turners Hill	64	0	64
Twineham	10	0	10
Warninglid	5	0	5
West Hoathly	5	0	5
TOTAL	9,921	6,687	16,607

Table 2b – Commitments by Parish

Parish	Commitments (at 1st April 2023)	District Plan 2021 – 2039 Allocations	Total Housing Supply 2021 - 2039
Albourne	88	1,850	1938
Ansty and Staplefield	48	135	183
Ardingly	42	0	42
Ashurst Wood	99	8	107
Balcombe	33	0	33
Bolney	40	200	240
Burgess Hill	5141	358	5499
Cuckfield	85	0	85
East Grinstead	1408	45	1453
Hassocks	726	25	751
Haywards Heath	1004	166	1169
Horsted Keynes	56	0	56
Hurstpierpoint and Sayers Common	98	1,983	2081
Lindfield	1	0	1
Lindfield Rural	244	30	274
Slaugham	298	0	298
Turners Hill	64	0	64
Twineham	10	0	10
West Hoathly	52	0	52
Worth	384	1,887	2271
TOTAL	9,921	6,687	16,607

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 District 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 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	<p>DPS1: Climate Change</p> <p>DPS2: Sustainable Design and Construction</p> <p>DPS3: Renewable and Low Carbon Energy Schemes</p> <p>DPS4: Flood Risk and Drainage</p> <p>DPS5: Water Neutrality</p> <p>DPS6: Health and Wellbeing</p>
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DPS1: Climate Change

Policy:	Strategic
Strategic Objectives:	<p>1 – Sustainable Development and Adaptation to Climate Change</p> <p>5 – Create and Maintain Green Infrastructure</p>

The impacts of climate change are seen in both the built and natural environment. There is clear evidence for the need to respond to the threat of climate change, as set out in the Intergovernmental Panel on Climate Change (IPCC) reports⁶. Global greenhouse gas emissions (GHG) have reached their highest levels in human history over the past 10 years and without immediate and significant emissions reductions across all sectors, we will be unable to avoid dangerous impacts of climate change on our communities. The planning system is one of the most effective tools available to councils to reduce their contribution to climate change by mitigating GHG emissions and by preparing for the impacts of climate change through adaptation measures.

In 2016, the UK joined the international effort by becoming a signatory to the Paris Agreement to keep global temperature rise ‘well below’ 2°C above pre-industrial levels, whilst aiming for a temperature rise of no more than 1.5°C. The UK Climate Change Act 2008 (amended 2019) aligns with this international commitment and commits the UK government by law to reducing GHG emissions by at least 100% of 1990 levels (net zero) by 2050.

Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 places a legal duty on local planning authorities to ensure development plans include ‘*policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change*’.

The Planning and Energy Act 2008 enables local authorities to impose ‘reasonable requirements’ for a proportion of energy to be from renewable sources, low carbon energy

⁶ Found here: [IPCC — Intergovernmental Panel on Climate Change](https://www.ipcc.ch/)

and for development to comply with energy efficiency standards that exceed the energy requirements of Building Regulations.

The National Planning Policy Framework (NPPF) Chapter 14 relates to *'Meeting the challenge of climate change, flooding and coastal change'* and sets out at paragraph 152 that the planning system should *'shape places in ways that contribute to radical reductions in greenhouse gas emissions.'*

At a local level, the Council has affirmed its commitment to tackling climate change and in November 2022 Mid Sussex District Council adopted three specific net zero targets:

- A District-wide net zero target aligned to the national target.
- A Council-only net zero target of 2040 for emissions the Council can directly control.
- A Council-only net zero target aligned to the national target for emissions the Council can only indirectly influence.

These evidence-based targets were based on detailed emissions analysis completed by specialist consultants Ricardo Energy and Environment. This work identified targets as well as actions needed to achieve them. Using the evidence base produced by Ricardo Energy and Environment, the Council has developed a detailed Action Plan for the Council's emissions (direct and indirect) which is being implemented.

Mid Sussex District Council however only directly controls 0.03% of the district's emissions. The vast majority exist beyond the Council's direct control and therefore depend on other mechanisms to influence behaviour change.

The Council also approved its Sustainable Economy Strategy in 2022 which includes actions to be delivered through the development of policies in the District Plan which are required to meet the district-wide net zero target.

Unless new developments in Mid Sussex are designed to meet net zero standards, they will cause emissions in the district to increase; this will undermine the district's ability to achieve the legally binding decarbonisation targets.

Policy DPS1 is an overarching policy that sets out principles that development should adopt to tackle climate change issues and it signposts to other more detailed policies in the Plan.

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. Even if some action appears to be small at an individual scale, taken together, individual actions can cumulatively be effective and lead to positive changes for climate change mitigation and adaptation. Applicants will need to consider climate change at the earliest stage to ensure effective incorporation of 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

1. Development will be required 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.
2. 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.
3. Development should embed the principles of the 20-minute neighbourhood and local living 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 and Sustainable Travel; and DPB1: Character and Design.
4. Development likely to be sources of other greenhouse gas emissions (methane, nitrous oxide and fluorinated gases) will be required 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

5. Development will be required to protect existing trees, woodland and hedgerows and their soils and seek opportunities to plant appropriate species of trees in appropriate places including street trees. Detailed policy requirements are set out in Policy DPN4: Trees, Woodland and Hedgerows.
6. Development will be required to protect existing carbon sinks and stores and take opportunities to provide nature-based solutions for carbon capture and sequestration.
7. Development will be required 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 Policy DPN1: Biodiversity, Geodiversity and Nature Recovery.

Climate change adaptation and mitigation

8. Development must be designed to minimise vulnerability from the effects of climate change particularly in terms of overheating, food security, flood risk and water supply. Detailed policy requirements are set out in Policies DPS2: Sustainable Design and Construction and DPS4: Flood Risk and Drainage.
9. Development will be required to incorporate green and blue 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 and Blue Infrastructure.

10. Development will be required to achieve a net gain in biodiversity and contribute to ecological networks and the Local Nature Recovery Strategy. Detailed policy requirements are set out in Policies DPN1: Biodiversity, Geodiversity and Nature Recovery, and DPN2: Biodiversity Net Gain.
11. 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
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
- Minimising waste

To assess if the carbon reduction or net zero targets have been met for all new build residential and major non-residential development, the council will seek confirmation via a third-party assessment tool and submission of proof of certification/performance. The use of a third-party assessment gives the council the confidence of the ratings given as the work is completed by independent assessors; it will also ensure the cost is borne by those benefiting from the uplift in values from the development.

The Building Research Establishment (BRE) oversees third-party sustainability certification for non-residential development through the BREEAM assessment framework and residential development through Home Quality Mark (HQM) assessment framework.

BREEAM and HQM assessments consider a wide range of sustainability factors and are completed throughout the lifecycle of the development. Both these schemes address topic areas other than energy and greenhouse gas performance and encourage developers to consider wider sustainability issues; 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 development's potential to achieve the highest scores. Details should be set out in an accompanying Sustainability Statement and Design and Access Statement, including evidence of registration of the project with BRE. Unless otherwise agreed, compliance with BREEAM and Home Quality Mark (HQM) standards shall be demonstrated via formal certification.

Another widely recognised third-party assessment scheme is Passivhaus; the Passivhaus Standard focuses on maximising the thermal efficiency of the building fabric using high levels of insulation and air tightness and mechanical ventilation with heat recovery. Certification is achieved through a rigorous and exacting third-party assessment process which is more onerous and costly to achieve than BREEAM or HQM⁷ but would be supported as an alternative.

Householder development applications must demonstrate through the submission of a proportionate Sustainability Statement that proposals have been designed to be as energy efficient and sustainable as possible. This includes consideration not only of the extension itself but also the existing building. Householders are strongly encouraged to take opportunities to improve the energy efficiency of the existing building as a whole. This could be achieved through improved thermal efficiency with replacement windows/ improved insulation and/ or by replacing an existing fossil fuel heating system with low/zero carbon energy sources such as an air source heat pump or on-site renewable technology such as photovoltaics.

Where proposals could impact existing heritage assets such as Conservation Areas and Listed Buildings, proposals will be required to demonstrate how any alteration will preserve their significance in accordance with the relevant requirements in Chapter 16 of the NPPF and relevant policies in this Plan. Proposals must take account of the most up to date guidance produced by Historic England, such as, *Retrofit and Energy Efficiency in Historic Buildings*⁸.

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
- using resilient, low maintenance materials

DPS2: Sustainable Design and Construction

All development must submit a proportionate Sustainability Statement to demonstrate how through its design, construction, operation and use it will contribute to the reduction of greenhouse gas emissions, increase resilience to the impacts of climate change and improve sustainability and includes incorporation of measures set out at Principle DG37 of the Mid Sussex Design Guide SPD.

⁷ As evidenced in the Ricardo Net Zero Local Plan Evidence Base Report for Mid Sussex District Council (July 2023).

⁸ Advice available at: <https://historicengland.org.uk/advice/technical-advice/retrofit-and-energy-efficiency-in-historic-buildings/>

Zero carbon development

Unless it can be demonstrated that doing so is not technically feasible or unviable, using a fabric first approach, all new build development must achieve zero operational GHG emissions by reducing heat and power demand and then supplying all (regulated and unregulated) operational energy through on-site renewables.

Energy use

The carbon reduction requirements for achieving net zero development must be met by using a fabric first approach following the energy hierarchy:

- i. Minimise the demand for energy.
- ii. Maximise energy efficiency.
- iii. Utilise renewable energy.

All developments must include decentralised, renewable or low carbon energy provision in line with Policy DPS3: Renewable and Low Energy Carbon Schemes.

Heating to all new build developments and major refurbishments shall be provided using renewable energy (not fossil fuels).

Residential new build:

Development must achieve sufficient credits in the “Energy performance” and “Towards carbon negative” categories of HQM (or equivalent) to demonstrate that the development produces net zero regulated and unregulated emissions.

An alternative route to compliance is to provide evidence by full Passivhaus Planning Package outputs demonstrating that Passivhaus certification is achievable and that 100% of operational energy use will be met via on-site renewables.

Non-residential new build:

Major development must achieve maximum credits in the “Energy performance”, and “Prediction of operational energy consumption” and “Beyond zero net regulated carbon” categories of BREEAM (or equivalent) to demonstrate that the development has surpassed net zero regulated emissions.

All minor⁹ new build developments have the option to demonstrate achievement of zero operational GHG emissions through the Part L of Building Regulations rather than a BREEAM assessment.

Evidence must be provided to demonstrate every feasible and viable option has been explored to fully achieve the net zero target on-site. Only in exceptional circumstances, where any shortfall is identified, appropriate mitigation should be formally agreed with the Council.

Assessment frameworks

Planning applications of a scale and nature defined in the table below, must 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.

⁹ Defined as new build development of less than 1,000sqm floorspace or a site area of less than 1 hectare.

Evidence demonstrating the project has been registered with BRE during the design stage shall be submitted with any application and conditions/ requirements will be imposed to secure appropriate final (post-construction/post-refurbishment stage) certification to demonstrate compliance with this policy.

Where Passivhaus certification is being sought, a 'pre-construction compliance check' completed by a Passivhaus certifier will be required; secured by condition and upon completion, a Quality Approved Passivhaus certification for each dwelling/building will be required.

Development, as defined below, will be required to meet the relevant minimum defined standards until they are superseded by higher national standards.

Development Type	Scale of Development	Minimum Standard
Residential new build	All	HQM 3 Star
Residential Refurbishment and/or extension	Major ¹⁰	BREEAM Excellent – Domestic Refurbishment
Non-residential ¹¹ and mixed-use new build	Major	BREEAM Excellent
Non-residential Refurbishment and/or extension	Major	BREEAM Excellent – Refurbishment and Fit-Out Technical Standards

Post-occupancy monitoring:

All major residential new build developments must achieve at least 50% of credits for post-occupancy evaluation (POE) under 'Customer Experience' under the HQM scheme.

All major non-residential new build developments must achieve a credit for POE in the category Man 05 Aftercare under the relevant BREEAM scheme.

Developers should share their POE information with the built environment sector to ensure transparency and inform wider lesson learning.

Embodied Carbon

Development proposals must prioritise retention and retrofit of existing buildings or structures to capture the embodied carbon associated with the building's original construction; unless it can be demonstrated to be unviable to do so.

Major new build developments:

Major new build developments must undertake a whole life-cycle (WLC) carbon assessment using a nationally recognised assessment methodology. Relevant credits in HQM, BREEAM, or equivalent shall be achieved to demonstrate reasonable endeavours have been made to minimise embodied carbon.

The use of sustainably sourced wood in construction, particularly from local sources, is strongly encouraged.

¹⁰ References to major development are as defined by the Town and Country Planning (Development Management Procedure) (England) Order 2015 or as amended.

¹¹ Defined as development falling outside of Use Class C3 as defined by The Town and Country Planning (Use Classes) Order 1987 (as amended).

Householder development

Proposals for householder development must demonstrate that they have been designed to be as energy efficient and sustainable as possible through good design and by:

1. Increasing the energy efficiency of the proposed new elements, and
2. Increasing the energy efficiency of other parts of the building.

All measure should be set out in a proportionate Sustainability Statement.

Prevent overheating

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

3. Minimise potential overheating such as through the layout, orientation and design of buildings.
4. 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.

All residential new build:

Development must meet a maximum water consumption standard of 85 litres per person per day to minimise the impact of the development on water resources and water quality.

Major non-residential new build:

Development must achieve 3 credits in BREEAM category Wat 01 and demonstrate reasonable endeavours to achieve an 'Outstanding' rating overall.

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

Sustainable water consumption rates can be achieved through incorporation of measures to reduce water use and reuse water including:

- Water efficient fittings and appliances
- Rainwater harvesting, including incorporation of rainwater butts
- Greywater recycling

Minimise waste

In accordance with relevant policies in the West Sussex Waste Local Plan, all development must 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 must 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

Strategic Objectives: 1 – Sustainable Development and Adaptation to Climate Change

Carbon emissions in Mid Sussex reduced by 38% between 2005 and 2018¹², 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.

Two energy studies have been carried out which relate to Mid Sussex, the more recent of the two is the Mid Sussex Sustainable Energy Study (2014) which 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 2018 District 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.

The Net Zero Carbon Emissions Feasibility and Options Study (Nov 2022) identified the actions needed to be undertaken to achieve net zero within the identified timescales and highlighted that there is potentially enough wind resource within Mid Sussex to provide more than 25% of electricity demands for the district but that the deployable amount is severely constrained by matters including landscape considerations. Such projects could however help support energy security, respond to fuel poverty, reduce carbon emissions and provide a longer-term financial return for communities and will be supported where they meet the requirements of policy DPS3: Renewable and Low Carbon Energy Schemes.

The National Planning Policy Framework (paragraph 152, NPPF) sets out that the planning system should contribute to radical reductions in greenhouse gas emissions, support the transition to a low carbon future and support renewable and low carbon energy and associated infrastructure. Paragraph 155 states that to help increase the use and supply of renewable and low carbon energy and heat, plans should have a positive strategy and identify suitable areas for such development. Proposals will be required to demonstrate they have taken full account of the latest National Planning Practice Guidance for Renewable and low carbon energy in the development and delivery of their proposal.

Any proposed development would need to comply with Aerodrome Safeguarding requirements. Aerodrome Safeguarding is a legislative requirement for officially safeguarded aerodromes of which Gatwick Airport is one. It is the process used to ensure the safety of aircraft while manoeuvring on the ground, taking off, landing or flying in the vicinity of aerodromes. Any proposed developments 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 and wind turbines will need to be assessed at an early stage as they have the potential to impact on

¹² Source: Department for Business, Energy & Industrial Strategy, 2020 (CO2 emissions estimates 2005-2018 in Mid Sussex (tonnes per capita))

Communication, Navigation & Surveillance (CNS) equipment and early engagement with the airport is encouraged to ensure the safeguarding requirements are met.

DPS3: Renewable and Low Carbon Energy Schemes

Solar energy

Taking account of the Mid Sussex Sustainable Energy Study (2014) Figure A.8, the Council will support proposals for solar energy generation providing they are in conformity with this policy and other policies in the District Plan. For standalone solar panel arrays and associated grid connection, it is expected that applications must address all of the following:

1. Mitigate landscape and visual impacts, including glare and glint and cumulative impacts, such as on the setting of the south Downs National Park and High Weald Area of Outstanding Natural Beauty, and any designated heritage asset.
2. Where necessary, the site will be screened (wherever possible with coppice, hedges or trees) and measures taken to mitigate harm to visual amenity.
3. Demonstrate the mitigation hierarchy has been applied in relation to ecology and biodiversity and deliver necessary mitigation.
4. Demonstrate development will not adversely affect the use of the best and most versatile agricultural land.
5. Demonstrate Aerodrome Safeguarding Requirements have been met and it can be demonstrated that there will be no impact on air safety.

Wind energy

The Council will support wind energy development proposals and associated grid connections, where they lie within an area potentially suitable for this type of development, including as shown in Mid Sussex Sustainable Energy Study (2014) Figure A.1.

Applicants must clearly demonstrate that adverse impacts, including cumulative impacts on the landscape can be satisfactorily addressed in all of the following areas:

6. Demonstrate that, following consultation, the planning impacts identified by the affected local community have been addressed by the proposal.
7. There is sufficient separation from the proposed wind turbines and/or mitigation measures, to protect residential amenity as a result of noise, shadow flicker and visual intrusion.
8. Mitigate landscape, tranquillity and visual impacts such as on the setting of the South Downs National Park and High Weald Area of Outstanding Natural Beauty, and any designated heritage asset.
9. Demonstrate Aerodrome Safeguarding Requirements have been met and that there will be no impact on air safety, any potential adverse effects on Communication, Navigation and Surveillance (CNS) equipment at the airport have been addressed.
10. Demonstrate potential interference to television and/or radio reception and information and telecommunications systems will be avoided and/or mitigated.
11. Demonstrate the proposed site access arrangements and access routes are suitable for the construction phase, including the delivery of turbine components and construction materials, the operational phase, and the decommissioning of the proposed wind farm. The use of aggregates, concrete batching and provision of grid connection infrastructure will ensure adverse impacts are avoided or can be satisfactorily mitigated.

12. Demonstrate the mitigation hierarchy has been applied in relation to ecology and biodiversity including consideration of flight paths and habitat corridors of protected mobile species such as birds and bats, and functionally linked habitat associated with protected sites (SACs; SPAs; SSSIs) and deliver necessary mitigation.

Hydro energy

13. The Council will support proposals for hydropower which are in conformity with this policy and other policies in the District Plan. Any applications for hydropower schemes will be expected to be accompanied by a Flood Risk Assessment, Water Framework Directive Compliance Assessment and evidence of discussions with the Environment Agency around requirements.
14. Taking account of the Mid Sussex Sustainable Energy Study (2014) Figure A.8, consideration must be given to the location, siting and design of the scheme, ensuring that there are no significant individual or cumulative adverse impacts on the environment and amenity. In all cases mitigation will be required to protect river flow, river continuity for fish and provide for sediment transfer.

Other renewable and low carbon technologies

The Council will support renewable or low carbon energy schemes that are compatible with this policy, other policies within the District Plan, and where impacts can be satisfactorily addressed.

In addition to the above renewable and low carbon energy sources, other renewable and low carbon technologies include: heat pumps; geothermal heat; energy and/or heat from waste; biomass; solar thermal; combined heat and power; and battery storage (see below).

Thermal Energy Distribution: Heating and Cooling Networks

The Council will support proposals for, and encourage the inclusion of, heating and cooling distribution networks, providing they are in conformity with District Plan policies. Where feasible, new major development should connect to existing networks, or provide new/purpose-built heating/cooling networks. It is expected that heat networks address all of the following:

15. Are designed for cost effective future connection to a proposed or planned network.
16. Employ individual or communal sustainable, renewable, or low carbon heating and/or cooling.
17. Make use of ambient or secondary heat sources¹³ (in conjunction with heat pumps where required).
18. Demonstrate compliance with appropriate technical standards (currently 'CIBSE's Heat Networks Code of Practice for the UK).
19. Be registered with the Heat Trust.
20. Use renewable and/or low carbon sources for their energy centre or provide an evidenced timeline and technology pathway towards system decarbonisation by 2050.
21. Provide heat and/or cooling services at a fair and affordable price.

¹³ Ambient or secondary heat sources include those arising from environment (air/ ground source) or those arising from commercial and industrial activities.

22. Where refrigerants are to be used, the global warming potential should be considered.

Energy Storage

The Council will support proposals for battery storage facilities and supporting infrastructure providing that they are in conformity with District Plan Policies and that all of the following is addressed:

23. A clear and evidenced operational lifespan for the facility is defined.
24. It is clearly stated which type of batteries will be used and of what size the units are.
25. A clear and funded plan for site failure including fire and material leakages is provided.
26. A clear definition of what the human and environmental receptors for smoke and materials from potential fires are, and that a plan for mitigating receptor risk is provided, including emergency fire service access and water supply.
27. Adverse impacts, including cumulative landscape and visual impacts, are addressed appropriately.

Community Led Energy

The positive benefits of community energy schemes will be a material consideration in assessing renewable energy development proposals. The preference is for schemes that are led by and directly meet the needs of local communities, in line with the hierarchy and project attributes below:

28. Project part or fully owned by a local community group or social enterprise.
29. Local community members have a governance stake in the project or organisation e.g. with voting rights.

Decommissioning renewable energy infrastructure

Permitted proposals will be subject to a condition that will require the submission of an End-of-Life Removal Scheme one year of the facility becoming non-operational, and the implementation of such a scheme within one year of the scheme being approved.

Such a scheme shall demonstrate how:

30. All solid waste will be removed, where, to a practical degree, be re-used or recycled and which facilities will receive the material.
31. The site will be restored including management of all potential sources of contamination.
32. Any biodiversity net gain that has arisen on the site will be protected or enhanced further.
33. An evidenced timeline for facility decommissioning and site restoration.

DPS4: Flood Risk and Sustainable Drainage

Policy: Strategic
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 Sustainable Drainage

Flood Risk

Proposals for development will need to follow a sequential risk-based approach directing development away from areas at highest risk (whether existing or future risk), ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. All development should consider flood risk in line with national guidance at the time of assessment, including the need to consider and assess flood risk from all sources consistently.

Environment Agency or site-specific flood mapping and 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), pluvial (surface water), groundwater, infrastructure and reservoirs. The cumulative impacts of all sources of flooding should be considered.

Where possible, development proposals should reduce overall flood risk. Particular attention will be paid to those areas of the district that have experienced flooding in the past.

Development proposals must, where required by national policy, be accompanied by a site-specific flood risk assessment. Development in areas of flood risk will, where relevant, be required to meet national sequential and exceptional tests.

Development classified as 'Highly vulnerable' will not be permitted within areas at 1:100 or greater flood extents now or in the future (flood zone 3a, 3b and equivalent). Development classified as 'more vulnerable' will not be permitted within areas of 1:30 flood extents now or in the future (flood zone 3b and equivalent).

Where flood management and mitigations are proposed to be utilised within a development, soft flood management methods are preferred over hard engineered solutions.

Sustainable Drainage

Surface water drainage schemes must be implemented in all new development, including replacement structures and brownfield development unless demonstrated to be inappropriate, to avoid any increase in flood risk and protect surface and ground water quality. Wherever possible, Sustainable Drainage Systems (SuDS) should be utilised within these surface water systems. SuDS must be incorporated into major development surface water drainage schemes. To mitigate flood risk both on and off-site, surface water drainage system discharge rates should be restricted to the equivalent Greenfield Qbar runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha).

Arrangements for the maintenance and management of drainage systems for their lifetime must also be identified through a maintenance and management plan, to be secured by condition at planning application stage.

New development will be required to make suitable provision for surface water drainage to ground, watercourses or surface water sewer. Surface water drainage to the foul sewer will be resisted in order to maximise the capacity of foul sewage to reduce the risk of sewer flooding. For the redevelopment of brownfield sites, any surface water drainage to the foul sewer should be disconnected, unless it can be shown no other feasible drainage option is available and that the Water Authority agree to the connection.

Surface water drainage should be sensitively designed and located, wherever possible, to promote the improvement of biodiversity, enhance landscape and create good quality spaces that improve public amenities. Green infrastructure will be incorporated, where possible, to improve biodiversity and water quality. Where relevant, proposed surface water drainage would need to be carefully designed to ensure that the bird strike risk to Gatwick airport is not increased and the safety of the airport is not compromised.

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 and/or sustainable drainage will be safeguarded from development and proposals will have regard to relevant flood risk plans and strategies. Any land located within the functional flood plan (1:30-year flood extent from any source) will be safeguarded from development.

DPS5: Water Neutrality

Policy: Strategic
Strategic Objectives: 1 – Sustainable Development and Adaptation to Climate Change

A small part of Mid Sussex District lies within Southern Water's Sussex North Water Resource Zone (WRZ), within which water is mains-distributed by Southern Water. As well as this area of Mid Sussex District, the WRZ covers Crawley Borough, Horsham District, parts of Arun District, Chichester District, and areas located in the South Downs National Park.

Sussex North WRZ is supplied from groundwater abstraction from the Folkestone beds of the Lower Greensand/Wealden Greensand semi-confined aquifer, on the River Arun, close to Pulborough in Horsham District. The abstraction site is located close to a group of nature conservation sites, known as the Arun Valley Sites, that are nationally or internationally designated as Special Area of Conservation, Special Protection Area, and a Ramsar Site for their rare and protected habitats.

To protect the nature conservation sites and to provide the necessary certainty that development will not have an adverse effect on the Arun Valley sites, the most feasible approach is for development within the WRZ to demonstrate that it is water neutral. This means that for every new development, total water use in the region after the development must be equal to or less than the total water-use in the region before the new development. Water neutrality should be achieved by first ensuring that development is highly water efficient, and secondly by ensuring that the additional demand arising from development is offset within the Sussex North WRZ.

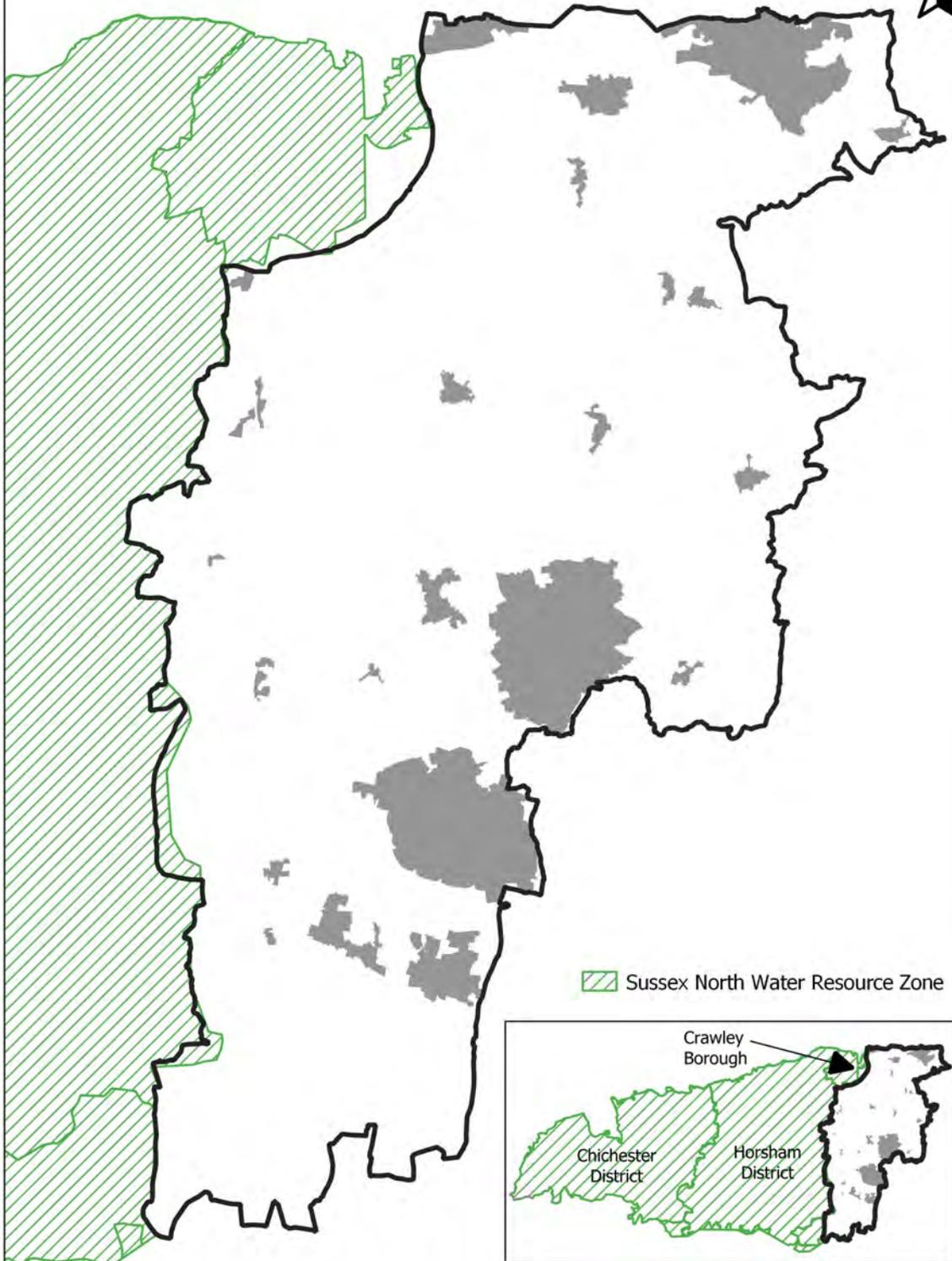
This means that all development will need to be designed to achieve water efficiency standards above the requirements set out by the optional requirements in Building Regulations. New residential development will be required to use no more than 85 litres per person per day (l/p/d) and non-residential buildings required to achieve 3 credits within the BREEAM water issue category. This may include incorporating a range of measures, such as greywater recycling and rainwater harvesting into the design of new development, and fitting water saving fixtures such as flow regulators, low flush toilets, low volume bath, aerated taps and water efficient appliances (in particular, washing machines and dishwashers).

Water efficient design will not be sufficient alone to achieve water neutrality, as new development, regardless of how efficient it is, would still increase the demand for water above existing levels. Therefore, the additional demand arising from development will need to be offset against existing supplies. It is envisaged that this will be achieved through demand management savings identified in Southern Water's Water Resource Management Plan, together with measures to be identified in a joint local authority- and South Downs National Park-led Offsetting Implementation Scheme (OIS) being prepared. Note that achieving the aforementioned higher levels of efficiency will enable the OIS to provide necessary offsetting more effectively, thereby reducing offsetting costs and ensuring viability for all development within the WRZ. Development may choose to achieve water neutrality through other means, but the key principles of water efficient design and offsetting the additional demand created remain. Offsetting is expected to be provided prior to occupation of new developments and this shall be secured through the Development Management process.

For all development, it will be necessary to demonstrate how water neutrality will be achieved through a Water Neutrality Statement to be submitted as part of any planning application within the Sussex North WRZ. This will be required to set out baseline

information relating to existing water use within a development site, full calculations relating to expected water use within a proposed development; and full details of how any remaining water use will be offset. Detail should also be provided as to how delivery of water efficiency measures, alternative water supplies and offsetting prior to occupation of the development will be verified and monitored. Should applicants not utilise the Local Authority OIS, the Water Neutrality Statement should supply full details of the offsetting scheme that their development would rely upon. The Council will seek to provide additional guidance to further assist applicants with water neutrality statements.

The Sussex North Water Resource Zone in Mid Sussex District



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DPS5: Water Neutrality

1. All development within the Sussex North Water Resource Zone (WRZ) will need to demonstrate water neutrality through water efficient design and offsetting of any net additional water use of the development. This is to be achieved by ensuring that:

Water Efficient Design

- a) New residential development is designed to utilise no more than 85 litres of mains supplied water per person per day.
- b) New non-domestic buildings achieve a score of 3 credits within the water (WAT01 Water Consumption) issue category for the BREEAM Standard or an equivalent standard set out in any future update.

AND

Offsetting Water Use

- c) Development proposals demonstrate that having achieved water efficient design, any remaining mains-supplied water use from the development is offset such that there is no net increase in mains-supplied water within the WRZ compared with pre-development levels.

Water Neutrality Statement

2. A water neutrality statement will be required to demonstrate how policy requirements have been met in relation to water supply, water efficient design and offsetting. The statement shall provide, as a minimum, all of the following:
 - a) Baseline information relating to existing water use within a development site.
 - b) Full calculations relating to expected water use within a proposed development.
 - c) Full details of how any remaining water use will be offset.

Offsetting Schemes

3. A local authority- and South Downs National Park-led water offsetting scheme will be introduced to bring forward development and infrastructure supported by Local and Neighbourhood Plans. The authorities will manage access to the offsetting scheme to ensure that sufficient water capacity exists to accommodate planned growth within the Plan period.
4. Development proposals are not required to utilise the local authority- and South Downs National Park-led offsetting scheme and may bring forward their own offsetting schemes. Any such development proposals will need to have regard to the local authority- and South Downs National Park-led offsetting scheme and associated documents.
5. Offsetting schemes can be located within any part of the WRZ, with the exception that offsetting will not be accepted within the Bramber/Upper Beeding area in Horsham district.

Alternative Water Supply

6. Where an alternative water supply is to be provided, the Water Neutrality Statement will need to demonstrate that no water is utilised from sources that supply the Sussex North WRZ. The wider acceptability and certainty of delivery for alternative water supplies will be considered on a case-by-case basis.

Policy DPS5: Water Infrastructure and Water Environment has been deleted as the contents of the policy have been moved to DPN1: Biodiversity, Geodiversity and Nature Recovery, and DPI7: Water and Wastewater Infrastructure.

DPS6: Health and Wellbeing

Policy:	Strategic
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 'local living', 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 pockets of deprivation and opportunities should be taken 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.

Health and wellbeing needs in Mid Sussex are identified in the Joint Strategic Needs Assessment and West Sussex Joint Health and Wellbeing Strategy. As set out in the Joint Strategic Needs Assessment report for West Sussex, some of the challenges for health in Mid Sussex are the ageing population which is likely to mean more older people living with dementia, sight loss and hearing loss; and the need to maximise prevention opportunities in relation to childhood obesity, alcohol consumption, smoking and physical inactivity.

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 HIA 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. A HIA makes recommendations to maximise the positive health and wellbeing impacts, minimise the negative health and wellbeing impacts and reduce health inequalities. Further information on the application of HIA will be set out on the Council's website. This will follow best practice guidance on how to undertake a HIA including reference to West Sussex

County Council's *Creating healthy and sustainable places: A public health and sustainability framework for West Sussex* (2021) and Public Health England's *Health Impact Assessment in spatial planning* (2020).

DPS6: Health and Wellbeing

To enable and support healthy lifestyles and address health and wellbeing needs in Mid Sussex, all new development must be designed to achieve healthy, inclusive and safe places by embedding the principles of the 20-minute neighbourhood and 'local living'.

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

1. Be of high quality in its design and construction and be set within an attractive environment.
2. Be well-designed to ensure legibility of layout and the public realm including through the use of materials.
3. Meet the needs of the community through accessible, inclusive and safe design including incorporating measures to reduce opportunities for crime.
4. Prioritise active travel such as walking and cycling and sustainable transport such as public transport, and take opportunities to enhance recreational routes and public rights of way.
5. Incorporate green and blue infrastructure and biodiversity enhancements.
6. Provide high quality private outdoor space and publicly accessible open and green space.
7. 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.
8. Take opportunities to increase community connectivity and social inclusion such as by providing spaces for the community to gather, socialise and interact.
9. 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, local amenity, and access to open space and the countryside.
10. 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.

Health Impact Assessment

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:	Strategic
Strategic Objectives:	3 – Protect Valued Landscapes 5 – Create and Maintain Green Infrastructure

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

It is well documented that access to nature is important for health and wellbeing. People access and connect to nature in many ways, for example, by visiting nature reserves, parks or the countryside, or by seeing nature on their doorstep including in residential gardens.

The district has a number of important habitats and species that need to be protected and enhanced. These include:

- 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 and floodplain grazing marsh, deciduous woodland, ghyll woodland, lowland calcareous grassland, lowland fen, lowland heathland, lowland meadow, reedbed, traditional orchard, and wood-pasture and parkland.

- Irreplaceable habitats including ancient woodland, ancient and veteran trees and lowland fen.

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.

Geodiversity is the variety of rocks, minerals, fossils, landforms, sediments and soils, and the natural processes that form and alter them. Geodiversity is important to the delivery of ecosystem services and for biodiversity, and as such conserving geodiversity is important to protect biodiversity. It is also part of our cultural heritage as local stone has traditionally been used as building materials and results in a local distinctive character. Mid Sussex District has a number of locally important sites for geodiversity; some SSSIs have been designated for their geological interest. Sandstone outcrops are visible in places and there is a history of quarrying, particularly for the brick-making industry.

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.

To protect and enhance the natural and ecological function of watercourses and the riparian environment, and to maintain good water quality, undeveloped buffer zones free from built development and artificial lighting will need to be retained, re-instated or provided as part of new development proposals. Drainage features such as pipes and headwalls can be included within the buffer zone but the main objective is for an undeveloped buffer zone. Main rivers and ordinary watercourses should have a buffer zone of a minimum 10 metres on each side measured from the top of the bank. This buffer zone provides an area of natural flood management or for flood compensation measures, and acts as a wildlife corridor that connects to other habitats and provides space for recreation and leisure.

River restoration is an opportunity for natural flood management and it has multiple benefits including slowing flood flows, increasing biodiversity, aiding natural cooling and by providing a natural capital asset for the local community. River restoration measures could include removing culverts and other capacity restrictions, re-introducing meanders, and naturalising riverbeds and banks.

All development can play its part in protecting biodiversity and geodiversity, however, the opportunities and measures available may vary depending on the type of development. Even if some provision of biodiversity features appears to be small at an individual scale, taken together, individual actions can cumulatively be effective and lead to positive changes for biodiversity, health and wellbeing, nature recovery, and climate change mitigation.

Biodiversity features could include bird boxes and roosts, bat boxes, swift bricks, bee bricks, insect or bug hotels, hedgehog highways, native wildflower planting with nectar- and pollen-rich flowers, rain gardens, or adding water features including a pond where possible. Applicants will be expected to provide details of such features as part of planning applications.

Development will be expected to align with the objectives and priorities of the Local Nature Recovery Strategy and other relevant local strategies. Development will be expected to take opportunities to deliver and contribute to the objectives and priorities of a local nature recovery network.

Applicants will need to consider biodiversity, geodiversity and nature recovery at the earliest stage to ensure effective incorporation of existing features and new assets. The results of site surveys and assessments should be provided to the Sussex Biodiversity Record Centre.

DPN1: Biodiversity, Geodiversity and Nature Recovery

Biodiversity and geodiversity will be protected because they are important natural capital assets and provide benefits as part of ecosystem services. Nature recovery will be supported and encouraged because it is important for delivering improvements to nature, ecological networks and green and blue infrastructure.

Proposed development likely to affect designated nature conservation sites, protected species, priority habitats and priority species must carry out habitat and species surveys at the earliest opportunity in order to inform the design and conserve important ecological assets as listed below from negative direct and indirect effects. These assessments will need to be submitted in an ecological impact assessment report.

Protecting Biodiversity

All development must ensure the protection, conservation and enhancement of biodiversity.

Direct and indirect damage and harm to existing important ecological assets will need to be avoided, including from recreational use. Such assets include:

- Internationally designated Special Protection Areas, Special Areas of Conservation and Ramsar sites, and any formally proposed for designation.
- Nationally designated Sites of Special Scientific Interest.
- Locally designated Local Wildlife Sites and Local Nature Reserves.
- Protected landscapes including Areas of Outstanding Natural Beauty and National Parks.
- Irreplaceable habitats such as ancient woodland, ancient or veteran trees and lowland fen.
- Priority habitats and species.
- Other areas identified as being of nature conservation or geological interest, including wildlife corridors, areas identified for nature recovery, Biodiversity Opportunity Areas, and Nature Improvement Areas.

Biodiversity in New Developments

Development will need to demonstrate that the mitigation hierarchy set out in national policy has been applied. If significant harm to biodiversity cannot be avoided (by locating development on an alternative site with less harmful impacts or through design), then such harm will need to be mitigated. Where harm cannot be adequately mitigated, then as a last resort, such harm must be compensated for.

Biodiversity will be protected and enhanced by ensuring development:

1. 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.
2. Takes appropriate measures to avoid and reduce disturbance to sensitive habitats and species and to support the recovery of Priority species populations.
3. Contributes and takes opportunities to improve, enhance, manage and restore biodiversity and green and blue infrastructure, so that there is a net gain in

biodiversity, including through creating new designated sites and locally relevant habitats to support nature recovery.

Development must incorporate biodiversity features¹⁴ and such biodiversity features must include appropriate long-term management arrangements where relevant. The Council will provide further guidance on recommended standards for biodiversity features within developments.

Soil

Due to the importance of soils for biodiversity and carbon storage, soils will be protected and enhanced by development avoiding the best and most versatile agricultural land or other valued soils, soil disturbance, compaction and erosion. Development must not result in soil pollution or contamination.

Geodiversity

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 and Local Geological Sites.

Water

New development with a main river or ordinary watercourse within its boundaries or new development proposed adjacent to or near to a main river or ordinary watercourse, will need to retain, reinstate, or provide an undeveloped buffer zone on both sides of the watercourse. This buffer zone should be a minimum of 10 metres on both sides measured from the top of the bank.

Development should take opportunities for river restoration as part of natural flood management and in particular proposed development with watercourses within or adjacent to the site boundary should seek such opportunities.

Nature Recovery

Development will need to demonstrate that it minimises habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats and increase coherence and resilience of biodiversity and nature.

Development will need to demonstrate that it promotes the restoration, management and expansion of priority habitats and irreplaceable habitats in the district.

Development will be expected to meet the objectives of the Local Nature Recovery Strategy and any local nature recovery network or strategy, taking opportunities to deliver ecological networks and green and blue infrastructure.

¹⁴ Swift bricks integrated into new buildings are preferred, as these are suitable for multiple bird species. Other biodiversity features include bird boxes and roosts, dormouse boxes, bat boxes, bee bricks, insect or bug hotels, hedgehog highways, native wildflower planting with nectar- and pollen-rich flowers, rain gardens, or adding water features including a pond where possible. When introducing measures involving nesting and roosting, developers should have regard to the habits of swifts and bats which nest and roost in colonies.

Areas identified as opportunities and priorities for nature recovery will be safeguarded from inappropriate development. Development will need to demonstrate that it will not harm or adversely affect an area or areas identified as opportunities and priorities for nature recovery.

DPN2: Biodiversity Net Gain

Policy:	Strategic
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. Biodiversity net gain is an additional requirement and should only be applied after impacts of development on nature conservation sites, habitats and species have first been avoided. Where impacts are unavoidable, these must be sufficiently mitigated and compensated before biodiversity net gain is applied.

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 areas identified for nature recovery, Biodiversity Opportunity Areas, priority habitats or irreplaceable habitats.

The intentional or deliberate neglect, removal, damage or degradation of biodiversity prior to submitting planning applications may affect the pre-development biodiversity value to be included in the biodiversity net gain calculation. This could be caused by ploughing or improving grassland, removing trees, refusing access for ecological surveys, stopping or starting habitat management, and situations where previous habitat mitigation has not been effective. To determine if any intentional changes have been made, the current habitat type and condition of a site can be judged using an up-to-date ecology survey against aerial photography and land use data over time. Areas of habitat that have naturally developed over many years may be excluded on the basis of natural succession.

Biodiversity net gain must be calculated using the approved statutory Biodiversity Metric or the Small Sites Metric as relevant for the development proposal. In addition to a completed Metric submitted in full and in an editable version, all of the following must be submitted to explain and support the conclusions of the assessment:

1. Condition assessment sheets for each biodiversity parcel to help establish the baseline and to demonstrate the site has been surveyed.
2. Photographs for each biodiversity parcel to help establish the baseline.

3. Raw flora data for each biodiversity parcel to demonstrate the site has been surveyed.

In addition, major development proposals and any proposals including off-site biodiversity net gain will need to provide:

4. Soil type and condition assessments to help understand if the proposed biodiversity enhancements or creation are feasible and deliverable without treatment to alter the soil type.
5. Baseline and proposed habitat(s) mapping in digital format to assist with ongoing monitoring of biodiversity net gain.

The Council will publish further guidance on implementing and delivering biodiversity net gain on its website particularly in relation to best practice and local priorities.

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 and blue 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. Clear and robust evidence must be provided to demonstrate that the biodiversity net gain is appropriate and high quality.

Principles of Biodiversity Net Gain

Development must demonstrate that good practice principles for biodiversity net gain have been followed.

Development must demonstrate that the mitigation hierarchy has been followed and the biodiversity net gain is in addition to this requirement.

Where there is evidence of deliberate or intentional neglect, removal, damage or degradation to any of the habitats and species on a site before an application, their deteriorated condition will not be taken into consideration and the ecological potential and/or previously recorded habitats of the site will be used to decide the acceptability of any development proposals. The biodiversity baseline value will be what it is likely to have been had the neglect, removal, damage or degradation not occurred.

Biodiversity net gain, including off-site biodiversity net gain, will be expected to align with and meet 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 and blue infrastructure. Consideration will need to 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.

Development must ensure that biodiversity net gain will be appropriately managed, maintained and funded for a minimum of 30 years after the completion of the development and this will need to be demonstrated in a Habitat Management and Monitoring Plan. This

will be secured through a planning condition and/or a planning obligation and will include a financial payment to cover the Council's cost associated with the long-term monitoring of the biodiversity net gain proposals.

Level of Biodiversity Net Gain

Biodiversity net gain will be calculated and assessed using the Government's published statutory biodiversity metric. The biodiversity net gain calculation and assessment will need to be completed by a suitably experienced and competent person, such as a qualified ecologist.

The biodiversity net gain calculation and assessment must be submitted in full and in an editable version with the application for development together with evidence that explains and supports the conclusions of the assessment.

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. The Council will encourage a higher level of biodiversity net gain and developments must seek to maximise opportunities, especially where development is located in or in proximity to areas identified for nature recovery, the Biodiversity Opportunity Areas, irreplaceable habitats or priority habitats.

A minimum percentage of biodiversity net gain of 20% will be required for Significant Sites and for the Significant Sites allocations in this Plan DPSC1 – DPSC3.

Opportunities to secure biodiversity net gain in exempted development will be supported.

Location of Biodiversity Net Gain

Biodiversity net gain should be provided on-site wherever possible. Off-site measures will only be considered where it can be demonstrated that, after following the mitigation hierarchy, all reasonable opportunities to achieve measurable net gains on-site have been exhausted or where greater ecologically meaningful gains can be delivered off-site where the improvements can be demonstrated to be deliverable and are consistent with the Local Nature Recovery Strategy and/or a local nature recovery network.

It is preferable that development proposing to use off-site biodiversity net gain selects locations within Mid Sussex District and ideally local to the proposed development.

Further guidance

The Council will publish further guidance on implementing and delivering biodiversity net gain on its website and development proposals will need to take this into account. This guidance will be reviewed periodically to ensure it reflects best practice, local priorities and opportunities.

DPN3: Green and Blue Infrastructure

Policy: Strategic
Strategic Objectives: 5 – Create and Maintain Green Infrastructure

6 – Infrastructure to Support Sustainable Communities
15 – Provide Cultural, Leisure and Sporting Facilities

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

Green and blue infrastructure functions at a variety of scales from individual street trees to large woodland; it is found from the local to the landscape scale. Green and blue infrastructure can also be formed of linear features such as roadside verges, rights of way and rivers. There are many different types of green and blue infrastructure and examples include:

Green and blue infrastructure typology	Examples
Parks and gardens	Urban parks, country and regional parks, formal gardens
Amenity green space	Informal recreation spaces, housing green spaces, domestic gardens, village greens, urban commons, other incidental space
Natural and semi-natural urban green spaces	Woodland and scrub, grassland, heath or moor, wetlands, open and running water, wastelands and disturbed ground
Green corridors	Rivers and canals including their banks, road and rail corridors, green bridges, field margins, hedgerows, cycling routes, pedestrian paths, and rights of way and other recreational routes
Vegetated sustainable drainage systems, SuDS	Green roofs, blue roofs, rainwater harvesting and smart controls, downpipe disconnection planters, rain gardens and biofiltration strips, swales, ponds, detention basins
Features for species	Bird and bat boxes, swift bricks, hedgehog holes
Other	Street trees, allotments, community gardens and orchards, private gardens, city farms, green walls, cemeteries and churchyards

Adapted from the Natural England Green Infrastructure Framework.

In line with Aerodrome Safeguarding Requirements any proposed green and blue infrastructure should be carefully designed to ensure that the bird strike risk to Gatwick Airport is not increased and the safety of the airport is not compromised.

Green and blue infrastructure assets and links

Existing green and blue infrastructure assets, links and the overall multi-functional network will be protected and new green and blue infrastructure will be encouraged as part of development proposals. To ensure the existing green and blue infrastructure network is protected and to help mitigate the effects of climate change, important green and blue 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 and blue 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
- Land in the Northern Arc (Brookleigh)

The following areas as shown on the Policies Maps will be safeguarded and designated as green and blue infrastructure. In some cases, these areas are used for informal open space or linear open space and so the requirements of Policy DPI5: Open Space, Sport and Recreational Facilities may be relevant. It should be noted that each designation may have different primary functions and green and blue infrastructure benefits:

- Land from Turvey Wood/ Franklands Wood to the Scrase Valley, Haywards Heath
- Ashenground and Bolnore Woods, Haywards Heath
- Heath Recreation Ground, Haywards Heath
- Blunts Wood and Paiges Meadow LNR, Haywards Heath
- East Court & Ashplats Wood, East Grinstead
- Brooklands Park, East Grinstead
- Spring Copse, East Grinstead
- St. Margaret's Loop, East Grinstead
- A22 Beeching Way, East Grinstead
- Worth Way
- Forest Way
- Railway corridor throughout the district
- All SANG sites in the district
- All Local Wildlife Sites in the district

All development can play its part in protecting and providing green and blue infrastructure, however, the opportunities and measures available may vary depending on the type of development. Even if some provision of green and blue infrastructure appears to be small at an individual scale, taken together, individual actions can be cumulatively effective and lead to positive changes for access to nature, health and wellbeing, nature recovery, and climate change mitigation. Applicants will need to consider green and blue infrastructure at the earliest stage to ensure effective incorporation of measures.

DPN3: Green and Blue Infrastructure

The protection of existing and provision of new green and blue infrastructure will be supported because it delivers a range of environmental, social and economic benefits

including resilience to the effects of climate change, positive health and wellbeing effects, active travel opportunities, nature-based solutions and supporting nature recovery.

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

1. Responds to and incorporates existing on-site and off-site green and blue infrastructure into the development design and layout.
2. Provides new green and blue infrastructure integrated into the development design.
3. Contributes to the wider green and blue infrastructure network by taking opportunities to improve, enhance, manage and restore green and blue infrastructure, and providing and reinforcing links to existing green and blue infrastructure including outside the development's boundaries to develop a connected network of multi-functional greenspace, including incorporating opportunities to contribute to strategic green and blue infrastructure.

Applicants will need to 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 and blue infrastructure design will be expected to demonstrate through a green and blue infrastructure masterplan and statement that opportunities have been taken to:

4. Strengthen connectivity and resilience of ecological networks.
5. Improve resilience to the effects of climate change.
6. Support health and wellbeing by providing access to green space, nature and rights of way.
7. Foster and improve understanding of green and blue infrastructure including natural greenspace and nature conservation features.

Green and blue infrastructure design will need to be informed by and respond to existing evidence and guidance on the multi-functional green and blue infrastructure network including Biodiversity Opportunity Area statements, priority and irreplaceable habitats, green infrastructure mapping, ecological surveys, landscape character assessments, local nature recovery networks and the Local Nature Recovery Strategy.

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

Green and blue infrastructure assets and links

To help deliver a multi-functional green and blue infrastructure network and to protect existing green and blue 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 and blue infrastructure assets and links will be safeguarded and allocated as green and blue infrastructure as shown on the Policies Maps. In some cases, these areas are used for informal open space or linear open space and so the requirements of Policy DPI5: Open Space, Sport and Recreational Facilities may be relevant.

DPN4: Trees, Woodland and Hedgerows

Policy:	Non-Strategic
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 such as by providing shade and carbon sequestration.

Ancient woodlands are irreplaceable 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 further fragmentation and the 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, and their soils, as well as encouraging new planting. Development will be required to incorporate trees, woodland and hedgerows into the design and landscaping of a scheme.

Where it is deemed and robustly demonstrated there will be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with loss of irreplaceable habitat. However, it is important that any new woodland is created in the right place with the right species so the primary objective is to protect ancient woodland and prevent its loss or damage.

Ancient, aged, veteran and notable trees identified through site surveys and assessments should be added to the Woodland Trust's Ancient Tree Inventory.

To avoid root damage and other adverse impacts, buffer zones for ancient woodland and ancient, aged and veteran trees will be required. The standards set out in Policy DPN4 will create a minimum root protection area, however, larger buffer zones may be required and the Council will expect applicants to demonstrate, through an assessment, that the distance and size of the buffer zone is appropriate and adequate to protect the trees, woodland and hedgerows. In accordance with Natural England 'Standing Advice' Buffer zones should not contain built or constructed features including roads, pavements and private space such as residential gardens. As sustainable drainage systems can affect the hydrology of a woodland, sustainable drainage schemes will only be allowed if they do not affect the root protection areas and if any change to the water table does not negatively affect ancient woodland or ancient, aged and veteran trees. Any development proposals to include built or constructed features within a buffer zone will need to demonstrate exceptional

circumstances and this will be determined through the planning application process on a case-by-case basis.

Hedgerows are an important habitat supporting a wide variety of flora and fauna. Hedgerows are used for food and shelter and by acting as wildlife corridors, hedgerows can also help species move through the landscape. In particular, hedgerows are vital for species like the rare hazel dormouse. Hedgerows also play an important role in mitigating the effects of climate change by storing carbon and providing shade.

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

All development to a greater or lesser extent can take account of trees, woodland and hedgerows and play its part in protecting them, however, the opportunities and measures available may vary depending on the type of development. Even if the provision of trees and hedgerows appears to be small at an individual scale, taken together, individual actions can cumulatively be effective and lead to positive changes for biodiversity, nature recovery, health and wellbeing, green infrastructure, and climate change mitigation. Applicants will need to consider trees, woodland and hedgerows at the earliest stage to ensure effective protection and incorporation of these features.

Development proposals will need to take into account relevant British Standards such as BS 3998:2010 *Tree work – Recommendations* and BS 5837:2012 *Trees in relation to design, demolition and construction – Recommendations*.

DPN4: Trees, Woodland and Hedgerows

Trees, woodland and hedgerows will be protected because they 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. As an irreplaceable habitat, ancient woodland and ancient or veteran trees and their soils will be protected. Where ancient wood pasture and historic parkland are identified, these areas will have the same consideration as other forms of ancient woodland.

Development (including construction and operational activities) that is adjacent to irreplaceable habitats including ancient woodland and ancient or veteran trees must incorporate appropriate buffers and/or root protection areas.

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, damage or loss of irreplaceable habitats including ancient woodland and ancient or veteran trees will not be permitted unless there are wholly exceptional reasons and in such circumstances, a suitable compensation strategy will be provided, including measures that respect the features and characteristics of the ancient woodland and ancient, aged or veteran trees.

The value of trees, woodland and hedgerows individually and cumulatively in providing connectivity and continuity across the landscape and a network for nature recovery will be taken into account so that habitat fragmentation, particularly of large and extensive woodland areas, is minimised.

New trees, woodland and hedgerows

Proposals for new trees, woodland and hedgerows must be of suitable species, usually native and from local or UK sourced stock, and where required for visual, noise or light screening purposes, trees, woodland and hedgerows must 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 all of the following:

- The biodiversity and amenity value of the existing habitat
- The landscape and its character
- Soil conditions
- Heritage and archaeology features
- Protected species
- Opportunities for natural regeneration
- Opportunities to connect to and extend existing woodland
- The long-term management arrangements for new woodland planting
- 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:

1. Retains and incorporates existing trees, woodland and hedgerows, including along the boundaries, into the design of new development and its landscape scheme.
2. Is orientated to have a positive edge to these features and the wider countryside.
3. Is designed to avoid the overshadowing of residential gardens which can lead to pressure for the removal of trees.
4. Prevents damage to root systems and takes account of expected future growth through respecting the root protection area.
5. Has appropriate protection measures throughout the development and construction process.
6. Secures appropriate long-term management and stewardship arrangements.

7. Where possible, incorporates retained trees, woodland and hedgerows within public open space rather than private space to safeguard their long-term management and stewardship.
8. 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.
9. Does not sever ecological corridors created by these assets and makes a positive contribution to the local nature recovery network and green infrastructure network.

All development proposed within 15 metres of any trees, measured from the trunk, will be required to submit an Arboricultural Impact Assessment and Arboricultural Method Statement prepared by a qualified arboriculturist.

Developments should integrate street trees and other urban greening measures into new streets and open spaces, and tree-lined streets will be encouraged. Appropriate species must be selected ensuring tree roots have sufficient space to support healthy, long-lived trees. Appropriate long-term management and stewardship arrangements will need to be in place and secured by planning conditions and/or planning obligations.

Works to trees and hedgerows

Proposals for works to trees and/or hedgerows, including felling, will be considered taking into account all of the following:

- The condition and health of the trees and/or hedgerows.
- The contribution of the trees and/or hedgerows to the character and visual amenity of the local area.
- The amenity, biodiversity and nature conservation value of the trees and/or hedgerows.
- The extent and impact of the works.
- Any replanting proposals.

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

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

Proposals for works to trees or proposals affecting trees will need to be in accordance with the relevant British Standards. For example, BS 3998:2010 *Tree work – Recommendations* and BS 5837:2012 *Trees in relation to design, demolition and construction – Recommendations* (or as updated).

The felling of protected or established trees will only be permitted if there is no appropriate alternative. Where a protected or established tree or group of trees is felled, a replacement tree or group of trees, on a greater than 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. Replacement trees must be of suitable species, usually native and from local or UK sourced stock.

Use of buffer zones

Development must 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. To avoid damage to hedgerows and a reduction in its resilience to change, an appropriate buffer strip along each side of a hedgerow of a minimum 2 metres must be maintained. The Council will encourage larger buffers and will expect applicants to demonstrate, through an assessment, that the distance and size of the buffer zone is appropriate and adequate to protect the trees, woodland and hedgerows.

The size of a required buffer zone may need to expand according to the nature of the site and the size and nature of the proposed development, and if there are other impacts likely to extend beyond the minimum buffer zone distance such as significant engineering operations or after-uses that generate significant disturbance.

Buffer zones will be expected to contribute to green infrastructure and wider ecological networks, prevent fragmentation of habitats and consist of a semi-natural habitat with appropriate planting. Buffer zones will be expected to prioritise ecological enhancement rather than the amenity of the proposed development and should not contain built or constructed features including roads, pavements or private space such as residential gardens. 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
Strategic Objectives:	3 – Protect Valued Landscapes 11 – Support Mid Sussex as a Visitor Destination

Historic parks and gardens are typically gardens, grounds and other planned open spaces that are designed landscapes and reflect the landscaping fashions of their day. It is important to protect historic parks and gardens because they are part of our heritage and can easily be damaged or lost forever. Those historic parks and gardens that have the most significance appear on the Historic England 'Register of Parks and Gardens of Special Historic Interest in England' and are designated heritage assets.

There are 10 Registered Parks and Gardens of Special Historic Interest in Mid Sussex. In addition there are a large number of historic parks and gardens that are unregistered but which appear on the West Sussex Historic Environment Record and are of special local historic interest. The need to protect such landscapes is also recognised.

The 10 Registered Parks and Gardens of Special Historic Interest in Mid Sussex are:

- Borde Hill
- Brockhurst
- Gravetye Manor
- Heaselands
- Nymans
- Slaugham Place

- Standen
- Stonehurst
- The High Beeches
- Wakehurst Place

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.

Buildings or structures within a registered park or garden, or park or garden of special local historic interest will also be protected where they form part of or contribute to the character, appearance and setting of a registered park or garden, or park or garden of special local historic interest.

DPN6: Pollution

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

Pollution is the introduction of harmful materials (pollutants) into the environment. Pollutants can be created by human activity and may damage the quality of air, water and land. Pollution can also spread from its source and affect larger areas. Pollution may or may not be visible, and it can cause problems to people's health and wellbeing and the natural environment, including wildlife. Some types of air pollution may also contribute to climate change.

Mid Sussex District is located in an area of serious water stress. Development must be positively planned to minimise its impact on water resources in order to provide resilience against the impacts of climate change including security of water supply. To protect the environment, biodiversity and aquatic ecosystems, development must take measures to control water pollution.

Road traffic is one of the main contributors to air pollution. There is one Air Quality Management Area (AQMA) in the district declared due to high levels of nitrogen dioxide. Exceedances are attributed to the topography of the area and the volume of road traffic. Increased traffic and associated nitrogen deposition can also affect the protected heathland habitat of the Ashdown Forest SPA and SAC.

Artificial lighting can be another source of pollution affecting the dark skies of the protected landscapes and wildlife.

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 and development proposals will need to take this into account.

DPN6: Pollution

Development must not cause or be adversely affected by 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 or hazards, taking into account any cumulative impacts.

Development must 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, biodiversity and ecology of surface water and groundwater resources including reservoirs. Development may need to include mitigation measures to reduce risks to the water environment and nature-based solutions will be encouraged.

Pollution prevention practices must be adopted during construction activities. Where relevant, development proposals should produce a Construction Environment Management Plan identifying how general and site-specific risks will be managed to avoid environmental harm.

Development proposals will need to take into account the Council's published guidance¹⁵.

DPN7: Noise Impacts

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

New development needs to be managed to protect people's health and quality of life and the natural environment from unacceptable levels of noise. Some development may create additional noise and some development may be sensitive to the prevailing acoustic environment. There may be opportunities through new development to make improvements to the acoustic environment. Good acoustic design will need to be considered early in the planning process to ensure that the most appropriate solutions are identified.

The impact of noise may be a combination of exposure to noise, the frequency of noise, the duration of noise and the time of day that noise occurs. In assessing the impact of noise and

¹⁵ Such as the [Air Quality and emissions mitigation guidance for Sussex \(2021\)](#)

whether it is of concern or may be a nuisance, the wider context of a development proposal needs to be considered including its location, for example, whether it is in an urban or rural setting.

Noise sensitive development is explained further in the *Planning Noise Advice Document: Sussex* guidance but includes uses such as residential, hotels and guest houses, and residential institutions such as care homes and hospitals. In addition to existing noise sensitive uses, planned noise sensitive uses includes adopted site allocations and development granted planning permission but not yet implemented.

Protected landscapes such as the High Weald AONB and the South Downs National Park are valued for their tranquillity and so development proposed within or in the setting of these protected landscapes should not result in unacceptable levels of noise.

Development proposals will need to take into account the Council's published guidance on noise impacts. For example, the *Planning Noise Advice Document: Sussex*.

DPN7: Noise Impacts

People's health and quality of life and the natural environment, including wildlife, 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:

1. Avoids significant adverse impacts on health and quality of life.
2. Mitigates and minimises adverse impacts on health and quality of life.
3. Where possible, contributes to the improvement of health and quality of life.

Development will be expected to be located, designed and controlled to avoid significant adverse impacts or minimise adverse impacts from noise. Development must 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 must be carefully considered to avoid noise.

In addition to good acoustic design, development should have regard to natural solutions for mitigating noise such as green infrastructure.

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:

- a) An assessment of the impact of noise generated by a proposed development; or
- b) 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 such as the Planning Noise Advice Document: Sussex.

DPN8: Light Impacts and Dark Skies

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

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

The South Downs National Park has been designated as an International Dark Sky Reserve (Moore's Reserve). The southern part of Mid Sussex District is within this dark sky designation and this Plan area is adjacent to it. The South Downs National Park Authority has produced guidance for developers setting out its approach to lighting design and the protection and enhancement of dark skies within the South Downs National Park.

The protected landscape of the High Weald AONB is also an intrinsically dark landscape and is characterised by having some of the darkest skies in the south-east of England. This gives the AONB a sense of remoteness and peacefulness and connects the natural environment to the cultural and historic landscape. Dark skies is one of the components of the natural beauty of the High Weald AONB and the High Weald AONB Management Plan sets out objectives to protect the dark skies of the High Weald.

Artificial light can also have an impact on wildlife and ecosystems. For example, the artificial lighting of bat roosts, access points and foraging pathways can cause disturbance to bats. It is important to consider the colour of lighting and the materials used in buildings so that light does not reflect off surfaces especially near water bodies.

Lighting is an important part of the design process and artificial lighting should be carefully considered to protect amenity and wildlife, Appropriate types and levels of lighting can also contribute to a sense of place, however, poorly designed lighting can result in light pollution which can lead to negative effects on health and wellbeing and ecosystems.

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.

It is necessary to consider where, when and how much the light shines. For example, measures should be taken to turn off or dim the light when it is not being used, selecting appropriate types and levels of lighting, and considering whether lighting is for functional or decorative purposes. The character of the area and the surrounding environment may affect what is considered to be an appropriate form and level of lighting.

DPN8: Light Impacts and Dark Skies

People's health and quality of life and the natural environment 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, the South Downs International Dark Sky Reserve (Moore's Reserve) 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 must demonstrate all of the following:

1. The minimum amount of lighting necessary to achieve its purpose is specified or otherwise justified on safety or security grounds.
2. 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.
3. The means of lighting would be unobtrusively sited.
4. Low energy lighting is used.
5. There would not be an adverse impact on wildlife such as through consideration of the appropriate siting, fitting, design, colour and temperature of lighting.

Development proposals must carefully consider the design and layout of parking arrangements to avoid headlight nuisance.

Where lighting of a landmark or heritage feature is proposed, the level and type of illumination used would need to enhance the feature itself as well as meeting the above requirements.

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

DPN9: Air Quality

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

New development needs to be managed to protect people's health and quality of life and the natural environment from poor air quality. Air pollution is associated with a number of adverse health impacts as well as having adverse effects on biodiversity and habitats. Some air pollutants can also lead to an increase in greenhouse gases such as ozone which contribute to climate change.

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.

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.

Air quality is also a consideration for the nationally and internationally designated Ashdown Forest SPA and SAC. Development proposals likely to result in increased traffic may be expected to demonstrate how any air quality impacts have been considered. Further assessment may be required in a Habitats Regulations Assessment.

Development proposals will need to take into account the Council's published guidance on air quality. For example, the Air Quality and Emissions Mitigation Guidance for Sussex.

DPN9: Air Quality

People's health and quality of life and the natural environment 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 must 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 that measures and/or mitigation 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.

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 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 SPA and SAC. Any development likely to have an adverse effect on the integrity of the Ashdown Forest SPA and SAC, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid any potential adverse effects on the integrity of the Ashdown Forest SPA and SAC. If any potential adverse effects on the integrity of the Ashdown Forest SPA and SAC cannot be avoided, then mitigation for any potential adverse effects on the integrity of the Ashdown Forest SPA and SAC will be required.

DPN10: Land Stability and Contaminated Land

Policy: Non-Strategic
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 people and the natural environment from unacceptable risks.

The effects of land instability may result in landslides, subsidence or ground heave. These issues could have impacts on property, infrastructure, the public and the wider environment. The design and layout of new development and any structures may need to avoid areas of unstable land if it cannot be mitigated. Applicants may need to submit technical and environmental reports where land instability or slope instability may be a concern.

Land contamination can also impact and cause harm to human health, property, infrastructure and the wider environment. Some areas may be affected by previous industrial uses or the natural or background occurrence of potentially hazardous substances which may need to be mitigated through the development process. Applicants may need to undertake site investigations and assessments which include a risk assessment to identify the potential sources, pathways and receptors of contamination, and the proposed approach to remediation.

Technical and environmental investigations, assessments and reports will need to be prepared by a competent person such as a chartered member of a relevant professional institution. Investigations and assessments will need to be carried out at the earliest possible stage.

DPN10: Land Stability and Contaminated Land

Development proposals must 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. Such investigations and assessments will need to be carried out at the earliest possible stage. The investigations and assessment work must consider the nature and extent of the risk, the potential pathways for identified risks to receptors, and potential

impacts to human health, adjacent land uses and the natural environment. This includes risks and potential impacts to soil, watercourses, water bodies, groundwater and aquifers.

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

1. Unacceptable risks to the health of future users and occupiers of the development or people in the locality.
2. Risks to the structural integrity of buildings or structures on or adjoining the site.
3. Contamination to soil, watercourses, water bodies, groundwater or aquifers.
4. Harm to wildlife and the natural environment.

Planning conditions and/or planning obligations will be used to secure the submission and approval of relevant information and assessments, and measures to protect land stability, land quality and protection of 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

Policy:	Strategic
Strategic Objectives:	<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>

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 also valuable in providing ecosystem services, delivering a nature recovery network and providing resilience to the effects of climate change.

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. The countryside's 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 or the other environmental and social benefits that the countryside provides.

Agricultural land is graded into five grades:

- Grade 1 is excellent quality agricultural land.
- Grade 2 is very good agricultural land.

- Grade 3 is good to moderate agricultural land.
 - Subgrade 3a is good quality agricultural land.
 - Subgrade 3b is moderate quality agricultural land.
- Grade 4 is poor quality agricultural land.
- Grade 5 is very poor agricultural land.

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 (Grades 1, 2 and 3a are defined as the best and most versatile agricultural land). In the High Weald AONB, both Grades 3a and 3b soils are important and contribute to the pastoral agricultural economy and landscape character.

Not all land has been surveyed in detail and more detailed field surveys may be required to inform decisions about specific sites. Where identified, Grades 1, 2 and 3 agricultural land should be protected from development. This is land which is most flexible, productive and efficient and can best deliver future crops and pasture 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 Safeguarding Zone or Consultation Area, West Sussex County Council as the Minerals Planning Authority must be consulted to identify whether minerals are accessible in sufficient amounts to be economically viable to extract. Applications for development should address the requirements of Policy M9 in the West Sussex Joint Minerals Local Plan (July 2018, Partial Review March 2021) (JMLP).

DPC1: Protection and Enhancement of the Countryside

The countryside will be protected in recognition of its intrinsic character and beauty, and for the benefits it has for agriculture, natural capital, ecosystem services, health and wellbeing, delivering a nature recovery network and resilience to the effects of climate change.

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 including not adversely affecting the environmental and social benefits that the countryside delivers, and:

1. It is necessary for the purposes of agriculture; or
2. 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) and Grade 3b in the High Weald AONB will be protected from non-agricultural development proposals and will be protected from being covered by artificial surfaces or woodland 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 will need to be undertaken and proposals will be expected to use areas of poorer quality land in preference to that of higher quality.

Development proposals will need to 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 specific to the High Weald AONB and that gathered to support Neighbourhood Plans) will be used to assess the impact of development proposals on the rural and landscape character.

Major applications must be accompanied by a Landscape and Visual Impact Assessment or Appraisal (LVIA) for proposed development on greenfield, rural and edge of settlement sites. The LVIA will need to inform the site design, layout, capacity and any mitigation requirements. In the High Weald AONB, the LVIA will utilise the AONB Management Plan components as landscape receptors.

For major applications, a Landscape Strategy will need to be provided to identify how the natural features and characteristics of a site have been retained and incorporated into the landscape structure and design of the site and how they have informed the landscaping proposals for the site.

Economically viable mineral reserves within the district will be safeguarded.

*Significant development will be determined on a case-by-case basis.

DPC2: Preventing Coalescence

Policy: Strategic
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, individually or cumulatively, 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:	Strategic
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

New homes in the countryside

New homes in the countryside, defined as areas outside the built-up area boundaries on the Policies Map, will be permitted in specific circumstances, as set out below:

1. 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;
2. 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;
3. Development would involve the subdivision of an existing residential building;
4. The proposed development meets the requirements of Policy DPH2: Sustainable Development – Outside the Built-Up Area;
5. The proposed development is not in conflict with Policy DPC1: Protection and Enhancement of the Countryside; or
6. Affordable housing in accordance with Policy DPH34: Rural Exception Sites.

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.

Agricultural dwellings

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 all of the following apply:

7. The need cannot be fulfilled by another existing dwelling on, or any other existing accommodation near to, the agricultural unit.
8. 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.
9. 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.

10. 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, in accordance with marketing guidance at Appendix 1 of the Plan, 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.

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 constructed¹⁶ agricultural building which has not been or has been little used for its original purpose and:

11. the re-use would secure the future of a heritage asset; or
12. 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.

Replacement dwellings in the countryside

Replacement dwellings in the countryside will be permitted where all of the following apply:

13. The residential use has not been abandoned.
14. Highway, access and parking requirements can be met.
15. The replacement dwelling is of similar scale and position of the existing dwelling, unless there are demonstrable benefits in relocating the dwelling.
16. 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).

DPC4: High Weald Area of Outstanding Natural Beauty

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

¹⁶ 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.

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 statutory purpose of the landscape designation is to conserve and enhance the natural beauty of the area, and AONBs have the highest status of protection nationally in relation to landscape and scenic beauty.

Section 85 of the Countryside and Rights of Way Act 2000 (as amended) places a statutory duty on all relevant authorities, including a local authority such as Mid Sussex District Council, that in exercising or performing any functions in relation to, or so as to affect, land in an AONB, they must seek to further the purpose of conserving and enhancing the natural beauty of the AONB.

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 of this landscape, as are historic routeways.

The High Weald AONB Management Plan is the policy 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 covers a range of local authority functions, and in particular it can be used to guide environmental land management and climate change strategies. The Management Plan is a material consideration in the planning process, including plan-making, site allocations and assessing the impact of development proposals or other changes on the High Weald AONB.

Within the Management Plan, the High Weald AONB Statement of Significance sets out a number of components that comprise the natural beauty of the High Weald, and the Management Plan sets out specific objectives and actions for each component. The whole of the AONB is designated for its outstanding natural beauty and all the AONB is important; any areas perceived as 'degraded' landscape characters should be seen as opportunities for the enhancement of natural beauty, contributing positively to the objectives of the Management Plan.

The High Weald Housing Design Guide was prepared by the High Weald AONB Partnership, which includes the 15 local authorities with land in the AONB, to support the objectives of the High Weald AONB Management Plan. The High Weald Housing Design Guide aims to give succinct, practical and consistent advice to set clear design expectations for new housing development within the High Weald AONB, to help ensure higher quality and landscape-led design that reflects intrinsic High Weald character, and is embedded with a true sense of place, without stifling innovation and creativity. Importantly, the High Weald Housing Design Guide is not solely focused on the appearance or style of individual buildings, but rather it is about creating successful places in terms of layout, grain and massing of development.

The High Weald Colour Study documents the existing colours in the High Weald AONB landscape and provides advice on what colours can be used in new development, including the colours of different materials, to help to integrate it into the landscape successfully.

DPC4: High Weald Area of Outstanding Natural Beauty

The scale and extent of development within the High Weald Area of Outstanding Natural Beauty (AONB) should be limited. Major development will not be supported and will not be permitted other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.

Development within the High Weald AONB, as shown on the Policies Maps, will only be permitted where it conserves and enhances landscape and scenic beauty of the area, with reference to the components of natural beauty set out in the High Weald AONB Management Plan, and has regard to the High Weald AONB Management Plan, in particular:

- The identified components of natural beauty, as set out in the High Weald AONB Management Plan, 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, landscape features, historic settlement pattern, sense of place and setting of the AONB.
- The conservation of wildlife and cultural heritage.

Development proposals should demonstrate a positive contribution to the objectives of the High Weald AONB Management Plan.

New housing development within or affecting the setting of the AONB should take account of the High Weald Housing Design Guide and High Weald Colour Study including applying a landscape-led design approach that reflects High Weald character; responding to the historic pattern and character of settlements in the form, layout, grain and massing of development; and using high quality architecture.

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

Setting of the High Weald AONB

Development within land that contributes to the setting of the AONB will only be permitted where it does not adversely affect the identified components of natural beauty of the AONB.

Development proposals in the setting of the AONB should be sensitively located and designed, be consistent with AONB purposes, and should not adversely affect transitional landscape character in the setting of the AONB and views, outlook and aspect, into and out of the AONB by virtue of its location, scale, form or design.

Assessment of such development proposals will have regard to the High Weald AONB Management Plan and other adopted planning documents and strategies such as the High Weald Housing Design Guide and High Weald Colour Study.

DPC5: Setting of the South Downs National Park

Policy: Strategic

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. The South Downs National Park covers over 1,600 sq km of the lowland landscape in Hampshire, West Sussex and East Sussex. The chalk ridge of the South Downs is often described as the spine of the South Downs National Park. Approximately 11% of Mid Sussex District is within the South Downs National Park. The boundary is to the south of Burgess Hill, Hassocks and Hurstpierpoint. The area of Mid Sussex District that falls within the South Downs National Park includes the downland villages of Fulking, Poynings and Pyecombe. 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:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
2. To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Section 11A of the National Parks and Access to the Countryside Act 1949 (as amended) provides a duty for relevant authorities, including a local authority such as Mid Sussex District Council, that in exercising or performing any functions in relation to, or so as to affect, land in any National Park in England, they must seek to further the purpose for which National Parks were designated.

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.

New developments in the setting of the South Downs National Park may increase traffic and may impact on rural roads which are part of the setting of the National Park, or on roads which pass through settlements and other parts of the National Park. This may affect their character and experiential qualities such as tranquillity. Reference should be made to the South Downs National Park's guidance 'Roads in the South Downs' (2015)¹⁷ which considers best practice for rural road design and management.

DPC5: Setting of the South Downs National Park

Development within land that contributes to the characteristics 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 the views, outlook and aspect, into and out of the National Park by virtue of the development's location, scale, form or design.

Development proposals in the setting of the National Park should be sensitively located and designed, be consistent with National Park purposes, should not adversely affect transitional landscape character, and must not significantly harm the National Park or its setting.

¹⁷ Roads in the South Downs (2015): <https://www.southdowns.gov.uk/landscape-design-conservation/design-in-the-south-downs/guidance/roads-in-the-south-downs/>

Assessment of such development proposals will have regard to the South Downs Partnership Management Plan, South Downs Local Plan and other adopted planning documents and strategies.

Development proposals should consider and address potential impacts on roads within the National Park or in the setting of the National Park. A Transport Statement/ Assessment and/or landscape assessment may be required for development likely to generate significant amounts of movement.

DPC6: Ashdown Forest SPA and SAC

Policy: Strategic
Strategic Objectives: 3 – Protect Valued Landscapes

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

The 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 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 either to 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 five currently operational SANG sites.

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.

A programme of monitoring will allow adjustments to be made to the overall mitigation strategy if necessary to ensure its continued effectiveness; this may include the SANG and SAMM requirements and the zone of influence. To ensure that the impact of development in the district is fully assessed and applying the precautionary principle, development proposed adjacent or near to the boundary of the 7km zone of influence may still require mitigation. This may reflect evidence of the pattern and origin of visitors to Ashdown Forest through the visitor surveys undertaken as part of the SAMM Strategy. Such proposals will be dealt with on a case-by-case basis and assessed through a site-specific Habitats Regulations Assessment. Should a Habitats Regulations Assessment conclude that mitigation is required for development adjacent or near to the boundary of the 7km zone of influence, for example, because of its size and/ or the likelihood of new residents visiting Ashdown Forest, then mitigation requirements are likely to be in the form of SANG and SAMM in line with the strategic solution.

In terms of atmospheric pollution, it is not necessary to include any mitigation measures in this Plan, 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 SPA and 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 an adverse 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 outside of the zone of influence but proposed adjacent or near to the boundary of the 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. Should mitigation be necessary, the mitigation requirements are likely to be in the form of SANG and SAMM in line with the strategic solution.

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 SPA and SAC.

11. Built Environment



Built Environment	DPB1: Character and Design DPB2: Listed Buildings and Other Heritage Assets DPB3: Conservation Areas DPB4: Aerodrome Safeguarding Requirements (Air Safety)
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DPB1: Character and Design

Policy:	Strategic
Strategic Objectives:	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

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.

The Council has prepared a Mid Sussex Design Guide which is adopted as a Supplementary Planning Document (SPD) and looks specifically at enhancing local distinctiveness, as well as ensuring high quality, sustainable development. The design principles in the SPD will be treated as a material consideration in the assessment of future planning schemes. Policy DPC4 sets out further design requirements in relation to development occurring within the High Weald AONB and within its setting, in particular to ensure that development takes account of the High Weald Housing Design Guide and the High Weald Colour Study.

DPB1: Character and Design

All new development must be designed in accordance with the Mid Sussex Design Guide Supplementary Planning Document (SPD).

All new development must 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 and streets, alterations to existing buildings and the design of surrounding spaces.

All development proposals will be required to demonstrate all of the following, to ensure that development:

Understanding the Context

1. Reflects the distinctive character of the towns and villages and protects their separate identity, heritage assets and valued townscapes.
2. Is sensitive to the countryside including the topography.

Layout, Streets and Spaces

3. Includes appropriate landscaping and greenspace, providing a main area of open space where it is most accessible and central to the scheme where relevant¹⁸;
4. 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.
5. 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.
6. Incorporates well integrated parking and servicing areas that do not dominate the street environment, particularly where high density housing is proposed.

Establishing the Structure

7. Is organised around sustainable transport principles and creates a pedestrian and cyclist - friendly layout that is safe, well connected, legible and accessible.
8. 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.
9. Takes 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

10. 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, height, massing, spacing, orientation, views, materials and relationship with the public realm.
11. Incorporates sustainable construction principles¹⁹ and is designed for adaptation and future weather events.

Residential Amenity

12. 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

¹⁸ Standards for on-site provision are detailed within Appendix 5 on developer contributions

¹⁹ Both in terms of materials as well as techniques such as optimising orientation of houses for maximising solar gain

privacy, outlook, daylight and sunlight, and noise, air and light pollution (see Policies DPN6, DPN7, DPN8 and DPN9).

20-minute neighbourhoods

13. Major residential and mixed-use proposals must demonstrate how they will deliver a scheme which embeds the 20-minute neighbourhood principles²⁰ and local living, taking account of the existing settlement pattern services, creating high quality active/ sustainable travel connections to existing services and where appropriate making provision of new. Proposals must address all of the following:
- a) Deliver diverse and affordable homes and design a development for all ages, supporting a diverse community.
 - b) Provide a layout which prioritises active and sustainable travel, delivering high-quality, well-connected paths, streets and spaces.
 - c) Provide good quality green spaces and green infrastructure in the right places and connect to existing provision.
 - d) Provide food growing opportunities.
 - e) Exploit opportunities to improve access to local employment, community health and wellbeing facilities, either by connecting to existing facilities or providing new.
 - f) Support home working through measures including advanced digital infrastructure.

DPB2: Listed Buildings and Other Heritage Assets

Policy: Non-Strategic

Strategic Objectives: 4 – Protected Built and Historic Environment

The heritage assets of the district include over 1,000 Listed Buildings and 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 the contribution made by their settings. This will be achieved by ensuring that:

²⁰ https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf

1. A thorough understanding of the significance²¹ of the listed building and its setting, and the potential to better reveal it, has been demonstrated. This will be proportionate to the importance of the building and potential impact of the proposal.
2. 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.
3. Traditional building materials and construction techniques are normally used. The installation of uPVC windows and doors will not be acceptable.
4. 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.
5. Special regard is given to protecting the contribution made by the setting of a listed building.
6. 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 and enhance heritage assets and their settings in a manner appropriate to their significance²¹, so that they can be enjoyed for their contribution to the character and quality of life of the district, and will look at opportunities to enhance or better reveal their significance.

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

Proposed development must undertake pre-determination evaluation of potential archaeological features on the site prior to any planning applications being submitted, unless it can be demonstrated that such evaluation is not appropriate for the site. Appropriate mitigation may be required depending on the outcome of that evaluation.

Where appropriate, a Heritage Impact Assessment must be provided to establish the significance of heritage assets and their settings, the impact of development on this significance, and if appropriate, mitigation strategies.

DPB3: Conservation Areas

Policy:	Non-Strategic
Strategic Objectives:	2 – Maintaining Settlement Identity and Character 4 – Protected Built and Historic Environment

²¹ Significance can be defined as the special interest of a heritage asset, which may be archaeological, architectural, artistic or historic.

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:

1. 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.
2. Open spaces, gardens, trees and landscaping and boundary features that contribute to the special character and appearance of the area are protected, and any new landscaping or boundary features are designed to reflect that character.
3. 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.
4. Existing buildings that contribute to the character of the conservation area are protected. Where demolition is permitted, the replacement buildings must be of a design that reflects the special characteristics and appearance of the area.
5. Activities such as markets, crafts or other activities which contribute to the special character and appearance of the conservation area are supported.
6. 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.

DPB4: Aerodrome Safeguarding Requirements (Air Safety)

Policy:	Strategic
Strategic Objectives:	4 – Protected Built and Historic Environment 12 – Support Safe, Healthy and Inclusive Communities

Aerodrome safeguarding is the process used to ensure the safe and efficient operation of airports. It is in place to help protect aircraft and passengers while manoeuvring on the ground, taking off and landing and while flying in the vicinity of the airport. This in turn helps ensure the safety of people living and work nearby.

Aerodrome safeguarding relates to how a development could impact on safety. Various assessments need to be made, for example, the height and design of the proposed development or construction equipment (such as cranes) which could create potential risk to the airport through impacts on Communication, Navigation & Surveillance (CNS) equipment, the creation of an obstacle or by causing building induced turbulence. It also considers lighting schemes and the potential risk to aviation created by large landscaping schemes, large areas of flat/shallow pitched roofs used for nesting and roosting and new water bodies & SUDS which could attract birds hazardous to aviation.

The Council is required to consult Gatwick Airport Limited on all planning applications where aerodrome safeguarding applies. The safeguarded area is not the responsibility or the proposal of the Local Planning Authority.

DPB4: Aerodrome Safeguarding Requirements (Air Safety)

All development proposals will be required to demonstrate that development complies with Aerodrome Safeguarding requirements to ensure that the operational integrity and safety of Gatwick Airport are not compromised.

The following must be taken into consideration:

1. Impact of buildings, structures and construction equipment on Communication, Navigation & Surveillance (CNS) equipment & Instrument Flight Procedures (IFPs).
2. Impacts of buildings, structures and construction equipment on Obstacle Limitation Surfaces (OLS).
3. 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.
4. Lighting schemes that could dazzle pilots or Air Traffic Control or could be confused with aeronautical ground lighting.
5. Wind turbines or large areas of solar panels.
6. Buildings/structures in proximity to the airport that could create induced turbulence or thermal uplift from vapour plumes from flues/cooling towers.

Where required, the Council will consult with the airport operators and/or the operator of Communication, Navigation & Surveillance (CNS) sites on relevant proposals in the aerodrome safeguarded area. Statutory consultation responses may require that restrictions are placed on the height or detailed design of buildings' structure or other development to avoid impacts on the airport, including those relating to CNS or on developments which may increase bird strike risk, create building induced turbulence or include lighting that could pose a hazard to the safe operation of the airport. Proposals that cannot be mitigated to the satisfaction of the statutory consultees are considered to be a hazard to aircraft safety and will be refused.

12. Transport



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

Policy: Strategic Objectives:	Strategic 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
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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 locations 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. National Design Guidance²² notes that the patterns of movement of people are integral to well-designed places. A well-designed movement network should limit the impacts of car use by prioritising and encouraging walking, cycling and public transport, in line with the movement hierarchy to ensure sustainable travel is taken into account from the outset of any new proposal.

²² Ministry of Housing, Communities & Local Government, 'National Design Guide: Planning practice guidance for beautiful, enduring and successful places' (2021). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/962113/National_design_guide.pdf



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.

The Plan has a strategic aim of increasing walking and cycling, with a long-term goal that these should be the first choice for shorter journeys such as those to and from school, college, work or leisure trips. Increasing the proportion of shorter trips made by walking and cycling has the twin benefit of improving the health and wellbeing of the population, and improving traffic flow on local roads and air quality in local neighbourhoods by reducing the number of car journeys.

In order to demonstrate that walking and cycling are prioritised, development proposals need to consider the location of services within or outside the development site and assess the suitability of walking and cycling to these services. Subsequently, public transport movements should be considered and finally the movement of general traffic and thus demonstrating an appropriate movement hierarchy and appropriate prioritisation of active travel routes.

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 (WSSCC) 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. Strategic Objective 6 seeks to ensure that development is accompanied by the necessary infrastructure to support development and the community and 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 scale of the challenge to decarbonise the transport system is significant and one which the County Council cannot achieve alone. 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 large capital investment for building capacity in the network to cater for forecast unconstrained traffic growth which has often led to exacerbate other impacts, such as increased car ownership, reduced public transport use and service viability, health and wellbeing and achieving climate change mitigation.

In accordance with paragraph 113 of the NPPF, developments which create significant amounts of movement will be required to provide a travel plan on a case-by-case basis, and the application should be supported by a transport statement or assessment so that the likely impacts of the proposal can be assessed. Approved schemes will then be required to undertake and promptly report regular monitoring of travel movements in and out of site by all modes at all relevant access points, to enable enforcement of travel plan targets against agreed remedial actions. This is critical to successful implementation of a vision-led approach to spatial planning by ensuring suitable mechanisms are in place to respond, if necessary, as travel patterns change.

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 have recently adopted a Strategic Investment Plan (SIP) for the transport network in the South East up to 2050. The SIP provides a framework for investment in strategic transport infrastructure, services, and regulatory interventions. The District Council acknowledges that travel needs and patterns do not obey administrative 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 acknowledges that partnership working will be necessary with other public, private and third sectors to help deliver their strategy and to effect real change to travel in the southeast.

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 are 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 must 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:

1. 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.
2. All major developments must 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.
3. Developments which generate significant amounts of movement must provide a Travel Plan and undertake and report regular monitoring of travel movements by all modes, to enable enforcement of agreed travel plan actions and targets.
4. Development shall create liveable communities which embody the 20-minute neighbourhood principles,²³ demonstrate accordance with the movement hierarchy and deliver attractive, healthy places that have a permeable street network within the site, connecting to existing networks and services, with clearly defined street hierarchies that are safe, and incorporate green infrastructure, particularly on walking and cycling routes, whilst ensuring they are designed for all users and supporting desirable opportunities for people to choose not to travel by car.
5. Development must integrate relevant requirements of Chapter 4 of the Mid Sussex Design Guide SPD and be designed to prioritise sustainable and active modes of travel and define a clear street hierarchy, providing safe and convenient routes for walking, wheeling and cycling through the development and linking with existing and enhanced networks beyond, including schemes identified in Local Cycling & Walking Infrastructure Plans, before the highway layout is planned.
6. New streets must be designed and built to adoptable standard which can easily incorporate advanced digital infrastructure, including full fibre to support opportunities for home working and incorporate and integrate with green infrastructure.

²³ https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf

DPT2: Rights of Way and Other Recreational Routes

Policy:	Non-Strategic
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 master-planning of new development takes full account of existing provision at the early design stage, to demonstrate it 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:

1. Ensuring that (where appropriate) development provides safe and convenient links to rights of way and other recreational routes.
2. Supporting the provision of improved and additional routes within and between settlements that contribute to providing a joined up network of routes where possible.
3. 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 those walking, wheeling, cycling, using micro mobility²⁴ and horse-riders*).
4. Wherever feasible, new public rights of way and routes should provide equal access opportunities for those with mobility challenges.

²⁴ Defined as – small, lightweight vehicles operating at speeds typically below 15mph such as bikes, e-bikes, electric scooters, electric skateboards, shared bicycle fleets, and electric pedal assisted bicycles.

DPT3: Active and Sustainable Travel

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

The Government's plan to decarbonise transport in Britain is linked to their commitment for the UK's emissions to be net zero by 2050²⁵. Transport is the largest contributor to UK domestic greenhouse gas (GHG) emissions, responsible for 27% in 2019²⁶. The past 30 years have seen other sectors GHG emissions decline. However, transport has remained fairly constant and efficiency improvements to vehicles have been matched by increasing numbers of journeys.

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 and sustainable travel an easy and attractive choice. Active travel facilities include those walking, wheeling, cycling, horse-riding and micro-mobility (such as mobility scooters, shared bike fleets and e-bikes).

In 2017 the Government published its first Cycling and Walking Investment Strategy²⁷ which sets out the ambition to make walking and cycling the natural choices for shorter journeys or as part of a longer journey and identified Local Cycling and Walking Infrastructure Plans (LCWIPs) as a mechanism for councils to identify and deliver individual and tailored interventions fit for their specific local context. In addition to the urban routes identified in the Mid Sussex District Council LCWIP, the West Sussex Walking and Cycling Strategy 2016-2026 Appendix 1 sets out various suggested schemes for inter-urban routes in the district. Mid Sussex will work with developers and communities with the aim of supporting delivery of suitable routes to support active travel in the district.

In consultation with West Sussex County Council Highway Authority (WSSCC HA), the Council has developed and adopted its LCWIP,²⁸ which focuses on the district's three town centres. This LCWIP sets out the strategic approach to identifying long-term cycling and walking improvements and makes the case for future investment through funding bids.

Active travel is an essential component of the 20-minute neighbourhood/local living principles. However, what can be achieved will be different across the district and the concept of a 20 minute journey time will be used as a guide and not rigidly applied. Delivering development which embodies the 20-minute neighbourhood and local living principles will help to ensure the community can access services and destinations which meet their day-to-day needs by active and sustainable transport modes.

In order to support the strategic ambition of 20-minute neighbourhoods/local living with better connected rural settlements, the Council will support the creation of an expanded network of inter-urban routes, including suggested routes in the West Sussex Walking and Cycling Strategy 2016-2026 Appendix 1 and any subsequent Active Travel Strategy. An expanded

²⁵ Climate Change Act 2008 (2050 Target Amendment) Order 2019.

²⁶ Department for Transport (DfT) Decarbonising Transport – A Better Greener Britain 2021

²⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/918442/cycling-walking-investment-strategy.pdf

²⁸ Mid Sussex LCWIP: <https://www.midsussex.gov.uk/media/9010/mid-sussex-local-cycling-and-walking-infrastructure-plan-2023-vfinal.pdf>

network of active travel routes between settlements will create a better-connected network of settlements and enable communities to access services in nearby towns and villages by non-car modes. In partnership with WSCC HA, the council will explore appropriate use of traffic calming measures, particularly on faster, minor rural routes, such as 'Quiet Lanes' which are designated to include measures to lower vehicle speeds and better cater for shared use by walkers, cyclists, horse riders and other vulnerable road users.

Crucial to successful delivery of the 20-minute neighbourhood/local living principles is provision of high quality, attractive, legible and convenient pedestrian and cycle routes and environments which can encourage people to choose to walk or wheel more as an alternative to car travel.

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 walk or 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 walking²⁹ for many without mobility difficulties. 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.

Developments of a sufficient scale to warrant consideration during the application process by the statutory consultee, Active Travel England (ATE), are strongly advised to consult with the agency at the earliest possible stage in the scheme development to ensure active travel principles are embedded from the outset.

Working in partnership with other travel operators and Highway Authorities, the Council will ensure that new developments that increase demand for public transport, provides for any required improvements to services and infrastructure. Taking account of the West Sussex Bus Service Improvement Plan (BSIP), contributions will be sought to provide new bus passenger facilities which might include accessible and sheltered bus stops including Real Time Passenger Information (RTPI) and bus priority measures to help improve journey times.

DPT3: Active and Sustainable Travel

Development will be required to help remove barriers to active and sustainable travel and create a healthy environment in which people choose to walk, wheel and use sustainable transport by taking account of all of the following:

1. Embedding the principles of 20-minute neighbourhoods, development must demonstrate that the proposal accords with the movement hierarchy and provide high quality, attractive, fit for purpose and convenient active travel infrastructure within the development which links to existing networks, key facilities and services and builds on the schemes identified in the Mid Sussex and West Sussex (and where relevant, neighbouring authority's) Local Cycling and Walking Infrastructure Plan (LCWIP), along with suggested routes in the West Sussex Walking and

²⁹ DfT Decarbonising Transport A Better Greener Britain 2021

Cycling Strategy 2016-2026 Appendix 1, and any subsequent Active Travel Strategy.

2. Where feasible, exploiting opportunities to improve active travel connections between settlements to enable communities to access services in nearby towns and villages by non-car modes, including negotiation of 'Quiet Lanes' to reduce car speeds.
3. Designing and constructing new infrastructure to an appropriate standard, incorporate green infrastructure and, where appropriate, integrate with existing green networks and, where possible, be designed to provide equal opportunities for those with mobility challenges.
4. Providing high quality facilities that will encourage and enable active travel, such as communal facilities such as cycle-hubs, bike hire, workplace showers, lockers and changing facilities.
5. 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.
6. Providing or contributing towards delivery of service and infrastructure improvements, in accordance with the West Sussex Bus Service Improvement Plan (BSIP) or subsequent documents.

DPT4: Parking and Electric Vehicle Charging Infrastructure

Policy: Non-Strategic

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 is set out in the West Sussex County Council (WSCC) Guidance on Parking at New Developments (2020) and some Neighbourhood Plans and account will be taken of the factors set out in paragraph 107 of the NPPF when considering parking levels in a development. Where guidance and policy requirements differ, more weight will be given to the most up to date reference, taking account of paragraph 107 of the NPPF and the specifics of the proposed development.

Guidance on Electric Vehicle charging can be found in the WSCC Electric Vehicle Strategy 2019-2030 (and subsequent iterations), which acknowledges that for certain activities and individuals, cars and vans remain an appropriate mode of transport over sustainable modes. Therefore, moving these vehicles from petrol and diesel to ultra-low emission vehicles is critical to reduce the impact of those journeys and help achieve climate change and air quality ambitions. The Strategy will be reviewed regularly to ensure it adapts to changes in this developing area of technology.

The 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 which requires all new residential buildings with associated parking to have access to electric vehicle charging points 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 will apply in line with Policy DPT4 below, unless or until higher standards are required nationally.

DPT4: Parking and Electric Vehicle (EV) Charging Infrastructure

Development must provide:

1. 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 Developments³⁰ (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.
2. Parking associated with all new residential development to ensure the relevant requirements of Schedule 1 Part S of the Building Regulations regarding Electric Vehicle Charging are met.
3. A minimum of 25% of all associated parking spaces for non-residential buildings to have fast (minimum 7kW) or faster Electric Vehicle Charging points; cable routes shall be provided for 100% of the remaining total number of spaces.

The Council will support the provision of car clubs, including the provision of accessible car club parking spaces and/or contributions towards the provision of car clubs in the vicinity of a development. Car club vehicles must be powered by non-fossil fuels.

Development for Rapid and Ultra Fast EV Charging facilities must:

4. Be delivered in accordance with the most up to date WSCC EV Charging Strategy.
5. Demonstrate the site is appropriately located to meet an identifiable need and/or locational gap in provision.

Outside the defined built-up area boundary, in addition to criteria iv and v above, sites that are part of existing development will be viewed more favourably over undeveloped greenfield sites. Any necessary ancillary uses for customers must be small scale to serve a functional need.

DPT5: Off-Airport Car Parking

Policy: Non-Strategic

Strategic Objectives: 6 – Infrastructure to Support Sustainable Communities

³⁰ **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 (2019-2030) on the basis policy DPT4 requirements currently exceed those of the WSCC Guidance.

Gatwick Airport Limited (GAL) published a Surface Access Strategy in October 2022. The strategy sets out how GAL will increase passenger public transport mode share, 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 off airport related parking, helps encourage the use of alternative sustainable transport modes whilst ensuring sufficient parking is available to passengers and staff 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
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 (2022) 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 and 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, and facilitating high value employment development, effective partnership working to secure key supporting infrastructure including rolling out full 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 (March 2022) 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). 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 northwest 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:

1. 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.
2. Encouraging high value employment development of appropriate land and premises to meet the needs of 21st century businesses which embody sustainable practices and support a circular economy and the achievement of Carbon Net Zero by 2050.
3. Supporting existing businesses and allowing them room to expand.
4. Promoting inward investment opportunities, promotion and expansion of clusters or networks of knowledge and data-driven, creative or high technology industries.
5. Seeking the appropriate infrastructure to support business growth – in particular, advanced digital infrastructure, including full fibre.

DPE2: Existing Employment Sites

Policy:	Non- Strategic
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, which 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 to support a balanced community, thriving economy and reduce the need to commute outside the district to find employment.

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.

Existing employment sites protected 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 (1) and (2) 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 in accordance with additional guidance set out at Appendix 1, 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.

In respect of redevelopment proposals on existing and allocated employment sites, (the majority of which are identified on the Policies Map), a sequential approach will be applied. 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). Those sites identified on the Policies Map do not represent an exhaustive list and application of policy DPE2 will be on a case-by-case basis where sites/units are not already identified but fall within the uses classified in the policy.

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 (including those 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/unit is 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, in accordance with marketing guidance set out Appendix 1 of the Plan and through the provision of:

1. Details of comprehensive marketing of the site/ unit for at least 12 months and appropriate to the prevailing marketing conditions; and
2. A financial appraisal that demonstrates that the development of employment generating uses (E(g), B2 or B8) are 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 would cause or 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

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

Redevelopment for employment use within the boundary of Existing Employment Sites (including those 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 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 all of the following apply:

3. Detailed layout and design are in keeping with its countryside location.
4. The expansion is contiguous with the boundary of an existing employment site.
5. 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
Strategic Objectives:	1 – Sustainable Development and Adaptation to Climate Change 2 – Maintaining Settlement Identity and Character

The Economic Growth Assessment Update (March 2022) 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. 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 at Crabbet Park, Copthorne
- DPSC3: Land to the South of Reeds, Sayers Common

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

DPE4: Town and Village Centre Development

Policy: Strategic
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. In response to their roles and significance the Council has adopted masterplans for each of the centres as SPDs in order to guide their future development. 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 district's 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'³¹. The services and facilities our towns and villages provide are crucial components of 20-minute neighbourhoods³² and should therefore be afforded appropriate protection.

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 district's 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.

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.

Annex 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'³³ 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'³⁴ (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 to be justified as an alternative to the default threshold of 2,500m² identified by the NPPF. The level of detail included within a Retail Impact Assessment should be proportionate to the

³¹ **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.

³² The Town and County Planning Association 'Guide to 20-minute Neighbourhoods – Creating Heathier, Active, Prosperous Communities' (March 2021) - https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf

³³ **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)

³⁴ **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.

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 stores 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 district’s centres, 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:

1. Applications for main town centre uses to be located in town centres; or, if suitable sites are not available,
2. In edge of centre locations where the site is accessible and well connected to the town centre; or, if suitable sites are not available,
3. 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 is likely to be refused.

For the purposes of the sequential test, neighbourhood and smaller village centres do not perform the same function as defined Town and Village Centres. Proposals in

neighbourhoods and smaller villages 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, including on allocated sites, must be accompanied by a Retail Impact Assessment which demonstrates that they would not have a significant adverse impact on a town/ village centre as defined on the Policies Map, either on their own or cumulatively in the area.

DPE5: Within Town and Village Centre Boundaries

Policy: Strategic
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 scale 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 high streets 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.

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 has 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 Masterplan SPDs. Support will also be given for:

1. The amalgamation or subdivision of units, subject to meeting the requirements of policies DPB2 and DPB3 relating to heritage impacts.
2. Temporary 'meanwhile' uses where they deliver community benefits, do not harm amenity and do not compromise the future redevelopment of the site.
3. 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
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 Town 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 maintains 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 period in accordance with marketing guidance at Appendix 1. '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.

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, involving the loss of Class E Uses will only be supported where all of the following are met:
 - 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.
 - e) It does not result in a concentration of uses that harm the vitality and viability of the centre.
2. Residential uses will be supported at upper storeys. Residential uses at ground floor level will be resisted unless it can be demonstrated that all of the following apply:
 - a) The vitality and viability of the centre is not harmed.
 - b) An attractive and active frontage to the public realm is maintained.
 - c) No harm would be caused to the character of the street scene.
3. 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.
4. 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 all of the following:
 - a) In accordance with marketing guidance at Appendix 1 that the existing and any alternative Class E use is no longer viable; this must be demonstrated through evidence of vacancy and proactive marketing for a minimum of 6 months from vacancy.
 - b) The proposed use would enhance the vitality and viability of the centre.
 - c) It would not result in adverse impacts on neighbouring amenity.

DPE7: Smaller Villages and Neighbourhood Centres

Policy: Non-Strategic
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:

In smaller villages, neighbourhood centres and parades of main town centre uses will be protected to meet the needs of their own communities and countryside areas, except where it can be demonstrated in accordance with marketing guidance at Appendix 1 that the existing use is no longer viable, and the proposed use is appropriate in scale and function, will not result in adverse amenity impacts, and/or is in accordance with a relevant Neighbourhood Plan.

DPE8: Sustainable Rural Development and the Rural Economy

Policy:	Non-Strategic
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 wellbeing of the local community in accordance with policy DPC1: Protection and Enhancement of Countryside.

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

Outside the built-up area boundaries on the Policies Maps, on sites which are not in the AONB, the following types of development will be permitted provided the development is not in conflict with other relevant policies in the plan:

1. New small-scale* economic development, and extensions to existing facilities, including leisure and tourism-related development, within the countryside will be permitted provided all of the following apply:
 - a) It supports sustainable growth and the vitality of all types of businesses in the rural economy.
 - b) It involves conversion of existing buildings and/or well-designed new buildings, where possible on previously developed sites.
 - c) 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:
 - a) They are of a scale which is consistent to the location of the farm holding, and
 - b) 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 all of the following apply:
 - a) The building is genuinely redundant for agricultural or forestry use.
 - b) It is not a recently constructed** agricultural building which has not been or has been little used for its original purpose.
 - c) The building is demonstrated to be structurally sound and capable of conversion without substantial reconstruction or extension.
 - d) The site is served by an existing suitable access to the local road network.
 - e) 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
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 retention, expansion and creation of tourism accommodation and attractions will be supported by the Council provided it meets certain criteria as set out in the policy and the requirements of other relevant development plan policies.

Where proposals will lead to a change of use or loss of existing tourism accommodation and attractions, planning applications will need to demonstrate that the existing use is unviable. Comprehensive marketing and viability evidence in line with requirements set out in Policy DPE9 and Appendix 1 will need to be provided.

Wakehurst Place and Millennium Seed Bank is located within the district to the north of Ardingly village, partly owned by the National Trust and operated by Royal Botanic Gardens Kew (RBGK). It is recognised as a major cultural destination attracting over 400,000 visitors per year and is a centre of scientific research of international importance. Wakehurst Mansion is Grade I listed, with part of Wakehurst a Registered Park and Garden (Grade II). The site is located within the High Weald Area of Outstanding Natural Beauty. Proposals that support sustainable tourism and the visitor economy will be supported where they meet the requirements of this policy, other policies in the Plan and the made Ardingly Neighbourhood Plan “ARD20: Wakehurst Place and Millenium Seed Bank”.

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, part of which falls in Wealden District, 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 they are well located and, if outside of the built-up area boundary, they respect the character and beauty of the countryside in line with the requirements in Policy DPC1: Protection and Enhancement of the Countryside.

Where development proposals are brought forward for the change of use or loss 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 in line with the requirements set out below and in Appendix 1. Applicants will need to provide all or some of the following:

1. Evidence of marketing actively conducted for a reasonable period.
2. Evidence that alternative visitor uses have been fully explored.
3. An appraisal indicating that the existing use is no longer viable.
4. Evidence that the site has not been made deliberately unviable.
5. Evidence of the suitability of the site to accommodate the alternative visitor use.
6. 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.

New tourism accommodation and attractions

Development proposals for new tourism accommodation* and attractions, or expansions or improvements to existing tourism accommodation* and attractions, will be supported where they are not in conflict with Policy DPC1: Protection and Enhancement of the Countryside, Policy DPC4: High Weald Area of Outstanding Natural Beauty and Policy DPE8: Sustainable Rural Development and the Rural Economy, and where all of the following are demonstrated:

7. It increases the range and/or quality of tourist facilities.
8. There would be no harm on highway safety or severe residual cumulative impacts on the road network.
9. It encourages sustainable travel opportunities.
10. It will not adversely affect the character, landscape, biodiversity, historical significance, appearance and amenity of the area, or cause loss or harm to irreplaceable habitats.
11. Opportunities are taken to use existing buildings where possible.
12. The design and layout of the proposals, including ancillary facilities, are sensitive to the existing character and setting.
13. It does not have an adverse effect on residential amenity in the local area.
14. It will not have an adverse effect on the vitality and viability of existing facilities in the locality or relevant assets of community value.
15. It meets the requirements of other relevant development plan policies.

Bluebell Railway

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. Housing



Housing	<p>DPH1: Housing</p> <p>DPH2: Sustainable Development - Outside the Built-Up Area</p> <p>DPH3: Sustainable Development - Inside the Built-Up Area</p> <p>DPH4: Older Persons' Housing and Specialist Accommodation</p> <p>DPH5: Gypsies, Travellers and Travelling Showpeople</p> <p>DPH6: Self and Custom Build Housing</p> <p>DPH7: Housing Mix</p> <p>DPH8: Affordable Housing</p> <p>DPH9: First Homes</p> <p>DPH10: Rural Exception Sites</p> <p>DPH11: Dwelling Space Standards</p> <p>DPH12: Accessibility</p>
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DPH1: Housing

Policy:	Strategic
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 19,620 dwellings (an average of 1,090 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 2023 there were 9,920 commitments made up from planning permissions and development plan allocations that have yet to be implemented. In addition, there were 2,240 completions in the first two years of the Plan. Therefore, to ensure the housing need is met in full the District Plan needs to make provision for 7,459 dwellings. The housing trajectory for the plan period can be found at Appendix 4.

The strategic sites allocated in the 2018 District Plan are making good progress with the first completions on the Brookleigh site (previously known as the Northern Arc) taking place in 2022. Over two-thirds of the 600 homes are now completed at Pease Pottage and the on-site school is open, while the Clayton Mills site at Hassocks had its first completions during 2022/23.

The spatial strategy of this Plan is to focus growth at 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 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. These are a mix of Sustainable Communities (set out in the Sustainable Communities chapter) and Housing Sites (set out in the Allocations chapter).

Sustainable Communities Sites

Policy Ref	Site	Yield to 2039
DPSC1	Land to the West of Burgess Hill and North of Hurstpierpoint	1,350
DPSC2	Land at Crabbet Park	1,500
DPSC3	Land to the south of Reeds Lane, Sayers Common	1,850
DPSC4	Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common	33
DPSC5	Land at Coombe Farm, London Road, Sayers Common	210
DPSC6	Land to the West of Kings Business Centre, Reeds Lane, Sayers Common	100
DPSC7	Land at LVS Hassocks, London Road, Sayers Common	200
Total		5,243

Housing Allocations

Policy Ref	Site	Yield to 2039
DPA1	Batchelors Farm, Keymer Road, Burgess Hill	33
DPA2	Land south of Apple Tree Close , Janes Lane, Burgess Hill	25
DPA3	Burgess Hill Station	300
DPA4	Land off West Hoathly Road, East Grinstead	45
DPA5	Land at Hurstwood Lane, Haywards Heath	36
DPA6	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath	30
DPA7	Land east of Borde Hill Lane, Haywards Heath	60
DPA8	Orchards Shopping Centre, Haywards Heath	100
DPA9	Land to west of Turners Hill Road, Crawley Down	350

DPA10	Hurst Farm, Turners Hill Road, Crawley Down	37
DPA11	Land rear of 2 Hurst Road, Hassocks	25
DPA12	Land west of Kemps, Hurstpierpoint	90
DPA13	The Paddocks Lewes Road Ashurst Wood	8-12
DPA14	Land at Foxhole Farm, Bolney	200
DPA15	Ham Lane Farm House Ham Lane Scaynes Hill	30
DPA16	Land west of North Cottages and Challoners Ansty	30
DPA17	Land to the west of Marwick Close Bolney Road Ansty	45
Total		1,444

The yields stated against the Significant Sites and housing allocations in the table above, as well as the allocations themselves, are approximate and based on the work undertaken to date. The yields may be refined as a result of more detailed masterplanning work as sites come forward through the planning application process.

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 1,768 units over the plan period is included in policy DPH1.

DPH1: Housing

The district's Local Housing Need is a minimum 19,620 dwellings over the Plan period.

Minimum Housing Need

The Housing Need will be met from the following sources:

Commitments (Existing allocations and Permissions)	9,921
Completions 2021/22	1,187
Completions 2022/23	1,053
Sustainable Communities	5,243
of which Significant Sites	4,700
DPSC1: Land to West of Burgess Hill/ North of Hurstpierpoint	1,350
DPSC2: Land at Crabbet Park, Copthorne	1,850
DPSC3: Land to the South of Reeds, Sayers Common	1,500
of which Housing Sites DPSC4 - DPSC7	543
Housing Sites DPA1 – DPA17	1,444
Windfall allowance	1,768
<i>Of which larger identifiable sites</i>	<i>466</i>
<i>Of which smaller and other non-identifiable sites</i>	<i>1,302</i>

Total Housing supply from 2021 - 2039	20, 616
Mid Sussex Housing Need	19,620
Total under/over supply for resilience and unmet need	+ 996

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.

DPH1 indicates that there will be a total over supply of 996 dwellings over the Plan period. This will add resilience to housing delivery in Mid Sussex, should any commitments not be delivered as expected. The Council is fully cognisant of the housing need within the Northern West Sussex Housing Market Area (HMA), which the Strategic Housing Market Assessment (SHMA) concludes is the primary HMA for Mid Sussex. Whilst Mid Sussex can meet its housing need as a result of the allocations set out in DPH1, there is likely to be an unmet need arising in the HMA overall. Any provision over and above meeting Mid Sussex housing need serves as a contribution towards unmet need arising in the Northern West Sussex Housing Market Area in accordance with the agreed priority order, as set out in Chapter 2 of this Plan.

DPH2: Sustainable Development – Outside the Built-up-Area

Policy: **Strategic**
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
2. Where the proposed development is for fewer than 10 dwellings the site is contiguous with an existing built-up area boundary, 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 1.

The developer will need to satisfy the Council that:

4. 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

5. A larger site is not brought forward in phases that individually meets the threshold but cumulatively does not.

DPH3: Sustainable Development – Inside the Built-up Area

Policy:	Strategic
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

Within built-up area boundaries, as defined on the 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, the Mid Sussex Design Guide SPD and other policies within the development plan.

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.

Note: Previous Policy DPH4 (General Principles for Housing Allocations) has been deleted and the components of it have been inserted into individual site allocations for clarity.

DPH4: Older Persons' Housing and Specialist Accommodation

Policy:	Strategic
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 persons' 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 is 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 about the viability of redevelopment of the site for another specialist scheme. In such cases, the Council will consider alternative provision such as accessible flats for older people.

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 are allocated to meet this need.

DPH4: Older Persons' Housing and Specialist Accommodation

Older Persons' Housing Need

Over the Plan Period there is an estimated need for net 1,887 additional dwellings with support or care and net 211 additional bedspaces³⁵. The need by type identified by the 2021 SHMA is set out below:

Accommodation Type and Tenure		Need (units/bedspaces)
Housing with Support (retirement living or sheltered housing)	Market	801
	Affordable	15
Housing with Care (extra care)	Market	857
	Affordable	214
Residential Care Bedspaces	n/a	300

³⁵ The figure of 211 bedspaces reflects the oversupply of 89 Nursing Care Bedspaces.

Site Allocations

To ensure that enough 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 to west of Burgess Hill/ North of Hurstpierpoint
- DPSC2: Land at Crabbet Park, Copthorne
- DPSC3: Land to the south of Reeds Lane, Sayers Common
- DPA9: 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:

- DPA18: Land at Byanda, Hassocks
- DPA19: Land at Hyde Lodge, London Road, Handcross

The precise yield and accommodation type will be determined following further work with site promoters/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:

1. Provide affordable housing in line with Policy DPH8, where classified as C2 or C3, and
2. 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 all of the following criteria are met:

3. 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.
4. The site is accessible by foot or public transport to local shops, services, community facilities and the wider public transport network.
5. 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 Persons' Accommodation and Specialist Housing

Proposals for extensions, upgrades and/or annexes to older persons' housing and specialist accommodation will be supported where all of the following apply:

6. There is a demonstrable need to support the existing accommodation.

³⁶ 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.

7. The design respects the character and appearance of the host building and local area and is subservient to the existing building.
8. The cumulative additions are not disproportionate to the original building.
9. 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 in accordance with marketing guidance at Appendix 1 of the Plan and to the Council's satisfaction that:

10. There is no longer an identified need for the type of housing.
11. Suitable alternative provision is, or will be, provided locally so that there is no net loss; or
12. 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.

DPH5: Gypsies, Travellers and Travelling Showpeople

Policy: Strategic
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 criteria below, 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.

DPH5: 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 travel³⁷ and 12 net permanent pitches for Gypsies and Travellers who no longer travel³⁸, for the period 2021 to 2038. Part of the 16-pitch need will be met by the delivery of existing commitments³⁹, as shown in the table below.

Gypsy and Traveller Provision

Gypsy and Traveller Pitch Provision	No longer travel	Still Travel
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³⁷ 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)

³⁸ 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)

³⁹ Commitments here relate to pitches with planning permission.

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 enough 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 sites⁴⁰ (permanent and transit) and the consideration of planning applications, proposals will be supported provided that all of the following are addressed:

1. The site or extension satisfies a clearly defined need, as evidenced by the Mid Sussex Gypsy and Traveller Accommodation Assessment, or the latest available evidence.
2. Avoid locating sites in areas at high risk of flooding or significantly contaminated land, or adjacent to existing uses incompatible with residential uses, such as waste tips and wastewater facilities.
3. The site is reasonably accessible to schools, shops, health and other local services and community facilities.
4. 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.
5. The development is appropriately located and designed or capable of being designed 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 wellbeing of the residents.
6. The site is supported by necessary infrastructure, including water, power, drainage and connection to a main foul sewer at the nearest point of adequate capacity.
7. The sites are compatible with neighbouring land uses and minimise impacts on adjacent uses, built form and landscape character.
8. In rural and semi-rural areas sites should not dominate the nearest settled community.
9. Each pitch should be capable of accommodating 1 mobile home, 1 touring caravan, 2 car parking spaces, an amenity building and amenity space.
10. Sites for Travelling Showpeople should include adequate space for storage and/or keeping and exercising any animals associated with Travelling Showpeople's needs.
11. 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 Special Protection Area (SPA) and Special Area of Conservation (SAC) refers).
12. In the case of proposals within the High Weald AONB or within the setting of the South Downs National Park, Policy DPC4: High Weald Area of

⁴⁰ 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.

Outstanding Natural Beauty and DPC5: Setting of the South Downs National Park will apply.

Existing Gypsy, Traveller and Travelling Showpeople sites

Existing Gypsy and Traveller sites, as shown on the Policies Map, 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 latest available evidence.

Any new or extensions to existing Gypsy, Traveller or Travelling Showpeople sites⁴¹ 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.

DPH6: Self and Custom Build Housing

Policy: Strategic
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 period⁴².

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.

To help satisfy potential future demand the Council will look to allocations to deliver a number of serviced plots, and provision on other 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

⁴¹ 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.

⁴² The three-year period runs from the end of each Base Period (31 October to 30 October)

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.

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. 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.

DPH6: 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:

1. 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.
2. 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, and the suitability of the development.
3. A minimum of 2% of the residential plots on housing sites comprising of 100 or more dwellings will need to be provided as serviced plots for self or custom build housing.
4. 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.
5. 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.
6. 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. The design code should be secured by a planning condition at the outline planning application stage.
7. 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.
8. Serviced plots will be marketed solely to households on the District Council's Self-build and Custom Housebuilding Register for a period of 6 months. If after the 6 months a plot has not been bought or reserved, it can be put on the open market as a self or custom build plot for a further 6 months. If a plot remains unsold after the period of 12 months, it must either remain on the market as a self or custom build plot or be offered to the District Council or an approved Registered Provider, before being built out by the developer as a market sale dwelling.
9. Self or custom build plots must be made available at competitive prices, supported by an RICS valuation, which are fairly related to site/plot costs

and agreed through the S106 agreement, in order to ensure their sale for such a purpose.

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.

DPH7: Housing Mix

Policy: Strategic
Strategic Objectives: 12 – Support Safe, Healthy and Inclusive Communities
13 – Provide Housing to Meet Community Needs

A key feature of 20-minute neighbourhoods⁴³ requires the provision of a mix of housing tenures and types that reflect local housing need and support people at all stages of life. 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, at 19.6%. Providing a suitable mix of different 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 policy seeks to provide a starting point for considering what sized dwellings will be appropriate, recognising that needs might change over the Plan period and that there might be certain types or models of accommodation that prescribe the mix.

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 DPH4: Older Persons' Housing and

⁴³ https://www.tcpa.org.uk/wp-content/uploads/2021/11/final_20mnguide-compressed.pdf

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 DPH12: Accessibility to ensure that new residential development provides both adaptable dwellings to support the changes and needs of individuals and families at different stages of life and accessible dwellings for wheelchair users.

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 DPH5: Gypsies, Travellers and Travelling Showpeople identifies the pitch requirement and how the need is to be met.

Regarding 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 been built within the district, the SHMA notes that the private rented sector accounted 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.

DPH7: Housing Mix

To support the delivery of sustainable, mixed and balanced communities which meet the 20-minute neighbourhood principles, housing development (including affordable housing) will:

1. Provide a mix of dwelling types and sizes that reflects current and future local housing needs. As identified by the 2021 SHMA, the Council expects the ranges set out in the table below to be used as a starting point:

Housing Mix split (SHMA 2021)

	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%

Variations to the above will be considered where the Council is satisfied that:

2. The site characteristics and location dictate that there is a more appropriate mix of size of dwellings.
3. There is an identified need for a particular size or sizes of dwelling in the settlement where the scheme is located.
4. The latest available evidence justifies deviation, or
5. There are demonstrable financial viability reasons for doing so.

Developments for specialist or specific accommodation types (such as older persons' housing) will be exempt from meeting the above housing mix split.

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.

These types of accommodation include that which is suitable for:

- Older persons (DPH4).
- People with disabilities (DPH12).
- People who wish to build their own home (DPH6).
- Build to Rent.
- Co-Living.
- Gypsy and Traveller community (DPH5).

Where applicable, specific policies on the different accommodation types are identified against each of the above.

DPH8: Affordable Housing

Policy:	Strategic
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's preference is for rented units to be provided as social rent units with rents determined through the Government's rent policy, but it is recognised that grant is not currently available for section 106 units. Any additional affordable housing units provided on a s106 site should however ideally be for social rent.

The Council recognises that the NPPF expects that 10% of homes on major developments should be for affordable home ownership unless this would significantly prejudice the ability to meet the identified affordable housing needs of specific groups. The Council's approach

regarding the 25%/75% mix is supported by the SHMA findings which highlights a clear and acute need for rented affordable housing (both social and affordable rented) and the approximate 2,000 households on the Council's Common Housing Register (as at November 2023).

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 social or affordable 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, and any ground floor affordable units are to have their own individual means of access.

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 together 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. 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.

The Council has adopted an Affordable Housing SPD to provide further guidance.

DPH8: 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:

1. 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 combined gross floorspace of greater than 1,000m².
2. The full 30% affordable housing requirement to be provided on each and every phase of a phased development, unless an alternative approach is justified to the satisfaction of the Council, and for the affordable housing to be fully integrated within the development.
3. Developments in the High Weald Area of Outstanding Natural Beauty providing 6 – 9 dwellings, or with a combined gross floorspace of greater than 1,000m², to provide a minimum of 30% on-site affordable housing, with the number of units rounded up to the next whole number.
4. In the case of redevelopment, where the most recent use included affordable housing, at least the same number of affordable homes to be re-provided in accordance with current mix and tenure requirements.
5. 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.
6. Unless otherwise agreed with the Council, the size split on each site is to be as shown in Policy DPH7: Housing Mix. The majority of 2-bed/4 person units should be provided as houses rather than flats, wherever possible and maisonettes should each have their own private garden area.

7. A minimum of 4% of affordable housing units to be wheelchair accessible M4(3)(2)(b) units in line with Policy DPH12: Accessibility, unless otherwise agreed with the Council's Housing Enabling Officer.
8. 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.
9. Affordable housing units to meet the occupancy 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/ maisonettes/ 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)

10. 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 in order to create more balanced communities.
11. 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 on the sale/ letting of 75% of the total units, for all schemes which are not policy compliant. At the review stage more accurate information about actual 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.
- A Registered Provider cannot be found to take on the affordable housing units.
- The development comprises a single block retirement scheme.
- 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 to 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.

DPH9: First Homes

Policy:	Strategic
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 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.

DPH9: 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 (DPH8), subject to all of the following criteria being met:

1. First Homes are to form 25% of the total number of affordable units.
2. The dwellings are discounted by a minimum of 30% against the market value.
3. After the discount has been applied, the first sale of the home is priced no higher than £250,000.
4. The purchaser meets the First Homes eligibility criteria.
5. The local connection criteria are met by the purchaser.

In order to meet the Local Connection Criteria the purchaser must:

6. 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
7. 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
8. 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.

There are exemptions from the Local Connection Criteria for members of the Armed Forces, the divorced or separated spouse or civil partner of a member of the Armed Forces, a widow or widower of a deceased member of the Armed Forces (if their death was caused wholly or partly by their service) and a veteran who left the Armed Forces in the last five years, as long as the other eligibility criteria are met.

First Homes Exception Sites

The District Council will support First Homes Exception Sites provided that all of the following additional criteria are met:

9. The proposals are wholly or primarily for First Homes.
10. There is an identified local need for First Homes which is not already being met elsewhere in the district.
11. 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.
12. The proposal is proportionate in size and scale to the existing settlement and respects its setting.
13. The site is not located within a designated rural area⁴⁴.

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.

DPH10: Rural Exception Sites

Policy: Non – Strategic
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 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

⁴⁴ National Parks, Areas of Outstanding Natural Beauty and areas designated as 'rural' under Section 157 of the Housing Act 1985 (Annex 2, NPPF)

work with Parish Councils 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 DPH9: First Homes.

DPH10: Rural Exception Sites

The development of rural exception sites for affordable housing will be permitted provided that all of the following apply:

1. The development comprises 100% affordable housing.
2. 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.
3. The size of properties is justified by a Parish Housing Needs Survey carried out by or on behalf of the Parish Council in the last 5 years.
4. The occupancy of the homes is restricted in perpetuity to those with a genuine local need for affordable housing.
5. The scale of the development respects the setting, form and character of the settlement and surrounding landscape.
6. The development is adjacent 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:

7. The requirements of policy criteria 2, 3, 5 and 6 can be met for the overall scheme and for the affordable housing element criteria 1 and 4 can be met; and
8. 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 DPI8).

Rural exception sites must be brought forward with the support of the relevant Parish Council, a specialist rural Registered Provider and the Council's Housing Enabling Officer.

DPH11: Dwelling Space Standards

Policy:	Non-strategic
Strategic Objectives:	12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

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 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 participating in communal and social activities.

DPH11: 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 (see DPH8: Affordable Housing for the occupancy and floor area requirements for Affordable Housing).

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.

DPH12: Accessibility

Policy:	Non-strategic
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 homes, places and spaces, including areas of open space and transport infrastructure.

Together with providing homes to minimum standards (DPH11: Dwelling Space Standards), 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)⁴⁵ will help create sustainable development and support healthy communities.

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 at least 12% of new affordable homes to be wheelchair accessible, this policy seeks a minimum of 4%. The lower

⁴⁵ Schedule 1 of the Building Regulations 2010, as amended

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. 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 in DPH8: Affordable Housing), to properly accommodate the requirements and all units will require an area of private outdoor space.

Dimensions, floor areas, manoeuvring zones and correctly sized furniture layouts, which meet the size specifications referred to above are to be clearly indicated on individual unit layouts of the M4(3)(2)(b) Wheelchair Accessible Units (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 before reserved matters/full planning permission is granted. Final agreement of any details will also be required as a condition of planning consent in order to ensure full compliance.

DPH12: 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 new residential dwellings will be expected to meet Category 2 – accessible and adaptable dwellings under Building Regulations – Approved Document M Requirement M4(2), with the following exceptions:

1. Where new dwellings are created by a change of use.
2. Where the scheme is for flatted residential buildings of fewer than 10 dwellings.
3. Where specific factors such as site topography make such standards unachievable by practicable and/or viable means.

Category 3 - Wheelchair-User Dwellings

4. 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.
5. 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 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 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.

15. Sustainable Communities



Sustainable Communities	<p>DPSC GEN: Significant Site Requirements</p> <p>DPSC1: Land West of Burgess Hill/ North of Hurstpierpoint</p> <p>DPSC2: Land at Crabbet Park, Copthorne</p> <p>DPSC3: Land to the south of Reeds Lane, Sayers Common</p> <p>DPSC4: Land at Chesapeake and Meadow View, Reeds Lane</p> <p>DPSC5: Land at Coombe Farm, London Road</p> <p>DPSC6: Land to the west of Kings Business Centre, Reeds Lane</p> <p>DPSC7: Land at LVS Hassocks, London Road</p>
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The allocations in this chapter support the principle of Sustainable Communities. They provide a quantum of growth that will support provision of new services and facilities such as education, health, employment, retail and open space to meet day-to-day needs. This will enable these communities to be as self-sustaining as possible and grow in accordance with the 20-minute Neighbourhood and “Local Living” principles as described in Chapter 3.

The allocations in this chapter accord with the Plan Strategy (Chapter 6), particularly:

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

Policies **DPSC1: Land to the west of Burgess Hill and north of Hurstpierpoint** and **DPSC2: Land at Crabbet Park** adjoin the settlements of Burgess Hill and Crawley/Copthorne respectively. Services and facilities are planned on-site in order for these communities to be as self-sustaining as possible. However, their location adjacent to existing services and facilities such as public transport links and town centres will encourage localised journeys by walking/wheeling and limit private car use.
- Opportunities for extensions to improve sustainability of existing settlements.**

Policy **DPSC3: Land to the south of Reeds Lane, Sayers Common** proposes services and facilities on-site to support this development. Four smaller allocations (**DPSC4 – DPSC7**) are proposed which will also benefit from such day-to-day needs being provided in close proximity. Sayers Common has a limited range of services and facilities, therefore growth at this settlement supported by new on-site infrastructure such as Primary/Secondary education and community facilities will support improved sustainability for the settlement as a whole. The quantum of development will also support provision of additional infrastructure (such as wastewater treatment and drainage) to alleviate existing known issues.

The allocations in this policy are defined as follows:

- **Significant Sites:** Sites over 1,000 dwellings which will provide on-site services and facilities.
 - DPSC1: Land to the west of Burgess Hill and north of Hurstpierpoint
 - DPSC2: Land at Crabbet Park
 - DPSC3: Land to the south of Reeds Lane, Sayers Common
- **Sustainable Communities - Housing Sites:** located in proximity to a Significant Site and therefore benefitting and contributing to improved sustainability in the settlement.
 - DPSC4: Land at Chesapeake and Meadow View, Reeds Lane
 - DPSC5: Land at Coombe Farm, London Road
 - DPSC6: Land to the west of Kings Business Centre, Reeds Lane
 - DPSC7: Land at LVS Hassocks, London Road

DPSC GEN: Significant Site Requirements

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 the 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 and north of Hurstpierpoint	1,350	1,350
Copthorne	Land at Crabbet Park, Copthorne	1,500	2,000
Sayers Common	Land to the south of Reeds Lane, Sayers Common	1,850	2,000

DPSC GEN: Significant Site Requirements

All significant 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

In addition, all of the following will must be addressed to ensure all Significant Sites⁴⁶:

1. Progress in accordance with an allocation-wide Masterplan, Design Code, Infrastructure Delivery Strategy and Phasing Plan which will have been submitted to and approved by the local planning authority. Each planning application should be determined in accordance with these documents. The Masterplan must be informed by a community engagement exercise and must consider relationships with existing settlements and other Site Allocations in order to ensure all future development is integrated with the existing community. The Infrastructure Delivery Strategy must

⁴⁶ Significant sites are defined as housing/ mixed use development of over 1,000 dwellings.

demonstrate how the infrastructure will be delivered in a timely manner to meet the needs of the new community and to mitigate impacts of the development on the existing community.

2. Support a vibrant and inclusive community which embodies the local living/20-minute neighbourhood⁴⁷ principles of a complete, compact, and well-connected neighbourhood with advanced digital infrastructure, in which people can meet most of their daily needs within a convenient walk or cycle ride.
3. Provide a variety of housing types of varying sizes, levels of affordability and tenure that supports diversity, includes housing for older people and at densities that can support local services.
4. Be supported by a Community Development Officer (to be secured by the legal agreement) to facilitate the development of a secure, sustainable and inclusive community which is well integrated with the existing settlement.
5. Provide high quality, easily accessible green space, central to the development with formal and informal areas for play and include opportunities for food growing areas.
6. Prepare a site-wide Infrastructure Delivery Strategy demonstrating that the development will deliver, in a timely manner, sufficient infrastructure to cater for the needs of the proposed development as a whole and also mitigate to an acceptable level the effect of the whole development upon the surrounding area and community. Key elements including shops and transport hubs must be delivered at the earliest opportunity to encourage maximum patronage and long-term success.
7. Deliver a layout that prioritises sustainable and active modes of travel, providing safe and convenient routes for walking, wheeling and cycling through the development and linking with existing and enhanced networks beyond.
8. Support delivery of new inter-urban active travel routes to nearby towns, including those identified in the West Sussex Walking and Cycling Strategy 2016-2026 suggested schemes listed at Appendix 1.
9. Consolidate any commercial and community uses, along with extra care housing facilities and transport hub and integrate them with movement routes to create a thriving and coherent centre/focal point to the development, and exploit opportunities to incorporate measures to discourage/remove through motor traffic from this centre.
10. Co-locate provision of new schools within/close to the centre of the development and demonstrate how vehicular traffic will be managed to encourage walking and cycling, including the potential for low/no traffic streets/'School Streets' schemes.
11. Design new schools to enable facilities to be open to the community when not in use by the school during evenings, weekends and holiday periods and facilitate a community use agreement as part of any planning application.
12. 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.
13. Engage with Gatwick Airport at an early stage of proposals to ensure Aerodrome Safeguarding Requirements (Air Safety) are fully addressed.
14. Develop a strategy for the long-term management and stewardship of open space and green infrastructure including initiatives for income generation that could be integrated into the scheme.
15. 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.

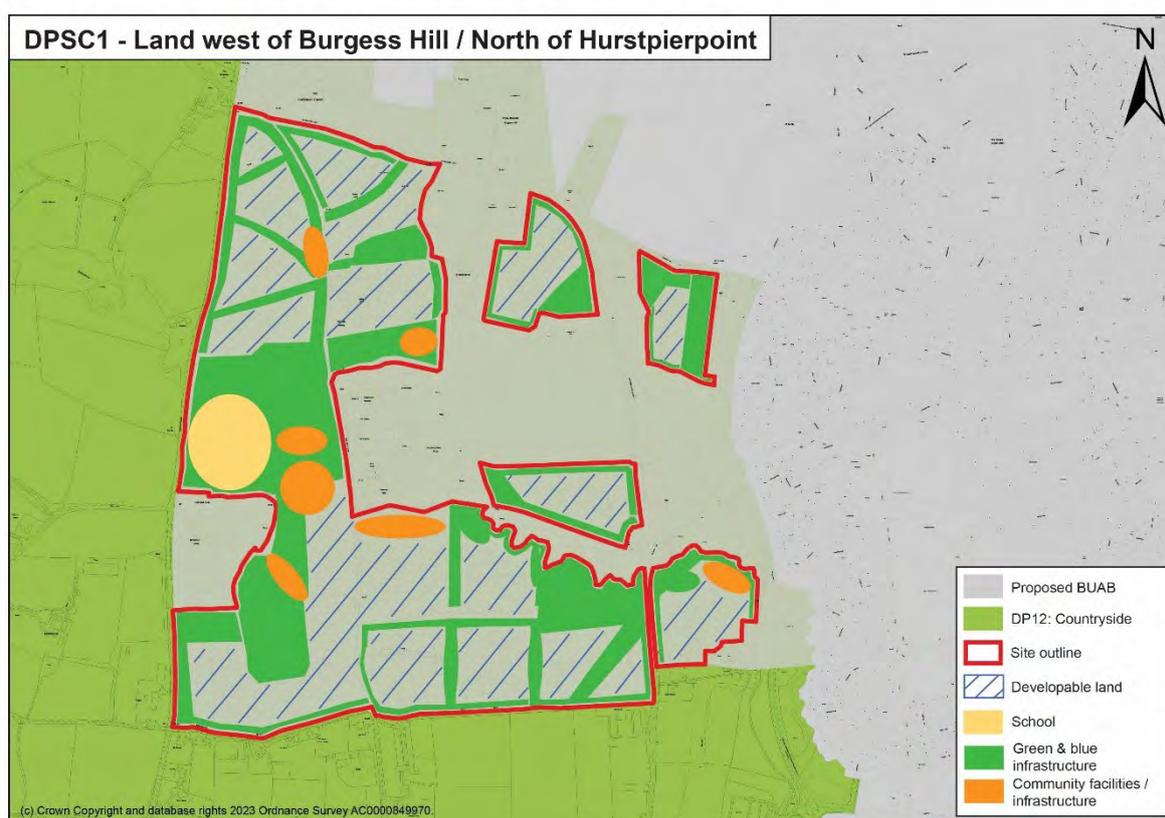
⁴⁷ The Town and County Planning Association 'Guide to 20-minute Neighbourhoods - Creating Healthier, Active, Prosperous Communities' (March 2021).

DPSC1: Land to the West of Burgess Hill/ North of Hurstpierpoint

Burgess Hill is an area of significant growth with 3,500 homes consented as part of the Brookleigh 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.

The boundary shown on the site map below represents the extent of the site inclusive of all land uses (residential, employment, facilities and services and open spaces) 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.

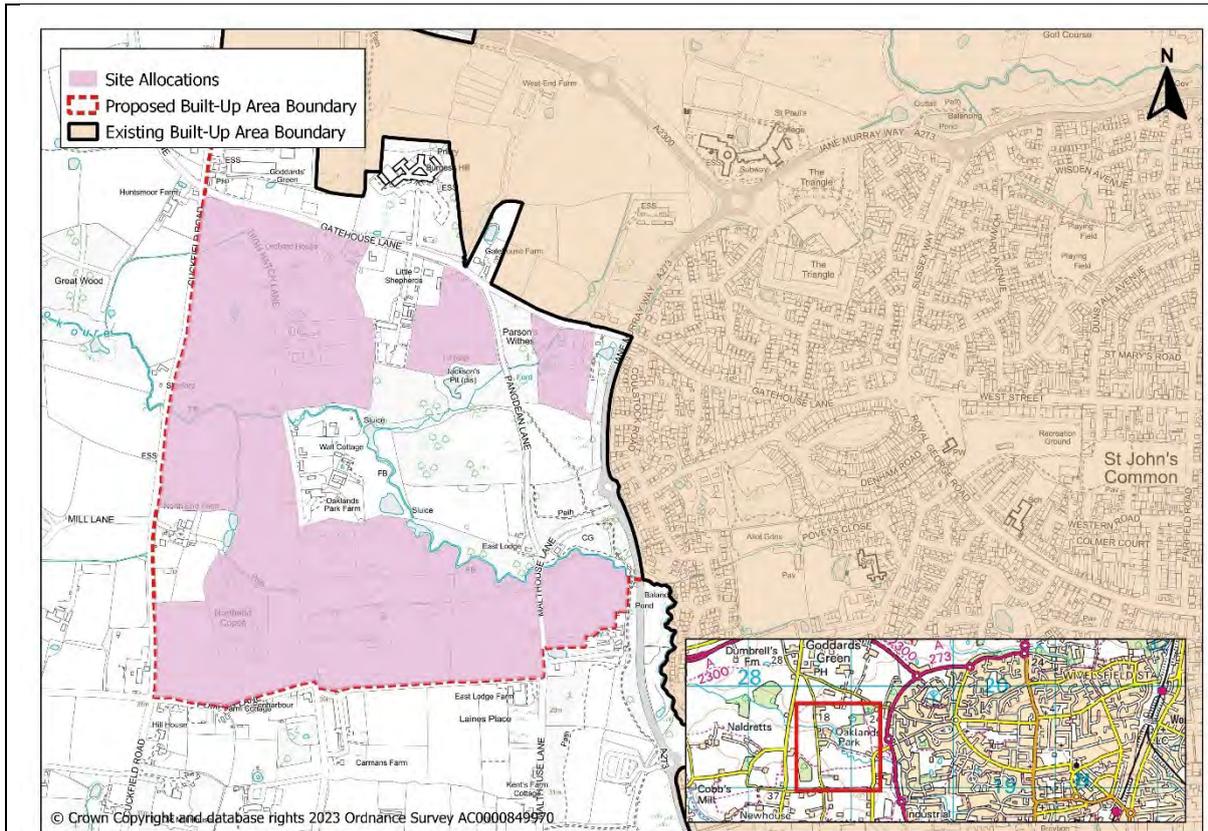
The site promoter has prepared a visioning document for this site, which is available to view at www.midsussex.gov.uk/DistrictPlan by following the links to District Plan Review and Evidence Base. An indicative plan showing the approximate location of uses and mitigation is available below. This is for illustrative purposes only and subject to detailed masterplanning by the promoter at the planning application stage.



DPSC1: Land to the West of Burgess Hill/ North of Hurstpierpoint						
SHELAA Ref:	740	Settlement:	Burgess Hill	Gross Site Area (ha):	57.81	
Indicative Development Capacity						
Net Residential Dwellings				1,350		

Employment	300 m2
Older Persons Accommodation	Contribution towards identified need
Retail / Community	500 m2
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"> • Land for education provision and associated 2FE Primary School with Early years and Support Centre Provision • Space for the provision of full-day care nursery • Self-service Library • Neighbourhood centre – retail, leisure and workspace • Local Community Infrastructure including allotments, public realm, public rights of way, cycle tracks • Extra Care housing provision⁴⁸ • Play area • Other outdoor provision including a MUGA • Informal outdoor space including community orchards <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Improvements at Burgess Hill Station • SEND School • Community buildings, where need not met on-site • Health • Emergency services • Outdoor sports, where need not met on-site <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable transport measures and provision • Highways works • Foul water infrastructure and pumping station(s) • Sewerage network upgrades

⁴⁸ 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 shall provide all of the following:

1. Approximately 1,350 new homes, including provision for an extra care housing (C2 Use Class) facility.
2. New 2FE primary school with associated playing pitches, provision of Early Years and Special Support Centre Provision.
3. Potential for Special Education Needs and Disability (SEND) facilities.
4. A Neighbourhood centre with up to c.800sqm floorspace, including a range of commercial uses which could comprise:
 - shop(s), café and/or restaurant
 - Self-service library
 - Co-working space
 - Open space/play space/‘village green’
 - Community orchards
 - Community allotments
5. Extra care housing to contribute towards the overall identified need, as set out in Policy DPH4: Older Persons’ Housing and Specialist Accommodation. Such provision should be located near to the Neighbourhood Centre.
6. A Transport mobility hub close to/within the Neighbourhood Centre with public transport connections with co-location of delivery lockers and shared transport facilities – cycle/E-bike, Car Club, Electric Vehicle charging points, taxi pick-up/drop-off point.
7. A layout which prioritises active and sustainable travel connections throughout the site:
 - a) Linking to Burgess Hill town centre, with potential to support delivery of a shared route with other allocated sites at Sayers Common (potential route

- shown at Appendix 3), and links to employment uses centred around the A2300 and the strategic allocation of Brookleigh to the north.
- b) Integrating green travel corridors for active travel throughout with links to the 'Green Circle', exploiting potential for High Hatch Lane as a pedestrian/cycle priority Quiet Lane, and integrating and enhancing the existing PRow which cross the site.
8. Demonstrate a coordinated approach and collaboration with the delivery of strategic allocation Brookleigh, to deliver high-quality placemaking which supports the 20-minute neighbourhood principles to ensure development is complementary, and to the benefit of the community as a whole.
 9. Address any impacts associated with areas of Ancient Woodland (on and adjacent to the site) including Northend Copse, Jackson's Pit and Parson's Withes which will be excluded from development.
 10. Follow a sequential approach by directing development away from areas of flood risk and mitigate impacts through integration of SUDS to deliver biodiversity/environmental improvements and flood resilience. Development will be expected to:
 - a) Exploit opportunities to deliver river restoration measures to the currently classified 'poor'⁴⁹ main river, Pook Bourne Stream to provide terrestrial and aquatic habitat net gain.
 - b) Be informed by a detailed site survey which determines the nature and exact location of any watercourses on site (open or culverted), and the potential to daylight any culverted watercourse as part of the development of the site.
 11. Phase occupation of development to align with the delivery of sewerage infrastructure, in consultation with the service provider, and provide necessary easement to Southern Water's infrastructure which crosses the site.
 12. Provide a layout and design which have been informed by a Heritage Statement and which preserve the setting of Grade II Listing Buildings at North End Farm to the west, The Sportsman Inn to the north and Kent's Farm House to the south of the site.
 13. Retain and enhance the historic routeways of High Hatch Lane and Pangdean Lane. Layout and design shall take account of and be informed by the historic landscape character of the site.
 14. Provide effective acoustic design to address impacts associated with potential noise impacts of the adjacent allocated Existing Employment Site SA34 (Site Allocations DPD).
 15. Address any impacts associated with the brick clay (Weald clay) Minerals Safeguarding Area and metal recycling consultation area.
 16. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
 17. Meet the requirements of other relevant development plan policies.

DPSC2: Land at Crabbet Park

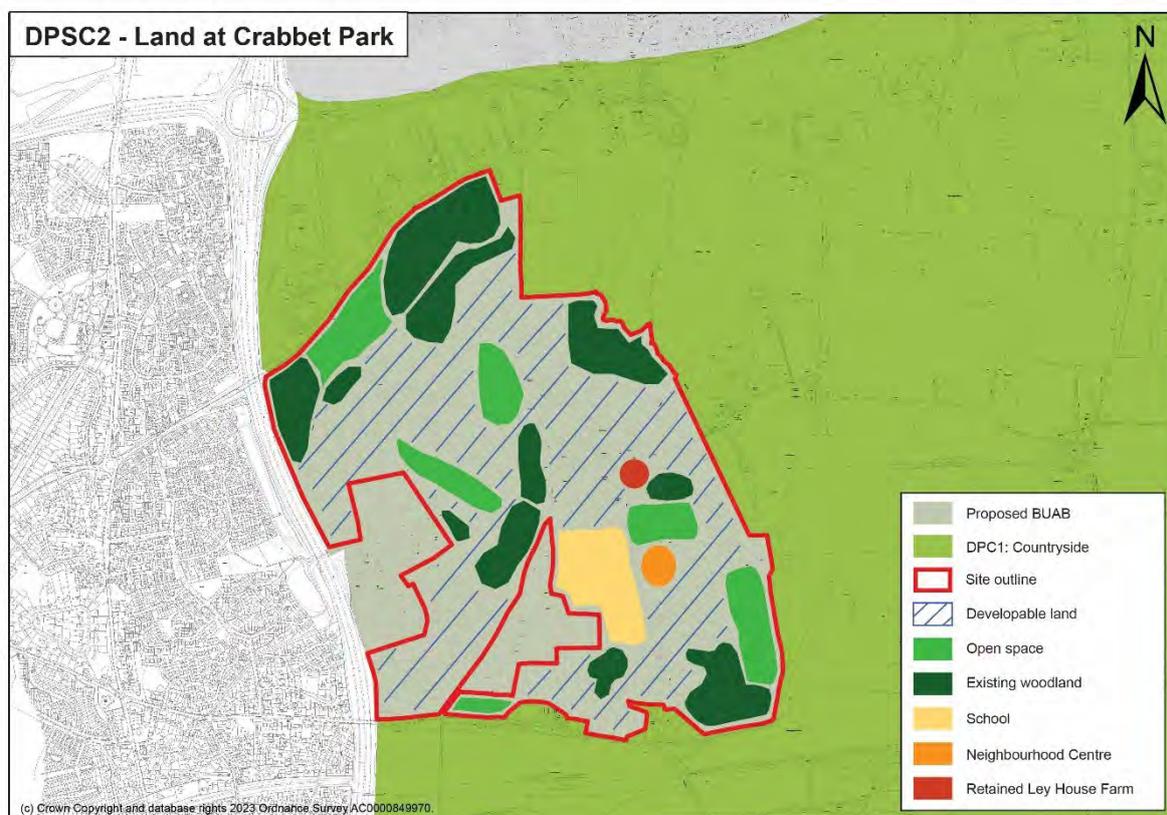
Crabbet Park lies to the south of Copthorne village and is separated from Crawley by the M23. Whilst the site is capable of delivering around 2,000 new homes, it is estimated only 1,500 will be deliverable within the Plan period to 2039. Any additional supply above 1,500

⁴⁹ As defined by the Water Framework Directive assessment - [https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters#:~:text=A%20WFD%20assessment%20helps%20you,river%20basin%20management%20plan%20\(%20RBMP%20](https://www.gov.uk/guidance/water-framework-directive-assessment-estuarine-and-coastal-waters#:~:text=A%20WFD%20assessment%20helps%20you,river%20basin%20management%20plan%20(%20RBMP%20)

will be maximised and subject to further work, this will be considered during the next Plan review.

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.

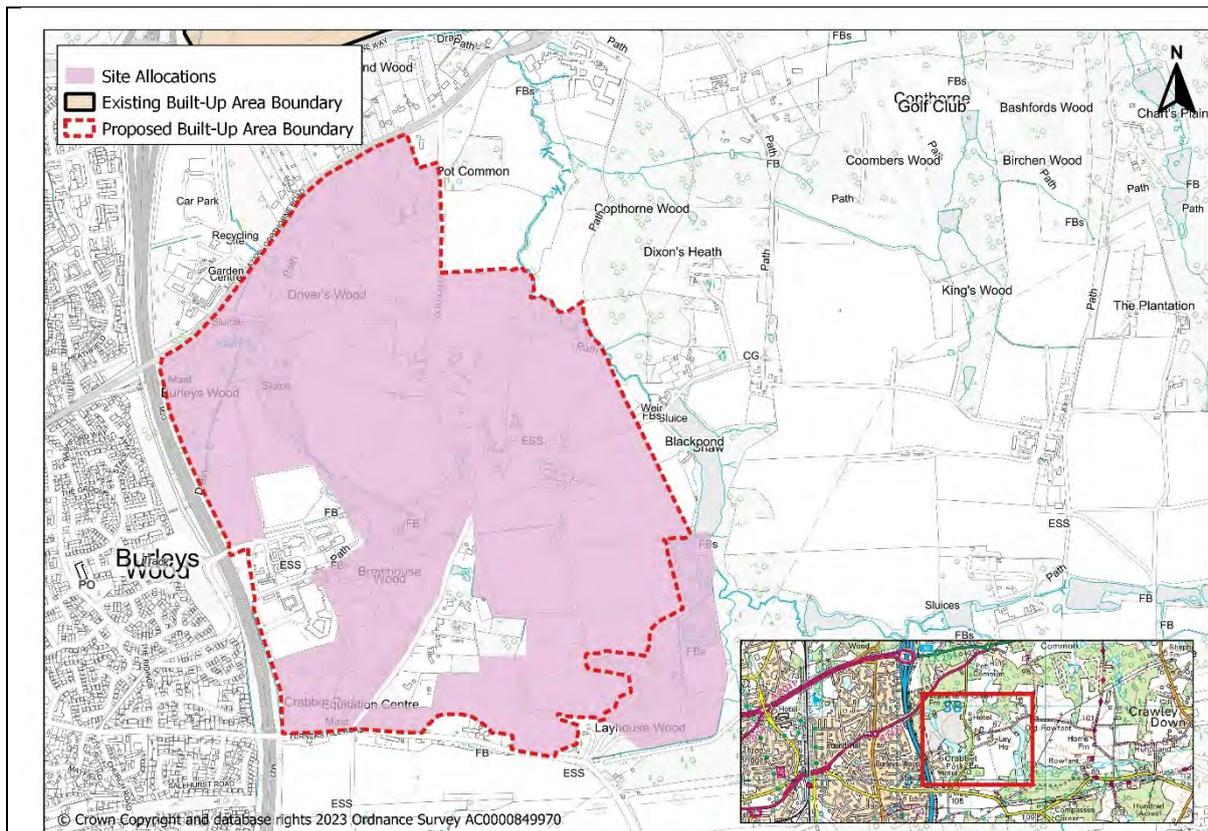
The site promoter has prepared a visioning document for this site, which is available to view at www.midsussex.gov.uk/DistrictPlan by following the links to District Plan Review and Evidence Base. An indicative plan showing the approximate location of uses and mitigation is available below. This is for illustrative purposes only and subject to detailed masterplanning by the promoter at the planning application stage.



DPSC2: Land at Crabbet Park						
SHELAA Ref:	18	Settlement:	Copthorne (Mid Sussex) Crawley (Crawley)	Gross Site Area (ha):	172	
Indicative Development Capacity						
Net Residential Dwellings			2,000 (approximately 1,500 to 2039)			
Employment			1,000sqm E Class			
Older Persons Accommodation			Contribution towards identified need			
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"> • Land for education provision with associated all-through school with 3FE at Primary and 4FE (expandable to 6FE) at Secondary, with or without Sixth Form, with Early Years and Special Support Centre • Space for the provision of full-day care nurseries • Self-service Library • Community buildings • Local Community Infrastructure including allotments, public realm, public seating, public rights of way and cycle tracks • Community facilities • Leisure • Extra Care housing provision⁵⁰ • Play area • Other outdoor provision • Outdoor sports • Informal outdoor space including community orchards • Wastewater infrastructure <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Emergency services • Health <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport measures and provision • Highways works

⁵⁰ Housing that is suitable for older persons and those with specialist accommodation or care needs



Policy Requirements

Land at Crabbet Park, as shown on the inset map, is allocated for a mixed-use development. Development shall provide all of the following:

1. Approximately 2,000 new homes, 1,500 of which are within the Plan Period, including provision of extra care housing.
2. New all-through 3FE primary and 4FE (expandable to 6FE) secondary school with Early Years and Special Support Centre Provision and associated playing pitches.
3. Potential for Special Education Needs and Disability (SEND) facilities.
4. A Neighbourhood centre with a range of community facilities including library, retail, employment and potential healthcare.
5. Extra care housing to contribute towards the overall identified need, as set out in Policy DPH4: Older Persons' Housing and Specialist Accommodation. Such provision should be located near to the Neighbourhood Centre.
6. A transport mobility hub located close to/within the neighbourhood centre with public transport connections with co-location of delivery lockers and shared transport facilities – cycle/E-bike, Car Club, Electric Vehicle charging points, taxi pick-up/drop-off point.
7. A layout which prioritises active and sustainable travel connections throughout the site:
 - a) To improve sustainable transport routes to Three Bridges train station, Crawley Town Centre and areas of employment centre including links to the Worth Way, and
 - b) Integrating green travel corridors for active travel throughout the site, including the potential for Old Hollow to be used by non-vehicular modes of travel/ creation of a 'Quiet Lane'.
8. Mitigation of impact of the development on the AONB which lies to the south of the site.

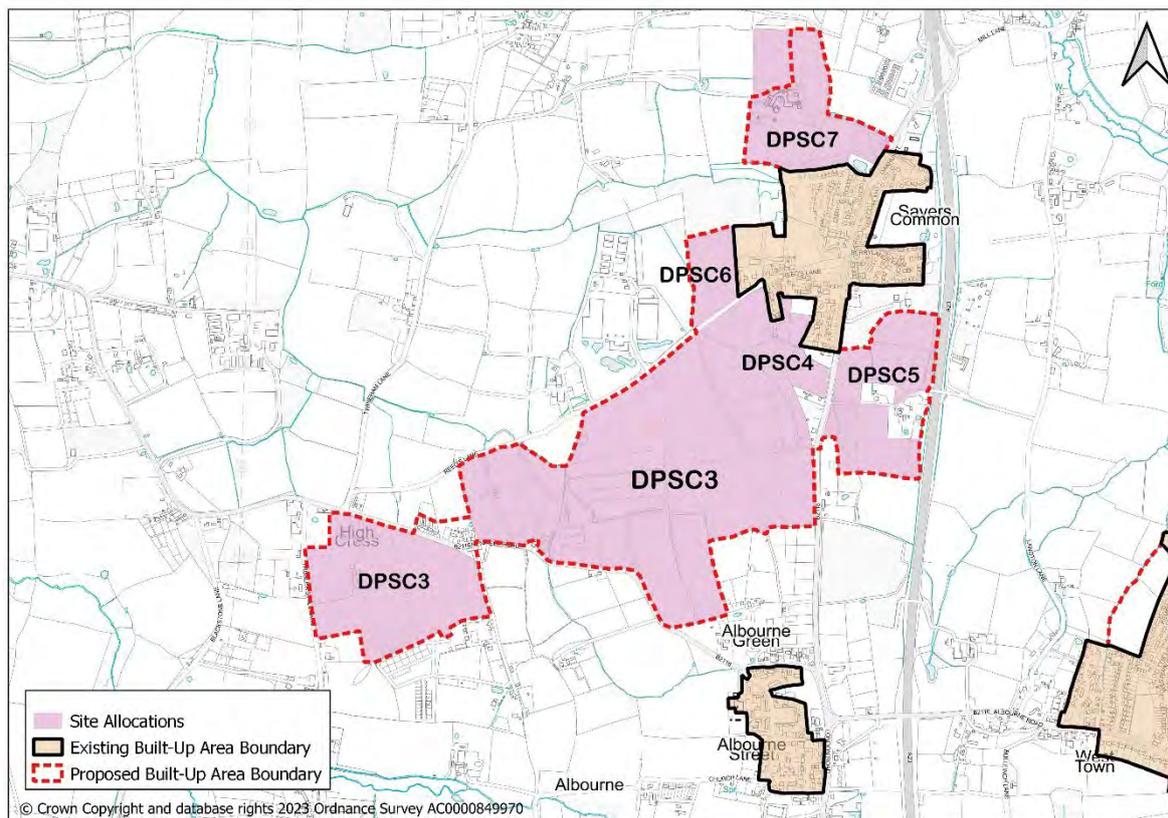
9. Address any impacts associated with ancient woodland (on and adjacent to the site) including Burleys Wood, Drivers Wood, Old Hollow Wood, Brewhouse Wood, Hotel Wood, Layhouse Wood, Compasses Wood and Horsepasture Wood which will be excluded from development.
10. Informed by a Heritage Statement, provide a layout and design which preserve the setting of Grade II* Listed Building Crabbet Park, the Orangery and Tennis Court and Grade II Listed Buildings Pear Tree House, Ley House, Rowfant Mill, Rowfant Mill House and Rushmore Cottage.
11. Integrate and/or enhance the existing PRoWs that cross the site, reflecting their purpose within the overall scheme, and maximise opportunities to improve connections beyond the site.
12. Assess noise impacts associated with the M23 and provide good acoustic design to address noise impacts in the western part of the site.
13. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
14. Meet the requirements of other relevant development plan policies.

Vision and Objectives for Growth at Sayers Common

Following application of the Site Selection Methodology, a series of sites were considered suitable for allocation at Sayers Common. This includes a Significant Site with the potential to deliver services and facilities on-site to support sustainable growth.

The District Plan includes the following allocations at Sayers Common.

- **DPSC3:** Land to the South of Reeds Lane – 1,850 dwellings, extra care housing provision, primary/secondary school, playspace, library, leisure facilities, healthcare provision, community facilities, open space.
- **DPSC4:** Land at Chesapeake and Meadow View, Reeds Lane – 33 dwellings
- **DPSC5:** Land at Coombe Farm, London Road – 210 dwellings
- **DPSC6:** Land to west of Kings Business Centre, Reeds Lane – 100 dwellings
- **DPSC7:** Land south of LVS Hassocks, London Road – 200 dwellings



These sites accord with the Plan Strategy to seek **Opportunities for extensions to improve sustainability of existing settlements**. To achieve this Plan Strategy objective, it will be crucial that these developments are considered collectively rather than individually, integrating with the existing settlement of Sayers Common, and promoting opportunities for enhanced connectivity between the sites themselves and the existing community so that the entire settlement can take advantage from the services and facilities being provided in proximity.

To achieve this, the following Objectives for Growth at Sayers Common have been established:

1. The Council will facilitate collaboration between the site promoters at Sayers Common to ensure a cohesive, integrated and master-planned development at Sayers Common. This will include developing the Mid Sussex Infrastructure Delivery Plan to ensure timely delivery of infrastructure and engagement with the local community to identify local issues and needs.
2. The Sustainable Communities site **DPSC3: Land to the South of Reeds Lane** to be integrated and master-planned to be the focal point of the village.
3. Services and facilities within **DPSC3: Land to the South of Reeds Lane** such as education and primary neighbourhood centre to be central and accessible to the settlement as a whole, providing opportunities to meet day-to-day needs within walking distance, consistent with the 20-minute neighbourhood and “Local Living” principles as described in Chapter 3 and the requirements of policies **DPSC GEN: Significant Site Requirements** and **DPB1: Character and Design**.
4. Deliver a development that prioritises active and sustainable modes of travel throughout, enhancing connectivity between all site allocations **DPSC3 – DPSC7**, the existing village and wider network facilitating delivery of additional routes off-site to

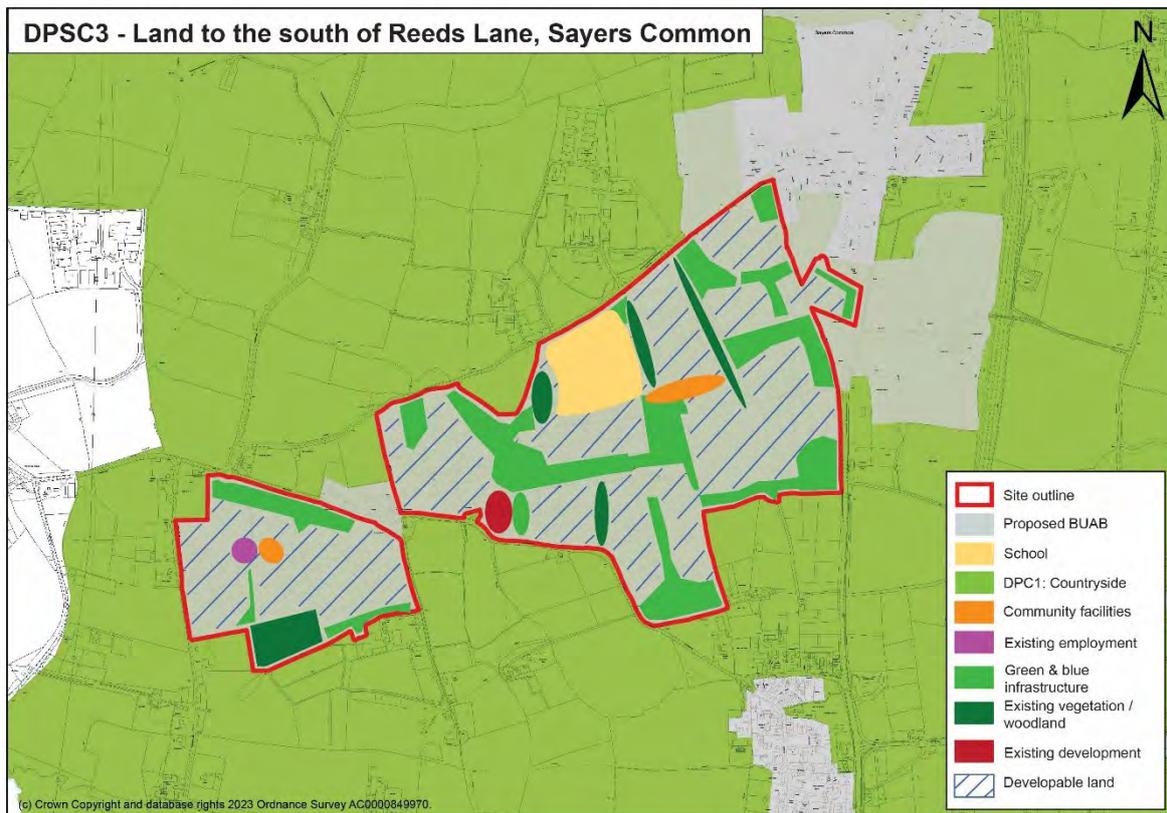
other nearby settlements, including a link to Burgess Hill Town Centre (potential route shown at Appendix 3). Creation of permeable, legible and attractive connections between the allocations and existing settlement(s).

DPSC3: 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.

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.

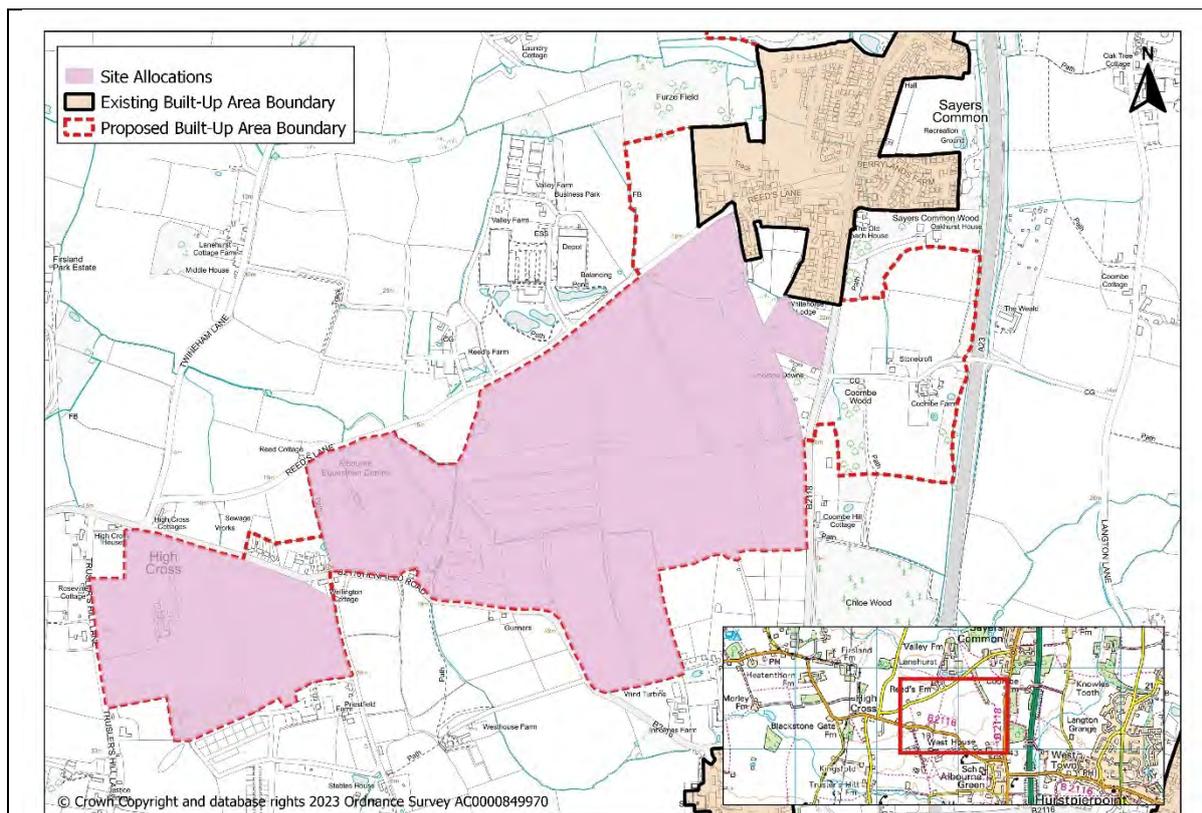
The site promoter has prepared a visioning document for this site, which is available to view at www.midsussex.gov.uk/DistrictPlan by following the links to District Plan Review and Evidence Base. An indicative plan showing the approximate location of uses and mitigation is available below. This is for illustrative purposes only and subject to detailed masterplanning by the promoter at the planning application stage.



DPSC3: Land to the South of Reeds Lane, Sayers Common						
SHELAA Ref:	799	Settlement:	Sayers Common	Gross Site Area (ha):	90.05	
Indicative Development Capacity						

Net Residential Dwellings	2,000 (approximately 1,850 to 2039)
Employment	5,000 – 9,000sqm E Class
Older Persons Accommodation	Contribute towards identified need
Retail / Community	2,000 – 4,000sqm
Gypsy and Traveller Provision	6 permanent pitches
Infrastructure	<p>On site:</p> <ul style="list-style-type: none"> • Land for education provision with associated all-through school with 2FE (expandable to 3FE) at Primary and 4FE (expandable to 6FE) at Secondary, with or without Sixth Form, with Early Years and Special Support Centre • Space for the provision of full-day care nursery • Self-service Library • Community building • Local Community Infrastructure including allotments, public realm, public seating, public rights of way and cycle tracks • Community facilities • Leisure • Extra Care housing provision⁵¹ • Play area • Other outdoor sport provision • Informal outdoor space • New terminal pumping station <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Improvements at Hassocks Station • Emergency services • Health • Outdoor sports, where need not met on-site • Provision of Sustainable Transport measures and provision • Highways improvements • Wastewater Treatment Works

⁵¹ Housing that is suitable for older persons and those with specialist accommodation or care needs

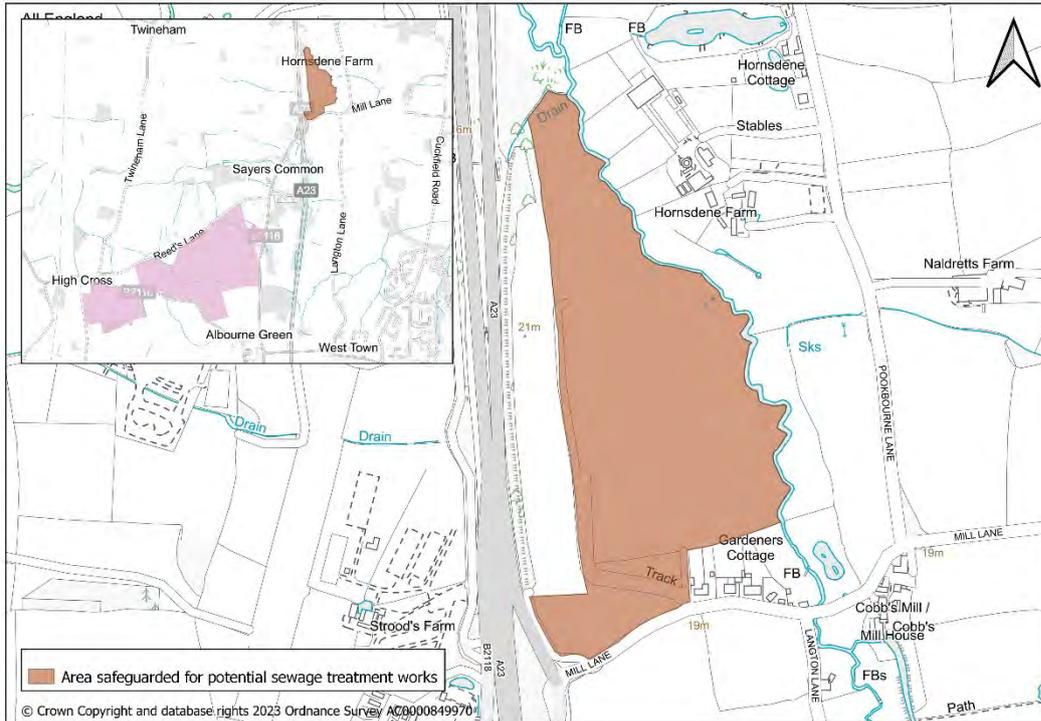


Policy Requirements

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 shall provide all of the following:

1. Approximately 2,000 new homes, 1,850 of which are within the Plan Period; including provision for an extra care facility.
2. A site for six serviced permanent pitches for Gypsies and Travellers in line with Policy DPH5: Gypsies, Travellers and Travelling Showpeople. Delivery is to be phased alongside the delivery of other new homes. Pitches should be provided onsite unless the applicant can demonstrate that these pitches can be provided on an alternative site which is suitable, available and within the applicant's control. Land provided (whether onsite or offsite) for this purpose will be secured through an appropriate legal agreement.
3. A Neighbourhood centre towards the eastern part of the site which has a range of community facilities including library, cafe, retail, co-working space, employment and potential healthcare. A local centre should be provided in the western part of the site offering further community facilities.
4. Extra care housing to contribute towards the overall identified need, as set out in Policy DPH4: Older Persons' Housing and Specialist Accommodation. Such provision should be located near to the Neighbourhood Centre.
5. Two transport mobility hubs located close to/within each of the neighbourhood and local centres. The hubs should include public transport connections with co-location of delivery lockers and shared transport facilities – cycle/E-bike, Car Club, Electric Vehicle charging points, taxi pick-up/drop-off point.
6. New all-through 2FE (expandable to 3FE) primary and 4FE (expandable to 6FE) secondary school with provision of Early Years and Special Support Centre Provision with associated playing pitches.
7. Potential for Special Education Needs and Disability (SEND) facilities.

8. New onsite terminal pumping station and new offsite wastewater treatment works subject to receiving the necessary permissions and permits. Land to the east of the A23, in the site promoters' control and defined on the Policies Map, is safeguarded for such a use.
9. A layout which prioritises active and sustainable travel connections throughout the site:
 - a) Support delivery of a shared route with Significant Site allocation DPSC1: Land West of Burgess Hill/North of Hurstpierpoint, to Burgess Hill town centre (potential route shown at Appendix 3), and
 - b) Integrate green travel corridors for cycle and pedestrian access throughout with potential for Reeds Lane to become pedestrian/ cycle priority Quiet Lane.
10. Demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles, with direct enhanced active/sustainable travel connections and includes enabling the viability of new public transport services.
11. Informed by a Heritage Statement, provide a layout and design which preserves the setting of Grade II Listed Buildings Wellington Cottage, North Pottersfield and South Pottersfield Cottages.
12. Follow a sequential approach by directing development away from areas of flood risk and mitigate impacts through integration of a surface water drainage scheme to deliver biodiversity/environmental improvements and flood resilience. Development will be expected to create a new wetland area adjacent to the eastern access point designed to ease flooding associated with the low point of the B2118.
13. Integrate and/or enhance the existing PRowS that cross the site, reflecting their purpose within the overall scheme, and maximise opportunities to improve connections beyond the site, including footpaths 6AI with 4AI and 11Hu and 86Hu.
14. The site lies within the brick clay (Weald) Mineral Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with the requirements of the West Sussex Joint Minerals Local Plan and associated Safeguarding Guidance.
15. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
16. Meet the requirements of other relevant development plan policies.

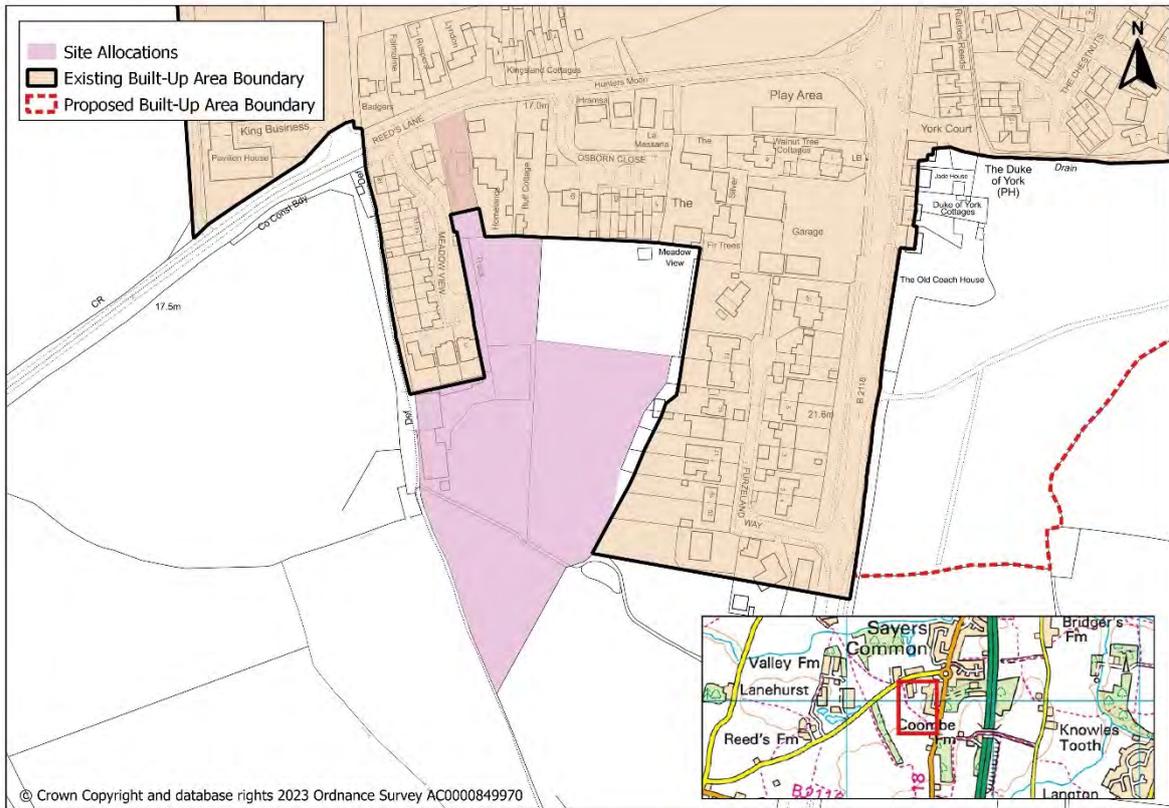


DPSC4: Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common

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"> Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Sustainable Transport Improvements at Hassocks Station Education Library Community buildings Local Community Infrastructure Health Play area Other outdoor provision Outdoor sports Parks and Gardens <p>Provision of:</p>		

- Sustainable transport measures
- Highway works



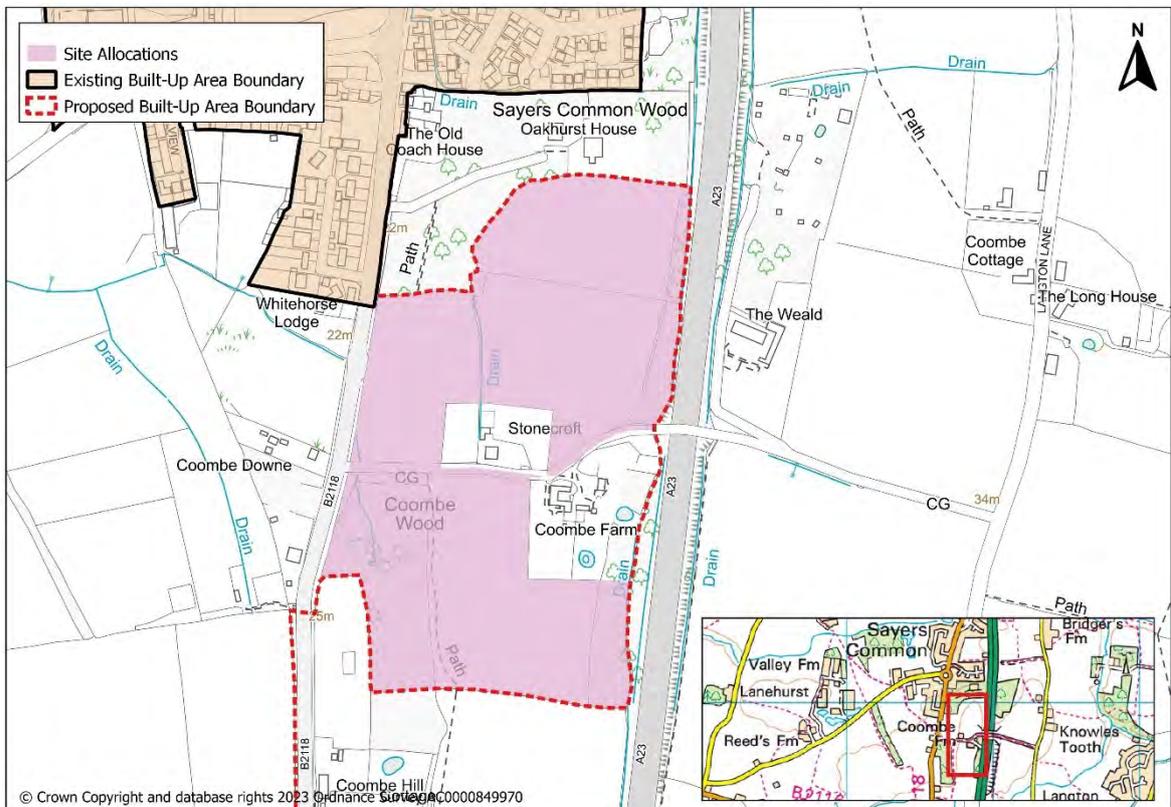
Policy Requirements

1. Demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles, with direct enhanced active/sustainable travel connections, and includes enabling the viability of new public transport services.
2. Prioritise pedestrian and cycle access through the site to enable connection into Significant allocation DPSC2 and towards Reeds Lane, including integration and upgrade of existing PRoW which crosses the site.
3. Provide suitable access onto Reeds Lane either directly or via Meadow View.
4. Follow a sequential approach by directing development away from areas of flood risk associated with the site.
5. Address any impacts associated with the brick clay (Weald) Minerals Safeguarding Area.
6. Meet the requirements of other relevant development plan policies.

DPSC5: Land at Coombe Farm, London Road, Sayers Common

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"> • Informal outdoor space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Improvements at Hassocks Station • Education • Library • Community buildings • Local Community Infrastructure • Emergency Services • Health • Play area • Other outdoor provision • Outdoor sports <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable transport measures • Highway works • Sewerage network upgrades 	



Policy Requirements

1. Demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles, with direct enhanced active/sustainable travel connections, and includes enabling the viability of new public transport services.
2. Prioritise pedestrian and cycle access throughout the site linking to Significant site allocation DPSC2 and bus stops on the B2118 to the west and provide suitable access onto the B2118.
3. Integrate and enhance the existing PRow which cross the site.
4. Informed by a Heritage Impact Assessment, provide a layout and design which preserve the setting of nearby Grade II listed buildings, Coombe Farmhouse, Granary, and Barn at Coombe Farm.
5. Address impacts associated with areas of ancient woodland both on and adjacent to the site.
6. Follow a sequential approach by directing development away from areas of flood risk associated with the site.
7. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.
8. Provide good acoustic design to address noise impacts associated with the adjacent A23 to the east.
9. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
10. Address any impacts associated with the brick clay (Weald) Minerals Safeguarding Area.
11. Meet the requirements of other relevant development plan policies.

DPSC6: Land to the West of Kings Business Centre, Reeds Lane, Sayers Common

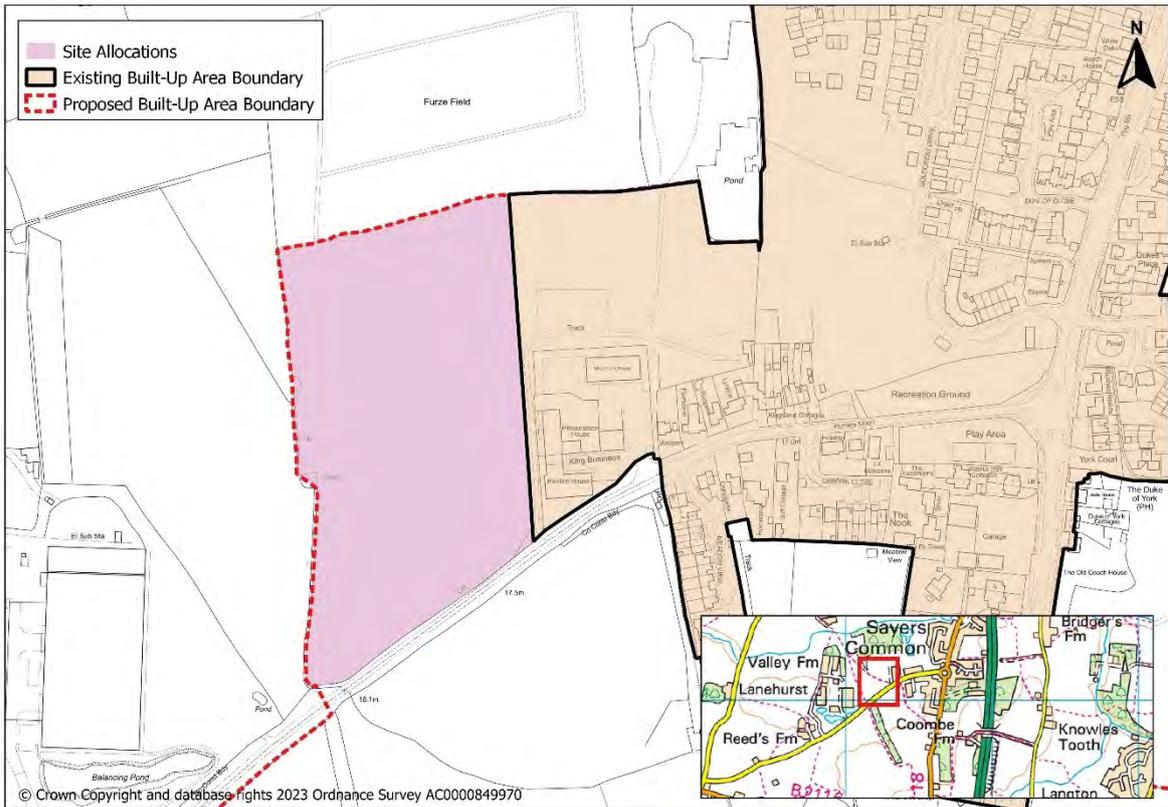
The boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

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"> • Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Improvements at Hassocks Station • Education • Library • Community buildings • Local Community Infrastructure • Emergency Services • Health • Play area 		

- Other outdoor provision
- Outdoor sports
- Parks and Gardens

Provision of:

- Highway improvements
- Sustainable transport measures
- Sewerage network upgrades



Policy Requirements

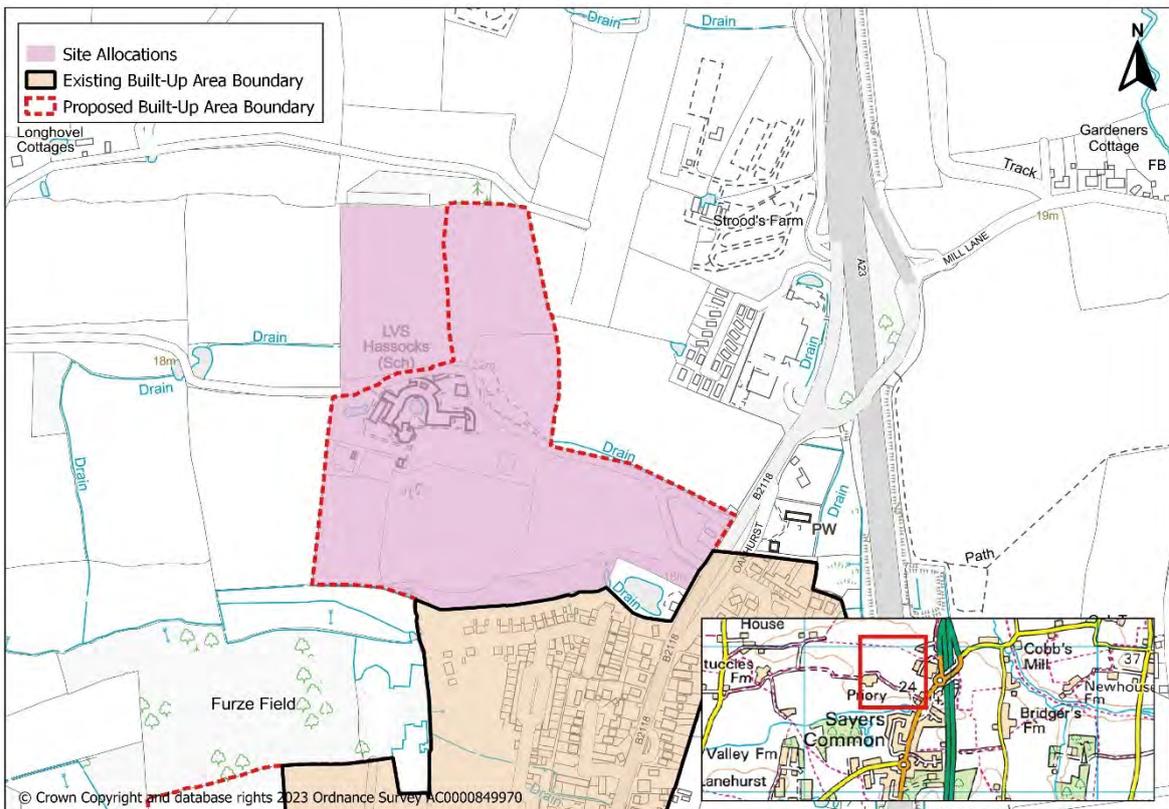
1. Demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles, with direct enhanced active/sustainable travel connections, and includes enabling the viability of new public transport services.
2. Prioritise pedestrian and cycle access throughout the development and create convenient, direct links to Significant site allocation DPSC2 to the south, providing appropriate extensions to the footway on Reed's Lane.
3. Integrate and enhance the existing PRoW which crosses the site and provide connection to PRoW (route 3_1A1) which runs across Significant site allocation DPSC2.
4. Comprehensively masterplan development of the site incorporating and providing connections between site allocation SA30 (Land to the North of Lyndon, Reeds Lane, Sayers Common).
5. Follow a sequential approach by directing development away from areas of flood risk.
6. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.

- | | |
|-----|--|
| 7. | Provide good acoustic design to address noise impacts associated with the adjacent Kings Business Centre. |
| 8. | Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site. |
| 9. | Address impacts associated with the brick clay (Weald) Minerals Safeguarding Area. |
| 10. | Meet the requirements of other relevant development plan policies. |

DPSC7: Land at LVS Hassocks, London Road, Sayers Common

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"> • Informal outdoor space • Relocation of the SEND school <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Improvements at Hassocks Station • Education • Library • Community buildings • Local Community Infrastructure • Emergency services • Health • Play area • Other outdoor provision • Outdoor sports <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable transport measures • Highway works • Re-provision of SEND school • Sewerage network upgrades 	



Policy Requirements

1. Demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles, with direct enhanced active/ sustainable travel connections, and includes enabling the viability of new public transport services.
2. Prioritise pedestrian and cycle access throughout the development and integrate and enhance the existing PRoW which crosses the site.
3. Provide any necessary upgrades to the existing access onto B2118.
4. Redevelopment proposals shall provide evidence that demonstrates how a replacement SEND school will be provided either on-site or within the district, to the satisfaction of the Council and relevant key stakeholders.
5. Occupation of the development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.
6. Follow a sequential approach by directing development away from areas of flood risk.
7. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
8. Address impacts associated with the brick clay (Weald) Minerals Safeguarding Area.
9. Meets the requirements of other relevant development plan policies.

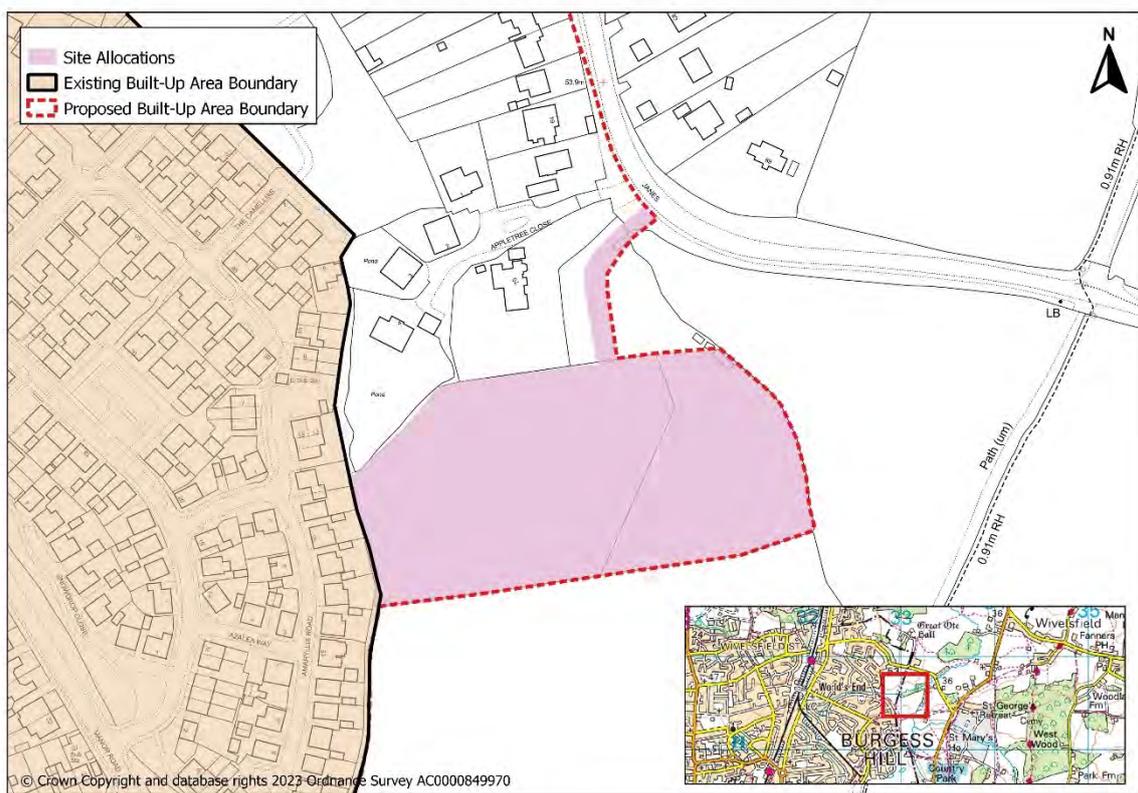
16. Site Allocations

DPA1: Batchelors Farm, Keymer Road, Burgess Hill

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.

Allocation	Housing		
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"> Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Sustainable Transport Improvements at Burgess Hill Station Education Library Community buildings Local Community Infrastructure Health Play area Other outdoor provision Outdoor sports Parks and Gardens <p>Provision of:</p> <ul style="list-style-type: none"> Highway works Sustainable Transport measures 		

Gross Site Area (ha):	1.2	Number of Dwellings:	25
Infrastructure		<p>On-site:</p> <ul style="list-style-type: none"> Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Sustainable Transport Education Library Community buildings Local Community Infrastructure Health Play area Other outdoor provision Outdoor sports Parks and Gardens <p>Provision of:</p> <ul style="list-style-type: none"> Highway works Sustainable Transport measures 	



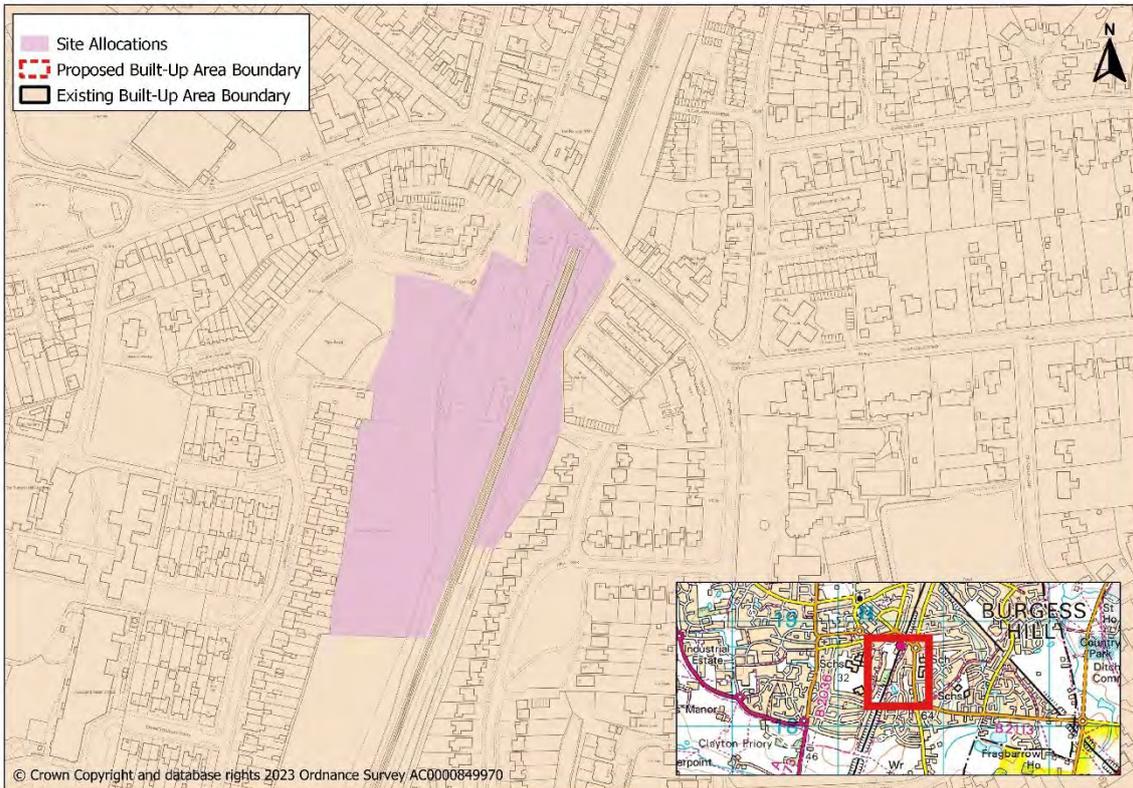
Policy Requirements

1. Prioritise cycle and pedestrian connections throughout the site and onto Janes Lane.
2. Provide suitable access from Janes Lane which avoids loss of mature trees.
3. Address any impacts associated with the brick clay (Weald clay) Minerals Safeguarding Area.
4. Meet the requirements of other relevant development plan policies.

DPA3: Burgess Hill Station, Burgess Hill

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.

Allocation	Housing		
SHELAA:	1123	Settlement:	Burgess Hill
Gross Site Area (ha):	3.5	Number of Dwellings:	300
Infrastructure	<p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Education • Library • Community buildings • Local Community Infrastructure • Emergency services • Health • Play area • Other outdoor provision • Outdoor ports • Informal outdoor space, where need not met on-site <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport measures • Compensatory community allotments • Sewerage network upgrades 		



Policy Requirements

1. 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.
2. 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.
3. Orientate development positively to address existing open space at Queens Crescent Park along with any proposed areas of open space.
4. 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.
5. Deliver a transport mobility hub which prioritises sustainable and active travel with safe links to the wider network, taking account of the Place & Connectivity Programme and LCWIP. Co-locate appropriately designed delivery lockers and car club facilities.
6. Provide at least an equal number of allotments through the delivery of Policy DPA3a: Allotment Site – Nightingale Lane. The re-provision of the loss of allotment plots at Chanctonbury Road at DPA3a must be complete and operational before development on the former allotments at Chanctonbury Road can commence.
7. Provide good acoustic design and necessary mitigation to address noise impacts associated with the use and operation of the railway and station and substation.
8. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
9. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.

10. Layout of the development must be planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.
11. Meet the requirements of other relevant development plan policies.

DPA3a: Allotment Site – Nightingale Lane, Burgess Hill

Allocation	Allotments
Gross Site Area (ha):	1ha



Policy Requirements

1. Allotment re-provision to compensate for the proposed loss at Chanctonbury Road, Burgess Hill (DPA3). Re-provision must be at least equal in quantity (63 plots) and quality to those at Chanctonbury Road, Burgess Hill.
2. Opportunities must be taken to maximise allotment provision above the amount required for re-provision. This may include provision of various plot sizes to meet local needs.
3. Provide suitable access from London Road, utilising and upgrading the existing access as required.
4. Provide on-site parking with sufficient space for loading/unloading for plot holders.
5. Provision of buildings for storage must be minimised. Proposals should maximise opportunities for communal storage. Any storage building must be small-scale and respect the open space and landscape setting of this site.
6. Provision of adequate water supply and drainage.
7. Part of this site is within an Archaeological Notification Area. Undertake pre-determination evaluation of potential archaeological features on the site prior to any planning application being submitted. Appropriate mitigation may be required depending on the outcome of that evaluation.

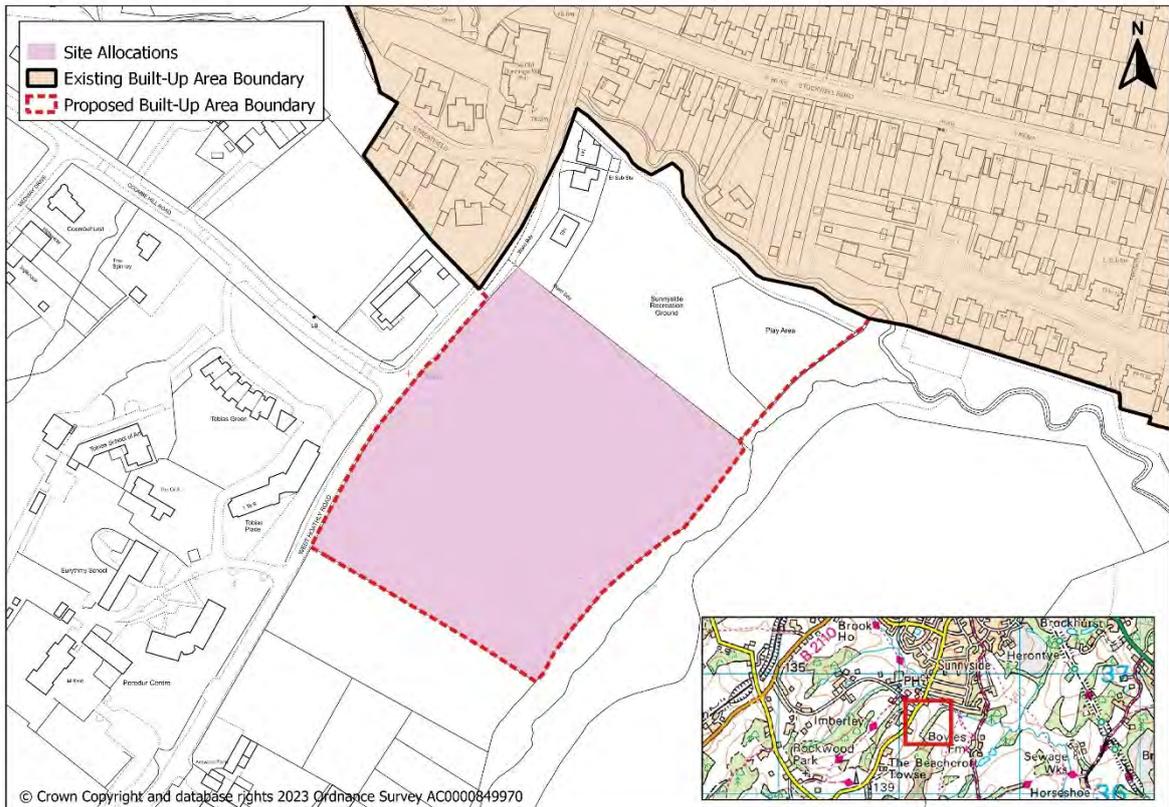
8. Retain the Public Right of Way on the southern and western boundaries.

As a result of this allocation, these allotments will be Statutory upon completion with freehold or long-lease provided to Burgess Hill Town Council for their ongoing management and maintenance.

DPA4: Land off West Hoathly Road, East Grinstead

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.

Allocation	Housing		
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"> • Open space • Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Education • Library • Community buildings • Local Community Infrastructure • Ashdown Forest SPA and SAC mitigation measures • Health • Play area • Other outdoor provision • Outdoor sports • Parks and Gardens <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport measures • Highway works 		



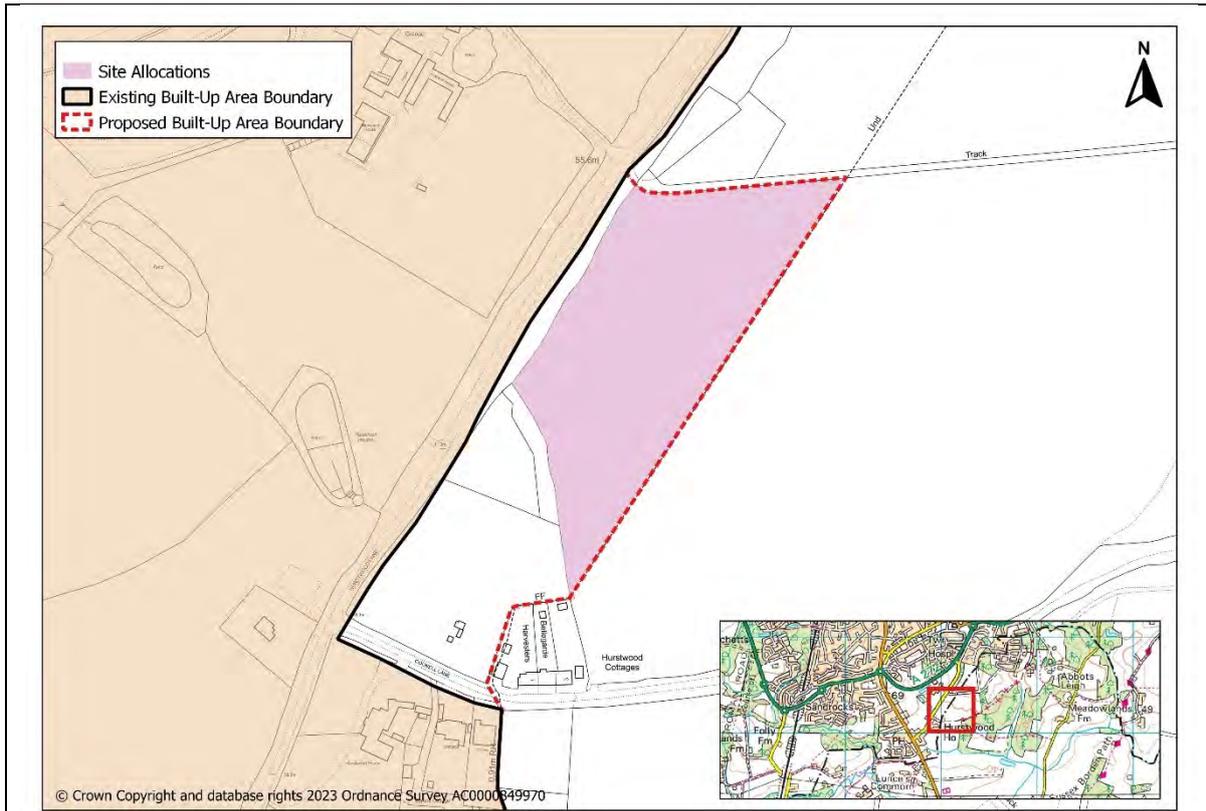
Policy Requirements

1. Conserve and enhance the High Weald AONB, taking account of the landscape and natural features of the site and the surrounding settlement pattern and character in the design and layout of the site.
2. Provide an appropriate buffer for the ancient woodland and priority habitat (deciduous woodland) within the site and to the east of the site.
3. Retain as much as possible and enhance the hedgerow fronting West Hoathly Road.
4. Provide a link to Sunnyside Recreation Ground.
5. Provide suitable access from West Hoathly Road.
6. Subject to technical highways work, provide an appropriate pedestrian crossing from the site to the pavement along West Hoathly Road opposite the site.
7. The site lies within the brick clay (Wadhurst) Mineral Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with the requirements of the West Sussex Joint Minerals Local Plan and associated Safeguarding Guidance.
8. Meet the requirements of other relevant development plan policies.

DPA5: Land at Hurstwood Lane, Haywards Heath

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.

Allocation	Housing		
SHELAA:	858	Settlement:	Haywards Heath
Gross Site Area (ha):	1.8	Number of Dwellings:	36
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Sustainable Transport Improvements at Haywards Heath Station Education Library Community buildings Local Community Infrastructure Health Play area Other outdoor provision Outdoor sports Parks and Gardens <p>Provision of:</p> <ul style="list-style-type: none"> Sustainable transport measures Green infrastructure to neighbouring allocated site 		



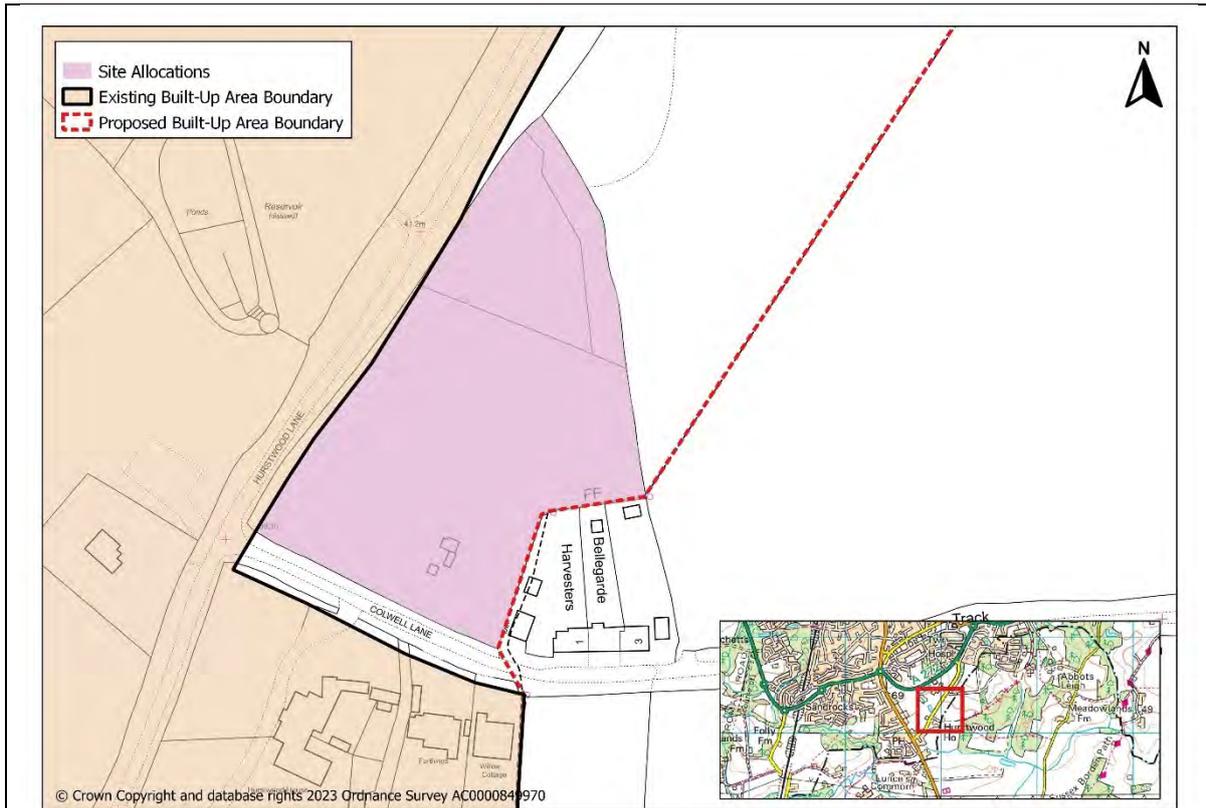
Policy Requirements

1. Integrate development with the site to the south (DPA6) 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.
2. Provide access to integrate with the wider Hurst Farm development (the Haywards Heath Neighbourhood Plan allocation).
3. Respect, retain and enhance the rural character of Hurstwood Lane.
4. Retain and enhance the trees and retain the ground levels along Hurstwood Lane (which forms the western boundary of the site) and in the western part of the site. Any unavoidable loss of trees required to provide a site access should be justified and supported by evidence and will need to be mitigated with additional planting along the site boundary.
5. 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.
6. Provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the east of the site, including ecological corridors.
7. Meet the requirements of other relevant development plan policies.

DPA6: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath

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.

Allocation	Housing		
SHELAA:	508	Settlement:	Haywards Heath
Gross Site Area (ha):	1	Number of Dwellings:	30
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Sustainable Transport Improvements at Haywards Heath Station Education Library Community buildings Local Community Infrastructure Health Play area Other outdoor provision Outdoor sports Parks and Gardens <p>Provision of:</p> <ul style="list-style-type: none"> Sustainable transport measures Green infrastructure to neighbouring allocated site 		



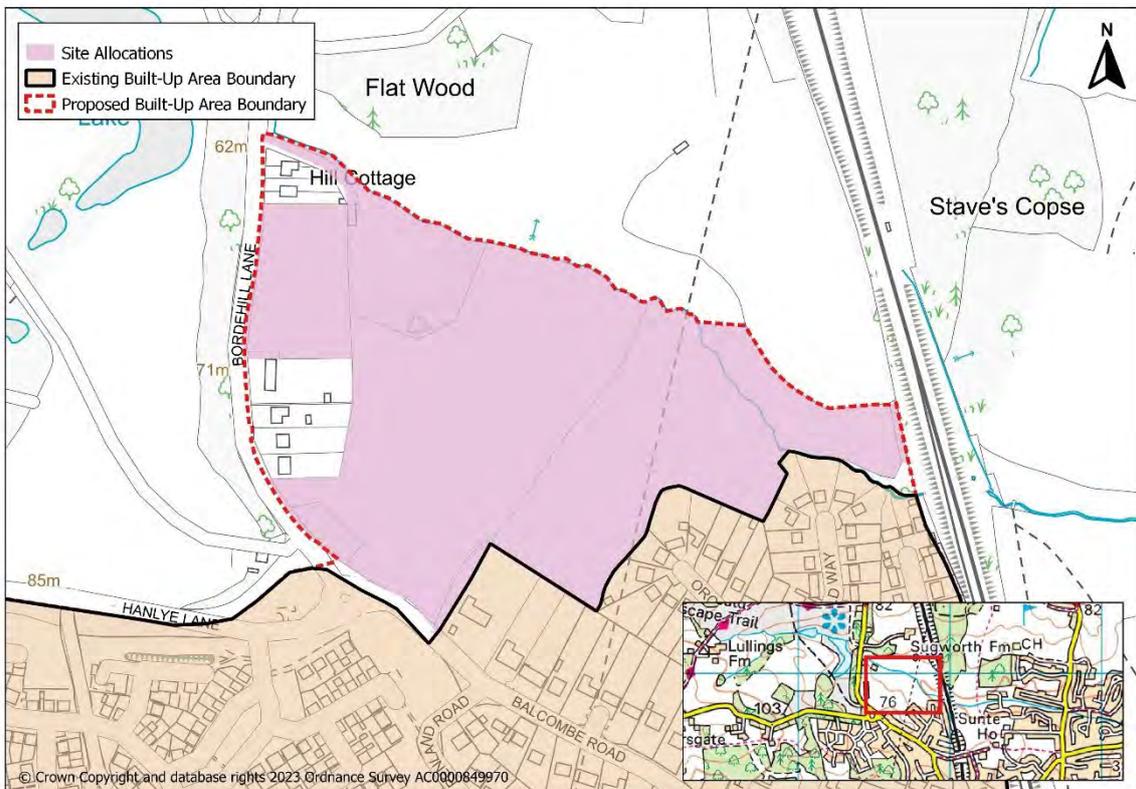
Policy Requirements

1. Integrate development with the site to the north (DPA5) 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.
2. Provide access to integrate with the wider Hurst Farm development (the Haywards Heath Neighbourhood Plan allocation).
3. Respect, retain and enhance the rural character of Hurstwood Lane.
4. Retain and enhance the trees and retain the ground levels along Hurstwood Lane which forms the western boundary of the site. Any unavoidable loss of trees required to provide a site access should be justified and supported by evidence and will need to be mitigated with additional planting along the site boundary.
5. Retain and enhance the trees on the site boundaries to provide a landscape buffer to the wider countryside.
6. Measures will be necessary to mitigate the impact of development on the landscape character of the surrounding area.
7. Meet the requirements of other relevant development plan policies.

DPA7: Land east of Borde Hill Lane Haywards Heath

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.

Allocation	Housing		
SHELAA:	556	Settlement:	Haywards Heath
Gross Site Area (ha):	10.5	Number of Dwellings:	60
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> • Play area • Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Improvements at Haywards Heath Station • Education • Library • Community buildings • Local Community Infrastructure • Emergency services • Health • Other outdoor provision • Outdoor sports • Parks and Gardens <p>Provision of:</p> <ul style="list-style-type: none"> • Highway works • Sustainable transport measures 		



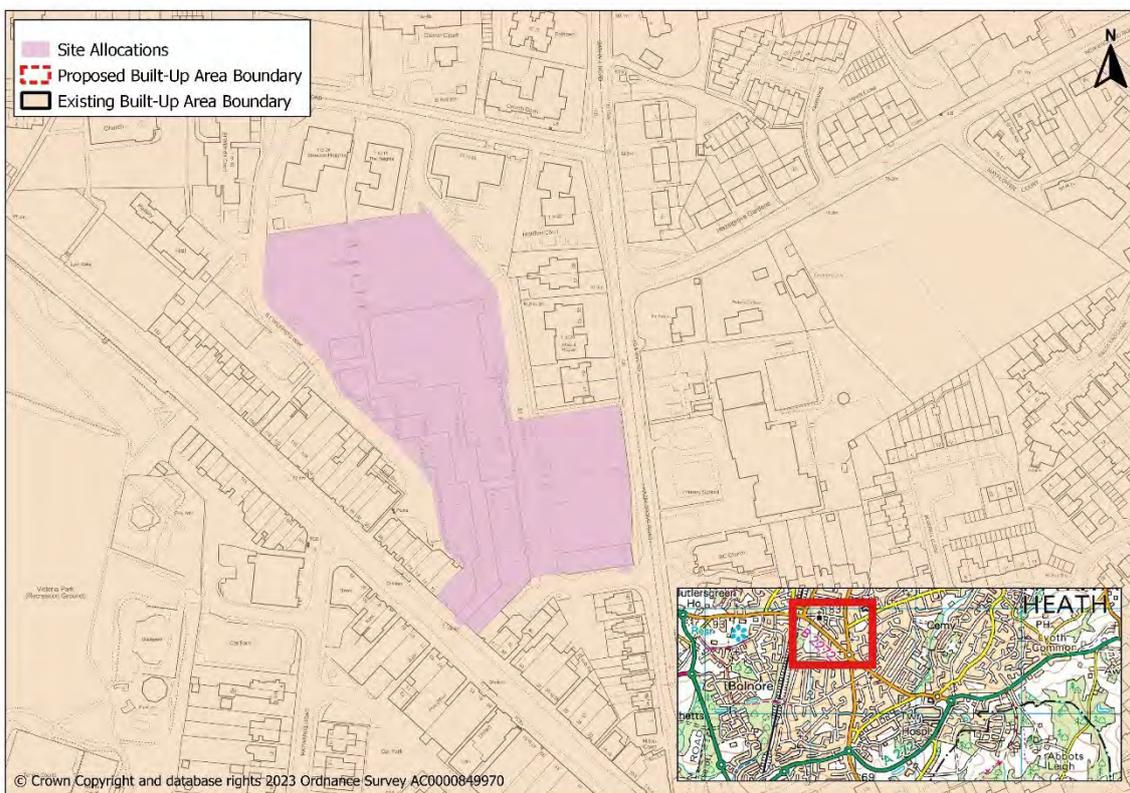
Policy Requirements

1. Contain development to central and eastern parts of site to reduce potential impacts on the setting of High Weald AONB (to be informed by an LVIA).
2. Follow a sequential approach by directing development away from areas of flood risk and mitigate impacts through integration of SUDS to deliver biodiversity/environmental improvements and flood resilience.
3. Provide suitable vehicular, pedestrian and cycle access from Borde Hill Lane via a fourth arm from the roundabout, south west of the site.
4. 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 Highway Authority.
5. Informed by a Heritage Statement, provide appropriate layout and design which preserves the setting of nearby Grade II listed building 'South Lodge'.
6. Submit a Statement of Significance on Borde Hill Gardens together with an assessment of the impact of the proposal on that significance.
7. Provide good acoustic design to address noise impacts associated with the railway.
8. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
9. Address any impacts associated with the building stone (Cuckfield) Minerals Safeguarding Area, the building stone (Ardingly) Minerals Consultation Area and the brick clay (Wadhurst) Minerals Safeguarding Area.
10. Meet the requirements of other relevant development plan policies.

DPA8: Orchards Shopping Centre, Haywards Heath

Allocation	Housing		
SHELAA:	1121	Settlement:	Haywards Heath
Gross Site Area (ha):	1.9	Number of Dwellings:	100
Infrastructure	<p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Sustainable Transport Improvements at Haywards Heath Station Education Library Community buildings Local Community Infrastructure Emergency services Health Play area Other outdoor provision Outdoor sports Informal outdoor space, where need not met on-site <p>Provision of:</p> <ul style="list-style-type: none"> Sustainable Transport measures Car parking 		

- Sewerage network upgrades



Policy Requirements

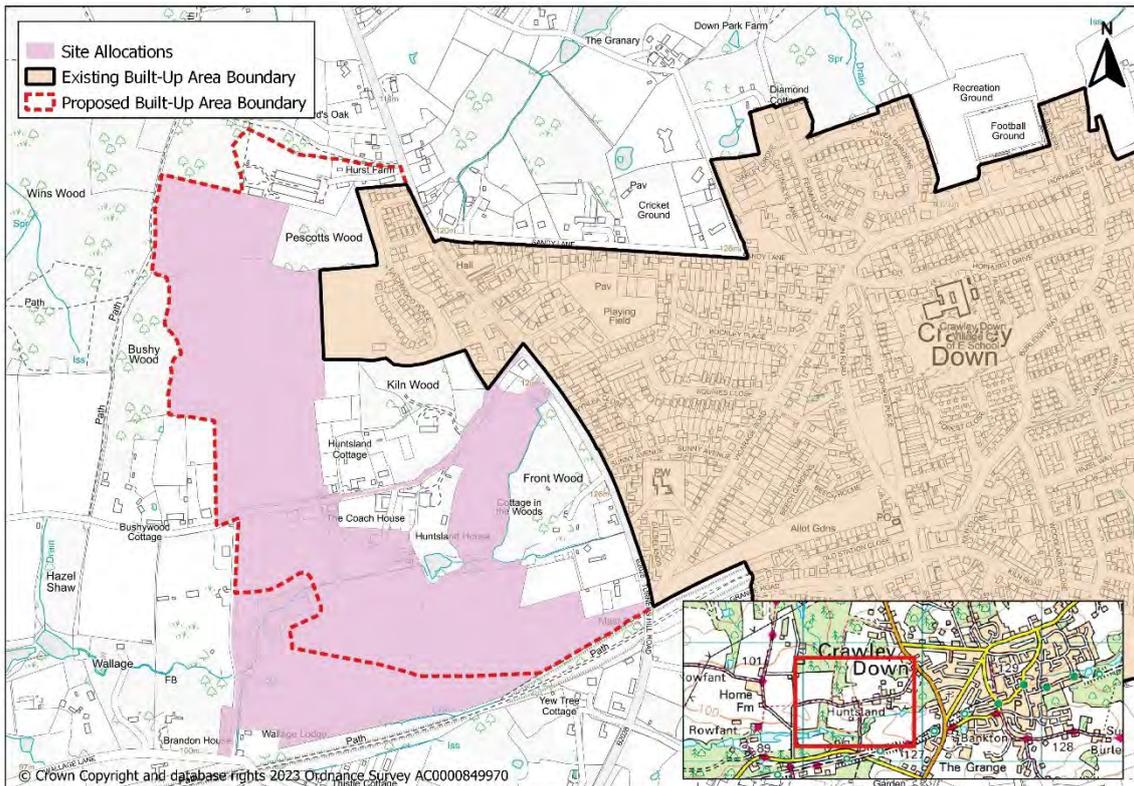
1. Deliver a mixed-use development including retail, leisure, residential and other complementary town centre uses to help provide a central and diverse hub for the town centre.
2. Pedestrian routes through the site should be clear and link well to adjacent areas.
3. Maximise active frontages in the design of any redevelopment of the site.
4. 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 Mid Sussex Design Guide SPD.
5. 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'.
6. Take into account the 2021 Haywards Heath Town Centre Masterplan SPD and opportunities for The Orchards Shopping Centre (Chapter 5).
7. Phase the occupation of development to align with the delivery of sewerage infrastructure, in consultation with the service provider.
8. Plan the layout of the development to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes.
9. Provide good acoustic design to address noise impacts associated with the mixed-use development.
10. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
11. Meet the requirements of other relevant development plan policies.

DPA9: Land to west of Turners Hill Road, Crawley Down

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.

Allocation	Housing		
SHELAA:	688	Settlement:	Crawley Down
Gross Site Area (ha):	33.7	Number of Dwellings:	350
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> • Community building • Allotments • 50 bed (C2) care home • Play area • Sports pitches⁵² • Informal outdoor space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Education • Library • Local Community Infrastructure • Emergency services • Ashdown Forest SPA and SAC mitigation measures • Health <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable transport measures • Highway works • Sewerage network upgrades 		

⁵² Subject to further discussion regarding overall provision within settlement, refer to IDP for most up-to-date position.



Policy Requirements

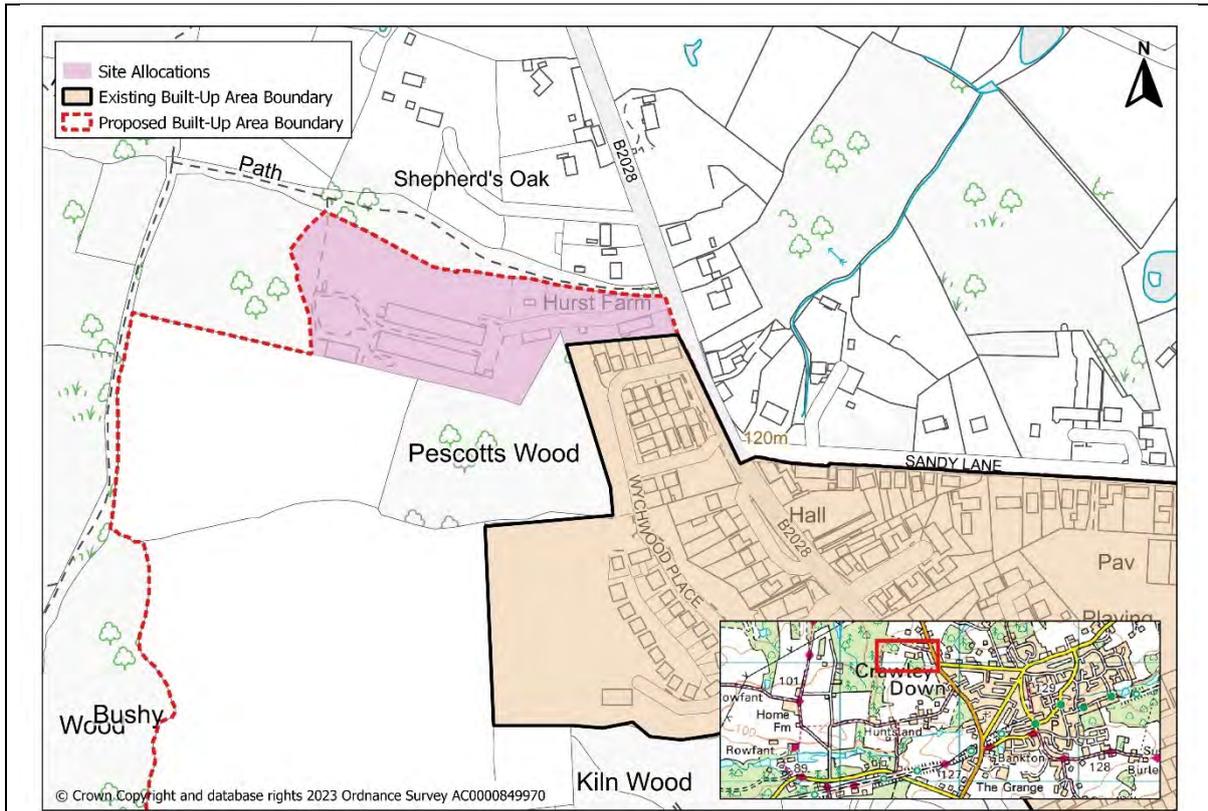
1. Assess the areas of archaeological interest – Crest of Sandstone Ridge and the stream running through the High Weald that has a potential pre-historic bank.
2. Follow a sequential approach by directing development away from areas of flood risk and mitigate impacts through integration of SUDS to deliver biodiversity/environmental improvements and flood resilience.
3. Address any impacts associated with Ancient Woodland (on and adjacent to the site) including Front Wood, Wallage Wood, Wallage Lodge Shaw, Bushy Wood, Pescotts Wood (east and west parcels), which will be excluded from development.
4. Provide a woodland buffer to existing vegetation along the southern boundary and set development back from the Worth Way to mitigate potential visual impact to the route and help enhance its setting.
5. Provide a 5m landscape buffer to existing hedgerows.
6. Integrate and enhance the existing PRoWs within the site and retain the character of PRoWs that border the site.
7. Provide suitable pedestrian and cycle connections to Crawley Down, including via the Worth Way.
8. Integrate development with the site to the north (DPA10) such as through the design of the site layout and by providing pedestrian and cycling connections between the developments, green infrastructure and ecological corridors.
9. Provide suitable access to Turners Hill Road to each of the three areas of the site. The northern access is to be via Wychwood Place and the middle access and route through site is to be separate from Huntsland which will remain a no through road and public right of way.
10. Avoid development in the most sensitive areas, including the central ridge.

- | | |
|-----|--|
| 11. | Provide a country park in southern part of site and along western boundary linking the north and south parts of the site. It meets the requirements of other relevant development plan policies. |
| 12. | Meet the requirements of other relevant development plan policies. |

DPA10: Hurst Farm, Turners Hill Road, Crawley Down

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.

Allocation	Housing		
SHELAA:	743	Settlement:	Crawley Down
Gross Site Area (ha):	2.2	Number of Dwellings:	37
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> • Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Education • Library • Community buildings • Local Community Infrastructure • Ashdown Forest SPA and SAC mitigation measures • Health • Play area • Other outdoor provision • Outdoor sports • Parks and Gardens 		



Policy Requirements

1. 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.
2. Address any impacts associated with ancient woodland along the western and southeastern edges of the site.
3. Integrate development with the site to the south (DPA9) such as through the design of the site layout and by providing pedestrian and cycling connections between the developments, green infrastructure and ecological corridors.
4. Informed by a Heritage Statement, provide layout and design which preserves the setting of Grade II listed building 'Westlands'.
5. Provide suitable vehicular, pedestrian and cycle access from Turners Hill Road.
6. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
7. Meet the requirements of other relevant development plan policies.

DPA11: Land rear of 2 Hurst Road, Hassocks

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.

Allocation	Housing		
SHELAA:	210	Settlement:	Hassocks
Gross Site Area (ha):	0.9	Number of Dwellings:	25

Infrastructure

On-site:

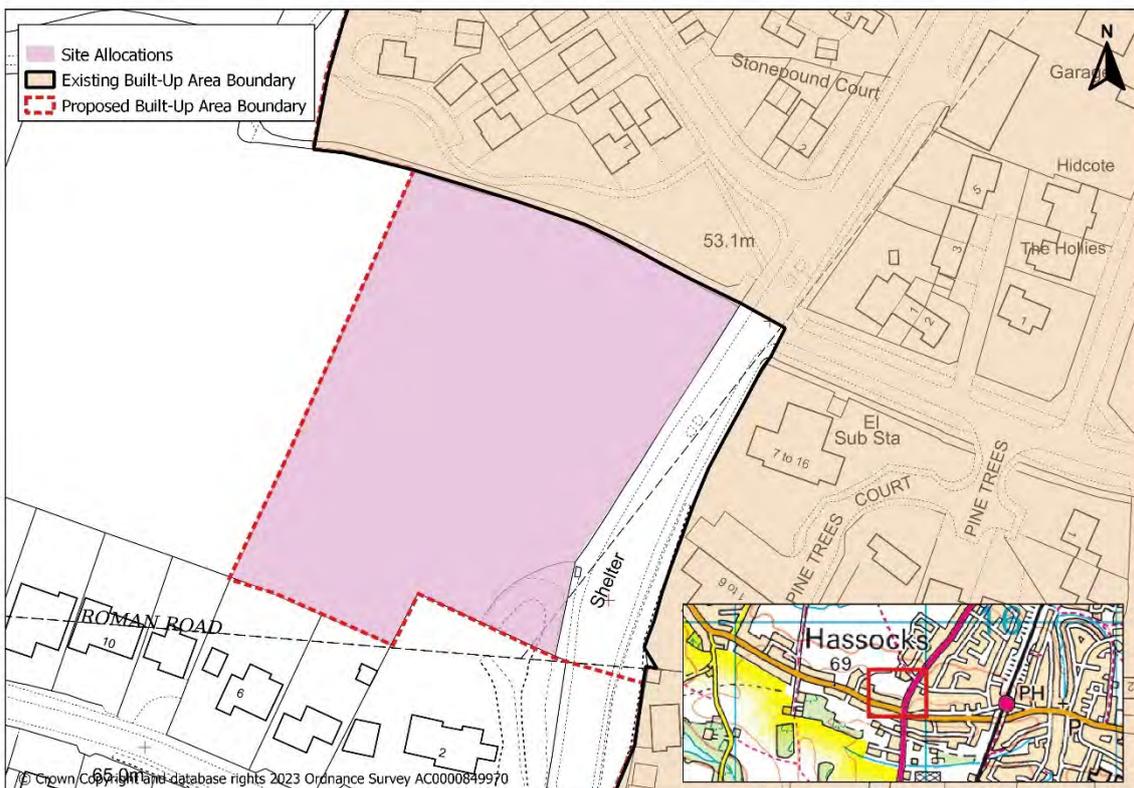
- Natural, semi-natural and amenity green space

Financial contributions towards the provision of:

- Sustainable Transport
- Improvements at Hassocks Station
- Education
- Library
- Community buildings
- Local Community Infrastructure
- Health
- Play area
- Other outdoor provision
- Outdoor sports
- Parks and Gardens

Provision of:

- Sustainable Transport measures
- Highway works



Policy Requirements

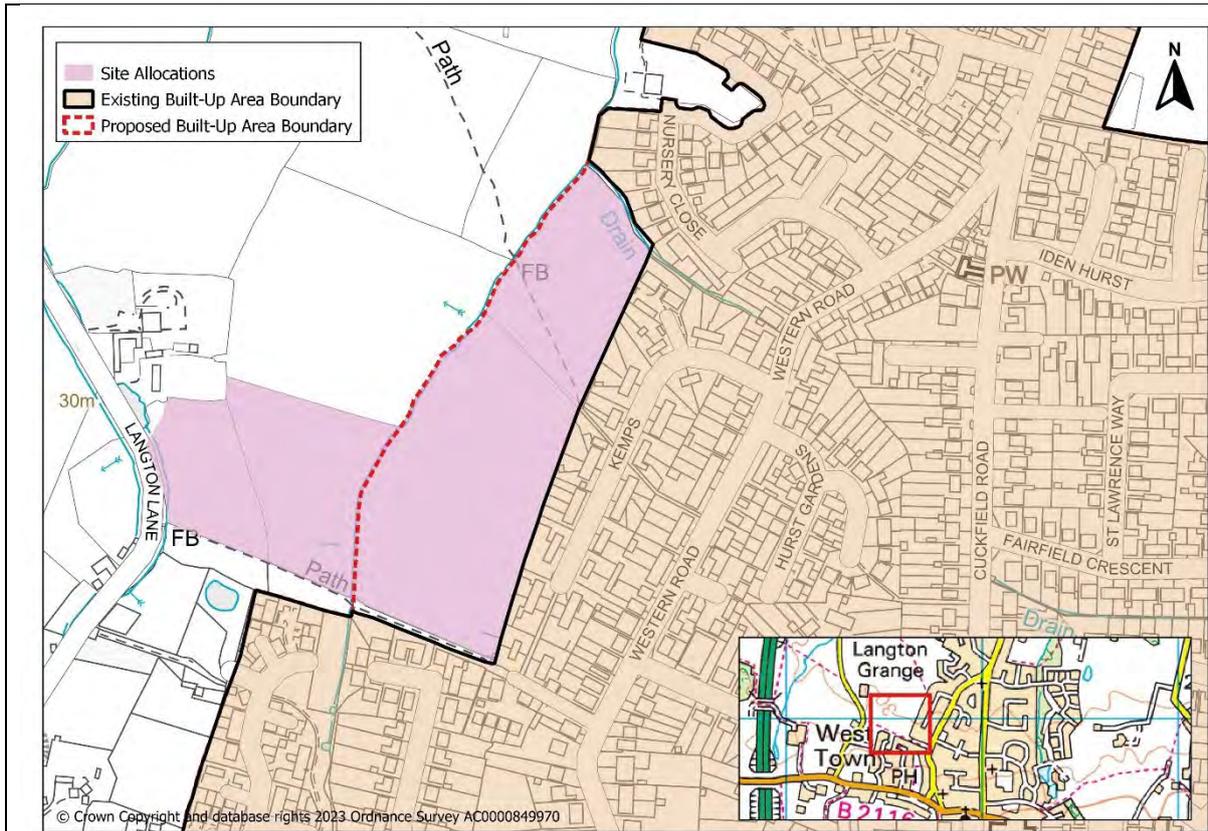
1. Provide appropriate landscaping, taking into account any sensitive, longer views to the northwest of the site.
2. Mitigate potential impacts from development on TPOs in the southeast corner and along northern boundary.
3. Retain and enhance mature trees/hedgerows along site boundaries, including screening to the A273.

4. Provide suitable vehicular, pedestrian and cycle access including necessary off-site highways improvements.
5. Provide good acoustic design to address noise impacts associated with the A273.
6. Provide air quality mitigation to address impacts on the Stonepound Crossroads AQMA.
7. Address any impacts associated with the soft sand Minerals Safeguarding Area.
8. Meet the requirements of other relevant development plan policies.

DPA12: Land west of Kemps, Hurstpierpoint

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.

Allocation	Housing		
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"> • Play area • Informal outdoor space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Education • Library • Community buildings • Local Community Infrastructure • Emergency Services • Health • Other outdoor provision • Outdoor sports <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable transport measures • Highway works • Sewerage network upgrades 		



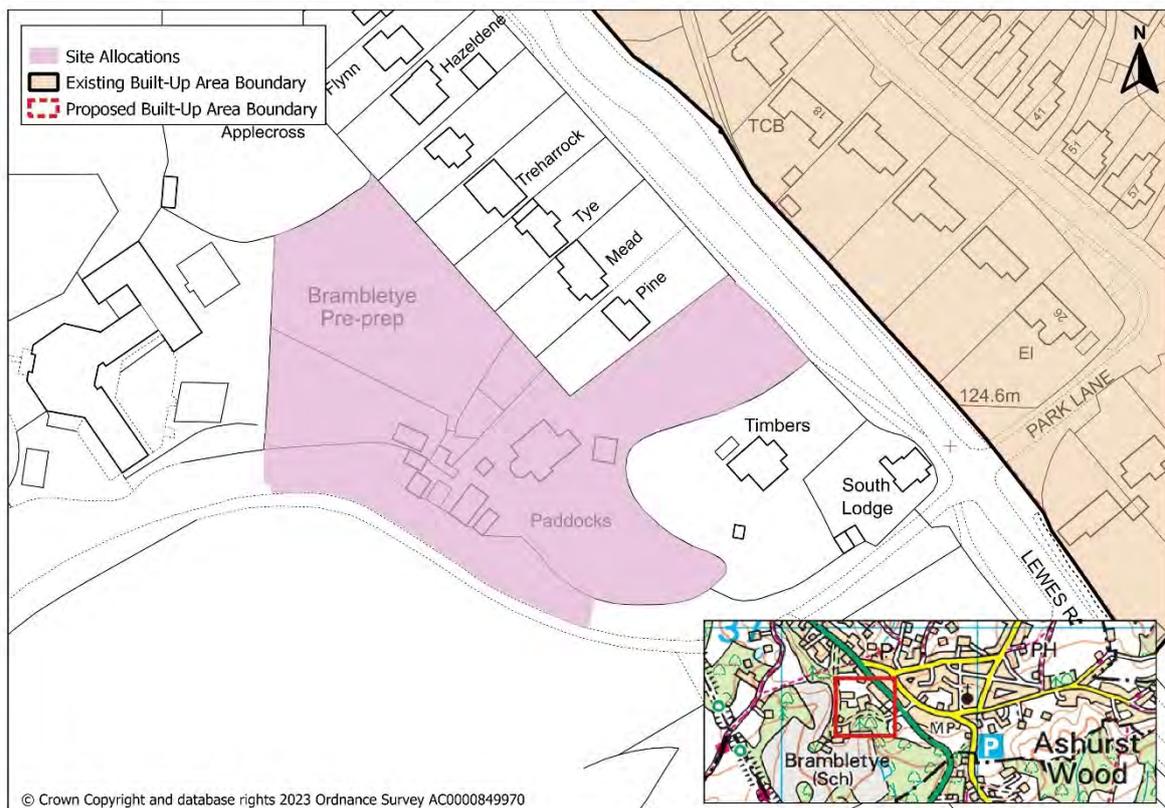
Policy Requirements

1. Provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west of the site, including ecological corridors.
2. Protect and enhance the streams on the western boundaries and crossing the site.
3. Provide a designated/equipped play area on-site.
4. Create new pedestrian and cycle links to connect to the existing PRow network.
5. Retain and enhance the existing PRow, Footpath 36Hu, crossing the site.
6. Upgrade Footpath 37Hu to the south of the site connecting to Western Road to Langton Lane.
7. Informed by a Heritage Statement, provide layout and design which preserve the setting of the neighbouring Grade II listed building 'Langton Grange' and the Langton Lane Conservation Area.
8. Provide suitable access from Orchard Way.
9. Address any impacts associated with the brick clay (Weald) Mineral Safeguarding Area.
10. Meet the requirements of other relevant development plan policies.

DPA13: The Paddocks, Lewes Road, Ashurst Wood

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.

Allocation	Housing		
SHELAA:	984	Settlement:	Ashurst Wood
Gross Site Area (ha):	0.84	Number of Dwellings:	8-12
Infrastructure	<p>On-site:</p> <ul style="list-style-type: none"> Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> Sustainable Transport Education Library Community buildings Local Community Infrastructure Ashdown Forest SPA and SAC mitigation measures Health Play area Other outdoor provision Outdoor sports Parks and Gardens 		



Policy Requirements

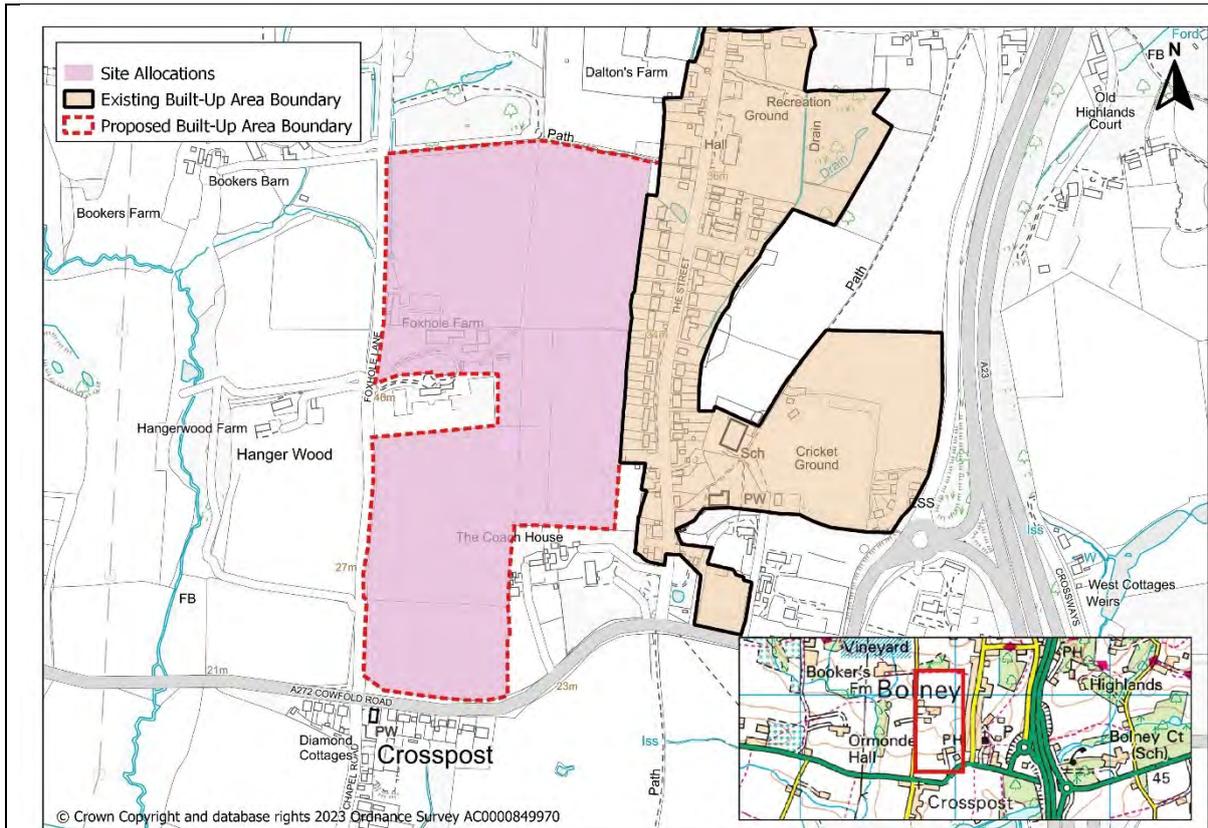
1. Provide suitable access from Lewes Road.
2. Take a landscape-led approach to development and take into account the existing trees in the design and layout of the site.
3. Provide an appropriate buffer for the priority habitat (deciduous woodland) within the site and take opportunities to enhance it.

4. Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB.
5. Avoid the appearance of a car-dominated layout in the design of the development in accordance with the Mid Sussex Design Guide SPD.
6. The layout of the site needs to take into account the location of existing water and sewerage infrastructure to allow for maintenance and future upgrades.
7. The site lies within the brick clay (Wadhurst) Mineral Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with the requirements of the West Sussex Joint Minerals Local Plan and associated Safeguarding Guidance.
8. Meet the requirements of other relevant development plan policies.

DPA14: Land at Foxhole Farm, Bolney

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.

Allocation	Housing		
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"> • Land for education provision • Community facility • Community working hub • Allotments • Informal outdoor space including community orchard and country park <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Education • Library • Local Community Infrastructure • Emergency Services • Play area • Health • Other outdoor provision • Outdoor sports <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable transport measures • Highway works • Sewerage network upgrades 		



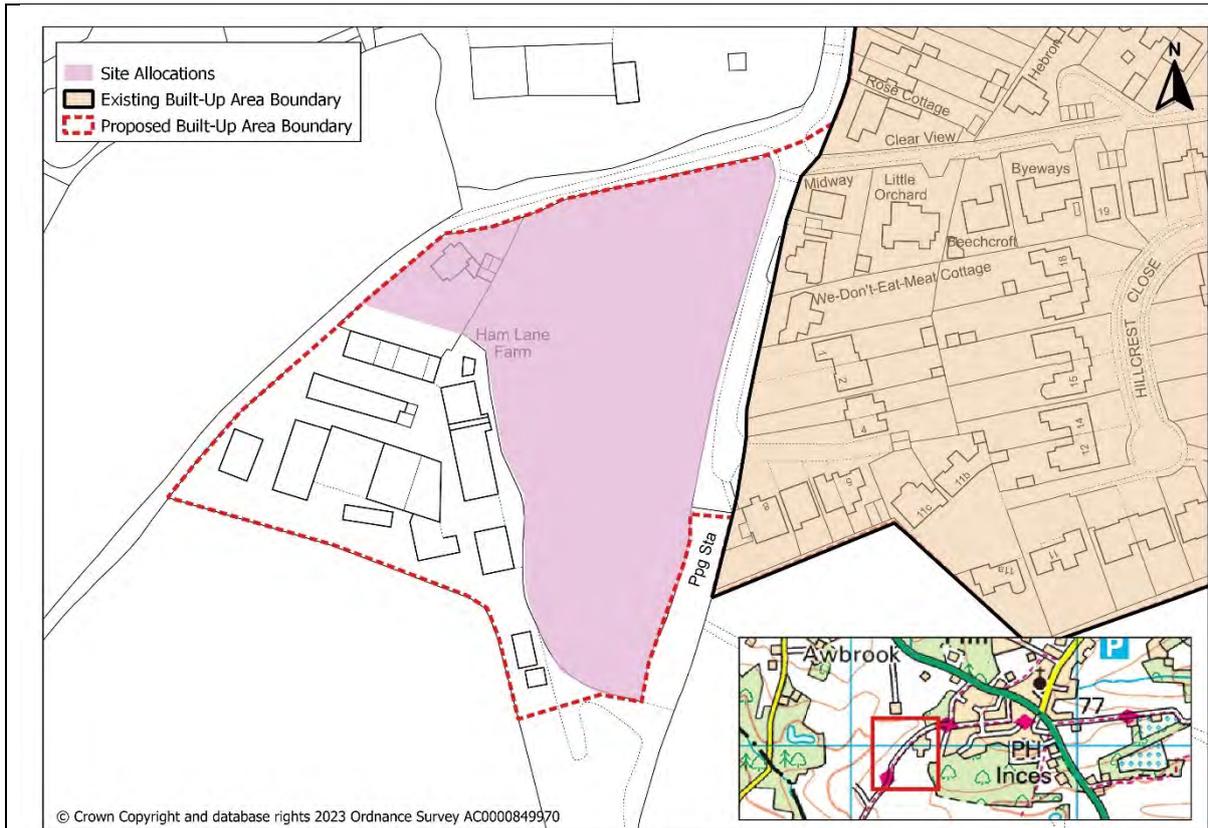
Policy Requirements

1. 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).
2. Follow a sequential approach by directing development away from areas of flood risk associated with surface water flooding in lowest areas of the site.
3. Retain the character of footpath 44Bo which runs along the site's northern boundary and create a pedestrian link from the site.
4. Provide suitable vehicular, pedestrian and cycle access from Cowfold Road (A272).
5. Provide pedestrian and cycle access to The Street into the north part of the site between the properties of Westmeadow and Downland. In addition, explore potential for additional pedestrian and cycle access to The Street into the south-central part of the site.
6. Provide a country park between the north and south development parcels.
7. Explore opportunities on-site to enhance education provision in the village that meets an identified local need.
8. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in consultation with the service provider.
9. The site lies within the brick clay (Weald) Mineral Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with the requirements of the West Sussex Joint Minerals Local Plan and associated Safeguarding Guidance
10. Meet the requirements of other relevant development plan policies.

DPA15: Ham Lane Farm House, Ham Lane, Scaynes Hill

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.

Allocation	Housing		
SHELAA:	1020	Settlement:	Scaynes Hill
Gross Site Area (ha):	0.97	Number of Dwellings:	30
Infrastructure	<p>On-site: Natural, semi-natural and amenity green space</p> <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Improvements at Haywards Heath Station • Education • Library • Community buildings • Local Community Infrastructure • Health • Play area • Other outdoor provision • Outdoor sports • Parks and Gardens <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport measures • Highway works 		



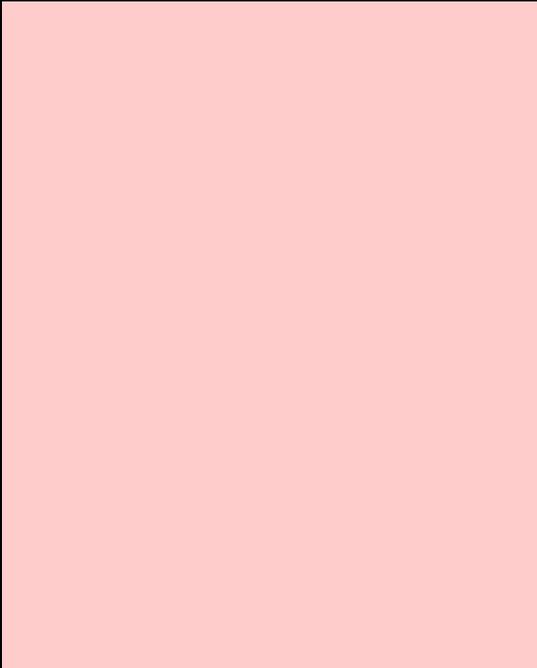
Policy Requirements

1. Address any impacts associated with ancient woodland in the south east corner of the site.
2. Create new pedestrian links to existing PRoW network.
3. Provide suitable vehicular, pedestrian and cycle access from Ham Lane.
4. Provide good acoustic design to address noise impacts associated with adjacent industrial workshops.
5. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
6. Address any impacts associated with the Building Stone (Cuckfield and Ardingly) Minerals Consultation Area and the CDE Waste and Aggregate Recycling facility consultation area.
7. Meet the requirements of other relevant development plan policies.

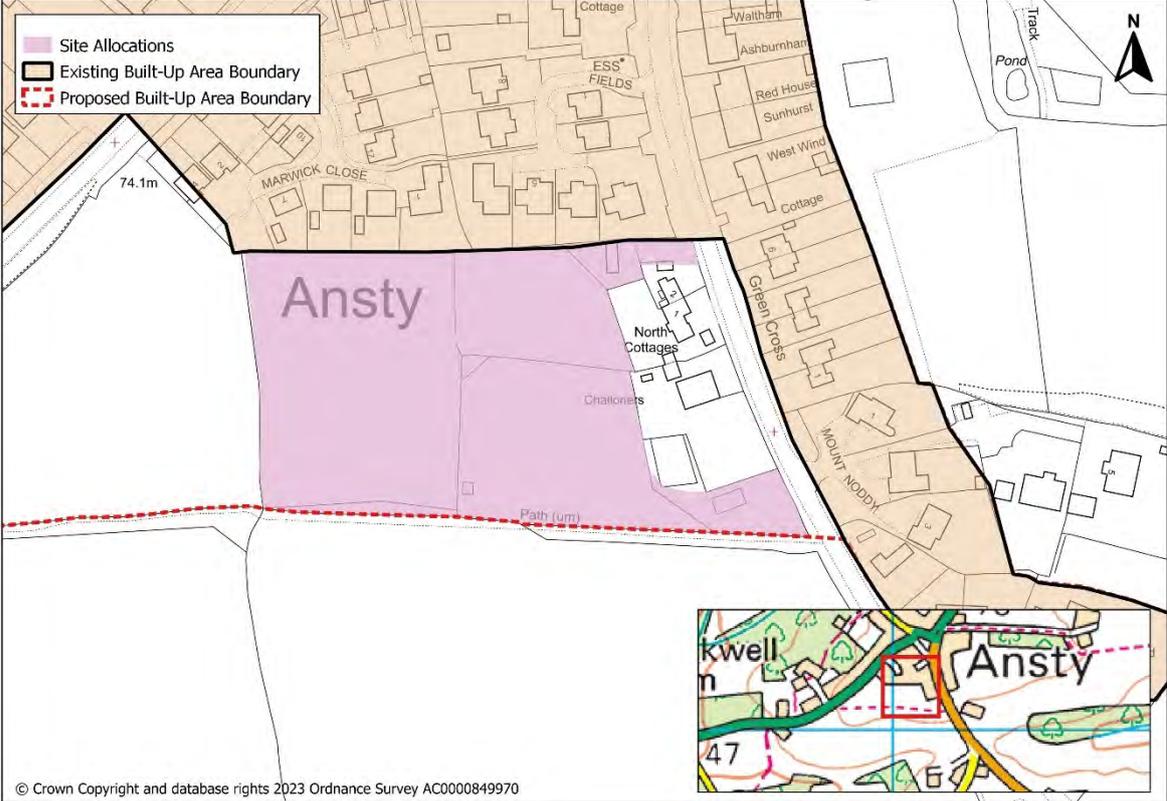
DPA16: Land west of North Cottages and Challoners, Cuckfield Road, Ansty

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.

Allocation	Housing		
SHELAA:	1148	Settlement:	Ansty
Gross Site Area (ha):	1.3	Number of Dwellings:	30
Infrastructure	On-site:		



- Natural, semi-natural and amenity green space
- Financial contributions towards the provision of:
- Sustainable Transport
 - Improvements at Haywards Heath Station
 - Education
 - Library
 - Community buildings
 - Local Community Infrastructure
 - Health
 - Play area
 - Other outdoor provision
 - Outdoor sports
 - Parks and Gardens
- Provision of:
- Sustainable Transport measures
 - Highway works



Policy Requirements

1. Provide suitable access from Cuckfield Road.
2. Retain and provide an appropriate buffer to the mature English oak tree in the centre of the site unless it can be demonstrated and justified through survey and assessment evidence that the tree needs to be removed.
3. Particular attention should be given to trees and hedgerows on the southern boundary adjacent to the PRoW.

4. Maintain the rural character of the PRow on the southern boundary of the site.
5. 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.
6. The design and layout of the site should reflect a transition from the built environment to the rural countryside.
7. The design and layout of the site should reflect the rural character of the settlement and avoid being urban or suburban in character.
8. Integrate development with the site to the west (DPA17) by providing pedestrian and cycling connections and green infrastructure connectivity.
9. The layout of the site needs to take into account the location of existing water and sewerage infrastructure to allow for maintenance and future upgrades.
10. Meet the requirements of other relevant development plan policies.

DPA17: Land to the west of Marwick Close, Bolney Road, Ansty

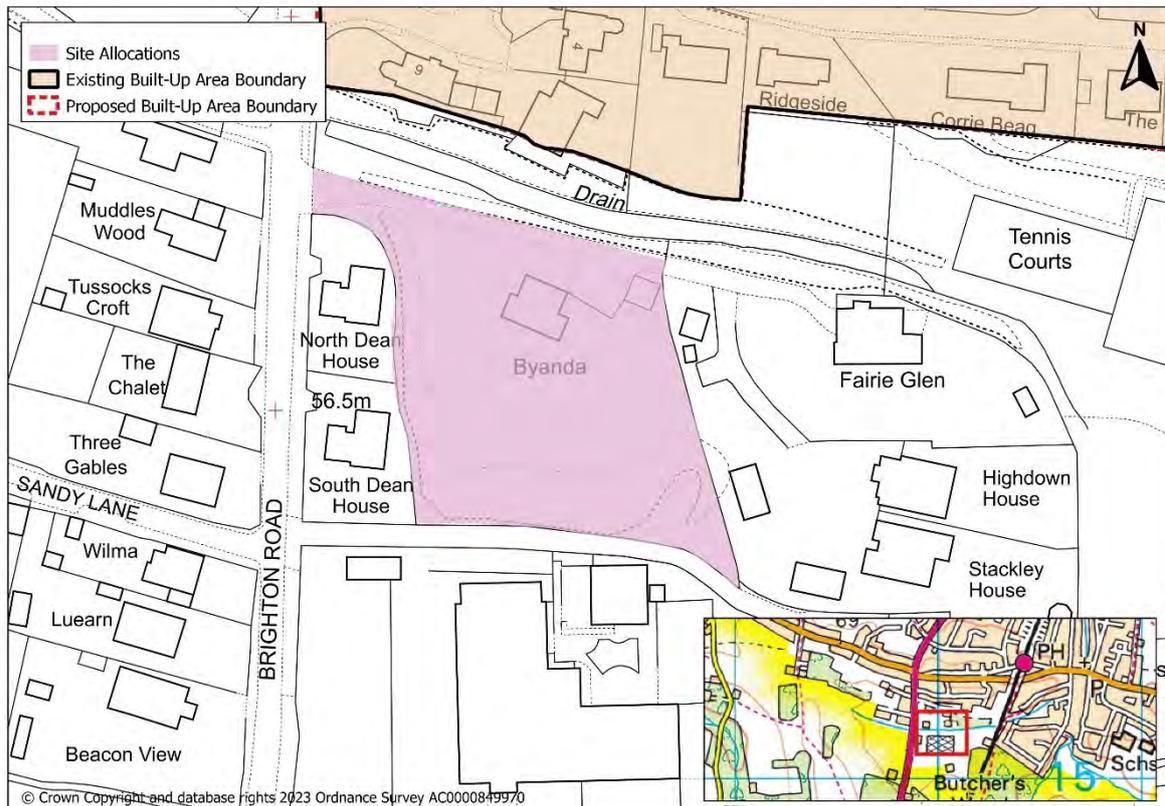
Note: the boundary shown on the site map below represents the extent of the site inclusive of all built development and any mitigation requirements (e.g. landscape buffers or open space) listed within the policy requirements.

Allocation	Housing		
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"> • Natural, semi-natural and amenity green space <p>Financial contributions towards the provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport • Improvements at Haywards Heath Station • Education • Library • Community buildings • Local Community Infrastructure • Health • Play area • Other outdoor provision • Outdoor sports • Parks and Gardens <p>Provision of:</p> <ul style="list-style-type: none"> • Sustainable Transport measures • Highway works 		

application reference DM/23/0002). In the event that the permission lapses, the allocation will continue to secure the site for older persons' accommodation.

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.

Allocation	Older Persons' Accommodation		
SHELAA	1101	Settlement	Hassocks
Gross Site Area (ha)	0.4ha	Number and type of older persons' accommodation	60 bed residential care home



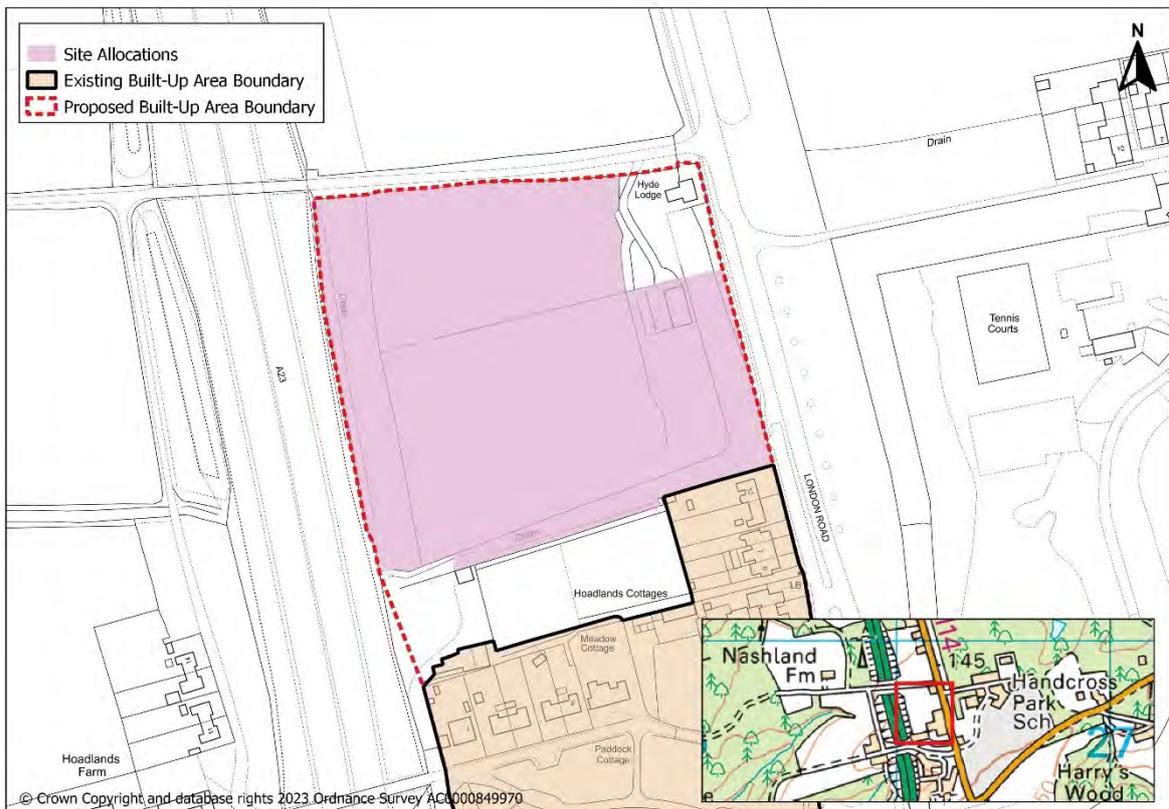
Policy Requirements

1. Provide suitable vehicular, pedestrian and cycle access from Brighton Road.
2. Follow a sequential approach by directing development away from areas of flood risk associated with the site.
3. The building design including its height, scale, massing and appearance should be appropriate to the site's edge of settlement location and address any sensitive views to the site from within the South Downs National Park, including footpath 11c and top of Wolstonbury Hill.
4. The site lies within the soft sand Minerals Safeguarding Area, therefore the potential for mineral sterilisation should be considered in accordance with the requirements of the West Sussex Joint Minerals Local Plan and associated Safeguarding Guidance.
5. Meet the requirements of other relevant development plan policies.

DPA19: Land at Hyde Lodge, Handcross

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.

Allocation	Older Persons' Accommodation		
SHELAA	1106	Settlement	Handcross
Gross Site Area (ha)	3.0	Number and type of older persons' accommodation	Contribution towards identified need



Policy Requirements

1. Provision of older persons' accommodation to contribute towards the overall identified need, as set out in Policy DPH4: Older Persons' Housing and Specialist Accommodation.
2. Provide an appropriate buffer to the priority habitat (deciduous woodland) within the site on its western boundary.
3. Explore and take opportunities to open up/daylight the culvert within the site.
4. Provide access from the B2114 London Road.
5. Extend the 30mph speed limit northwards (to be discussed with the Highway Authority).
6. Provide a pedestrian access in the southeast corner of the site where there is an existing gateway.
7. Retain the existing rural character of London Road.
8. Take a landscape-led approach to development.
9. Undertake a LVIA to inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB.

10. The design, density and layout of the site should reflect the rural character of the settlement and area and avoid being urban or suburban in character. The site should reflect a transition from the built environment to the rural countryside.
11. The building design including its character, grain, mass and height should be appropriate for this rural location on the edge of a settlement and in the High Weald AONB.
12. Provide good acoustic design to address any impacts from noise and air quality associated with the A23.
13. Investigate, assess and address any land contamination issues arising from former uses of the site or from uses, or former uses, of land in proximity to the site.
14. Retain the character of Hyde Lodge and its gardens including in the design and layout of the proposed development.
15. Meet the requirements of other relevant development plan policies.

17. Infrastructure



Infrastructure	<p>DPI1: Infrastructure Provision</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: Water and Wastewater Infrastructure</p> <p>DPI8: Viability</p>
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DPI1: Infrastructure Provision

Policy: Strategic
Strategic Objectives: 6 – Infrastructure to Support Sustainable Communities

The provision 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.

The term ‘infrastructure’ comprises physical, social and green infrastructure and includes utilities (including telecommunications and waste management), open space, sport facilities, play areas, roads, public transport, education, libraries, health facilities, flood defences and community facilities. It is provided and managed by a wide range of organisations in Mid Sussex. A full list is provided in the Infrastructure Delivery Plan, updated alongside and to support the District Plan. It sets out 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. It also identifies who is responsible for delivery and the associated costs.

Providers have been engaged in the preparation of the District Plan and the plan’s objectives and policies to address their various strategies and programmes. Infrastructure providers are encouraged to maintain close dialogue with the Council as their plans develop, to ensure that any issues are resolved at an early stage. Where delivery is expected on-site, the developer will be a delivery partner and will be bound by legal agreements to deliver it.

Infrastructure provision can be funded through the public sector and the private sector. The District Plan will play a key role in securing continued investment in infrastructure delivery and in aligning the programmes of the various providers with the local need to achieve sustainable communities. This includes, but is not limited to, transport projects, health facilities, school places and open space and leisure provision. Known infrastructure projects are listed in the Infrastructure Schedule in the Infrastructure Delivery Plan, with information about phasing of delivery, estimated cost and funding.

The Infrastructure Schedule provides a framework for the monitoring and managing of progress in the delivery of key infrastructure programmes and associated funding. It will be updated annually through continuous engagement with the delivery agencies to reflect the most up-to-date information and the organic nature of infrastructure planning. Any issues with delivery will be addressed in discussion with the relevant agency and partnership body. Future growth in the district together with projected demographic changes will place increased demand upon the capacity of infrastructure. Investment to improve existing infrastructure and the provision of new infrastructure and services will be necessary to support sustainable development. The Council expects developers to fund and provide the necessary investments to mitigate or compensate for the impact of their proposals. Sites required to deliver specific elements of essential infrastructure during the plan period are signposted within the Plan and the requirements clearly identified under the relevant site allocation policy.

DPI1: Infrastructure Provision

To support growth across the district, the Council will safeguard and improve infrastructure and work in partnership with infrastructure and service providers to ensure the delivery of the necessary additional physical infrastructure. The potential and predicted infrastructure requirements over the lifetime of the District Plan are identified and monitored, including in relation to funding, in the Infrastructure Delivery Plan.

New development

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), in-kind and via financial contribution, may be required to address the impacts of development, including cumulative effects on the existing infrastructure. Generally, these will be secured via section 106 planning obligation, or where relevant via planning conditions.

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 to ensure that the value of planning obligations has been maximised having regard to the likely viability. The Council's approach to the assessment of financial viability is set out in Policy DPI8: Viability.

The design and layout of a development must ensure future access to utility infrastructure for maintenance and upgrading.

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. Replacement facilities must be provided to at least the same standard which could include floorspace, volume, functionality and purpose.

Infrastructure Delivery

Infrastructure must be provided at the appropriate time as recommended by the relevant infrastructure provider. This may be prior to the development becoming operational or being occupied, and designed to ensure that services and amenity of existing residents is not unduly reduced during the development period. 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 on-site delivery has been identified, direct delivery by the developer will be favoured. The Council will encourage dialogue between service providers and developers. Where appropriate opportunities arise, the co-location of services and joint delivery of infrastructure by service providers will be supported.

Significant sites must prepare a site-wide Infrastructure Delivery Strategy demonstrating that the development will deliver, in a timely manner, sufficient infrastructure to cater for the needs of the proposed development as a whole and also mitigate to an acceptable level the effect of the whole development upon the surrounding area and community.

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
Strategic Objectives: 6 – Infrastructure to Support Sustainable Communities

Planning obligations, commonly referred as 'section 106', are a type of developer contribution entered into to assist in mitigating the impact of a development. This can be via a planning agreement entered into by a person with an interest in the land and the planning authority, or via unilateral undertaking entered into by a person with an interest in the land without the local planning authority. Planning obligations run with the land, are legally binding and enforceable.

Planning obligations must meet the statutory test set out in the CIL Regulations:

1. Necessary to make the development acceptable in planning terms
2. Directly related to the development

3. Fairly and reasonably related in scale and kind to the development

Planning obligations will be the principal mechanism for securing and collecting developer contributions.

The obligation sought will depend on the nature of the development proposed to address the impact of the development on the capacity of existing infrastructure. The Infrastructure Delivery Plan identifies the expected level of provision to address the level of growth throughout the plan period, and where known the projects that will be funded. It will be updated as information is made available by the relevant providers.

Further information about the requirement for the obligations listed in the policy is provided under relevant policies elsewhere in the plan, which have been tested for their cumulative impact on development viability and are therefore considered deliverable.

In situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, the priorities will be determined on a case-by-case basis.

For some obligations, charging approaches for monetary contributions are set out in Appendix 5, with further information in the relevant policies about how and when these charging approaches will be used. 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. Planning obligations secured for improvement to open space can be spent on all types of open space such as allotment, parks and recreation grounds, play space, amenity green space and natural green space, including those on housing estates.

A monetary contribution for the monitoring of planning obligations will be sought.

Monitoring fees must be:

- Fairly and reasonably related in scale and kind to the development, and
- Not exceed the authority's estimate of its cost of monitoring the development over the lifetime of the planning obligations which relate to that development.

They will be calculated on a case-by-case basis according to the nature of the proposed development, the obligation secured and the number of trigger points. Monitoring fees are set out on the Council's website.

The Council reports on developer contributions secured, received and spent in its annual Infrastructure Funding Statement.

DPI2: Planning Obligations

Planning obligations will be sought to:

1. Secure affordable housing in line with the requirements of policy DPH8.
2. Ensure that proposals appropriately mitigate the impact of development.
Depending on the nature of the development, this may include although it would not be restricted to:

- Provision of, or financial contribution towards the provision of, infrastructure such as travel and transport, education, health, community facilities, open space and leisure, green infrastructure, and emergency services.
 - Highways and traffic improvements.
 - Local walking and cycling improvements.
 - Car clubs, parking restrictions, and travel plans.
 - Access to employment opportunities created by development opportunities.
 - Sustainable drainage systems and flood risk mitigation.
 - Connection to, and support of, quality broadband and other telecommunication and information technology support networks.
 - Specialist accommodation.
 - Accommodation for Gypsies, Travellers and Travelling Showpeople.
 - Waste management.
 - Green and blue infrastructure.
 - Measures to deliver biodiversity net gain.
 - Adequate measures to avoid or mitigate adverse effects on the integrity of the Ashdown Forest SPA and SAC.
 - Other sustainability measures including mitigation impacts on and/or enhancement of biodiversity.
 - Maintenance and management arrangements.
3. Secure an appropriate contribution towards monitoring of planning obligations, in addition to the Council's legal costs in drafting and completing the agreements.

DPI3: Major Infrastructure Projects

Policy: Strategic
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 (MIPs) 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 (NSIPs).

The Planning Inspectorate is responsible for operating the planning process for NSIPs. 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 the national case in principle for NSIPs 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, but 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, which are not NSIPs, 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. Where the Council is the decision maker, these matters will be taken into account through the planning application process. However, the Council will seek to adopt an approach which is consistent with relevant NPS and take into account operational requirements of the MIP.

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 wellbeing), 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.

Nationally Significant Infrastructure Projects

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. 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.

DPI4: Communications Infrastructure

Policy:	Non-Strategic
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 2022-2025 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, and 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 full 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:

1. 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.
2. 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.
3. 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
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
- Climbing centres

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

New and additional provision

The provision of new, improved and/or enhanced open space, leisure, sport and recreational facilities (including allotments) to support healthy lifestyles in accordance with the strategic aims of the Playing Pitch Study, and other relevant studies as they are published and/or updated, will be supported where it meets the requirements of other relevant development plan policies. 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.

Existing provision

The Council's adopted standards for open space, sport and recreational facilities will be met by protecting and appropriately maintaining existing facilities.

Proposals that involve the loss of open space, leisure, sports and recreational buildings and land, including playing fields, will not be supported unless:

1. An assessment has been undertaken which has clearly shown that there is no longer a demand and/or need for the open space, leisure, sports or recreational land or building, and where relevant it has been marketed, in accordance with the marketing guidance in Appendix 1, for a reasonable period; or
2. The loss resulting from the proposed development would be replaced by alternative provision that is accessible, inclusive, available and of equivalent or better quantity and quality in a suitable location; or
3. Community benefits would be achieved that could not be achieved in any other way, and appropriate compensatory provision is made, including improvement to the quality of the remaining open space; or
4. The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use; or
5. The proposed development directly relates to the use of open space and is appropriate in scale and form to the character of the open space and is acceptable in terms of impact on openness without harming the function and operation of the open space.

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 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
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 12 – Support Safe, Healthy and Inclusive Communities 15 – Provide Cultural, Leisure and Sporting Facilities

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

New and additional provision

The provision and/or improvement of community and cultural facilities and local services that contribute to creating sustainable communities will be supported where the proposal meets the requirement of other relevant development policies and where all of the following criteria apply:

1. The need for the community or cultural facility or local service is clearly demonstrated.
2. The facility is well located for the community it would serve.
3. The development will not have an adverse effect on the vitality and viability of existing facilities in the locality or relevant assets of community value.
4. The proposal is supported by a robust proportionate business plan and governance arrangement, including any funding arrangement, to ensure the facility is financially sustainable in the longer term. This information will be prepared by the applicant.
5. Appropriate consideration had been given to the shared use, re-use and/or redevelopment of existing buildings in the host community to expand or diversify the level of service.

Existing provision

The Council's adopted standards for community and cultural facilities will be met by protecting and appropriately maintaining existing facilities.

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:

6. A marketing exercise has been undertaken in accordance with marketing guidance at Appendix 1 and for a minimum of 12 months after the facility became vacant, which clearly demonstrates that there is no longer a demand and/or need for the community or cultural facility, local service or an equivalent community use; or
7. The loss resulting from the proposed development would be replaced by alternative facilities that are accessible, inclusive, available and of equivalent or better quantity and quality in a suitable location; or
8. The development is for alternative community and cultural provision, the benefits of which clearly outweigh the loss of the current or former use.

DPI7: Water and Wastewater Infrastructure

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

A growing population and an increase in development will place pressure on water supply and wastewater treatment works, with some having limited available capacity to meet these needs. The Council will engage with the water utility companies through the Infrastructure Delivery Plan to ensure water infrastructure and facilities are fit for purpose and to minimise leaks and to support the needs of the local community.

To protect the environment, increased loading on wastewater infrastructure from proposed development should be treated appropriately and adequately and should not result in untreated sewage discharges into the environment.

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 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 early in the development process to agree the improvements required and how these will be funded prior to any occupation of the development.

DPI7: Water and Wastewater Infrastructure

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

1. Through consultation with the water company 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
2. 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 must be supported by sufficient information to understand the potential implications for the water environment, biodiversity and climate change. Long-term management and maintenance commitments must be clearly set out at the application stage.

Where development is proposed within 800m of a sewage treatment works or 15m of a sewage pumping station, the developer will need to liaise with the utility company to consider whether an odour impact assessment is required. The odour impact assessment will need to determine whether the proposed development would result in adverse amenity impacts for new occupiers and provide mitigation measures as appropriate.

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 wastewater management, provided that the need for such facilities outweighs any adverse land use, landscape or environmental impacts and that any such adverse impact is minimised.

DPI8: Viability

Policy:	Strategic
Strategic Objectives:	6 – Infrastructure to Support Sustainable Communities 12 – Support Safe, Healthy and Inclusive Communities 13 – Provide Housing to Meet Community Needs

The 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, standards and infrastructure requirements on development viability, through the preparation of the Local Plan Viability Study (May 2022) in accordance with the guidance set out in the NPPF and Planning Practice Guidance (PPG) on Viability and Plan Making.

As a result, when negotiating site acquisitions and undertaking development feasibility studies, developers should take account 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.

Where an applicant formally requests the Council to consider a reduced level of infrastructure contributions and/or affordable housing, they will need to robustly demonstrate that it is not possible to meet the full quota of affordable housing without prejudicing the delivery of housing on the site. They will also need to demonstrate to the satisfaction of the Council that, in the individual case, the objective of creating mixed and balanced communities can be effectively and equally met through either off-site provision or an appropriate financial contribution in lieu or a combination of the two.

In order to demonstrate the above, a full viability appraisal must be submitted with a planning application which is based upon, and refers to, the Mid Sussex District Council Local Plan Viability Study. Such an appraisal should include evidence of what has changed since the adoption of the Plan which has impacted on viability and should reflect the government's recommended approach to defining key inputs as set out in NPPG.

Viability Appraisal - Information requirements

Policy DPI8 identifies the criteria for considering development proposals where a non-policy compliant scheme is put forward. 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 outturn.

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.

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.

Appendix 6 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 scheme's 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.

DPI8: 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:

1. A Viability Appraisal must be submitted by the applicant prior to validation of the planning application. It must be based on a policy compliant scheme and current costs and values. There must also be a clear correlation between a development's specification, build costs and development values.
2. 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.
3. In accordance with PPG paragraph 10-008-20190509, the weight given to a viability assessment will be a matter for the Council as the decision maker, *'...having regard to all the circumstances in the case.'* Viability submissions that are not in line with paragraphs 007-20190509 and 10-008-20190509 and/or have not been carried out in accordance with the relevant and most up to date RICS Guidance, will be given little weight.
4. 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.
5. 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.
6. 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.

7. 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.
8. If a surplus (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.
9. All Viability Appraisals will be made publicly available on the planning register, in order to increase openness and transparency in the planning process. Limited weight will be given to assessments not published in full. 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.

18. 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

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPS4: Flood Risk and Sustainable Drainage	1	Number of planning applications approved contrary to advice on flood risk/ flood defence grounds	Zero	Public agencies, local authority	Environment Agency
DPS5: Water Neutrality	1, 6	Per capita water consumption	Reduce	Developers, statutory water supply company, public	Water company data
		Net change in water demand within the part of Mid Sussex that falls within the Sussex North Water Resource Zone	Improve	Developers, statutory water supply company, public	Water company data
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	Secure relevant and meaningful biodiversity net gain	Developers	MSDC Monitoring Biodiversity Gain Plan

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		(on-site or off-site)	linked to wider nature recovery		
DPN3: Green and Blue 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	1, 3, 12	Number of major pollution incidents in the District	Zero	Local authority	Mid Sussex District Council monitoring
		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
		Incidents of major and significant water pollution within the District	Zero	Developers, Statutory sewerage/ water undertakers, Local Authority, Public agencies	Environment Agency
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

Policy	District Plan Objective	Indicator	Target	Implementation	Source
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
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

Policy	District Plan Objective	Indicator	Target	Implementation	Source
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
DPB4: Aerodrome Safeguarding Requirements (air safety)	4,12	Number of planning applications refused as contrary to this policy but overturned at appeal	Zero	Local authority	Mid Sussex District Council Monitoring
	5, 6, 8, 12, 14, 15	Number of sustainable transport	Maximise	Local authority	Mid Sussex District Council/ West Sussex

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPT1: Placemaking and Connectivity		schemes implemented			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 and Sustainable Travel	6	Increase in walking, cycling and sustainable transport 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	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability Survey

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		B8 Storage and Distribution			
		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	No net loss per annum	Developers, Local Authority	West Sussex County Council Commercial, Industrial and Leisure Land Availability

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		Industrial and B8 Storage and Distribution floorspace			Survey
DPE5: Within Town and Village Centre Boundaries	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
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
DPSC1: Significant Site – Land to the West of Burgess Hill/	1, 2, 5, 6, 12- 15	Number of dwellings completed	In accordance with DPSC1	Developers	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
North of Hurstpierpoint		Completion of infrastructure requirements (<i>specifics to TBC</i>)	In accordance with DPSC1	Developers	Mid Sussex District Council monitoring
DPSC2: Significant Site – Land at Crabbet Park	1, 2, 5, 6, 12- 15	Number of dwellings completed	In accordance with DPSC2	Developers	Mid Sussex District Council monitoring
		Completion of infrastructure requirements (<i>specifics to TBC</i>)	In accordance with DPSC2	Developers	Mid Sussex District Council monitoring
DPSC3: Significant Site – Land to the South of Reeds Lane, Sayers Common	1, 2, 5, 6, 12- 15	Number of dwellings completed	In accordance with DPSC3	Developers	Mid Sussex District Council monitoring
		Completion of infrastructure requirements (<i>specifics to TBC</i>)	In accordance with DPSC3	Developers	Mid Sussex District Council monitoring
DPSC5-7: Sayers Common Housing Site Allocations	12, 13	Number of dwellings completed	In accordance with relevant policy	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 contiguous to the BUA	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
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: 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
DPH5: 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
DPH6: Self/ Custom Build	12, 13	Number of self-build or custom build dwellings completed	Maximise	Developers, local authority	Mid Sussex District Council monitoring
DPH7: Housing Mix	12, 13	Number of dwellings granted planning permission by size (no. of beds)	In accordance with DPH31	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
DPH8: Affordable Housing	12, 13	Gross number of affordable homes completed (by tenure: Affordable/ Social Rent and Affordable	Maximise	Developers, local authority, Highway Authority, public agencies, utility companies and service providers	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		Home Ownership)			
		Financial contributions towards affordable housing provision	Maximise in compliance with DPH32	Developers, local authority, Highway Authority, public agencies, utility companies and service providers	Mid Sussex District Council monitoring
DPH9: First Homes	12, 13	Number of first homes completed	Maximise	Developers, Registered Providers, Local Authority	Mid Sussex District Council monitoring
DPH10: Rural Exception Sites	12, 13	Number of affordable housing dwellings completed on rural exception sites	Maximise in compliance with DPH34	Developers, Registered Providers, Local Authority	Mid Sussex District Council monitoring
DPH11: 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
DPH12: 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		
DPA1-DPA17: Housing Site Allocations	12, 13	Number of dwellings completed	In accordance with relevant policy	Developers	Mid Sussex District Council monitoring
DPA3a: Allotment Site – Nightingale, Burgess Hill	6	Number of plots delivered	In accordance with policy	Developers	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
DPA18: Land at Byanda, Hassocks	12, 13	Number of beds completed	In accordance with DPA18	Developers	Mid Sussex District Council monitoring
DPA19: Land at Hyde Lodge, Handcross	12, 13	Number of beds completed	In accordance with DPA19	Developers	Mid Sussex District Council monitoring
DPI1: Infrastructure provision	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
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	Minimise	Developers, local authority	Mid Sussex District Council monitoring

Policy	District Plan Objective	Indicator	Target	Implementation	Source
		local services lost			
DPI7: Water and Wastewater Infrastructure	1, 6,	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
DPI8: 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

19. Saved Policies

On adoption of the District Plan most of the policies in the Mid Sussex District Plan (2018) will be replaced by 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.
SA1 Sustainable Economic Development	Individual site allocations remain saved (where they have not been implemented)
SA10 Housing	Replaced by DPH1
SA11 Housing allocations	Individual site allocations remain saved (where they have not been implemented)
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 centre development	DPE4 DPE5 DPE6
DP3 Town and Neighbourhood Centre development	DPE4 DPE5 DPE6 DPE7
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	DPH11
DP28 Accessibility	DPH12
DP29 Noise, Air and Light pollution	DPN7 DPN8
DP30 Housing Mix	DPH7
DP31 Affordable Housing	DPH8
DP32 Rural Exception Sites	DPH10
DP33 Gypsies, Travellers and Travelling Showpeople	DPH5
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	DPN6 DPI7

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	Landowner 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 Folders Meadow Burgess Hill	Implemented
SSH/14 Keymer Tiles Works Nye Road Burgess Hill	Implemented
SSH/15 Land north of Maltings 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 Holtye Road East Grinstead	Implemented
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Site Allocation DPD (2022) policies will no longer be saved on adoption of the District Plan 2021 - 2039

Site Allocation DPD Policy	Policy type	Reason
SA4 Land north of A264 at Junction 10 M23	Employment Allocation	Implemented
SA6 Marylands Cowfold Road	Employment Allocation	Implemented
SA7 Cedars Brighton Road	Employment Allocation	Implemented

District Plan (2018) 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
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 Wilfrid'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
SA26 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 2021 - 2039

Saved Local Plan Policy	Policy type	Reason
East Grinstead		
EG8 Stonequarry Woods	Housing	Planning Application pending consideration November 2023. Shows intention of landowner to bring site forward for housing development.

20. 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 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). In Mid Sussex rents must be set at the level of the prevailing Local Housing Allowance for the relevant size of unit if lower. (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 sale housing** is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households. First Homes are a type of DMS which: a) must be discounted by a minimum of 30% against the market value; b) are sold to someone meeting the First Homes Eligibility Criteria and approved by the Council; c) have the discount and certain restrictions registered on the title at HM Land Registry; and d) after the discount is applied, have a first sale price cap of £250,000. They are delivered by developers and remain as First Homes in perpetuity.
- c) **Other affordable routes to home ownership** include 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.

Natural and semi-natural space – Woodland, scrub, grassland, wetlands, open and running water, and open access land.

Ancient Woodland – Areas that have had continuous woodland cover since 1600, non-statutory designations.

Ancient, 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 biodiversity 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.

Equipped/ Designated play areas – Designated areas for children and young people containing a range of facilities and an environment that has been designed to provide focused opportunities for outdoor play comprising casual or informal playing space within housing areas. These play areas comprise Local Area for Play (LAP and informal recreation), Local Equipped Area for Play (LEAP and informal recreation) and Neighbourhood Equipped Area for Play (NEAP and informal recreation, and provision for children and young people).

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.

Heritage Asset - A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets such as listed buildings, conservation areas, scheduled monuments, the historic landscape, registered parks and gardens, and assets identified by the local planning authority (including local listing).

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

	<ul style="list-style-type: none"> • 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 • 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 Community Infrastructure – Services and facilities needed by the local community usually located in the same settlement or an area as the new development. The contributions can be used to help provide and support schemes, but not limited to, local CCTV, burial grounds, enhancement of public realm, car parks, local signage, traffic calming, allotments, lighting, public seating, pedestrian, cycle and equestrian routes.

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 Authority 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.

Micro mobility – small, lightweight vehicles operating at speeds typically below 15mph such as bikes, e-bikes, electric scooters, electric skateboards, shared bicycle fleets, and electric pedal assisted bicycles.

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 authority 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 (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
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.

Natural and semi-natural space – Woodland, scrub, grassland, wetlands, open and running water, and open access land.

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, wastewater 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.

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.

Older persons' housing – covers different types of accommodation:

- **Age-restricted general market housing** – This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens but does not include support or care services.
- **Retirement living or sheltered housing (housing with support)** – This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.
- **Extra care housing or housing-with-care (housing with care)** – This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.
- **Residential care homes and nursing homes (care bedspaces)** – These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

Outdoor sports – Includes **playing pitches** (pitch sports including soccer, rugby union, rugby league, hockey, lacrosse, cricket and American football) as well as **other outdoor**

sports (courts and greens comprising natural and artificial surfaces, including tennis courts, bowling greens, athletics tracks and other outdoor sports areas).

Other outdoor provision – Comprise Multi Use Games Areas (MUGAs), skateboard parks and other outdoor provision.

Parks and gardens – Formal green spaces including urban parks, country parks, forest parks, and formal gardens.

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.

Quiet Lanes – Quiet Lanes are minor rural roads, typically C or unclassified routes, which have been designated by local highway authorities to pay special attention to the needs of walkers, cyclists, horse riders and other vulnerable road users, and to offer protection from speeding traffic.

Rapid and Ultra-Fast Electric Vehicle Charging Facilities are defined as at least 43kW-50kW (Rapid) or 100kW-350kW (ultra-fast) and are capable of delivering up to 80 percent charge in between 20-30 minutes.

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.

School Streets – Restriction of traffic outside schools at pick-up and drop-off times during term time.

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.

Significant Site – Housing/mixed use development delivering over 1,000 homes.

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.

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, wheeling and cycling, micro mobility, 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: Marketing Guidance and additional information required to support planning applications

Introduction

Applications for some changes of use or redevelopment of property/land are required to be accompanied by evidence that sufficient marketing has taken place before concluding that the property/land is no longer required for its current use, or that there are no preferable alternatives to that proposed.

This appendix gives guidance on the marketing evidence and additional information that is recommended to be provided in support of such applications.

Policies contained in the Local Plan to which this guidance relates are:

DPE2: Existing Employment Sites

DPE6: Development within Primary Shopping Areas

DPE7: Smaller Village Neighbourhood Centres

DPE9: Sustainable Tourism and the Visitor Economy

DPC3: New Homes in the Countryside

DPH4: Older Persons' Housing and Specialist Accommodation

DPI5: Open Space, Sport and Recreational Facilities

DPI6: Community and Cultural Facilities and Local Services

1.1 Proportional Approach

This appendix sets out the expected minimum standard of marketing. However, it is recognised that any marketing should be proportionate to the size and characteristics of the site/property along with the state of the market at the time and the scale of the proposed alternative use.

1.2 General Requirements of Marketing

It is important that the marketing explores appropriate alternative uses; that the marketing price is competitive (set by an independent valuer with relevant qualifications); the marketing has been appropriate and genuine and that a record of all the marketing is presented with the application proposal. The type and scale of marketing should be commensurate with the scale of the facility proposed to be lost.

A marketing report should be submitted as part of any relevant planning application, to demonstrate that a robust marketing strategy has been followed. Unless material considerations justify otherwise, or a different period is prescribed in the relevant policy or has been agreed with the Council, the marketing report should include evidence that the site

has been continuously marketed for at least 1 year, and an appropriate amount of time according to the market conditions. The period of marketing should not have ended more than 2 months prior to the date the planning application was submitted.

The marketing report must include as a minimum:

1. Confirmation by an appropriate marketing agent that the premises were continuously marketed for the required length of time. Evidence of the continuous marketing should include: copies of all advertisements in the local press and trade journals (at least four weeks' worth of advertisements, spread across a six month period); and evidence of regular marketing across popular digital platforms, such as a commercial agent's website or other commercial property website, over a minimum of 12 months unless stated otherwise in the relevant policy.
2. In some circumstances, this may be required to be independently verified at the applicant's expense.
3. Details of the conditions/state of the land/ premises and their upkeep before and during marketing and viability.
4. Information on how interest in the site has been dealt with; including an enquiry log, details of how enquiries were followed up and why any enquiries were unsuccessful.
5. Evidence that a review of the marketing process, and price, has been undertaken after 3 months if interest remains low.

1.3 Community and Cultural Facilities, Local Services and Assets of Community Value

Where the property is listed as an Asset of Community Value under the Localism Act 2011, in addition to the requirements of policy DPE7: Smaller Village and Neighbourhood Centres/ DPI6: Community and Cultural Facilities, the council will expect to see evidence of discussion with the local community about options for its continued use. This might include exploring the potential for a community enterprise.

1.4 Additional information relating to the loss of employment land and use

In addition to requirements of policy DPE2: Existing Employment Sites and the general criteria above, where a planning application will lead to the loss of an existing site currently within the business and industrial use classes (E(g), B2 and B8) or similar employment generating uses to alternative uses (without satisfactory provision for replacement land/floorspace or relocation of existing businesses) supporting information will also be required to demonstrate all of the following:

1. The site/premises has been vacant for a minimum of 12 months and has not been made deliberately unviable.
2. The site/premises has been actively marketed for business, industrial or similar employment generating uses at a realistic rent/price for a minimum of 1 year or a reasonable period based on the current economic climate.
3. Alternative employment uses for the site/premises have been fully explored; where an existing firm is relocating elsewhere within the district, maintaining or increasing employment numbers will be acceptable.
4. For proposals involving a net loss of 1,500m² or more employment floorspace, the loss of the site will not result in an under-supply of available employment floorspace in the local area.

1.5 Additional information relating to either proposals for, or the loss of, tourism including accommodation and attractions, and leisure 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).

In addition to the general criteria above the following information may be required:

1. Marketing and viability assessment for loss of tourism accommodation and attractions or leisure development as set out Policy DPE9: Sustainable Tourism and the Visitor Economy.
2. Evidence of the need for new tourist facilities to show a high level of demand on existing sites and justification for new sites, having regard to the quantitative and qualitative analysis of the range of tourist accommodation and attractions available, including details about other local touring and permanent sites. Detailed requirements are set out in Policy DPE9: Sustainable Tourism and the Visitor Economy.

1.6 Additional information relating to housing for agricultural, horticultural and other rural workers

In addition to the requirements of DPC3: New Homes in the Countryside and general criteria above, evidence may be required to demonstrate:

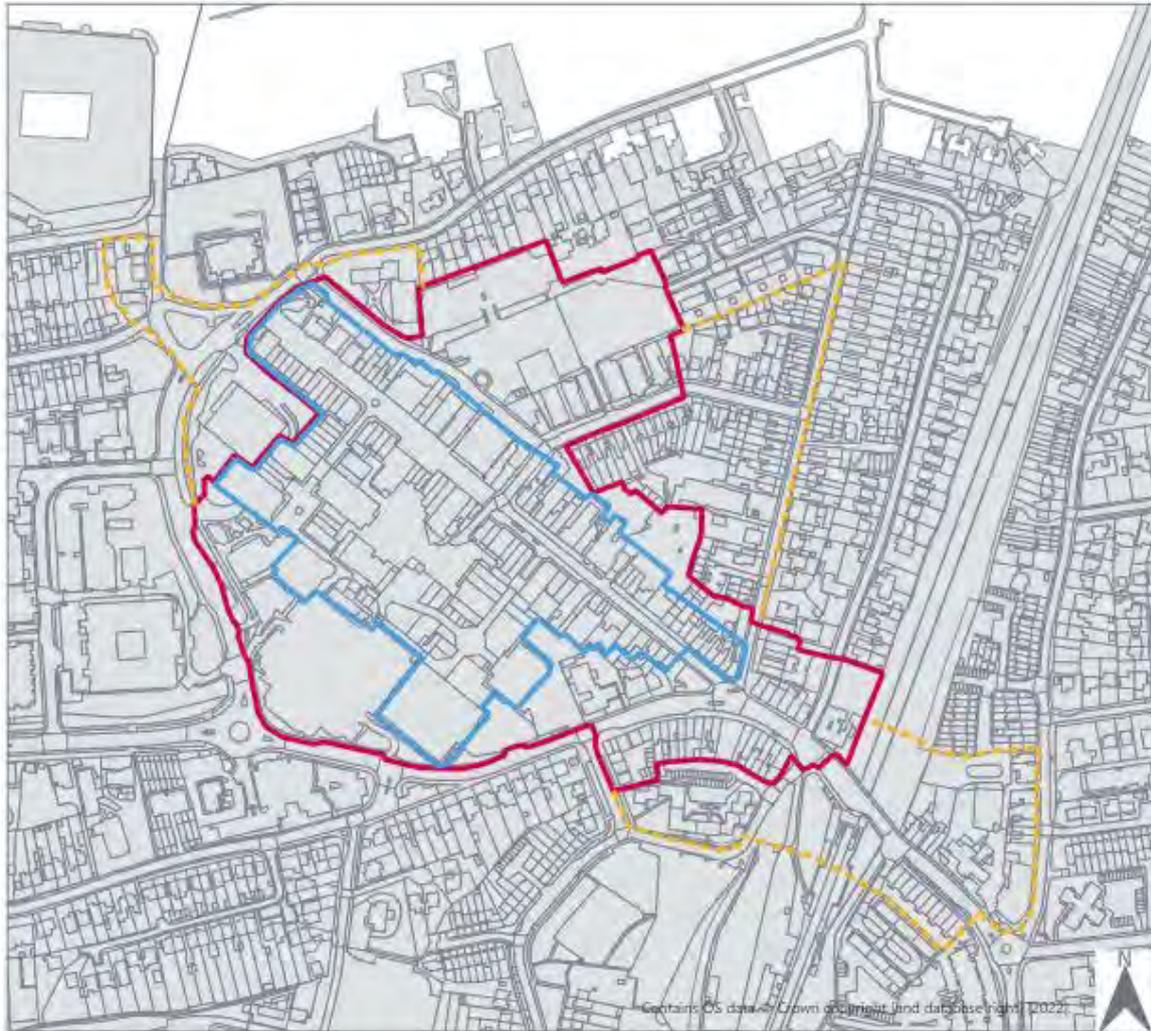
1. That the accommodation has been marketed for a reasonable period based on the current economic climate, how such marketing has been targeted, and whether the disposal is freehold, leasehold or on a rental basis. This should be at a realistic market price for accommodation tied to a rural business. Normally a discount of around 30% against open market price would be expected to establish whether it could meet the existing needs of another local farm or rural business.

Supporting information required for new temporary, seasonal or permanent accommodation to support existing agricultural, horticultural or other rural business activities includes all of the following:

1. There is a clearly established existing functional need such as workers needing to be readily available at most times.
2. The need relates to a person working solely or mainly in agriculture, horticulture, forestry or other rural business.
3. The functional need could not be fulfilled by other existing accommodation on the site or in the nearby area which is suitable and available for occupation by the workers concerned.
4. The rural enterprise is currently financially sound, and has a clear prospect of remaining so.
5. Other planning requirements, e.g. in relation to access, or impact on the countryside, are satisfied.

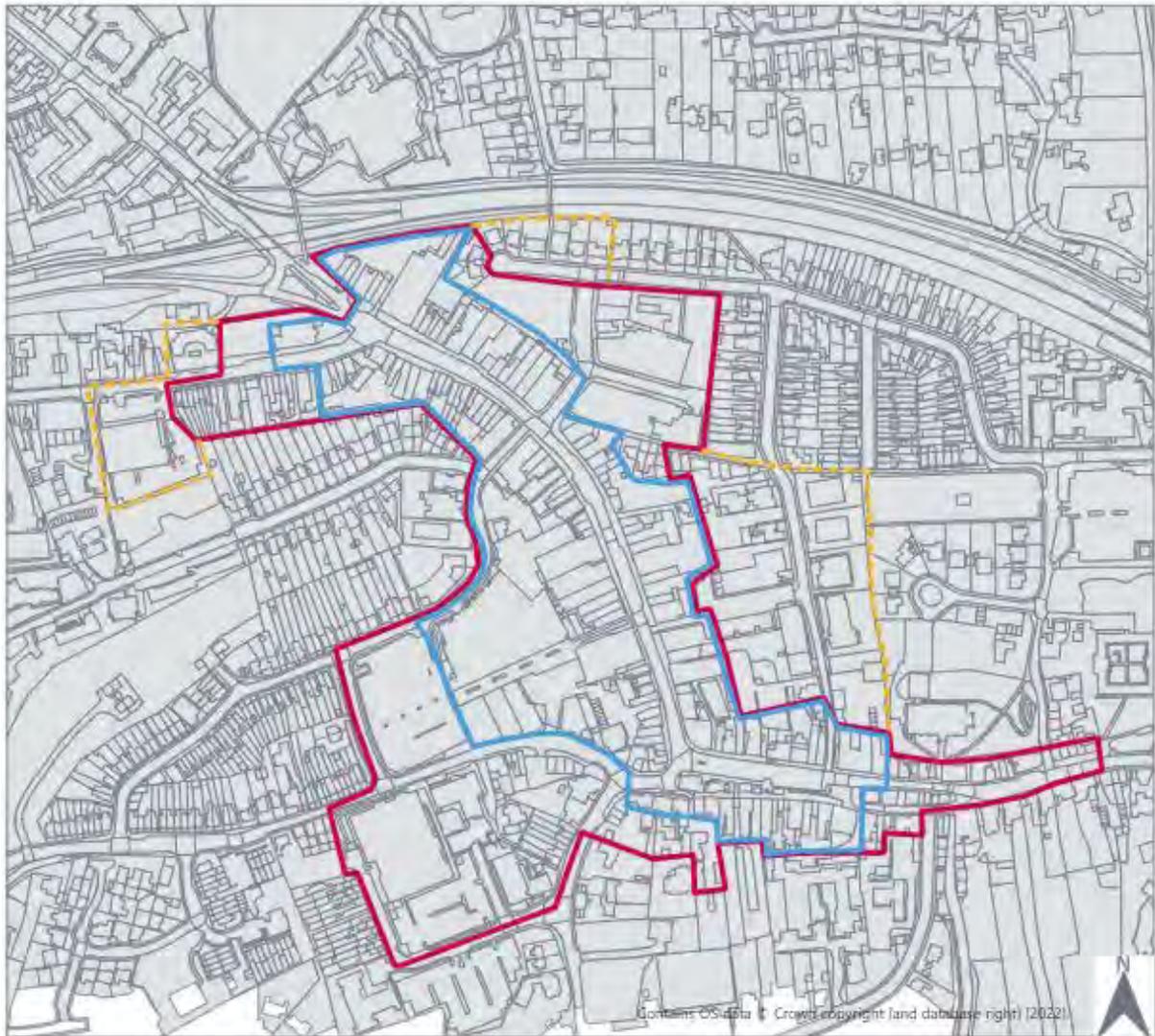
Appendix 2: Town Centres and Primary Shopping Area Boundaries

Burgess Hill Town Centre



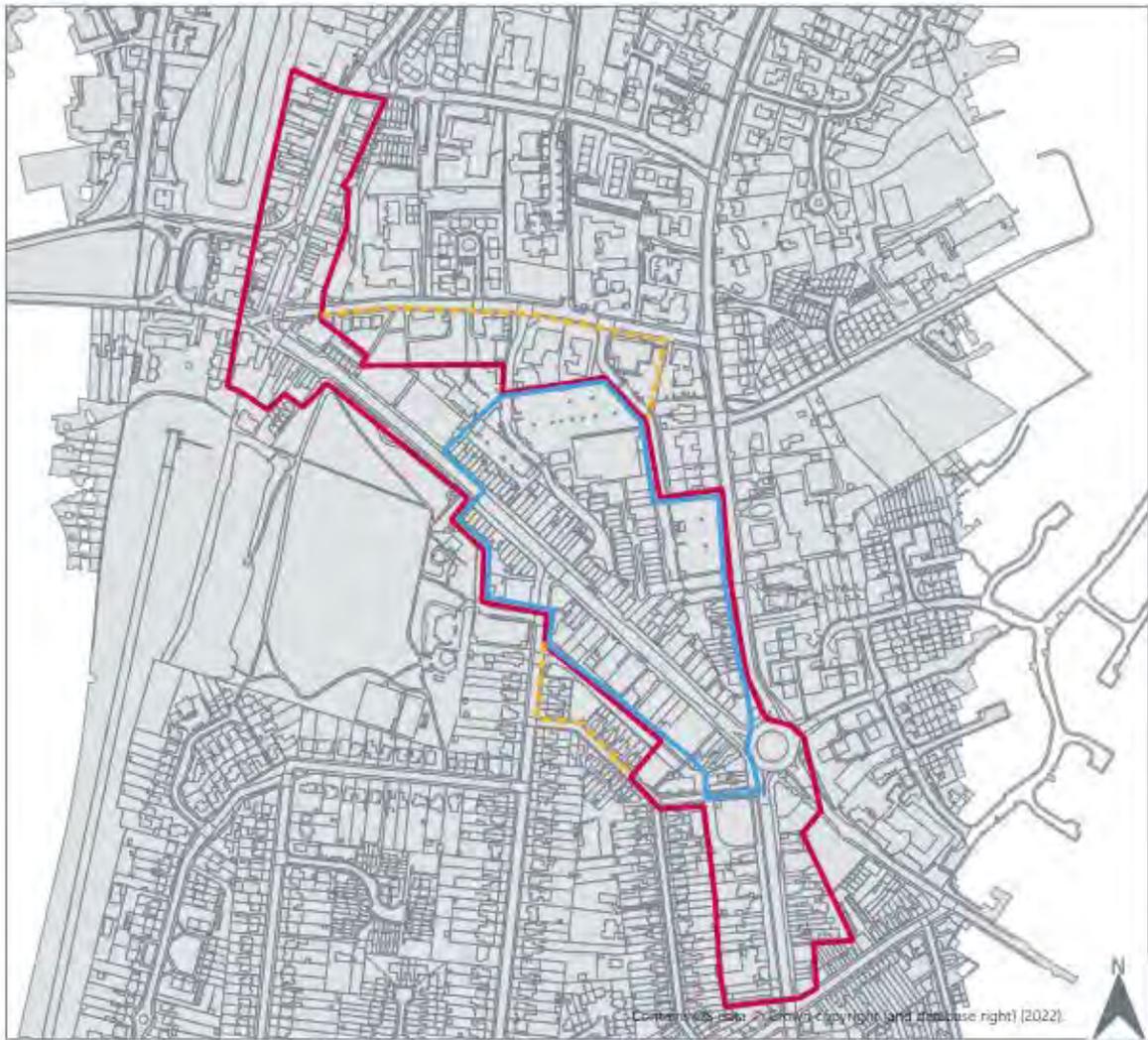
-  Proposed Town Centre Boundary
-  Proposed Primary Shopping Area
-  Adopted Town Centre Boundary

East Grinstead Town Centre



- Proposed Town Centre Boundary
- Proposed Primary Shopping Area
- Adopted Town Centre Boundary

Haywards Heath Town Centre



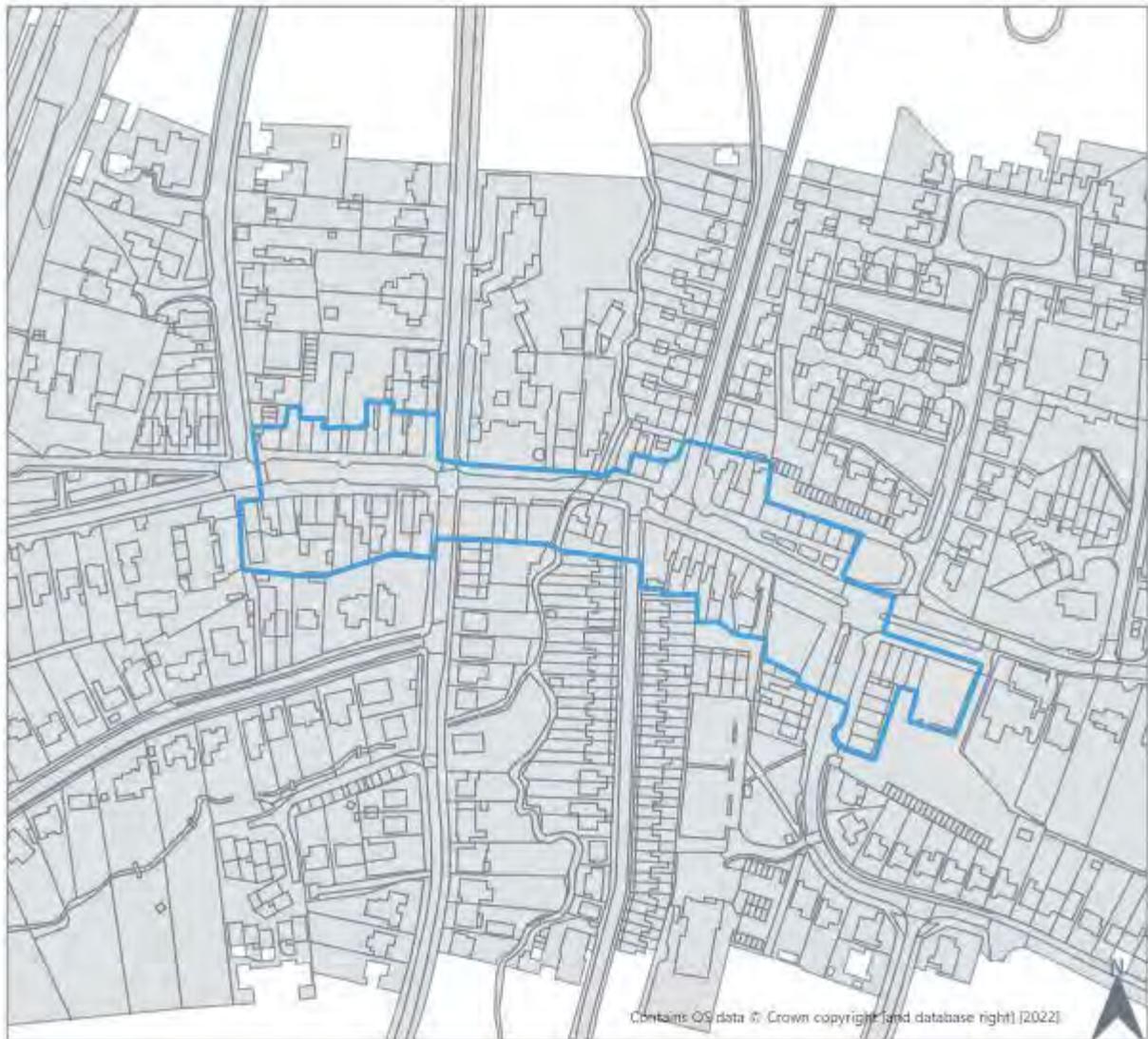
-  Proposed Town Centre Boundary
-  Proposed Primary Shopping Area
-  Adopted Town Centre Boundary

Crawley Down Village Centre



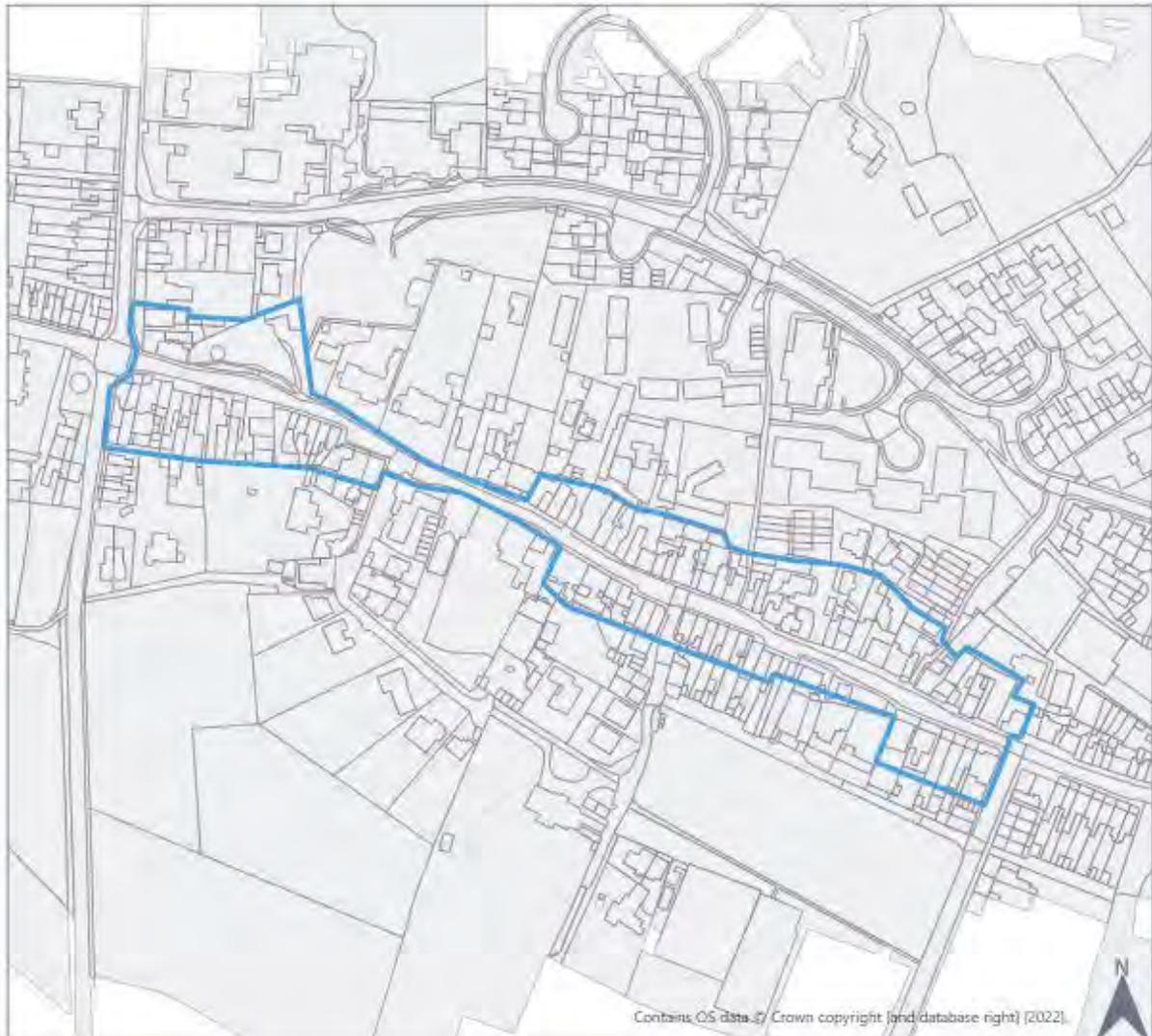
 Proposed Village Centre Boundary

Hassocks Village Centre



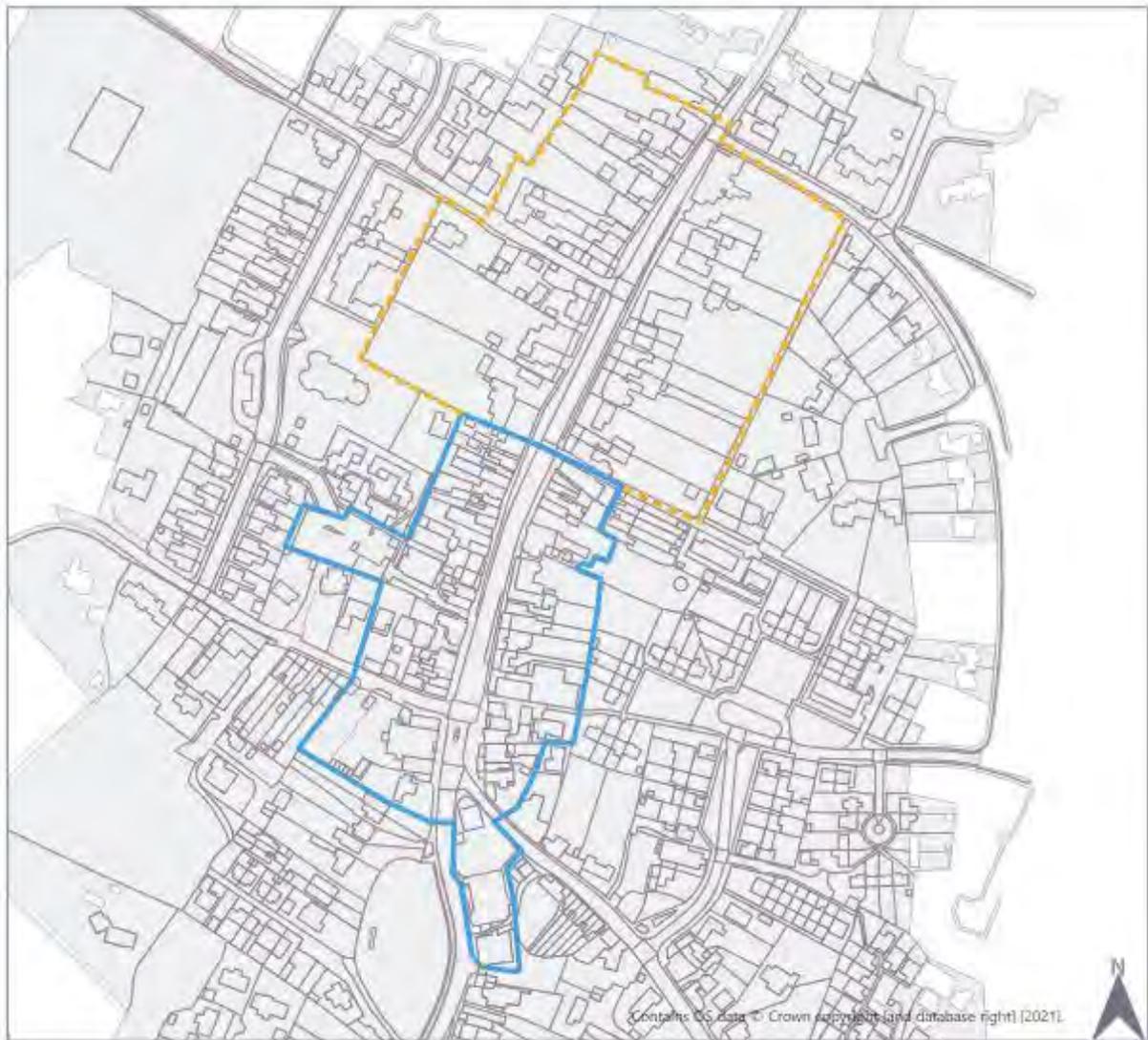
 Proposed Village Centre Boundary

Hurstpierpoint Village Centre



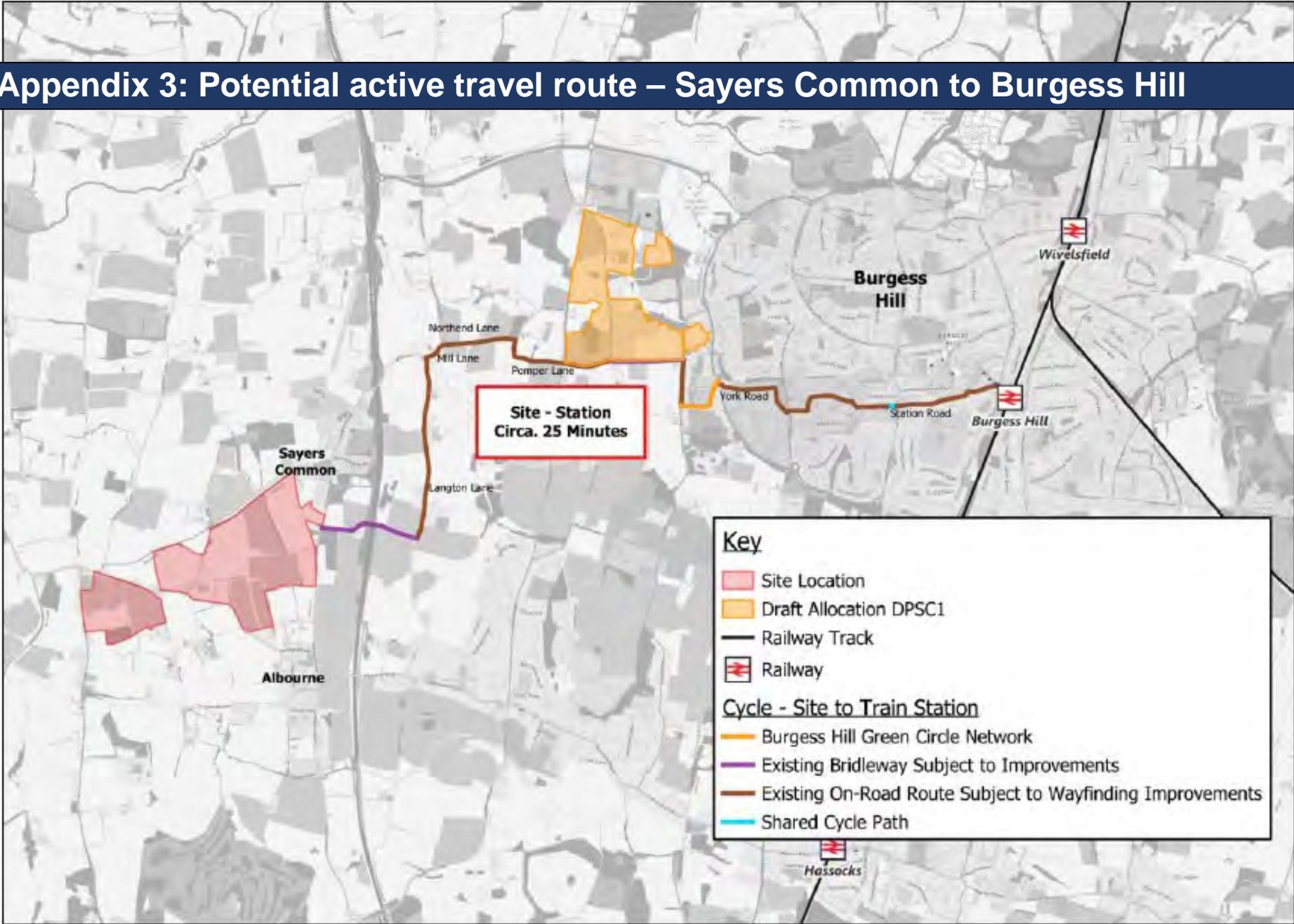
 Proposed Village Centre Boundary

Lindfield Village Centre

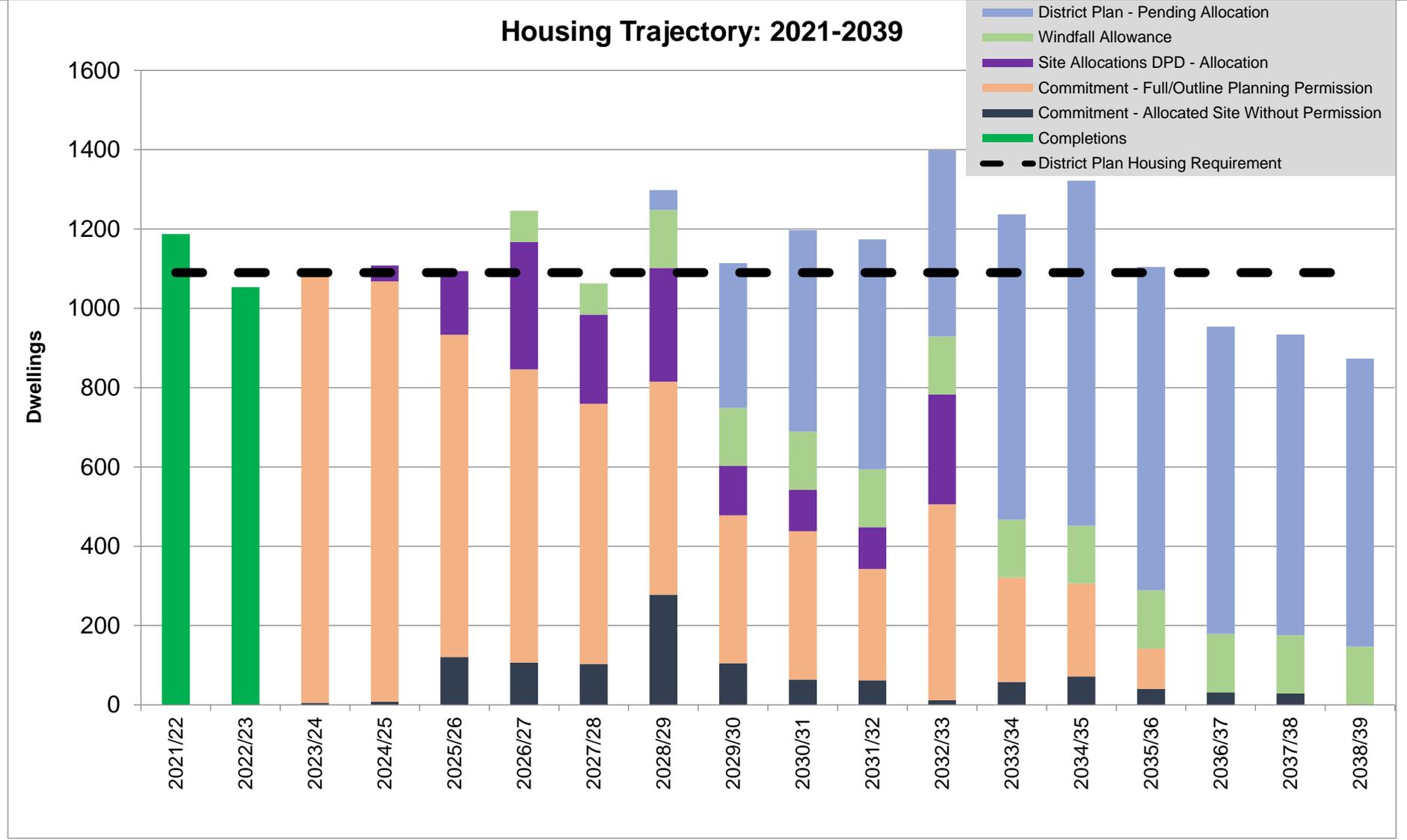


-  Proposed Village Centre Boundary
-  Adopted Village Centre Boundary

Appendix 3: Potential active travel route – Sayers Common to Burgess Hill



Appendix 4: Housing Trajectory



Appendix 5: Developer Contributions

INTRODUCTION

Background

Mid Sussex District Council (the District Council) is committed to delivering sustainable communities. To help achieve this, the District Council expects new development in the district to provide or contribute directly towards the provision of infrastructure and affordable housing to mitigate the impact of new development.

This appendix to the District Plan 2023-2039 identifies cases where infrastructure provision (including financial contributions) will be sought through planning obligations and Section 278 agreements.

Upon adoption of the District Plan 2023-2039, the Development Infrastructure and Contribution Supplementary Planning Document (2018) will be superseded.

Scope

The appendix sets out the likely scope of planning obligations applicable to different types of development and outlines the District Council's general approach to securing them. They should be viewed as a general guide as development proposals will continue to be assessed on a case-by-case basis.

The responsibility for determining the nature of planning obligations secured for each planning obligation and managing them is shared between Mid Sussex District Council and West Sussex County Council. This document exclusively sets out the approach followed by Mid Sussex District Council. For information on the planning obligation requirements for West Sussex County Council, please contact West Sussex County Council or refer to their website⁵³.

Status and use of this document

In accordance with relevant legislation and current guidance, this document has been produced alongside the District Plan to support the implementation of infrastructure policies. It has been subject to consultation and examination in public.

This document is a material consideration in the determination of planning applications. It should be taken into account during the preparation of development proposals. However, whilst standardised or formulaic evidence may have informed the identification of needs and costs and the settings of plan policies, each planning obligation must meet the statutory test set out in regulation 122 of the CIL Regulations, and therefore considered on a case-by-case basis during the determination of a planning application.

APPROACH TO SECURING INFRASTRUCTURE

Outline applications

⁵³ <https://www.westsussex.gov.uk/roads-and-travel/information-for-developers/section-106-planning-obligations/>

Provision standards and/or financial contributions are based on the number of dwellings and size of population that will occupy a proposed development. For an outline application, some, or even all, of these requirements may not be known as they may be amongst the reserved matters for a subsequent planning application.

In such circumstances, it will still be necessary to ensure that the development makes appropriate provision for infrastructure, services and facilities in accordance with the policies of the District Plan. The preferred approach will be to include the relevant cost formulae in the section 106 agreement, so that there is a clear commitment to providing appropriate contributions. Those contributions will subsequently be calculated upon the reserved matters stage once the number, type and/or size of dwellings is known, without having to amend the legal agreement.

Thresholds

Appropriate thresholds have been set for each of the types of contributions in order to provide clarity as to when particular obligations will be sought.

In setting thresholds, the intention is to balance the objective of ensuring that new development makes a proportionate contribution to the infrastructure requirement it will generate, without overburdening smaller developments which are likely to create marginal infrastructure need with more limited profit margin than larger schemes.

However, each planning obligation will also be considered on a case-by-case basis to ensure that the infrastructure needs are appropriately met.

Pre-application engagement

Applicants are strongly encouraged to engage in pre-application discussions with the District Council to determine the nature and scale of contributions that will be required, prior to submitting a planning application. This will ensure that the determination of the application is not unnecessarily delayed. Details of the process for engaging with the district council at pre-application stage are set out on our website: <https://www.midsussex.gov.uk/planning-building/planning-pre-application-advice/>

Occupancy rates

Proposed development population is based upon the following occupation rates:

Unit size	Occupancy
1-bed	1.3 persons
2-bed	1.9 persons
3-bed	2.5 persons
4-bed	2.9 persons
5+-bed	3.3 persons

The occupancy figure will be adjusted, if necessary, when data from the next Census is available.

Discounted contribution for Affordable Housing

Many affordable housing occupants already live in the same area as proposed new affordable housing development and residents of new affordable housing in the district are therefore already using the services provided. As a result a 33% contribution discount for affordable housing is applied to some of the contributions payable. This discount will be

applied to all affordable housing units provided by Registered Providers, regardless of tenure.

The following contributions have a 33% discount for affordable housing:

- Open Space, Sport and Recreational Facilities
- Community Facilities

PROVISION STANDARDS AND CHARGING APPROACHES

Health

Background

Delivering healthy communities is a key priority in the district. Although health and wellbeing are influenced by a number of factors, policy DPS6: Health and Wellbeing recognises the need for the relevant infrastructure to be provided to achieve it, including via the provision of health facilities.

New development, once occupied, will mean that there is a need to consider the capacity of local healthcare services to ensure that local communities can access the required health facilities.

Approach

Where new residential development including older persons' housing is proposed which creates an identified need for health infrastructure, the Council will seek contributions to provide facilities.

The contribution will, in most cases, be in the form of financial contributions to create new facilities to cope with the increased demand resulting from the development, or providing an extension to create additional capacity, or upgrade/improve the existing facility to make it more usable.

Large scale developments may be subject to bespoke negotiation which might include securing land and buildings for healthcare facilities.

Type of provision	1-9 dwellings	10-49 dwellings	50-499 dwellings	500 or more dwellings	Older persons' housing
PRIMARY CARE	x	✓ Financial contribution	✓ Financial contribution	✓ Land/ Building/ Financial contribution	✓ Financial contribution
ACUTE CARE	x	x	✓ Financial contribution	✓ Financial contribution	x
MENTAL HEALTH CARE	x	x	✓ Financial contribution	✓ Financial contribution	x
COMMUNITY HEALTH	x	x	✓ Financial contribution	✓ Financial contribution	x

Justification

Financial contribution towards **PRIMARY CARE** will be calculated according to the following formulae:

$$\begin{array}{l}
 \text{Number of residents generated (calculated in accordance with Occupancy Rates rounded up} \\
 \text{for each unit)} \\
 \quad \times \\
 \text{Average m}^2 \text{ per patient} \\
 \quad \times \\
 \text{Infrastructure Cost per m}^2 \\
 \quad = \text{Primary Care Contribution}
 \end{array}$$

An online contribution calculator is available at <https://www.midsussex.gov.uk/planning-building/supplementary-planning-documents/>.

Information on level of contributions for other health provision will be refined throughout the lifetime of the Plan as the evidence is made available by NHS Sussex. Applications received prior to the publication of this information will be assessed on a case-by-case basis in consultation with the NHS Sussex.

Community Facilities

Background

The development of sustainable communities requires the provision of a wide range of local facilities and services. Community and cultural facilities are an essential feature to created sustainable communities. However, there are other important local services and facilities, not specifically listed within this paper, which are still needed by the community. Policy DPI6: Community and Cultural Facilities and Local Services supports the provision of new and additional provision of community and cultural facilities.

New development will put additional pressure on existing local facilities and services and will be required to mitigate its impact via the provision of new facilities or by expanding existing facilities that will be needed to accommodate the increase in population.

Approach

New residential development of 5 dwellings or more, including older person's housing will be required to provide new or enhanced community facilities, or provide financial contributions towards enhancing existing community facilities to serve the need of future residents.

The on-site provision of new community facilities will be required on larger developments, where appropriate. The Council will expect the developer to provide land for the facility and either design and build the provision to the satisfaction of the Council or make a financial contribution to the Council so that it may arrange for the construction and development of the required facility. Where need is addressed off-site, contributions will be sought to provide and improve community facilities within the parish or nearby parish to which the development is located unless surplus provision exists locally.

Type of provision	1-4 dwellings	5-199 dwellings	200-999 dwellings	1000 or more dwellings	Older person's housing

COMMUNITY BUILDINGS	x	✓ Financial contribution	✓ On-site or financial contribution*	✓ On-site or financial contribution*	✓ Financial contribution**
LOCAL COMMUNITY INFRASTRUCTURE	x	✓ Financial contribution	✓ Financial contribution	✓ On-site	✓ Financial contribution**

* Where access to existing facilities is adequate and there is scope to increase the provision to meet additional need

** Where need is not met on-site and excluding for care bedspace

Justification

Financial contribution towards **COMMUNITY BUILDINGS** will be calculated according to the following formulae:

Number of residents generated (calculated in accordance with Occupancy Rates)

X

Average community building m² per person

X

Community building Cost per m²

= Community Buildings Contribution

Upon adoption of the plan the assumptions are:

- The current average community building floorspace per person in Mid Sussex is 0.23m²
- Building costs for the construction of community buildings are £2,940/m²
- The cost per person a community building provision is £676

They will be updated year-on-year to ensure that they remain relevant.

Financial contribution towards **LOCAL COMMUNITY INFRASTRUCTURE** will be calculated according to the following formulae:

Number of residents generated (calculated in accordance with Occupancy Rates)

X

Local Community Infrastructure Cost per person

= Local Community Infrastructure Contribution

Upon adoption of the plan the assumptions are:

- The Local Community Infrastructure cost is £481/person

They will be updated year-on-year to ensure they remain relevant

Open Space, Sport and Recreational Facilities

Background

Creating places to support and encourage healthy lifestyles is a key element of the District Plan supported through Policy DPS6: Health and Wellbeing, Policy DPI5: Open Space, Sport and Recreational Facilities, Policy DPB1: Character and Design and Policy DPN3: Green and Blue Infrastructure. Evidence based standards are available to support the Council's approach. Fields in Trust provide widely supported standards with established space standards for open space, sport and recreation facilities with accessibility recommendations. Access to Natural Green Space (ANGS) Standard ensure that development is connected to accessible greenspace.

New development creates an additional need for formal and informal outdoor space and must ensure that existing and future residents can access sufficient high quality local open space and leisure facilities, if and where possible and relevant as an integral part of the scheme. This will be satisfied either through the provision of new facilities or the improvement of existing ones.

Approach

Where access to existing facilities or the quality and/or quantity of the provision is inadequate to address the need of the proposed development as set out in Table 3, new residential developments of 5 or more units, including older persons' housing will be required to provide new or enhanced facilities in respect of formal outdoor space and parks and gardens, or otherwise provide financial contributions towards enhancing existing facilities to serve the needs of future residents. Contributions towards equipped/designated play areas will not be sought from 1-bed units.

The standard in the table below excludes car parking and changing rooms, which should be provided in addition to the open space quantity standards. However, SuDS and landscape screens and buffers can potentially be provided within the open space if they are both functionally appropriate and form an integral part of the design of the type of open space being provided.

The on-site provision of new facilities will be required for larger scale development, where appropriate. The Council will expect the developer to provide land for the facility and either design and build the provision to the satisfaction of the Council in compliance with the relevant national governing body guidance, Sport England Guidance or Play England Design for Play Guidance (or as the guidance is updated) or make financial contributions to the Council so that it may arrange for the construction and development of the required facility.

Where the need is addressed off-site, contributions will be sought to provide and improve facilities within the parish or nearby parish to which the development is located unless surplus provision exists locally.

It is expected that amenity green space and natural and semi-natural space will be provided on-site for most residential developments to meet the minimum standards, described within Table 3, to deliver high quality development. However, formal requirements are set out only for residential development of 20 units or more, including older persons' housing. Where the combined provision would result in less than 0.15ha, the required space should be provided as a single space, to avoid the proliferation of very small spaces with limited recreational value. Where on-site provision cannot be secured, financial contributions will be sought to provide and improve equivalent space within the vicinity of the development.

Table 3 – Threshold and provision standard requirements for open space, sport and recreational facilities contributions									
Type of provision		Quantity guideline (m ² per person)	Walking guideline (walking distance: metres from dwellings)	1-4 dwellings	5-19 dwellings	20-49 dwelling	50-199 dwellings	200+ dwellings	Older persons' housing
Formal outdoor space	OUTDOOR SPORTS	16	1,200m	✗	✓ Financial contribution	✓ Financial contribution	✓ Financial contribution	✓ On-site or financial contribution*	✓ Financial contribution ¹
	EQUIPPED/ DESIGNATED PLAY AREAS	2.5	LEAPs – 400m NEAPs – 1,000m	✗	✓ Financial contribution	✓ Financial contribution	✓ On-site or Financial contribution*	✓ On-site	✗
	OTHER OUTDOOR PROVISION	3	700m	✗	✓ Financial contribution	✓ Financial contribution	✓ Financial contribution	✓ Financial contribution/ on-site	✗
Informal outdoor space	PARKS AND GARDENS	8	710m	✗	✓ Financial contribution	✓ Financial contribution	✓ Financial contribution	✓ On-site or financial contribution*	✓ Financial contribution ²
	AMENITY GREEN SPACE	8	480m	✗	✗	✓ On-site	✓ On-site	✓ On-site	✓ On-site
	NATURAL AND SEMI-NATURAL SPACE	18	720m	✗	✗	✓ On-site	✓ On-site	✓ On-site	✓ On-site

* Where access to existing facilities is adequate and there is scope to increase the provision to meet additional need

¹ Only for age-restricted housing and housing with support

² Where need is not met on-site and excluding for care bedspace

Justification

Financial contribution towards **OUTDOOR SPORTS** will be calculated according to the following formulae:

$$\begin{aligned} &\text{Number of residents generated (calculated in accordance with Occupancy Rates)} \\ &\quad \times \\ &\text{Outdoor sports quantity guideline m}^2 \text{ per person} \\ &\quad \times \\ &\text{Outdoor sports cost per m}^2 \\ &= \text{Outdoor sport Contribution} \end{aligned}$$

Upon adoption of the plan the assumptions are:

- The quantity guideline for the provision of outdoor sports is 16 m² per person
- Outdoor sports costs are £42/m²

They will be updated year-on-year to ensure that they remain relevant.

Financial contribution towards **EQUIPPED/DESIGNATED PLAY AREAS** will be calculated according to the following formulae:

$$\begin{aligned} &\text{Number of residents generated (calculated in accordance with Occupancy Rates)} \\ &\quad \times \\ &\text{Equipped/designated play areas quantity guideline m}^2 \text{ per person} \\ &\quad \times \\ &\text{Play areas cost per m}^2 \\ &= \text{Equipped/Designated Play Areas Contribution} \end{aligned}$$

Upon adoption of the plan the assumptions are:

- The quantity guideline for the provision of equipped/designated play areas is 2.5 m² per person
- Play areas costs are £377/m²

They will be updated year-on-year to ensure that they remain relevant.

Financial contribution towards **OTHER OUTDOOR PROVISION** will be calculated according to the following formulae:

$$\begin{aligned} &\text{Number of residents generated (calculated in accordance with Occupancy Rates)} \\ &\quad \times \\ &\text{Other outdoor provision quantity guideline m}^2 \text{ per person} \\ &\quad \times \\ &\text{Other outdoor provision cost per m}^2 \\ &= \text{Other Outdoor Provision Contribution} \end{aligned}$$

Upon adoption of the plan the assumptions are:

- The quantity guideline for the provision of other outdoor provision is 3 m² per person
- Outdoor sports costs are £250/m²

They will be updated year-on-year to ensure that they remain relevant.

Financial contribution towards **PARKS AND GARDENS** will be calculated according to the following formulae:

Number of residents generated (calculated in accordance with Occupancy Rates)

X

Parks and gardens quantity guideline m² per person

X

Parks and Garden cost per m²

= Parks and Gardens Contribution

Upon adoption of the plan the assumptions are:

- The quantity guideline for the provision of outdoor sports is 8 m² per person
- Parks and Gardens costs are £117/m²

They will be updated year-on-year to ensure that they remain relevant.

Financial contribution towards **NATURAL, SEMI-NATURAL AND AMENITY GREEN SPACE** will be calculated according to the following formulae:

Number of residents generated (calculated in accordance with Occupancy Rates)

X

Natural, Semi-natural and Amenity Green Space quantity guideline m² per person

X

Natural, Semi-natural and Amenity Green Space cost per m²

= Natural, Semi-Natural and Amenity Green Space Contribution

Upon adoption of the plan the assumptions are:

- The quantity guideline for the provision of outdoor sports is 26 m² per person
- Natural, Semi-natural and Amenity Green Space costs are £26/m²

They will be updated year-on-year to ensure that they remain relevant.

Emergency services

Background

Delivering safe communities is a key priority in the district. Although safety is influenced by a number of factors, policy DPS6: Health and Wellbeing recognise the need for the relevant infrastructure to be provided to achieve it, including via the provision of policing infrastructure.

The additional population generated by development will place an increased demand on the level of policing for the area.

Approach

To maintain current levels of policing, developer contributions towards the provision of capital infrastructure are required from all residential development providing 50 dwellings/units or more including older persons' housing.

Justification

Financial contributions towards POLICE will be calculated according to the formulae detailed on the following page.

An on-line calculator is available at <https://www.midsussex.gov.uk/planning-building/supplementary-planning-documents/>.

<p>Staff set up cost</p>	<p>This is calculated once the number of incidents that are likely to occur as a result of development has been established.</p> $\frac{\text{Total incidents per year for Mid Sussex}}{\text{Total Mid Sussex population}} \times \text{Proposed development population}^{54}$ <p>Number of required staff as a result of development</p> $= \frac{\text{Required uniformed officers}}{\text{Predicted number of incidents from development} / \text{Total incidents per year for Mid Sussex} / \text{Total number of officers}}$ $+ \frac{\text{Required support staff}}{\text{Total support staff} \times \text{number of required uniformed officers} / \text{Totals number of officers}}$
<p>+</p>	
<p>Premises</p>	<p>Contributions towards premises are based upon existing capacity to accommodate additional required officers and will only be sought where floorspace is required to accommodate additional officers as a result of a proposed development.</p> <p>Taking an average floor space provision across Sussex Police’s sites which deliver neighbourhood policing, Sussex Police have determined that each new officer/member of staff should be allocated 8.93 sqm of floorspace (workstation/locker room/storage).</p> <p>BCIS Cost multiplier cost per m2 x average floorspace provision per employee x number of required staff (new or adaptation/conversion)</p>
<p>+</p>	
<p>Vehicles</p>	<p>Guideline is to replace vehicles every 4 years or 125,000 miles. The development requires fleet investment for a minimum of 8 year life of provision to serve the proposed development.</p> <p>Cost per vehicle x total vehicles x 2 x number of household proposed Total Mid Sussex households</p>
<p>+</p>	
<p>ANPR = Police Contribution</p>	<p>Considered on a case-by-case basis</p>

⁵⁴ Where the details of unit types are known, the assumed occupancy will reflect the rates detailed under the ‘Approach to securing infrastructure’ section of this appendix. They will be adjusted, if necessary, when data from the next Census is available. If the proposal is in outline form and only the total number of units is known, the contribution will be calculated on the basis of an average occupancy of 2.5.

Waste management

Background

The provision of on-site site-specific waste and recycling provision is expected as part of good design for development in line with Policy DPB1: Character and Design.

Approach

It is expected that development will provide:

- Adequate facilities within each dwelling for storage and collection of waste/recyclable materials.
- Depending on the scale of development, a local recycling facility off-site or a financial contribution towards the provision of such a facility off-site.

In considering planning applications for development other than new housing, the District Council will assess individually, the needs for provision of additional appropriate recycling facilities.

The provision of on-site site-specific waste and recycling provision will normally be secured through a planning condition or obligation. Contributions may be sought for the provision of wheeled bins in order for waste collection services to be provided.

Contributions for waste management services, such as recycling facilities and waste sites, are not currently required in Mid Sussex. However, this situation is monitored and should improvements be required in the future, contributions may be sought.

Justification

The District Council intends to use monies secured through planning obligations to purchase specialist lockable recycling bins to improve recycling quality in communal bin stores. Funds will also cover costs of signage, leaflets and stickers for bins in the future.

In large-scale residential developments (200 or more dwellings), it will be necessary to make provision for a central recycling point. This would ideally be located in an area visited by the local community, i.e. local retail outlet.

Ashdown Forest Mitigations

Background

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 increases in recreational pressure 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.

Approach

The Suitable Alternative Natural Greenspace (SANG) and Strategic Access Management and Monitoring (SAMM) mitigation approach set out in Policy DPC6 aligns with the strategic solution for recreational disturbance on the Ashdown Forest SPA. 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.

Justification

The current tariffs can be found at <https://www.midsussex.gov.uk/planning-building/protecting-ashdown-forest/>.

Other obligations

There may be instances where a development would result in a material increase in the need or demand for other types of infrastructure or services which are not specifically addressed within this document, and where provision is required in order to make the development acceptable in planning terms. In these cases, the Council will negotiate with a developer on a case-by-case basis, having regard to site-specific circumstances, and planning obligations may be the mechanism for securing provision.

The potential scope of site-specific planning obligations is very wide and may include a diverse range of infrastructure and services. Examples of the types of site-specific planning obligations could include, but are not limited to:

- Off-site provision of sustainable replacement open space land or facilities, where development would involve the loss of existing open space land or facilities (as required by policy DPI1).
- Commuted sum towards the future maintenance of formal and informal outdoor spaces.
- Ecological mitigation or compensatory measures, where development would result in a negative impact on biodiversity and habitats.
- Flood mitigation measures, which a development would be at a significant risk of flooding.
- Pollution and air quality mitigation measures, where development would result in an unacceptable impact.
- Improve linkage to an available backhaul network, exchange and/or the upgrading of an exchange where this has been identified as necessary to ensure full fibre broadband can be provided.
- Work that would result in a positive impact on an identified heritage asset, where a development would adversely affect the asset or its setting.
- On-site provision of Gypsy, Travellers and Travelling Showpeople accommodation or through an equivalent financial contribution towards off-site provision.

In addition, site allocation policies within the District Plan, or other adopted development plan documents, may identify site-specific infrastructure requirements that will be required to facilitate delivery of the allocated sites.

Monitoring fees for Planning Obligations

Background

Authorities should ensure that resources are available to support the monitoring and reporting of planning obligations. In line with regulation 122(2A) of the CIL Regulations, they can charge a monitoring fee through section 106 planning obligations to cover the cost of monitoring and reporting on delivery of that section 106 obligation. This approach is supported under Policy DPI2: Planning obligations.

Approach

Monitoring fees will be required from all development subject to planning obligations.

Justification

The current tariff can be found at <https://www.midsussex.gov.uk/planning-building/development-contributions/>

Appendix 6: The Advanced Stage Viability Review Contribution Formula

The formula below is 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

$$\text{'Contribution'} = ((A + B - C) - (D + E - F)) \times \text{APA}$$

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 *

B = Estimated GDV for parts of the development that are yet to be sold/let and other income sources *

C = GDV determined as part of the assessment of viability at planning application stage

D = Actual Build Costs incurred at point of review *

E = Estimated Build Costs for remainder of the development *

F = Total Build Costs determined as part of the assessment of viability at planning application stage

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

* Determined as part of the Advanced Stage Viability Review

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.



Mid Sussex District Plan (Regulation 19) Sustainability Appraisal

Environmental Report

Final

November 2023

Prepared for:

Mid Sussex District Council

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This report describes work commissioned by Mid Sussex District Council by an instruction dated 3rd October 2023. JBA Consulting carried out this work.

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Abbreviations

ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BMV	Best and Most Versatile
BUAB	Built-Up Area Boundary
DMRB	Design Manual for Roads and Bridges
DPD	Development Planning Document
DPR	District Plan Review
DfT	Department for Transport
EA	Environment Agency
EC	European Community
IRZ	Impact Risk Zone
GIS	Geographical Information System
HRA	Habitats Regulations Assessment
LFRMS	Local Flood Risk Management Strategy
LNR	Local Nature Reserve
LSE	Likely Significant Effects
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
MFGS	Multi-Functional Green Space
MSA	Mineral Safeguarding Area
MSDC	Mid Sussex District Council
MSDPR	Mid Sussex District Plan Review
NBS	Nature Based Solutions
NERC	Natural Environment Research Council
NHS	National Health Service
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PRoW	Public Right of Way

RPG	Regional Planning Guidance
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHELAA	Strategic Housing & Economic Land Avail. Assessment
SHMA	Strategic Housing Market Assessment
SI	Site Investigation
SM	Scheduled Monument
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TAG	Transport Analysis Guidance
TPO	Tree Preservation Order
ZoI	Zone of Influence

Definitions

Term	Definition
Area of Outstanding Natural Beauty	Areas of Outstanding Natural Beauty were formally designated under the National Parks and Access to the Countryside Act of 1949. They protect areas of the countryside of high scenic quality that cannot be selected for National Park status because of their lack of opportunities for outdoor recreation. Natural England (formerly The Countryside Agency) is responsible for designating AONBs and advising the Government and others on how they should be protected and managed.
Agricultural Land Classifications	The Agricultural Land Classification is part of the planning system in England and Wales – it provides a method for classifying agricultural land in six categories, or “grades” according to versatility and suitability for growing crops.
Biodiversity Action Plan	Plans developed by organisations to protect and enhance the biodiversity of an area.
Carbon Dioxide Equivalent	CO ₂ e is a metric measure used to compare the emissions from various greenhouse gases based on their global-warming potential.
Environment Agency	Non-departmental public body responsible for protecting and improving the environment.

Term	Definition
Flood and Coastal Erosion Risk Management Strategy	The strategy describes what needs to be done by all risk management authorities involved in flood and coastal erosion risk management for the benefit of people and places.
Habitat Regulations Assessment	A process that determines whether the proposed strategy could significantly impact the designated features of protected European sites.
Indices of Multiple Deprivation	The Index of Multiple Deprivation measures relative deprivation in an area. It is a combined measure of deprivation based on 37 separate indices of deprivation, grouped into seven key domains reflecting different aspects of deprivation.
Landscape Character Assessment	The process of identifying and describing variation in character of landscape in a certain area. The assessment identifies and explains the unique combination of elements and features that make landscapes distinctive by mapping and describing character types and areas.
Local Biodiversity Action Plan	Local plans developed by Local Planning Authorities to protect and enhance the biodiversity of an area.
Local Geological Site	Geological sites that are important for historical, scientific research or educational reasons.
Lead Local Flood Authority	County councils and Unitary Authorities which lead in managing local flood risk.
Local Nature Reserve	Statutory designation under the National Parks and Access to Countryside Act 1949. These can be declared by Parish and Town Council, but these must be delegated to by principle local authority.
Lower Super Output Area	Lower Layer Super Output Area are areas of population household minimum and maximum thresholds. These areas were designed to improve the reporting of small area statistics.
Nature-Based Solution	The sustainable management of the environment using natural features and processes. In the context of the LFRMS, NBS can be used to reduce the risk of flooding through schemes such as afforestation, wetland restoration and green infrastructure.
National Character Area	A natural subdivision of England based on a unique sense of place. The Character Area framework is used to describe and shape objectives for the countryside, its planning and management.
National Planning Policy Framework	The National Planning Policy Framework constitutes all policy statements and guidance documents into one document which forms a core part of the national planning system.

Term	Definition
National Nature Reserve	Reserves established to protect some of our most important habitats, species, and geology, and to provide outdoor laboratories for research.
National Recovery Network	The Nature Recovery Network is a commitment of the government's 25 Year Environment Plan. It is a national network of wild-life rich places which aims to help deal with biodiversity loss, climate change and wellbeing.
Office of National Statistics	The Office for National Statistics is the executive office of the UK Statistics Authority, a non-ministerial department which reports directly to the UK Parliament.
Planning Policy Guidance	Planning Policy Guidance Notes are statements of the Government's national policy and principles towards certain aspects of the town planning framework.
Public Right of Way	A public right of way is a right by which the public can always pass along routes over land.
Special Area of Conservation	Special Areas of Conservation are protected in the UK under, the Conservation of Habitats and Species Regulations 2017 (as amended) in England and Wales. The purpose of this designation is to conserve the habitat and species identified in the EU Habitats Directive.
Strategic Environmental Assessment	A decision support process which aims to promote sustainable development by assessing the extent to which the emerging plan will help achieve relevant environmental, economic, and social objectives.
Special Protection Area	Protected areas for birds in the UK, under the Wildlife & Countryside Act 1981 and the Conservation Regulations 2010.
Site of Special Scientific Interest	A conservation designation legally protected under the Wildlife and Countryside Act 1981 (as amended). These sites are selected for wildlife and natural features in England.
Sustainable Drainage System	SuDS are designed to manage stormwater, mimicking natural drainage and manage pollution risks resulting from runoff.
Water Framework Directive	The Water Framework Directive is a European Union directive transposed into UK law through The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017. It aims to prevent deterioration of the water environment and improve water quality.

Non-Technical Summary

Introduction

Mid Sussex District Council (MSDC) is currently preparing a District Plan Review (DPR) for Mid Sussex. The DPR will set out a long-term vision, planning policies, and site allocations for the authority area up to 2039.

Plans such as Mid Sussex's DPR are subject to a process called Sustainability Appraisal (SA). The Sustainability Appraisal assesses the potential social, environmental, and economic effects of the plan's proposals together with other 'reasonable alternatives' considered by the Council.

This Sustainability Appraisal Report has been prepared by JBA Consulting to document the SA (incorporating a Strategic Environmental Assessment (SEA)) of the Publication Draft of the Mid Sussex DPR being prepared for Regulation 19 consultation.

Purpose of this assessment

Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (2004 SI 1633), known as the 'SEA Regulations'. These Regulations were originally transposed from the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC), prior to the UK's departure from the EU. Therefore, it is a legal requirement for the Mid Sussex Publication Draft (Regulation 19) DPR to be subject to SA and SEA throughout its preparation.

The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 have modified several inspection requirements set out in the SEA Regulations that require responsible authorities to make physical copies of documents available for inspection at their principal office. This is particularly relevant to this stage of the Mid Sussex DPR.

The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process, whereby the requirements of the SEA Regulations can also be met through a single integrated SA process – this is the process that is being undertaken for the Mid Sussex DPR (Regulation 19). Therefore, the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

Background to the Mid Sussex District Plan Review

Mid Sussex District Council (MSDC) adopted the Mid Sussex District Plan 2014 - 2031 in March 2018. The Mid Sussex District Plan set out the commitment for the Council to prepare a Site Allocations Development Plan Document (DPD) 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.

Following the Examination in Public of the District Plan and the acknowledgement of the shortfall in housing supply within neighbouring authorities, the Council committed to an early review of the District Plan commencing in 2021 with submission to the Secretary of State in 2023.

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 are responsible for strategic planning within this area). The DPR will determine the overall strategy for 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.

In 2022, the Council published its Consultation Draft (Regulation 18) stage of the DPR. This set out its spatial vision and objectives, which together provided the framework for the DPR policies, and its spatial strategy, which examined the key development issues of relevance to Mid Sussex and identified a series of options for each policy area to deal with these issues. Alongside this, Lepus Consulting was appointed to undertake a SA and published its appraisal of options (called 'reasonable alternatives' in SA terms) in the DPR to identify their likely sustainability impacts on each objective of the SA Framework.

Summary of the Sustainability Appraisal process

Sustainability Appraisal is an iterative process that aims to identify the significant environmental, social and economic effects of a plan. For the Mid Sussex Publication Draft (Regulation 19), this involves assessing the spatial strategies, policies and site allocations, as well as any reasonable alternative considered by Mid Sussex District Council, to identify the extent to which sustainable development is likely to be achieved.

The SA has been prepared in accordance with the requirements of the SEA Regulations and follows good practice guidance produced by the Office of the Deputy Prime Minister (ODPM, 2004), Department for Communities and Local Government (DCLG, 2014), and Royal Town Planning Institute (RTPI, 2018).

This SA report assesses the sustainability performance of the updated options, policies and reasonable alternative sites considered during this DPR. This SA accompanies the Publication Draft (Regulation 19) Mid Sussex District Plan Review 2021 to 2039.

Developing the SA Framework

The SA Framework is used to identify and evaluate the potential sustainability effects associated with the implementation of the DPR. The SA Framework, outlined by Lepus Consulting at the Regulation 18 stage and carried forward to this Regulation 19 stage, 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 Regulations. The 14 SA Objectives used in the assessment are listed in Table 1 below.

Table 1: Sustainability Appraisal Objectives

SA Objective	
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 reuse of materials from buildings, and encourage urban renaissance.
7	Biodiversity and geodiversity: To conserve and enhance the District's biodiversity and geodiversity.
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: 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.
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.

SA Objective	
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.

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. The SA Objectives are at a strategic level and can potentially be open-ended. To focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of reasonable alternatives. Table 2 summarises the purpose and requirements of the SA objectives, appraisal criteria, and indicators.

Table 2: Definition of Sustainability Appraisal objectives, appraisal criteria, and monitoring indicators

Item	Purpose
Objective	Provide a benchmark ‘intention’ against which the sustainability effects of the plan can be tested. They need to be fit-for-purpose and represent the key sustainability issues of relevance to the District Plan area.
Appraisal question	Aid the assessment of impact significance. Provide a means of ensuring that key environmental and sustainability issues are considered by the assessment process.
Monitoring indicator	Provides a means of measuring the progress towards achieving the sustainability objectives over time. Needs to be measurable and relevant and ideally relies on existing monitoring networks.

Changes following the Consultation Draft (Regulation 18)

The planning policy team at MSDC has been receptive to changes and iterations in spatial strategies, policies and sites, and the appraisal throughout various stages of the SA process.

Following receipt of consultee comments on the Consultation Draft (Regulation 18) District Plan, there have been minor and major policy changes along with the introduction of new policies and inclusion of additional reasonable alternative sites.

Summary of SA findings (Regulation 19)

The Regulation 19 SA has drawn upon the SA undertaken by Lepus Consulting at Regulation 18 to provide an updated assessment of the preferred spatial option, policies and site allocations. This assessment has sought to determine the impact of these preferred options on a series of environmental and socio-economic considerations, and determine the extent to which sustainable development would likely be achieved.

Proposed monitoring

This SA provides some suggested monitoring indicators for each SA objective. It is acknowledged that these may not all be collected due to resource limitation and difficulty in data availability or collection.

Guidance stipulates that it is not necessary to monitor everything included within the SA Framework, but that monitoring should focus on significant sustainability effects.

Upon adoption, the Plan will be accompanied by an Adoption Statement, which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the SEA Regulations 2004.

Concluding statement

This SA has been conducted in line with the SEA Regulations. The appraisal shows that the Regulation 19 Draft DPR will have a largely positive effect, to varying degrees, against many of the SA objectives, with some neutral and negative. The draft DPR seeks to balance the social, economic and environmental expected impacts to meet the vision for the district.

The Regulation 19 Draft DPR and this SA Environmental Report will be subject to consultation. Following the consultee period, the DPR will be finalised and published alongside the SA Environmental Report.

1 Introduction

1.1 Background

Mid Sussex District Council (MSDC) is currently preparing a District Plan Review (DPR) for Mid Sussex. The DPR will set out the development strategy, planning policies, and site allocations for the authority area up to 2039.

Plans such as Mid Sussex's DPR are subject to a process called Sustainability Appraisal (SA). The Sustainability Appraisal assesses the potential social, environmental, and economic effects of the plan's proposals together with other 'reasonable alternatives' considered by the Council.

This Sustainability Appraisal Report has been prepared by JBA Consulting to document the SA (incorporating a Strategic Environmental Assessment (SEA)) of the Publication Draft of the Mid Sussex DPR being prepared for Regulation 19 consultation.

1.2 The Plan area

Mid Sussex is a rural district in the South East of England. The district has three towns, Burgess Hill, East Grinstead, and Haywards Heath, as shown in Figure 1-1 below. The 2021 census recorded 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).

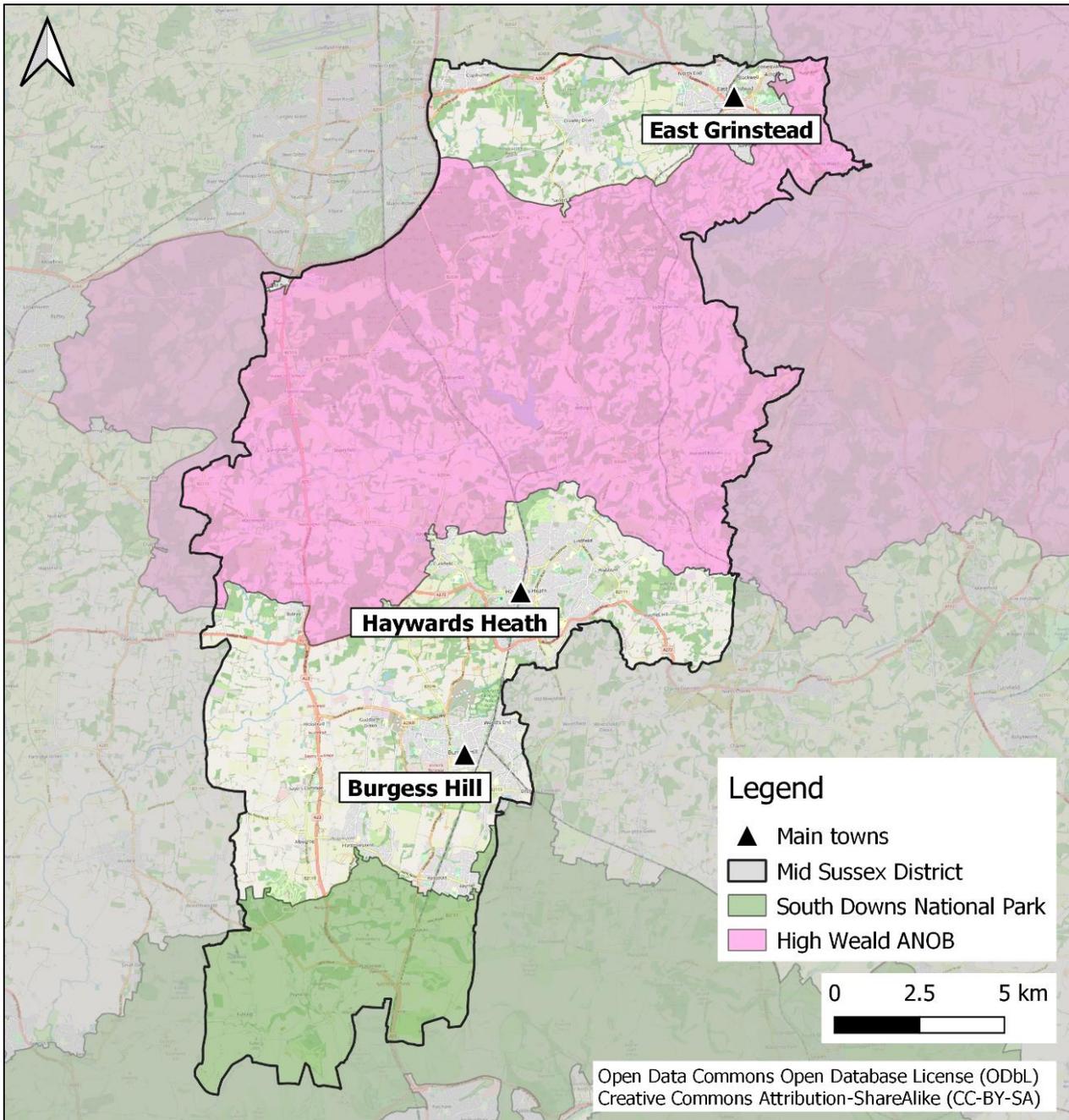


Figure 1-1: Mid Sussex District Plan Area

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. As of 22/11/23, Areas of Outstanding Natural Beauty have been renamed as “National Landscapes”. However, at the time of writing and assessment, the name AONB was still used and has therefore been used throughout this document.

Between the AONB and National Park 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 (SPA) and Special Area of Conservation (SAC).

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.

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 Mid Sussex Development DPR 2021 - 2039

MSDC adopted the Mid Sussex District Plan 2014 - 2031 in March 2018 ('the adopted plan'). 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 the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). The National Planning Policy Framework (NPPF, September 2023) mirrors the legislation by requiring Local Planning Authorities to review Local Plans at least once every five years and update them as necessary.

The Mid Sussex District Plan sets out the commitment for the Council to prepare a Site Allocations Development Plan Document (DPD) 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.

Following the Examination in Public of the District Plan and the acknowledgement of the shortfall in housing supply within neighbouring authorities, the Council committed to an early review of the District Plan commencing in 2021 with submission to the Secretary of State in 2023. 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, eight years beyond the existing District Plan.

This SA report assesses the sustainability performance of the updated options considered during this Development Plan Review. This SA accompanies the Publication Draft (Regulation 19) Mid Sussex District Plan Review 2021 to 2039.

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. The DPR will determine the overall strategy for 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.

In 2022, the Council published its Consultation Draft (Regulation 18) stage of the DPR. This set out its spatial vision and objectives, which together provided the framework for the DPR policies, and its spatial strategy, which examined the key development issues of relevance to Mid Sussex and identified a series of options for each policy area to deal with these issues. Alongside this, Lepus Consulting was appointed to undertake a Regulation 18 SA and published its appraisal of options (called 'reasonable alternatives' in SA terms) in the DPR to identify their likely sustainability impacts on each objective of the SA Framework.

Based on the evidence gathered and consultation undertaken previously, the Preferred Options Plan has been developed (the 'Regulation 19' plan) which sets out MSDC'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.

1.3.1 Level of housing need in Mid Sussex

A series of evidence based studies, including a Strategic Housing Market Assessment (SHMA), have been undertaken to determine the district's housing need.

The total housing requirement for Mid Sussex District is 1,090 dwellings per annum, which equates to a total of 19,620 dwellings between 2021 and 2039. As of 1st April 2023, there were 9,921 commitments made up from planning permissions and development plan allocations that have yet to be implemented, and 2,240 completions. Therefore to ensure that housing need is met, the District Plan needs to make a minimum provision of 7,459 dwellings.

1.3.2 Neighbouring authority housing need

The West Sussex & Greater Brighton (WS&GB) Strategic Planning Board, made up initially of the coastal West Sussex local planning authorities together with Brighton & Hove City Council and Lewes District Council, now expanded to include authorities within the Northern West Sussex HMA (Mid Sussex, Crawley and Horsham) works to support better integration and alignment of strategic spatial and investment policies in WS&GB.

Mid Sussex plays an active role in LSS3: the development of a longer-term strategy to address spatial options for meeting strategic housing, employment and infrastructure needs over the period to 2050. Duty to co-operate meetings have been held with all neighbouring authorities, with a particular focus on the predominant Northern West Sussex HMA. Regular and ongoing meetings have been held with Crawley and Horsham to discuss unmet needs with Northern West Sussex Housing Market Area to seek solutions. Crawley has an existing unmet need of 7,050 dwellings, with Horsham also likely to have unmet need.

1.4 Sustainability Appraisal and Strategic Environmental Assessment

Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Development Plan Documents. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended) (2004 SI 1633), known as the 'SEA Regulations'. These Regulations were originally transposed from the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC), prior to the UK's departure from the EU. Therefore, it is a legal requirement for the Mid Sussex Publication Draft (Regulation 19) DPR to be subject to SA and SEA throughout its preparation.

The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 have modified several inspection requirements set out in the SEA Regulations that require responsible authorities to make physical copies of documents available for inspection at their principal office. This is particularly relevant to this stage of the Mid Sussex DPR. Further details are described in Chapter 2.

The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process (as advocated in the National Planning Practice Guidance), whereby the requirements of the SEA Regulations can also be met through a single integrated SA process – this is the process that is being undertaken for the Mid Sussex DPR (Regulation 19). Therefore, the term 'SA' should be taken to mean 'SA incorporating the requirements of the SEA Regulations'.

1.5 Habitats Regulations Assessment

Under the Conservation of Habitats and Species Regulations 2017 (as amended by the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019) land-use plans, including Development Plan Documents, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of European sites and to ascertain whether it would adversely affect the integrity of those sites. European sites comprise Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and under UK Government policy, Ramsar sites.

Ashdown Forest, lying in neighbouring Wealden District Council area, is a Habitats site designated as both a SPA and SAC. Its proximity to Mid Sussex means that a Habitats Regulations Assessment (HRA) of the DPR is required. An HRA was 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. No Habitats sites other than Ashdown Forest SPA/SAC currently have an identified Zone of Influence (Zoi) within Mid Sussex District. The Regulation 18 HRA (AECOM, 2022) 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 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 HRA for the Publication Draft (Regulation 19) has been undertaken by AECOM on behalf of the Council. While the HRA is being reported separately to the SA, the findings have been considered in the SA, where relevant.

1.6 Structure of this Report

This SA is structured into the following sections:

- Chapter 2 presents the context for the SA and how sustainability objectives set by other policies, plans, and programmes, baseline information, and the key environmental, social, and economic issues facing Mid Sussex have been taken into account when preparing this SA.
- Chapter 3 summarises the methodology used to carry out the SA, including the 'SA Framework' (sustainability objectives and supporting assessment criteria) and site assessment criteria used to assess the DPR policies and site allocations, as well as any difficulties encountered in applying the methodology.
- Chapters 4 to 7 describe the results of the SA of each separate component of the DPR - the spatial options (Chapter 4), and site allocations and reasonable alternative allocations (Chapter 5), policies (Chapter 6), and site allocations taking into consideration mitigation measures (Chapter 7).
- Chapter 8 describes the sustainability effects of the DPR as a whole and cumulatively.
- Chapter 9 suggests a set of indicators that can be used to monitor the significant sustainability effects of implementing the DPR and sets out the next steps in the DPR and SA processes.

2 Sustainability context

2.1 Baseline characteristics of Mid Sussex

A detailed review of the baseline characteristics in Mid Sussex was undertaken during the preparation of the SA Scoping Report (MSDC, 2021). 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. The Scoping Report also identifies other plans, projects, programmes, guidance and initiatives, which may influence the nature of change in the plan area.

Where information was available, significant sustainability issues were highlighted. These key sustainability issues were then used to set the overarching SA framework – the SA objectives and supporting assessment criteria against which the DPR objectives and policies have been assessed. The purpose of this was to ensure that the key sustainability issues were fully reflected in the assessment of the sustainability of the DPR, with the Plan’s proposal assessed to determine whether they would positively or negatively affect these issues at a strategic level.

The SA Scoping Report, including the baseline characteristics, key sustainability issues and SA framework was produced by MSDC in November 2021 and was subject to stakeholder consultation. 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.

This assessment scope was further tested through the Consultation Draft (Regulation 18) process, which included SA of the proposed DPR spatial options for the distribution of development and the reasonable alternative site assessments, as well as a summary of the sustainability performance of the draft DPR policies. The Consultation Draft (Regulation 18) document provides a further detailed review of the baseline characteristics in Mid Sussex and identifies areas for potential growth. The Consultation Draft (Regulation 18) SA was then subject to public and stakeholder consultation between November and December 2022. Comments received related to spatial option assessment conclusions, some site assessment conclusions, and consideration of alternative policies. Consequently, additional assessment has been included within this Regulation 19 SA to address these comments received.

The Consultation Draft (Regulation 19) document has considered the available evidence, provided in the Evidence Base on the Council’s website, and national planning policy to ensure that the DPR has been prepared in accordance with the legal and procedural requirements and is ‘sound’. This document will then be subject to further consultation before submission to the Secretary of State for independent examination.

2.2 Policies, plans and programmes

The Mid Sussex DPR is greatly influenced by the requirements, aims and objectives of legislation and regulation, other policies, plans and programmes, and by broader sustainability objectives.

A review of relevant documents was undertaken as part of the SA scoping process and was further reviewed through the SA of the Consultation Draft (Regulation 18) document. The reviews sought to identify how wider strategic objectives could influence the development of the District Plan and the SA process. The full review of other policies, plans, and programmes can be found in Appendix 2 of the SA Scoping Report (MSDC, 2021). Plan and policies considered to be of particular relevant to the DPR are outlined below:

- **The National Planning Policy Framework (NPPF)** was revised in July 2018 and subsequently updated in 2019, 2021 and 2023. This document sets out the government's planning policies for England and how these are expected to be applied. The NPPF is supported by planning practice guidance documents which have also been updated. The original implications outlined in the SA Scoping Report still stand. The additional requirement to seek opportunities for wider environmental net gain, in particular for biodiversity net gains, must be included in the District Plan.
- The **Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020** makes permanent the temporary changes introduced in July 2020. From 31st December, measures to remove the requirement to have documents relating to a Strategic Environmental Assessment available for an inspection at an address, and for copies to be available to be obtained from that address come into force. The existing inspection requirements have been replaced with a duty to make documents available on a public website where they can be downloaded, for the responsible authority to provide copies of documents by email where requested (or physical copies by mail where it is reasonable to do so in light of Covid-19 restrictions), and to provide a telephone number where enquiries about these documents can be made.
- The **National Infrastructure Strategy** was published in November 2020 and sets out plans to transform UK infrastructure in order to level up the country, strengthen the Union and achieve net zero emissions by 2050.
- The **Planning for the Future White Paper** was published in August 2020, which proposes reforms of the planning system to streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed. Consultation ran from August to October 2020.
- The **Environment Act 2021** brought into UK law environmental protections and recovery. Once enacted, biodiversity net gain will be mandated through the planning system and so, the District Plan must ensure targets and mechanisms are included.

Several regulations have also been updated to reflect the UK exit from the European Union (EU) which are also of relevance to the DPR:

- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – no policy changes, changes only to ensure habitat and species protection and standards are implemented in the same or equivalent way following the exit from the EU.
- The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 – no substantive changes are made to the way Environmental Impact Assessments or Strategic Environmental Assessment regimes operate, changes remove unnecessary references, for example to the UK being a Member State.

2.3 Key sustainability challenges in Mid Sussex

Analysis of the baseline information has enabled several key sustainability challenges to be identified. A summary of these challenges as outlined during the Regulation 18 stage is provided in Table 2-1.

Table 2-1: Summary of the key challenges in Mid Sussex to achieve sustainable development.

Objective as set out in the NPPF	Key challenges for achieving sustainable development
<p>Environmental: to protect and enhance our natural, built and historic environment.</p>	<ul style="list-style-type: none"> • 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.

Objective as set out in the NPPF	Key challenges for achieving sustainable development
<p>Economic: to build a strong, responsive and competitive economy.</p>	<ul style="list-style-type: none"> • 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.
<p>Social: to support strong, vibrant and health communities.</p>	<ul style="list-style-type: none"> • 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.

Objective as set out in the NPPF	Key challenges for achieving sustainable development
	<ul style="list-style-type: none"> • 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.

2.3.1 Likely evolution of the key sustainability issues without the DPR

A wide range of key sustainability issues / key challenges have been identified. Many of these issues are relevant not only to Mid Sussex, but also to the wider region and at a national level. These issues are influenced by a wide range of factors and their future evolution is difficult to predict.

The pressures causing these issues are likely to continue regardless of the reviewed District Plan. However, the DPR does have a key role in delivering more sustainable outcomes and meeting sustainability challenges, and provides an important opportunity to deliver new development that can help address local issues in the area. Nonetheless, it also needs to be recognised that the DPR may not impact on some of these issues directly and that any potential effects will be because of changes that occur as a result of DPR policies influencing wider development-related aspects. For instance, the DPR is not likely to directly affect levels of crime or many of the key health issues affecting local residents. However, by providing opportunities for development that generates new job opportunities, affordable housing and community facilities that benefit deprived communities, some of the causes of crime and poor health can begin to be addressed.

The adopted District Plan set the vision and strategy, with accompanying site allocations and policies to achieve the vision and strategy for the plan period 2014 to 2031. The Adopted District Plan will continue to be valid until at least 2031. However, without the DPR, the policies relating to housing supply (including the five year housing land supply) included within the adopted District Plan would be automatically out of date upon its 5th anniversary (2023). The DPR provides an updated vision, strategy, site allocations and policies up to 2039, as opposed to the current plan period to 2031. It provides the opportunity to define new policies that can deliver the vision and address sustainability issues more effectively. Furthermore, the DPR ensures that the policies of the adopted Plan for the local area are relevant and effectively address the needs of the local community, providing an opportunity to address issues which have arisen, the impact of other newly adopted plans, and significant economic changes during the current plan period.

For example, the DPR embeds the UN's 17 inter-connected Sustainable Development Goals and sets out policies within the plan which contribute to one or more of them, which aim to achieve a better and more sustainable future for all. To achieve sustainable development, the DPR has adopted the concept of 20-minute neighbourhoods which provide a framework for new developments that can deliver attractive and inclusive places with services and community facilities that are accessible without the need for a car.

Therefore, the key sustainability issues / key challenges identified would remain in the future and are influenced by legislation and policy at a local, regional, and national level, much of which extends outside the scope of planning policy. Policy provisions relating to housing supply contained in the current District Plan would automatically become out of date in 2023. The DPR provides an important opportunity to deliver specific policies that build upon the existing District Plan and better address many of these issues in a positive

way, either directly or indirectly, through the provision of an up-to-date plan that reflects the latest requirements of the NPPF and delivers effective sustainable development through the 20-minute neighbourhood concept.

2.3.2 Changes made to the DPR in response to the Sustainability Appraisal

The planning policy team at MSDC has been receptive to changes and iterations in spatial strategies, policies and sites, and the appraisal throughout the various stages of the SA process. The scope of changes has included revisions to the spatial strategy, policies and site allocations, along with monitoring indicators.

There are likely to be changes that result from the Regulation 19 consultation process and the examination where they relate directly to legal and soundness issues. A further iteration of the Sustainability Appraisal will be prepared at later stages of the District Plan process if required.

3 Sustainability Appraisal methodology

3.1 The Sustainability Appraisal process

Sustainability Appraisal is an iterative process that aims to identify the significant environmental, social and economic effects of a plan. For the Mid Sussex DPR Publication Draft (Regulation 19), this involves assessing the spatial strategies, policies and site allocations, as well as any reasonable alternative spatial strategies, policies and site allocations considered by Mid Sussex District Council, to identify the extent to which sustainable development is likely to be achieved.

The SA has been prepared in accordance with the requirements of the SEA Regulations and follows good practice guidance produced by the Office of the Deputy Prime Minister (ODPM, 2004), Department for Communities and Local Government (DCLG, 2014), and Royal Town Planning Institute (RTPI, 2018).

3.1.1 Meeting legal requirements

Sustainability Appraisal is a compulsory requirement for Local Plans under Section 19 of the Planning and Compulsory Purchase Act 2004. This has since been amended by the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 to ensure it functions effectively following the UK’s exit from the EU. Government guidance requires that SA incorporate the requirements of the SEA Regulations; in practice, SA and SEA follow similar methodologies and it is possible to combine them without losing the essence of either.

Annex I of the SEA Directive sets out the scope of information to be provided through the SA process and can still be used to set the framework for assessment despite the UK’s exit from the EU. This is shown in Table 3-1 below, which also identifies where in the SA process each requirement will be met.

Table 3-1: Stages in the SA/SEA process as identified within Annex I of the SEA Directive.

SEA Directive requirements	Where in the SA
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	SA Scoping Report (MSDC, 2021)
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	SA Scoping Report (Chapter 4)
(c) the environmental characteristics of areas likely to be significantly affected;	SA Scoping Report (Chapter 4)

SEA Directive requirements	Where in the SA
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	SA Scoping Report (Chapter 4)
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	SA Scoping Report (Chapter 5)
(f) likely significant effects on the environment – issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape, and the interrelationship between these factors;	SA Environmental Report (Chapters 4-8 and Appendices A-D)
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	SA Environmental Report (Chapters 4-8 and Appendices A-D)
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	SA Environmental Report (Chapters 4-8 and Appendices A-D)
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10; and	SA Environmental Report (Chapter 9)
(j) a non-technical summary of the information provided under the above headings.	SA Environmental Report (Regulation 19)

The full range of environmental receptors as detailed in the SEA Directive have been considered when developing the scope of the SA (see SA Scoping Report (MDSC, 2021) for a full summary description of the scope of the SA).

The Directive states that an assessment should identify the potentially significant impacts on ‘*biodiversity, population, human health, fauna, flora, soil, water, air, climatic, material assets including architectural and archaeological heritage, landscape and the interrelationship between the above factors*’ (see Table 3-2).

Table 3-2: Sustainability topics covered in the Sustainability Appraisal.

SEA Directive and SA guidance requirements		Definition in relation to this SA
Environmental	Landscape	Local landscape character; protected and notable landscapes; key local landscape features.
	Biodiversity	Designated nature conservation sites; protected

SEA Directive and SA guidance requirements		Definition in relation to this SA
	Flora	and notable species and habitats; trends in condition and status.
	Fauna	
	Water	Chemical and biological water quality; surface and groundwater resources; waterbody hydro-morphology; flood risk.
	Soil (including geology)	Variety of rocks, minerals and landforms; the quantity and distribution of high-quality soil; land contamination.
	Cultural heritage	Protected and notable heritage assets and their setting; human induced physical changes to the environment; pressures on the historic environment, heritage assets and their setting.
	Architectural and archaeological heritage	
	Air	Air quality issues.
	Climatic factors	Regional climate patterns; trends in greenhouse gas emissions and the sources of these emissions; mitigation measures and adaptation options to manage climate change.
Social	Population	Where people live and work; population trends and demographics; housing; education; inequality and deprivation; key community facilities; accessibility.
	Human Health	Trends and patterns in human health; recreation opportunities.
Economic	Economy	Local economic and employment conditions.
	Material assets	Critical transport and other infrastructure; community services; green infrastructure and open space.
	Waste	Waste collection and recycling patterns.
The interrelationship between the above factors.		The relationship between environmental features and issues

3.1.2 Stages in the Sustainability Appraisal process

The ODPM guidance sets out a five-stage process (A to E) to be followed (see Table 3-3). This Environmental Report builds upon the Scoping Report (Stage A) and covers stages B and C of the process wherein the context and objectives of the Sustainability Appraisal are identified, and the scope of the assessment is determined.

Table 3-3: Stages in the SA process.

SA stages and tasks	Purpose		Where covered in the SA
Stage A	Setting the context and SA objectives, establishing the baseline and deciding on the scope.		SA Scoping Report (MSDC, 2021)
Stage B	Developing and refining options and assessing effects		
	(B1) Test the plan proposals against the SA framework.	To identify potential synergies or inconsistencies between the objectives of the plan and the SA objectives and help in developing alternatives.	SA Environmental Report (Chapters 4 to 8 and Appendices A-D)
	(B2) Develop the plan options including reasonable alternatives.	To develop and refine strategic alternatives.	SA Environmental Report (Chapters 4 to 8 and Appendices A-D)
	(B3) Predict the effects of the options, including alternatives.	To predict the significant environmental effects of the plan proposals and alternatives.	SA Environmental Report (Chapters 4 to 8 and Appendices A-D)
	(B4) Evaluate the likely effects of the plan proposals and alternatives.	To predict the effects of the plan proposals and reasonable alternatives and assist in the refinement of the plan.	SA Environmental Report (Chapters 4 to 8 and Appendices A-D)
	(B5) Consider ways of mitigating adverse effects and maximising beneficial effects.	To ensure that adverse effects are identified, and potential mitigation measures are considered.	SA Environmental Report (Chapters 4 to 8 and Appendices A-D)

SA stages and tasks	Purpose		Where covered in the SA
	(B6) Propose measures to monitor the significant effects of implementing the Local Plan.	To detail the means by which the environmental performance of the plan can be assessed.	SA Environmental Report (Chapter 9).
Stage C	Preparing the Environmental Report		SA Environmental Report
Stage D	Consulting on the draft Local Plan and the Environmental Report		SA Environmental Report (consultation to be undertaken).
Stage E	Monitoring the significant effects of implementing the Local Plan		SA Environmental Report and Adoption Statement (to be prepared at plan publication stage)

3.1.3 Relationship between the Plan Review and the Sustainability Appraisal

The relationship between the SA process and development of the District Plan (the 'Local Plan') is summarised in Figure 3-1.

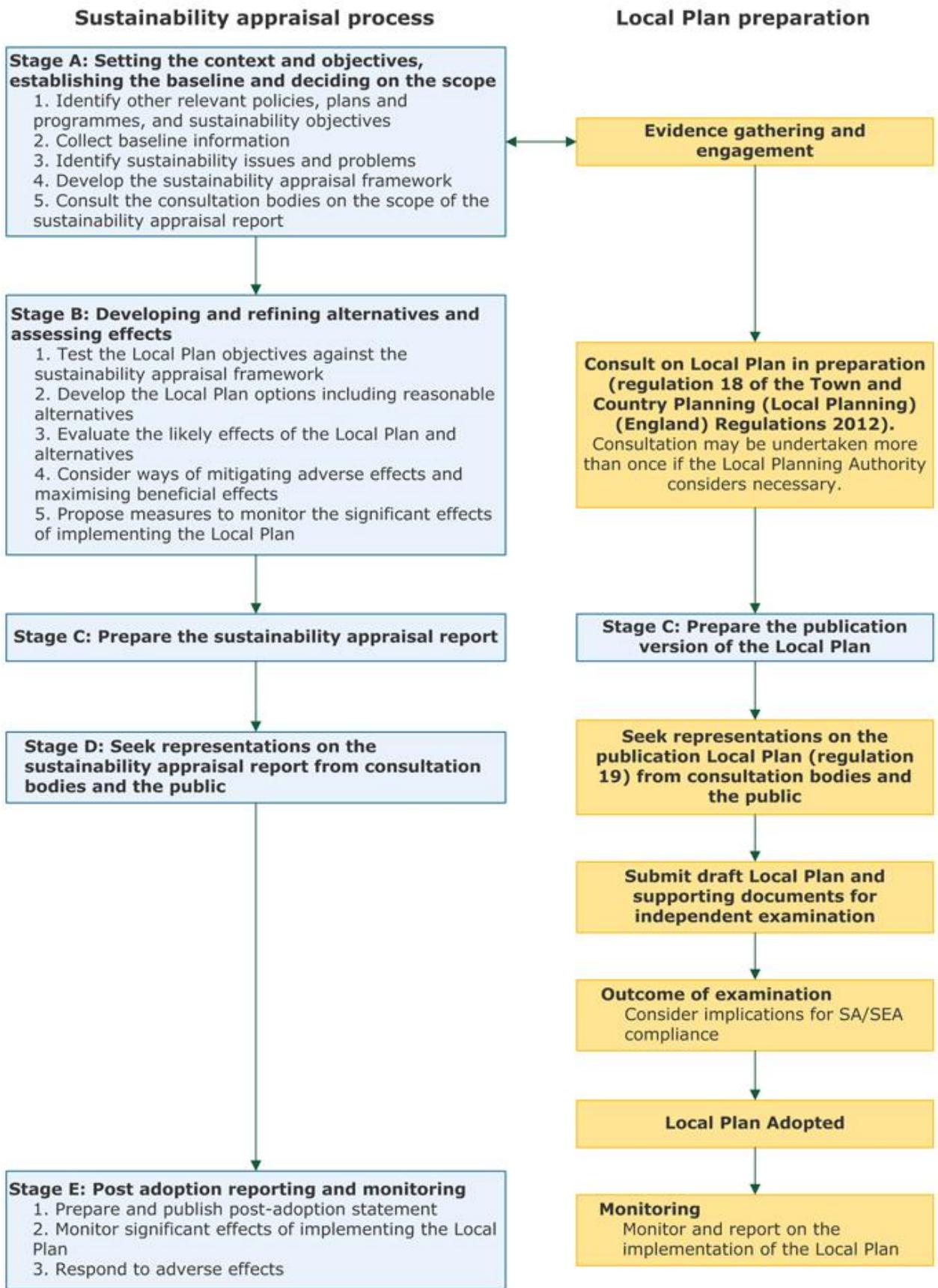


Figure 3-1: Key stages of Local Plan preparation and their link with the Sustainability

Appraisal process (DCLG, 2014).

Consultation Draft (Regulation 18)

The Review of the District Plan is an iterative process involving a staged approach to the development of the final strategic objectives, policies and site allocations contained within the adopted DPR; at each stage in this process, consultation with the public and stakeholders is undertaken to enable wider views to be considered and ensure the final outcomes reflect local priorities.

The Consultation Draft (Regulation 18) stage of the DPR process set out the spatial vision and objectives for Mid Sussex – which together provide the framework for the DPR policies – and its spatial strategy – which examined the key development issues of relevance to Mid Sussex and identified two spatial options for the Plan area to deal with these issues. Consultation with the public and other stakeholders on the Consultation Draft document was undertaken in November and December 2022.

Mid Sussex Council set out its preferred policies and site allocations needed to deliver the plan’s vision and objectives in its Consultation Draft (Regulation 18) document. The policies and allocations identified in this document are based upon the findings from the Consultation Draft stage and consider consultee responses to the consultation undertaken at that stage.

The preferred policies seek to deliver the objectives and directly reflect the spatial options set out in the Consultation Draft document; the policies have been developed to deliver the preferred options identified at that stage. SA of the spatial options therefore tested both the preferred option and ‘reasonable alternatives’ as required by Part 3 of the SEA Regulations. The outcomes of this assessment were set out in the SA Consultation Draft (Regulation 18). Consultation on the outcomes of this work was undertaken alongside the Consultation Draft document.

SA of the preferred policies and any further ‘reasonable alternatives’ identified by the Council has been undertaken against the SA Framework. Typically, this involved direct assessment of each proposed policy against the SA objectives and then consideration of the assessment outcomes of any related spatial option so as to demonstrate the potential effects had alternative options been taken forward to this Preferred Options stage. For many of the policies, the Council considered that there were no other reasonable policy approaches. This was because any other policy approach would not be in conformity with NPPF requirements, or the preferred policy direction set out in the Consultation Draft document (considering consultee views).

It should be recognised that the SA is not the only aspect considered when determining a preferred option and that other factors including conformity with national policy and public opinion will also be taken into account by the Council.

In addition, the Consultation Draft (Regulation 18) document contains the spatial vision and objectives for Mid Sussex. The 15 objectives, derived from the vision, have remained unchanged from the original District Plan 2014-2031, and the Consultation Draft stage.

Site Allocations Development Plan Document

The Mid Sussex District Plan sets out the commitment for the Council to prepare a Site Allocations Development Plan Document (DPD) 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 Council prepared a Strategic Housing and Economic Land Availability Assessment (SHELAA) (MSDC, 2023), which assesses the suitability of existing and potential development sites in the area and a Strategic Housing Market Assessment (SHMA). The SHELAA has been undertaken in accordance with the methodology set out in the Planning Practice Guidance accompanying the NPPF. This involves an assessment of each potential development site against a broad range of considerations, including national policy requirements and national and local designations.

The DPR has considered a number of reasonable alternatives including 44 sites, as well as 85 draft policies set out in the DPR (which includes 26 site allocation policies).

Publication Draft (Regulation 19) DPR

The Publication Draft (Regulation 19) sets out Mid Sussex Council's vision and objectives for the future development of the area, addressing needs and opportunities in the Plan area. It will also be a basis for safeguarding the environment, adapting to climate change, and securing good design. Its policies and site allocations will be used to guide decisions and investment on development and regeneration up to 2039. The policies and allocations in this document have been informed by the Consultation stage and consider consultee responses gathered during the consultation period November 2022 to December 2022, and meetings in March 2023 and June 2023. A summary of the comments received is provided in the evidence base for the Plan.

The preferred spatial vision and objectives have been refined following consultation at the Consultation stage.

The document also ensures that the most up to date available evidence and national planning policy are considered. The subsequent changes underwent a further SA utilising the SA framework and sites assessment criteria to determine if there were significant changes to the SA conclusions previously drawn.

A summary of how the DPR has emerged and the appraisal of reasonable alternatives is outlined in Table 3-4.

Table 3-4: Summary of SA and development of the DPR and reasonable alternatives.

Date	DPR Stage	Sustainability Appraisal
November 2021	Evidence Gathering	Mid Sussex District Council DPR: Sustainability Appraisal Scoping Report 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
October 2022	Consultation Draft (Reg 18)	Sustainability Appraisal: Regulation 18 The DPR has considered reasonable alternatives including two spatial options and 44 sites, which were assessed within the Regulation 18 SA Report, as well as 85 draft policies set out in the DPR (which includes 26 site allocation policies).
November - December 2022	Consultation on Reg 18 stage	A total of 2,882 comments were made on the Consultation Draft (Regulation 18) and associated documents, of which 22 comments were directly on the Sustainability Appraisal.
November 2023	Publication Draft (Reg 19)	This is the current stage of district plan preparation which is being assessed in this Sustainability Appraisal.

3.2 Sustainability Appraisal Framework

The SA framework is used to identify and evaluate the potential sustainability effects associated with the implementation of the DPR. Developed at the SA scoping stage (see SA Scoping Report (MSDC, 2021) for further details on the development of the SA framework), 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 Regulations. 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.

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. To focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of reasonable alternatives. Table 3-5 summarises the purpose

and requirements of the SA objectives, appraisal criteria, and indicators.

Table 3-5: Definition of Sustainability Appraisal objectives, appraisal criteria, and monitoring indicators

Item	Purpose
Objective	Provide a benchmark ‘intention’ against which the sustainability effects of the plan can be tested. They need to be fit-for-purpose and represent the key sustainability issues of relevance to the District Plan area.
Appraisal question	Aid the assessment of impact significance. Provide a means of ensuring that key environmental and sustainability issues are considered by the assessment process.
Monitoring indicator	Provides a means of measuring the progress towards achieving the sustainability objectives over time. Needs to be measurable and relevant and ideally relies on existing monitoring networks.

3.2.1 Sustainability Appraisal objectives and appraisal criteria

Sustainability Appraisal objectives and appraisal criteria have been developed for each of the sustainability receptors (see Table 3-6). The spatial strategy, proposed policies and site allocations have been assessed directly against these SA objectives to determine whether they have the potential to contribute towards or conflict with the achievement of each objective.

The SA objectives and appraisal questions were informed and developed through the baseline appraisal undertaken during the scoping process and the key environmental protection and sustainability themes identified by the plans, programmes, and policies (PPP) review. These objectives were revised in response to comments received during the consultation phase on the SA Scoping Report (MSDC, 2021) and considering additional baseline information.

The SA Framework was used by Lepus Consulting to assess the spatial options, policies and site allocations at the Consultation Draft (Regulation 18) stage of the DPR. Public consultation on these stages of the DPR, including the accompanying SA Report, were undertaken by Mid Sussex District Council in 2022, and no substantive comments on the SA Framework were received, indicating that the consultees, including the statutory consultees, considered the framework to be appropriate for the assessment of the DPR.

Further review of the SA framework was undertaken at this Publication Draft (Regulation 19) stage as part of the wider review of the sustainability context (see Chapter 2). However, the framework is considered to be robust, and no substantive changes have been made since the Consultation Draft stage.

Table 3-6: Sustainability Appraisal objectives, appraisal criteria and monitoring indicators for Mid Sussex.

SA receptor	SA objective	Appraisal question: will the approach / proposal help to...	Monitoring indicators
Human Health; Population; Material Assets	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?	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.
Biodiversity; Flora; Fauna; Human Health; Population; Material Assets	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	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

SA receptor	SA objective	Appraisal question: will the approach / proposal help to...	Monitoring indicators	
		<p>cycling?</p> <p>2.5. Support special needs and an ageing population?</p> <p>2.6. Increase access to leisure and open space facilities including in the countryside?</p> <p>2.7. Provide a range of play space for children and young people?</p>	<p>facilities received.</p> <p>Financial contributions towards health received.</p> <p>Amount of additional community facilities delivered.</p> <p>Percentage of population not in good health.</p>	
Human Health; Population; Material Assets	3	<p>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</p>	<p>3.1. Improve qualifications and skills of young people and adults?</p> <p>3.2. Provide an adequate range of education and childcare facilities?</p> <p>3.3. Contribute to meeting primary, secondary and post 19 education needs?</p>	<p>Percentage of population of working age qualified to at least NVQ level 3 (or equivalent).</p> <p>Percentage of adults with poor literacy and numeracy skills.</p> <p>Number of households within a 15-minute walk (approx. 1.2km) from a Primary School.</p>
Human Health; Population; Material Assets	4	<p>Community and crime: To create safe and crime resistant communities encourage social cohesion and reduce inequalities. Promote integration</p>	<p>4.1. Reduce crime / fear of crime and anti-social activity?</p> <p>4.2. Promote design that discourages crime?</p> <p>4.3. Promote sustainable mixed-use environments?</p> <p>4.4. Improve access to community facilities?</p> <p>4.5. Maintain existing community facilities and encourage the delivery of new ones?</p>	<p>All crime – number of crimes per 1000 residents per annum.</p> <p>Number of domestic burglaries per 1,000 households.</p> <p>Number of dwellings permitted more than 150m from a built-up area boundary.</p> <p>Number of households within a 15-minute walk (approx. 1.2km) from</p>

SA receptor	SA objective	Appraisal question: will the approach / proposal help to...	Monitoring indicators
	within existing town/village and retain their separate identities.		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.).
Climatic Factors; Human health; Biodiversity; Flora; Fauna; Material Assets; Water	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?	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.
Soil; Material Assets	6 Natural resources: To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban	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?	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.

SA receptor	SA objective	Appraisal question: will the approach / proposal help to...	Monitoring indicators
	renaissance.		Amount of empty homes.
Biodiversity; Flora; Fauna	7 Biodiversity and geodiversity: To conserve and enhance the District's biodiversity and geodiversity	<p>7.1. Avoid adverse effects on internationally and nationally designated biodiversity and geodiversity assets within an 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?</p> <p>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>	<p>Number and area of Local Wildlife Site (LWS) and Local Nature Reserve (LNR) within the District.</p> <p>Area of ancient woodland within the District.</p> <p>Condition of internationally and nationally important wildlife and geological sites (Sites of Special Scientific Interest (SSSI), Special Protection Area (SPA), Special Area of Conservation (SAC) & Ramsar).</p> <p>Number of planning applications approved contrary to advice given by Natural England on biodiversity issues.</p> <p>Number of dwellings permitted within the 7km Zone of Influence (SPA).</p> <p>Capacity of Suitable Accessible Natural Greenspace (SANG).</p> <p>Net gain in biodiversity.</p>
Landscape; Cultural Heritage; Architectural and Archaeological Heritage	8 Landscape: To protect, enhance and make accessible for enjoyment, the District's countryside and	<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</p>	<p>Open spaces managed to green flag standard.</p> <p>Number of applications approved contrary to advice from the High Weald AONB unit or the South Downs National Park Authority.</p>

SA receptor	SA objective		Appraisal question: will the approach / proposal help to...	Monitoring indicators
		ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place	<p>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>	<p>Amount of new development (units) within the High Weald AONB.</p> <p>Number of households within 300m of multi- functional green space (as defined in the Mid Sussex Assessment of Open Space).</p> <p>Hectares of accessible open space per 1000 population.</p> <p>Amount of rights of way.</p> <p>Number of new dwellings approved on low/negligible sites in the Plan.</p> <p>Area as identified in the Landscape Capacity Study.</p>

SA receptor	SA objective	Appraisal question: will the approach / proposal help to...	Monitoring indicators
Cultural Heritage; Architectural and Archaeological Heritage	9 Cultural heritage: To protect, enhance and make accessible for enjoyment, the District's historic environment.	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? 9.2. Protect and enhance sites, features and areas of archaeological value in both urban and rural areas? 9.3. Reduce the number of buildings at risk? 9.4. Support the undertaking of archaeological investigations and where appropriate recommend mitigation strategies? 9.5. Enhance accessibility to cultural heritage assets?	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.
Material Assets; Climatic Factors; Landscape; Population; Human Health; Air; Fauna	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	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? 10.2. Reduce CO2 emissions to contribute to identified national targets? 10.3. Improve accessibility to work and services by public transport, walking and cycling?	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

SA receptor	SA objective		Appraisal question: will the approach / proposal help to...	Monitoring indicators
		<p>across the district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.</p>	<p>10.4. Protect and improve air quality? 10.5. Avoid exacerbating existing air quality issues in designated AQMAs? 10.6. Achieve a healthy living environment?</p>	<p>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.</p>

SA receptor	SA objective	Appraisal question: will the approach / proposal help to...	Monitoring indicators
Climatic Factors; Material Assets	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.	11.1. Reduce energy consumption? 11.2. Reduce waste generated per head of population? 11.3. Increase rate per head of population of waste reuse and recycling? 11.4. Encourage recycling (including building materials)? 11.5. Incorporate sustainable design and construction techniques?	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.
Water; Biodiversity; Flora; Fauna; Material Assets	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?	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.

SA receptor	SA objective	Appraisal question: will the approach / proposal help to...	Monitoring indicators
Population; Material Assets	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?	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).
Human Health; Population; Material Assets	14 Economic growth: To promote and sustain economic growth and competitiveness across the District to ensure high and	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?	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

SA receptor	SA objective		Appraisal question: will the approach / proposal help to...	Monitoring indicators
		stable levels of employment including the opportunity for people to live and work within their communities.	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?	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).

3.3 Assessing impacts and impact significance of options, policies, and sites

The unmitigated impacts of the District Plan spatial strategy, proposed policies and site allocations have been identified through analysis of the baseline conditions, key sustainability issues and use of professional judgement to identify a potential significance of effect.

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.

3.3.1 Sensitivity

Receptor sensitivity has been measured through consideration of how the receiving environment may be affected by a plan. This includes assessment of the value and vulnerability of the receiving environment, whether environmental quality standards will be exceeded, and for example, if impacts will affect designated areas or landscapes. A guide to the range of scales used in determining sensitivity is presented in Table 3-7. For most receptors, sensitivity increases with geographic scale.

Table 3-7: 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.

3.3.2 Impact magnitude

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 based on the susceptibility of a receptor to the type of change (see Table 3-8).

Table 3-8: 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.

Impact magnitude	Typical criteria
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.

3.3.3 Significant effects

A single value from Table 3-9 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.

Table 3-9: Impact significance key.

Impact significance	Impact symbol
The size, nature and location of a development proposal would be likely to: <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 	Major negative --
The size, nature and location of development proposals would be likely to: <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. 	Minor negative -
Either no impacts are anticipated, or any impacts are anticipated to be negligible.	Negligible 0

Impact significance	Impact symbol
It is entirely uncertain whether impacts would be positive or adverse.	Uncertain + / -
The size, nature and location of a development proposal would be likely to: <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. 	Minor positive +
The size, nature and location of a development proposal would be likely to: <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. 	Major positive ++

The spatial options have been evaluated in light of their potential cumulative, synergistic and indirect effects on the SA objectives. The assessment of these effects has been informed by the baseline data collected at the scoping stage, professional judgement, and experience with other SEAs/SAs, as well as an assessment of national, regional, and local trends.

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 modal score has been taken. Where there is not a clear modal score, a precautionary principle has been used. This is a worst-case scenario approach. For example, if a positive effect is identified in relation to one criterion within the SA Framework 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 summaries and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option. This approach has been applied to both the new reasonable alternative sites assessed during this Regulation 19 SA and the update.

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.

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). The level of effect has been categorised as minor or major. Table 3-9 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.

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 3-9.

3.4 SEA Topic methodologies and assumptions

Several topic specific methodologies and assumptions have been applied to the appraisal process for specific SA Objectives, as outlined by Lepus Consulting during the Regulation 18 SA. These methodologies and assumptions have also been applied to this Regulation 19 SA for consistency.

The following should be borne in mind when considering the assessment findings.

3.4.1 SA Objective 1: Housing

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) (MSDC, 2023) and a Strategic Housing Market Assessment (SHMA), as well as a Site Selection Process. 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 stability.

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.

3.4.2 SA Objective 2: Health and Wellbeing

It is assumed that development proposals located near 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 road (DMRB, 2007). Negative impacts on the long-term health of site end users would be anticipated where residents would be exposed to air pollution. For the purposes of this assessment, main roads were identified using the Major Road Network dataset published by the Department for Transport (2021).

Air Quality Management Areas (AQMAs) are 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.

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 (2010).

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 emergency health facilities, therefore proximity to an NHS hospital with an Accident and Emergency 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 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.

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. (2010), 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.

By siting residential developments near 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.

3.4.3 SA Objective 3: Education

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. Travel time data provided by MSDC has been used to inform this assessment. In line with Barton et al.'s (2010) sustainable distances, 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.

3.4.4 SA Objective 4: Community and Crime

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. Travel time data provided by MSDC has been used to inform this assessment.

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.

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.

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.

3.4.5 SA Objective 5: Flooding and Surface Water

The level of fluvial flood risk present across the Plan area is based on the Environment Agency's flood risk data (EA, 2023), 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.

According to Environment Agency (EA, 2021), 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.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

3.4.6 SA Objective 6: Natural Resources

Previously Developed Land

In accordance with the core planning principles of the NPPF, 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) land (Natural England, 1988). 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 this report, a 20ha threshold has been used based on available guidance (Natural England, 2009). 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 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 2010, 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). 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.

3.4.7 SA Objective 7: 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 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 because of proposals: SPAs, SACs, Ramsar sites, SSSIs, ancient woodlands, NNRs, LNRs and LWSs as well as priority habitats protected under the 2006 NERC Act. 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 database. 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 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 JBA Consulting or Lepus Consulting during the Regulation 18 phase 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. Consequently, 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 sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. 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 (Zol) 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 addressed. 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.

An HRA was prepared by AECOM 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. No Habitats sites other than Ashdown Forest SPA / SAC currently have an identified Zone of Influence (Zol) within Mid Sussex District. The Regulation 18 HRA 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 results of this HRA AA have been used to inform this Regulation 19 SA.

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 Zol 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 sites considered as part of the Site Selection Process. 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.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

3.4.8 SA Objective 8: Landscape

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 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 – 2024 (High Weald JAC, 2019) aims "*to develop and manage access to maximise 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) during the Regulation 18 stage and the Landscape Capacity Study. 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 near 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 177.

South Downs National Park

Development proposals which coincide with or are located adjacent or near 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 near 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 PRow network or National Trails would be expected to have a minor negative impact on the landscape objective.

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 Maps.

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.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

3.4.9 SA Objective 9: Cultural Heritage

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, 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 Site Selection Conclusions Paper provided by the Council. Where a site coincides with or is near 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 near 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 near 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 near 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 Registered Park and Garden 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 near, an SM or a Registered Park and Garden, 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 Site Selection process and comments from a Mid Sussex County Archaeologist during the Regulation 18 stage. 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 several reasons, for example, due to dilapidation of the building fabric or other sources of risk such as coastal erosion, cultivation or scrub encroachment. Where Heritage at Risk assets could potentially be impacted by the proposed development at a site, this has been stated.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

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.

3.4.10 SA Objective 10: Climate Change and Transport

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 - 2023 (2018) 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 200 m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant." (DfT, 2023). This statement is supported by Highways England and Natural England based on evidence presented in several research papers. 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 emissions (DMRB, 2007). 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. For the purposes of this assessment, main roads were identified using the Major Road Network dataset published by the Department for Transport (2021).

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. 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 based on 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. Travel time data provided by MSDC has been used to inform this assessment.

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.

3.4.11 SA Objective 11: Energy and Waste

Household Waste

For 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 average. Between 2020 and 2021, the total waste collected by Mid Sussex Council was 52,161 tonnes (DEFRA, 2022).

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, 34% of UK emissions came from households through heating homes and driving cars (Climate Change Committee, 2020). For 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.

3.4.12 SA Objective 12: Water Resources

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.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

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 water. An approximate 10m buffer zone from a watercourse should be used in which no works, clearance, storage, or run-off should be permitted. 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.

Exact proposed site layouts are not known for all reasonable alternative sites at this stage; therefore a precautionary approach has been taken whereby if any part of the site is within the threshold outlined above, an adverse score has been assigned.

3.4.13 SA Objective 13: 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. Travel time data provided by MSDC has been used to inform this assessment. 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.

3.4.14 SA Objective 14: Economic Growth

Employment Opportunities

It is assumed that, in line with Barton et al.'s (2010) sustainable distances, 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

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.

3.4.15 Limitations and difficulties encountered

Sustainability Appraisal is a useful exercise in identifying and balancing potential environmental and socio-economic effects against each other. However, it does not represent the entire analysis required to determine the acceptability of a plan objective or policy and even where one policy scores positively in terms of sustainability, it may not be appropriate for other reasons.

SA is a desk based exercise carried out to report the generic potential sustainability effects of implementing the plan. SA is a strategic level assessment and therefore does not contain as much detail as site specific EIA that might accompany a specific development proposal.

One factor which is not reflected in the SA scoring is the likelihood of implementation. Some of these options have much less certainty of delivery than others. The feasibility and likelihood of delivery has been looked at through other assessments, including the site assessment. SA is a useful tool used in raising awareness of potential effects to inform the content of the Plan.

It should also be noted that SA is not a quantitative exercise, meaning it is not simply a matter of how many positive or negative scores are identified through appraisal. For the purposes of presenting an overall summary score, the modal score has been presented, however individual assessments should be used to provide granular detail.

It must also be noted that the SA itself has not been used to select the strategic sites, rather it satisfies the requirements of the SEA Directive to identify the likely significant sustainability effects of implementing the plan (including sites and policies).

The site assessment process followed and the criteria applied differ from that applied by MSDC in their site assessment process since the two processes are for different purposes. The SA takes each site at face value to provide an objective score. It is not known at this stage of the plan-making process exactly what kind of development would go on each site, for instance, it is not known what site layout or design would be proposed by each of the developers for all of the reasonable alternative sites. Therefore, in the interests of consistency of assessment, additional information that some developers may be able to supply, such as masterplans, have not been taken into consideration in the SA (although may have been taken into account in the overall decision making process by the Council).

Inevitably, a degree of professional judgement has been required in undertaking the policy appraisals to determine the 'significance' of effects based on the based on baseline data available and likely evolution of the baseline.

4 SA Findings for the Plan Spatial Options

4.1 Introduction

The updated District Plan will guide the delivery of new development. Policies DP4 and DP6 of the adopted District Plan 2014-2031 set out the current spatial strategy which was based around proportionate growth across the hierarchy of settlements, with development focussed towards the three towns (Burgess Hill, East Grinstead and Haywards Heath). This spatial strategy informed the location of allocations within the adopted District Plan and subsequent Site Allocations DPD.

The revised draft strategy provides an opportunity to review this approach and, within limits of national policy, consider possible alternatives for the distribution of development. The revised draft strategy also accounts for the increase housing requirement across Mid Sussex. Further growth identified within the revised District Plan will be in accordance with the revised District Plan Strategy. The revised District Plan Strategy is based on the following four principles. Further growth within the Regulation 19 District Plan has been based on these principles:

- Protection of designated landscape (e.g., AONB).
- Making effective use of land.
- Growth at existing sustainable settlements where it is considered to be sustainable to do so.
- Opportunities for extensions, to improve sustainability of existing settlements that are currently less sustainable.

A summary of the assessment scores and findings for these principles are provided in Table 4-1. The full assessment narrative is provided in this Regulation 19 SA Appendix A.

Table 4-1: Summary of the sustainability appraisal of the principles.

SA Objective		Principles			
		Protection of designated landscape (e.g., AONB)	Making effective use of land	Growth at existing sustainable settlements where it is considered sustainable to do so	Opportunities for extensions, to improve sustainability of existing settlements that are currently less sustainable
1	Housing	+/-	+/-	++	+/-
2	Health & wellbeing	+	+	+/-	+
3	Education	0	+	+/-	++
4	Community and crime	0	+	+/-	++
5	Flooding and surface water	+/-	+	0	0
6	Natural resources	+	++	--	--
7	Biodiversity and geodiversity	++	+	-	-
8	Landscape	++	+	-	--
9	Cultural heritage	+	+/-	0	-
10	Climate change and transport	+	++	-	+
11	Energy and waste	0	+/-	+/-	+/-
12	Water resources	+/-	+	+/-	+/-
13	Economic regeneration	0	+	+	++
14	Economic growth	0	+	+	++

4.2 Reasonable alternative principles

The SEA Regulations require the Council to identify 'reasonable alternatives for all policies and proposals, where feasible'. Alternatives that are not reasonable do not need to be subject to appraisal. Alternatives to each of these principles were identified through consideration of different spatial strategy options, however, an assessment of all these alternatives was not included within the Regulation 18 SA, only the preferred two Options.

During consultation on the draft Regulation 18 District Plan, the Council received several comments surrounding the assessment of spatial Options. Consequently, further assessment of the sustainability performance of all reasonable alternatives considered has been undertaken.

Each spatial Option has then been assessed against the full suite of SA objectives to identify whether they would contribute to, or conflict with, the achievement of the sustainability objective, taking into consideration the relevant appraisal questions.

4.2.1 Protection of designated landscapes

There were no reasonable alternatives identified for this principle since national planning policy and guidance outlines the importance of conserving and enhancing the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONBs) and its wildlife and cultural heritage. It is therefore reasonable to conclude that a 'do nothing' scenario is not a reasonable alternative and the only principle to assess is this spatial Option: "protection of designated landscapes".

4.2.2 Making effective use of land

As with the first principle above, there were no reasonable alternatives identified for 'making effective use of land' since this principle requires consideration under current national planning policy. Ensuring that land within the district is used effectively is an important consideration in the preparation of the District Plan. National planning policy and guidance promotes the use of previously developed land and encourages consideration of various approaches to accommodating growth. It is therefore reasonable to conclude that a 'do nothing' scenario is also not a reasonable alternative and the only option to assess is this principle: "making effective use of land".

4.2.3 Assessment of Spatial Options

Alternatives were identified for the latter two principles to reflect alternative strategies for delivery of growth and meeting housing need, as outlined below:

- **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.
- **Option 3:** Creating a new sustainable settlement with associated facilities.
- **Option 4:** Focus development in the three towns utilising existing facilities and transport links.
- **Option 5:** Prioritise development on brownfield land.

The sustainability performance of all five Spatial Options, as identified by MSDC, has been assessed as part of this Regulation 19 SA. Each Spatial Option has then been assessed against the full suite of SA Objectives to identify whether they would contribute to, or conflict with, the achievement of the sustainability objective, taking into consideration the relevant appraisal questions.

Options 1 and 2 were considered as part of the Regulation 18 SA. The SA conclusions made by Lepus Consulting in the Regulation 18 SA are largely considered to still be relevant. Some amendments have been made to the original assessment in light of increased understanding of the options.

Additional options were considered, as outlined above, which were not included within the Regulation 18 SA. Option 3 was considered which would entail creation of a new sustainable settlement within the district. Option 4 would focus on development primarily being within the exiting three main towns (Burgess Hill, Haywards Heath and East Grinstead) since these have existing suitable facilities and transport links. Lastly Option 5 was considered which focussed on prioritising development on brownfield land.

A summary of the assessment scores and findings for these principles are provided in Table 4-2. The full assessment narrative is provided in Regulation 19 SA Appendix A. 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. For the purposes of the summary tables presented, a modal score has been recorded.

Table 4-2: Summary of the sustainability appraisal of the Options

SA Objective		Options				
		1	2	3	4	5
1	Housing	+/-	++	+	+/-	+/-
2	Health & wellbeing	+	+/-	+/-	++	+
3	Education	++	+/-	+/-	++	++
4	Community and crime	++	+/-	+/-	++	++
5	Flooding and surface water	0	0	0	0	+
6	Natural resources	--	--	--	+/-	++
7	Biodiversity and geodiversity	-	-	-	-	+/-
8	Landscape	--	-	-	+	+/-
9	Cultural heritage	-	0	0	+/-	+/-
10	Climate change and transport	+	-	-	+	+
11	Energy and waste	+/-	+/-	+/-	+	+
12	Water resources	+/-	+/-	+/-	+/-	+/-
13	Economic regeneration	++	+	-	++	++
14	Economic growth	++	+	+	++	++

5 SA Findings for the Plan Policies

5.1 Introduction

A total of 42 policies were identified during the development of the adopted District Plan in 2014 and assessed against the previous SA framework.

Policies are split across themes (sustainability, natural environment and green infrastructure, countryside, built environment, transport, economy, sustainable communities, housing, infrastructure).

During the development of the Regulation 18 District Plan, Mid Sussex District Council undertook a review of each of the policies to determine the extent of any changes required and identified a series of alternative options to address these required changes. Policies either remained as they were, were subject to minor updates or major updates. New policies were also introduced to supplement existing policies.

The review status was as the below:

- **No update required:** the policy as written in the District Plan does not require any amendment - remains 'in date'; with full weight.
- **Minor update:** the 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 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.

A total of 88 draft policies were assessed against the SA framework and presented in the Regulation 18 SA, 28 of these are site allocation policies which set site specific requirements to guide development.

Following consultation on the Regulation 18 Plan and SA, several updates have been made to these policies.

Table 5-1 below lists the preferred draft policies. The sustainability performance of these policies is summarised in Table 5-2, and the full assessments are included in Appendix B.

Table 5-1: Preferred draft 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 Sustainable Drainage

Policy Number	Policy Name
DPS5	Water Neutrality
DPS6	Health and Wellbeing
Natural Environment and Green Infrastructure	
DPN1	Biodiversity, Geodiversity and Nature Recovery
DPN2	Biodiversity Net Gain
DPN3	Green and Blue 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
DPB4	Aerodrome Safeguarding Requirements (Air Safety)
Transport	
DPT1	Placemaking and Connectivity
DPT2	Rights of Way and Other Recreational Routes
DPT3	Active and Sustainable Travel
DPT4	Parking and Electric Vehicle Charing Infrastructure
DPT5	Off-Airport Car Parking
Economy	
DPE1	Sustainable Economic Development
DPE2	Existing Employment Sites
DPE3	Employment Allocations

Policy Number	Policy Name
DPE4	Town and Village Centre Development
DPE5	Within Town and Village Centre Boundaries
DPE6	Development within Primary Shopping Areas
DPE7	Smaller Villages and Neighbourhood Centres
DPE8	Sustainable Rural Development and the Rural Economy
DPE9	Sustainable Tourism and the Visitor Economy
Sustainable Communities	
DPSC GEN	Significant Site Requirements
DPSC1	Land to the West of Burgess Hill/North of Hustpierpoint
DPSC2	Land at Crabbet Park
DPSC3	Land to the south of Reeds Lane, Sayers Common
DPSC4	Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common
DPSC5	Land at Coombe Farm, London Road, Sayers Common
DPSC6	Land to the West of Kings Business Centre, Reeds Lane, Sayers Common
DPSC7	Land at LVS Hassocks, London Road, Sayers Common
Housing	
DPH1	Housing
DPH2	Sustainable Development - Outside the Built-up-Area
DPH3	Sustainable Development - Inside the Built-up-Area
DPH4	Older Persons' Housing and Specialist Accommodation
DPH5	Gypsies, Travellers and Travelling Showpeople
DPH6	Self and Custom Build Housing
DPH7	Housing Mix
DPH8	Affordable Housing
DPH9	First Homes
DPH10	Rural Exception Sites
DPH11	Dwelling Space Standards
DPH12	Accessibility
Site Allocations	
DPA1	Batchelors Farm, Keymer Road, Burgess Hill
DPA2	Land at South of Appletree Close, Janes Lane, Burgess Hill
DPA3	Burgess Hill Station, Burgess Hill
DPA3a	Allotment Site - Nightingale Lane, Burgess Hill
DPA4	Land off West Hoathly Road, East Grinstead

Policy Number	Policy Name
DPA5	Land at Hurstwood Lane, Haywards Heath
DPA6	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath
DPA7	Land east of Borde Hill Lane, Haywards Heath
DPA8	Orchards Shopping Centre, Haywards Heath
DPA9	Land to the west of Turners Hill Road, Crawley Down
DPA10	Hurst Farm, Turners Hill Road, Crawley Down
DPA11	Land rear of 2 Hurst Road, Hassocks
DPA12	Land west of Kemps, Hurstpierpoint
DPA13	The Paddocks, Lewes Road, Ashurst Wood
DPA14	Land at Foxhole Farm, Bolney
DPA15	Ham Lane Farm House, Ham Lane, Scaynes Hill
DPA16	Land west of North Cottages and Challoners, Cuckfield Road, Ansty
DPA17	Land to the west of Marwick Close, Bolney Road, Ansty
DPA18	Land at Byanda, Hassocks
DPA19	Land at Hyde Lodge, Handcross
Infrastructure	
DPI1	Infrastructure Provision
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	Water and Wastewater Infrastructure
DPI8	Viability

5.2 Policy Assessment

A summary of the assessment scores and findings for these policies are provided in Table 5-2. The full assessment narrative is provided in Regulation 19 SA Appendix B. For the purposes of the summary tables presented, a modal score has been recorded.

Table 5-2: Sustainability performance of the draft policies as assessed in this Regulation 19 SA.

Policy	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & 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	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

Policy	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
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	+
DPC6	0	+	0	0	0	0	+	+	0	+	0	0	0	0
Built Environment														
DPB1	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
DPB4	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Transport														

Policy	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
DPT1	0	++	0	+	0	0	0	0	0	++	0	0	0	+
DPT2	0	+	0	0	0	0	0	+	0	+	0	0	0	0
DPT3	0	++	0	++	0	0	+	0	0	++	0	0	0	+
DPT4	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														

Policy	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
DPSCGEN	++	++	+	++	++	+	++	++	++	++	++	++	+	+
DPSC1	++	+	++	++	0	-	0	-	0	0	-	0	0	++
DPSC2	++	+	++	++	0	!	-	-	-	0	-	0	+	++
DPSC3	++	+	++	++	+	!	0	-	0	+	-	0	+	++
DPSC4	+	+	+	+	+	-	+	-	0	+	0	0	0	+
DPSC5	++	+	+	+	+	-	+	+	0	+	0	0	0	+
DPSC6	++	+	+	+	+	-	+	+	0	+	-	0	0	+
DPSC7	++	+	+	+	+	-	+	+	0	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	+	+	0	+	0	0	0	+	0	+	0	0	0	0
DPH5	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH6	+	0	0	0	0	0	0	+	0	0	0	0	0	0
DPH7	+	+	0	+	0	0	0	0	0	0	0	0	0	0

Policy	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
DPH8	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH9	+	+	0	+	0	0	0	0	0	0	0	0	0	0
DPH10	+	0	+	0	0	-	0	+	0	+	0	0	0	0
DPH11	0	+	0	0	0	0	0	0	0	0	0	0	0	0
DPH12	+	+	0	0	0	0	0	0	0	0	0	0	0	0
Site Allocations														
DPA1	+	+	++	+	+	-	0	0	0	0	0	0	0	+
DPA2	++	+	+	+	+	-	0	-	0	0	0	0	0	+
DPA3	++	++	++	++	+	+	0	+	0	++	-	0	++	+
DPA3a	0	+	0	+	0	0	0	0	0	0	0	0	0	0
DPA4	+	+	+	+	+	-	0	-	0	0	0	0	0	+
DPA5	+	+	+	+	+	-	0	-	0	0	0	0	0	+
DPA6	+	+	+	+	+	-	0	0	0	0	0	0	+	+
DPA7	+	+	+	+	0	-	0	0	0	+	0	0	0	+
DPA8	++	++	++	++	+	+	0	+	0	++	-	0	++	+
DPA9	++	+	+	+	+	-	0	0	0	0	-	0	0	+

Policy	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
DPA10	+	+	+	0	+	0	+	0	0	0	0	0	0	+
DPA11	+	0	++	+	+	-	0	0	0	++	0	0	++	+
DPA12	+	+	+	++	+	-	0	-	-	++	0	0	++	+
DPA13	+	+	+	+	+	-	0	0	0	0	0	0	-	+
DPA14	++	0	-	+	0	-	0	0	0	-	-	0	0	+
DPA15	+	+	+	+	+	-	0	0	0	0	0	0	0	+
DPA16	+	0	0	+	+	-	0	0	0	0	0	0	0	+
DPA17	+	0	0	+	+	-	0	0	0	0	0	0	0	+
DPA18	+	0	0	++	+	-	0	0	0	0	+/-	0	++	++
DPA19	+	+	0	+	+	-	0	-	0	0	+/-	0	0	++
Infrastructure														
DPI1	0	+	+	+	+	0	0	0	0	+	+	+	+	+
DPI2	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

Policy	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
DPI6	0	+	0	+	0	0	0	0	0	0	0	0	0	+
DPI7	0	+	0	0	0	0	0	0	0	0	0	++	0	0
DPI8	+/-	+/-	+/-	+/-	0	0	0	0	0	+/-	+/-	+/-	+/-	+/-

6 Site Assessments Pre-Mitigation

6.1 Introduction

To inform the Regulation 18 Plan development and Sustainability Appraisal (SA), Mid Sussex District Council undertook a Strategic Housing and Economic Land Availability Assessment (SHELAA) and Site Selection Process to identify potential suitable sites for allocation within the District Plan to meet housing needs. This process involved assessing all potential sites against fourteen assessment criteria set out within a Site Selection Methodology paper, covering a range of topics including national policy requirements and national and local designations, to determine their suitability for allocation.

Following assessment against the Site Selection methodology, 42 reasonable alternative sites for housing, and two reasonable alternative sites for C2 use were identified. All of these reasonable alternative sites are outlined in Table 6-1 below.

6.2 Changes following Regulation 18 Consultation

The Regulation 18 SA, prepared by Lepus Consulting in 2022, presented an appraisal of these reasonable alternative sites for residential development and C2 use identified by Mid Sussex District Council, in accordance with the SA framework and methodology.

During consultation on the draft Regulation 18 District Plan, the Council received several comments from members of the public and consultees on the results of the SHELAA, Site Selection Process and supporting SA. Some of these comments related to questions over the scoring of particular sites and consistency of scoring between sites. These comments and questions have been reviewed by JBA Consulting, and amendments have been made to scoring assigned where it is deemed within the remit of the SA and in accordance with the topic specific methodologies and assumptions outlined in section 3.4 above. Where comments relate to scores based off travel time data provided by MSDC, or methodologies and assumptions outlined by Lepus Consulting, scores remain as per the Regulation 18 SA. It should also be reiterated that the SA is an objective assessment based on sites at face value and has not taken into consideration specific details of proposed developments, such as proposed layout and masterplans, as these are not available for all sites at the time of writing.

For completeness, the full site assessment undertaken by Lepus Consulting during Regulation 18 is presented in Appendix E. Where proposed changes following consultation have been deemed legitimate, these changes have been made by JBA Consulting through use of tracked changes.

Following review of comments on the SHELAA and the Site Selection Process, the Council reviewed the site assessment scores assigned against the Site Selection Methodology and

updated scores for 14 of the 42 reasonable alternative sites, where appropriate, to address concerns over inconsistency of assessment across all reasonable alternative sites. These changes and the updated assessment findings are presented in Appendix C. In addition, since the publication of the Regulation 18 Plan, eight new reasonable alternative sites have been identified. All of these sites and their respective status are outlined in Table 6- and shown on Figure 6-1 below.

This SA site assessment therefore presents an updated assessment of 14 reasonable alternative sites against the SA framework where updates have been made to the Site Selection conclusions following receipt of consultee comments, along with an assessment of the eight new reasonable alternative sites that have been identified. Where existing reasonable alternative sites have been assessed against the SA Framework at Regulation 18, and remain unchanged from the consultation process, no further assessment has been undertaken, these are presented within Appendix E.

6.3 Reasonable alternative sites

The reasonable alternative sites considered in this assessment are listed in Table 6-1 below, along with their location and potential yield.

Table 6-1: Reasonable alternative sites

SHELAA Ref	Site	Settlement	Yield
13	Land west of Kemps, Hurstpierpoint	Hurstpierpoint	90
18	Crabbet Park, Old Hollow, Near Crawley	Copthorne	2,300
19	Land east of College Lane, Hurstpierpoint	Hurstpierpoint	80
198	Land off West Hoathly Road, East Grinstead	East Grinstead	45
210	Land rear of 2 Hurst Road (Land opposite Stanford Avenue) Hassocks	Hassocks	25
503	Haywards Heath Golf Course, High Beech Lane, Haywards Heath	Lindfield	700
508	Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath	Haywards Heath	30
526	Land east of Paynesfield, Bolney	Bolney	30
543	Land West of London Road (north), Bolney	Bolney	65
556	Land east of Borde Hill Lane, Haywards Heath	Haywards Heath	60
573	Batchelors Farm, Keymer Road, Burgess Hill	Burgess Hill	33
575	Land north east of Hurstpierpoint	Hurstpierpoint	150

SHELAA Ref	Site	Settlement	Yield
601	Land at Coombe Farm, London Road, Sayers Common	Sayers Common	210
617	Land at Foxhole Farm, Bolney	Bolney	100
631	Challoners, Cuckfield Road, Ansty	Ansty	21
678	Broad location West of A23	Twineham	900
686	Land to the rear of The Martins (south of Hophurst Lane), Crawley Down	Crawley Down	125
688	Land to west of Turners Hill Road, Crawley Down	Crawley Down	350
736	Land at Ansty Farm, Cuckfield Road, Ansty	Ansty	1,400 - 1,600
740	Broad location to the West of Burgess Hill	Burgess Hill	1,350
743	Hurst Farm, Turners Hill Road, Crawley Down	Crawley Down	37
784	Extension to allocated Land at Bolney Road, Ansty	Ansty	45
789	Phase 1 Swallows Yard, London Road, Albourne	Albourne	46
799	Land south of Reeds Lane, Sayers Common	Sayers Common	2,000
830	Land to the west of Kings Business Centre, Reeds Lane, Sayers Common	Sayers Common	100
844	Land at Noth Colwell Farm, Lewes Road, Haywards Heath	Haywards Heath	100
858	Land at Hurstwood Lane, Haywards Heath	Haywards Heath	36
984	The Paddocks Lewes Road, Ashurst Wood	Ashurst Wood	8
986	Land to the West of Albourne Primary School Henfield Road, Albourne	Albourne	125
1003	Land to South LVS Hassocks, London Road, Sayers Common	Sayers Common	200
1018	Extension south west of Meadow View, Sayers Common	Sayers Common	250
1020	Ham Lane Farm House, Ham Lane Scaynes Hill	Scaynes Hill	30

SHELAA Ref	Site	Settlement	Yield
1022	Former Hassocks Golf Club, London Road, Hassocks	Hassocks	500
1026	Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common	Sayers Common	33
1030	Land at South of Appletree Close, Janes Lane, Burgess Hill	Burgess Hill	25
1063	Phase 2 Swallows Yard, London Road Albourne	Albourne	46
1075	Land north of Willow way and Talbort Mead, Cuckfield Road, Hurstpierpoint	Hurstpierpoint	153
1095	Land at West Town Farm Hurstpierpoint	Hurstpierpoint	500
1101	Land at Byanda, Hassocks	Hassocks	C2
1105	Land east and west of Malthouse Lane	Burgess Hill	750
1106	Land at Hyde Lodge, Handcross	Handcross	C2
1120	Land east of Foxhole Lane	Bolney	200
1121	Orchards Shopping Centre	Haywards Heath	100
1123	Burgess Hill Station	Burgess Hill	300
New reasonable alternative sites			
1146	Swallows Yard (Phases 1&2)	Hassocks	90
1135	Land r/o Challoners, Cuckfield Road	Ansty	9
1141	Land west of Cuckfield Road	Ansty	6
1148	Land west of North Cottages and Challoners		30
1133	Land west of Bolney Place	Bolney	10
1137	Land to the west of Ockley Lane	Hassocks	400
1122	Sussex House and Commercial House and 54 and 56 Perrymount Road	Haywards Heath	100
29	Land off Snowdrop Lane	Lindfield	40

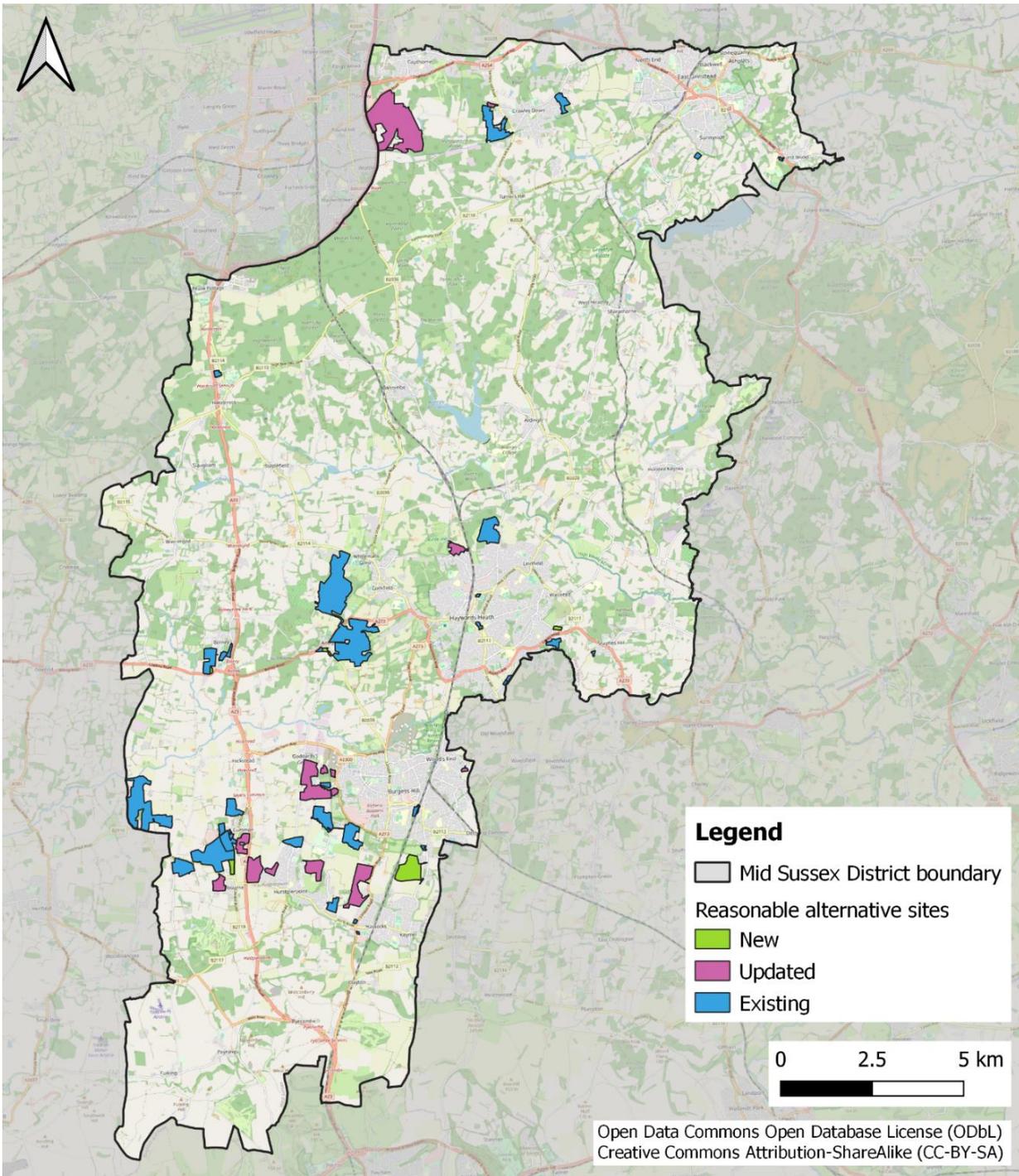


Figure 6-1: Map showing the existing sites, those with updated assessment results and new sites brought forward.

6.4 Site assessment pre-mitigation

Table 6-2 below provides a summary of the assessment of reasonable alternative sites, including re-assessed sites and new sites, against the SA framework. For the purposes of the summary tables presented, a modal score has been recorded.

Table 6-2: Pre-mitigation impact matrix for all reasonable alternative sites

Site Reference	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
Additional reasonable sites assessed at Regulation 19														
1146	+	0	+	0	0	-	0	0	0	-	0	0	-	0
1135	+	0	-	0	+	-	0	0	0	-	0	0	-	0
1141	+	+	-	0	0	-	0	0	0	+	0	0	-	0
1148	+	0	-	0	+	-	0	0	0	-	0	0	-	0
1133	+	-	-	0	-	-	0	0	-	-	0	0	-	0
1137	++	+	-	0	-	-	0	-	0	0	-	-	0	0
1122	++	+	+	0	0	0	0	0	0	+	-	0	+	0
29	+	+	+	0	0	-	0	0	0	-	0	0	-	0
Sites assessed at Regulation 18														
13	+	+	-	0	-	-	0	-	0	+	-	0	+	0
18	++	-	-	-	--	--	0	-	0	-	--	-	-	+
19	+	-	-	0	--	-	0	-	-	-	-	0	-	0
198	+	+	-	0	+	-	0	0	0	-	-	-	-	0
210	+	-	+	0	+	-	0	0	0	++	-	0	+	0
503	++	+	-	-	-	-	0	0	0	-	--	0	-	-
508	+	+	-	0	-	-	0	0	0	-	-	0	-	0
526	+	-	-	0	+	-	0	0	0	-	-	0	-	0
543	+	-	-	0	+	-	0	0	0	-	-	0	-	0
556	+	+	-	0	--	-	0	0	0	+	-	-	-	0
573	+	+	+	0	+	-	0	0	0	-	-	0	-	0

Site Reference	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
575	++	-	-	-	--	-	0	-	0	-	--	-	-	0
601	++	-	-	-	--	-	0	0	0	-	--	0	-	0
617	++	-	-	-	-	-	0	0	0	-	--	0	-	0
631	+	-	-	0	+	-	0	0	0	-	-	0	-	0
678	++	-	-	-	--	-	0	0	0	-	--	-	-	0
686	++	+	0	0	--	-	0	0	0	-	--	0	-	0
688	++	-	0	-	--	-	0	-	0	-	--	-	-	0
736	++	-	-	-	--	-	0	0	-	-	--	-	-	+
740	++	-	0	-	--	-	0	-	0	-	--	-	-	+
743	+	+	+	-	--	0	0	0	0	-	-	0	-	-
784	+	-	-	-	+	-	0	0	0	-	-	0	-	0
789	+	+	-	-	+	-	0	0	0	-	-	0	-	0
799	++	-	-	-	--	-	0	-	0	-	--	0	-	+
830	++	+	-	-	--	-	0	0	0	-	--	-	-	0
844	++	-	0	-	-	-	0	0	0	-	--	0	-	0
858	+	+	-	-	+	-	0	0	0	-	-	0	-	0
984	+	+	-	0	+	-	0	0	0	-	0	0	-	0
986	++	+	-	-	--	-	0	-	0	-	--	0	-	0
1003	++	+	-	-	--	-	0	-	0	-	--	-	-	0
1018	++	-	0	-	--	-	0	0	0	-	--	0	-	0
1020	+	+	-	-	-	-	0	0	0	-	-	0	-	0

Site Reference	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1022	++	-	-	-	--	-	0	-	0	-	--	-	-	-
1026	+	+	0	0	--	-	0	0	0	-	-	0	-	0
1030	+	+	0	0	+	-	0	0	0	-	-	-	-	0
1063	+	-	-	-	+	-	0	0	0	-	-	0	-	0
1075	++	+	-	0	--	-	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	+	-
1123	++	+	+	0	-	0	0	0	0	++	--	0	+	-

7 Site Assessments Post-mitigation

7.1 Cumulative Effects

A summary of the predicted cumulative effects of the proposed policies in relation to each of the SA objectives is detailed in Appendix D.

7.2 Post-mitigation site assessments

The impact matrices for the post-mitigation assessment of all reasonable alternative sites, taking into consideration mitigations through application of plan policies, is presented in Table 7-1. For the purposes of the summary tables presented, a modal score has been recorded, further detail of the assessment and the mitigation measures considered is detailed in Appendix D.

Table 7-1: Impact matrix of the post-mitigation assessment of reasonable alternative sites and sites assessed at Regulation 18 stage.

Site Reference	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
Additional reasonable sites assessed at Regulation 19														
1146	+	+	+	0	+	-	0	0	0	+	0	0	-	+
1135	+	+	-	0	+	-	0	0	0	0	0	0	-	+
1141	+	+	-	0	+	-	0	0	0	+	0	0	-	+
1148	+	+	-	0	+	-	0	0	0	+	0	0	-	+
1133	+	0	-	0	0	-	0	0	-	0	0	0	-	+
1137	++	+	-	0	0	-	0	-	0	+	+/-	0	0	+
1122	++	+	+	0	+	-	0	0	0	++	+/-	0	+	+
29	+	+	+	0	+	-	0	0	0	+	0	0	-	+
Sites assessed at Regulation 18														

Site Reference	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
13	+	+	+	++	+	-	0	-	-	++	0	0	++	+
18	++	+	++	++	0	-	-	-	-	0	-	0	+	++
19	+	+	-	0	0	-	0	-	-	-	0	0	-	+
198	+	+	+	+	+	-	0	-	0	0	0	0	0	+
210	+	0	++	+	+	-	0	0	0	++	0	0	++	+
503	++	+	-	0	0	-	0	0	0	0	+/-	0	-	0
508	+	+	+	+	+	-	0	0	0	0	0	0	+	+
526	+	+	-	0	+	-	0	0	0	0	+/-	0	-	+
543	+	+	-	0	+	-	0	0	0	-	+/-	0	-	+
556	+	+	+	+	0	-	0	0	0	+	0	0	0	+
573	+	+	++	+	+	-	0	0	0	0	0	0	0	+
575	++	+	-	0	0	-	0	-	0	0	+/-	0	-	+
601	++	+	+	+	+	-	+	+	0	+	0	0	0	+
617	++	+	-	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	0	+	+/-	0	-	+
688	++	+	+	+	+	-	0	-	0	0	-	0	0	+
736	++	+	-	0	0	-	0	0	-	-	+/-	0	-	+
740	++	+	++	++	0	-	0	-	0	0	-	0	0	++
743	+	+	+	0	+	0	+	0	0	0	0	0	0	+

Site Reference	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
784	+	0	0	+	+	-	0	0	0	0	0	0	0	+
789	+	+	-	0	+	-	0	0	0	0	+/-	0	-	+
799	++	+	++	++	+	-	0	-	0	+	-	0	+	++
830	++	+	+	+	+	-	+	+	0	+	-	0	0	+
844	++	+	0	0	0	-	0	0	0	-	+/-	0	-	+
858	+	+	+	+	+	-	0	-	0	0	0	0	0	+
984	+	+	+	+	+	-	0	0	0	0	0	0	-	+
986	++	+	-	0	0	-	0	-	0	+	+/-	0	-	+
1003	++	+	+	+	+	-	+	+	0	0	-	0	0	+
1018	++	+	0	0	0	-	0	0	0	+	+/-	0	-	+
1020	+	+	+	+	+	-	0	0	0	0	0	0	0	+
1022	++	+	-	0	0	-	0	-	0	+	+/-	0	-	+
1026	+	+	+	+	+	-	+	0	0	+	0	0	0	+
1030	++	+	+	+	+	-	0	-	0	0	0	0	0	+
1063	+	+	-	0	0	-	0	0	0	+	+/-	0	-	+
1075	++	+	-	0	0	-	0	0	0	+	+/-	0	-	+
1095	++	+	0	0	0	-	0	-	0	+	+/-	0	-	+
1101	+	0	0	++	+	-	0	0	0	0	+/-	0	++	++
1105	++	+	+	0	0	-	0	-	0	+	+/-	0	-	+
1106	+	+	0	+	+	-	0	-	0	0	+/-	0	0	++
1120	++	0	-	+	0	-	0	0	0	-	-	0	0	+

Site Reference	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1121	++	++	++	++	+	+	0	+	0	++	-	0	++	+
1123	++	++	++	++	+	+	0	+	0	++	-	0	++	+

8 Monitoring and Next Steps

8.1 Monitoring and the predicted significant impact of the Plan

The significant sustainability effects of implementing a DPR must be monitored to identify unforeseen adverse effects and to be able to undertake appropriate remedial action. The SA Framework contained in this report includes suggested indicators to monitor each of the sustainability objectives. These are shown in Table 8-1 below; however, these may not all be collected due to resource limitation and difficulty in data availability or collection.

Guidance stipulates that it is not necessary to monitor everything included within the SA Framework, but that monitoring should focus on significant sustainability effects.

Upon adoption, the Plan will be accompanied by an Adoption Statement, which will outline those monitoring indicators most appropriate for future monitoring of the Plan in line with Regulation 16 of the SEA Regulations 2004.

SA Receptor	SA Objective	Monitoring Indicators
Human Health; Population; Material Assets	1 Housing: To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	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.

SA Receptor	SA Objective	Monitoring Indicators
Biodiversity; Flora; Fauna; Human Health; Population; Material Assets	2 Health and wellbeing: To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.	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. Number of additional community facilities delivered. Percentage of population not in good health.
Human Health; Population; Material Assets	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	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.
Human Health; Population; Material Assets	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.	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.).
Climatic Factors;	5 Flooding and surface water: To	Percentage of the District that is within Flood Zone 2/Flood Zone 3.

SA Receptor	SA Objective		Monitoring Indicators
Human health; Biodiversity; Flora; Fauna; Material Assets; Water		reduce the risk to people, properties, the economy and the environment of flooding from all sources	<p>Number of properties at risk from flooding, as defined by the Environment Agency.</p> <p>Number of planning applications approved contrary to advice given by the Lead Local Flood Authority/EA on flood risk/flood defence grounds.</p> <p>Number of developments with sustainable drainage systems.</p>
Soil; Material Assets	6	<p>Natural resources: To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.</p>	<p>Percentage of new and converted homes developed on brownfield land.</p> <p>Percentage of new employment floorspace on previously developed land.</p> <p>Average density of new housing developments.</p> <p>Amount of Best and Most Versatile Agricultural Land (Grades 1, 2 and 3a) lost to development.</p> <p>Number of empty homes.</p>
Biodiversity; Flora; Fauna	7	<p>Biodiversity and geodiversity: To conserve and enhance the District's biodiversity and geodiversity</p>	<p>Number and area of Local Wildlife Site (LWS) and Local Nature Reserve (LNR) within the District.</p> <p>Area of ancient woodland within the District.</p> <p>Condition of internationally and nationally important wildlife and geological sites (SSSI, SPA, SAC & Ramsar).</p> <p>Number of planning applications approved contrary to advice given by Natural England on biodiversity issues.</p> <p>Number of dwellings permitted within the 7km Zone of Influence (SPA).</p> <p>Capacity of Suitable Accessible Natural Greenspace (SANG).</p> <p>Net gain in biodiversity.</p>

SA Receptor	SA Objective	Monitoring Indicators
Landscape; Cultural Heritage; Architectural and Archaeological Heritage	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>
Cultural Heritage; Architectural and Archaeological Heritage	9	<p>Cultural heritage: To protect, enhance and make accessible for enjoyment, the District's historic environment.</p>

SA Receptor	SA Objective	Monitoring Indicators
Material Assets; Climatic Factors; Landscape; Population; Human Health; Air; Fauna	10	<p>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.</p> <p>Car ownership.</p> <p>Number of households within a 5-minute walk (approx. 400m) of a bus stop with frequent service (3+ an hour).</p> <p>Number of households within a 10-minute walk (approx. 800m) of a bus stop with less frequent service (less than 3 an hour)</p> <p>Number of households within a 15-minute walk (approx. 1.2km) of a train Station.</p> <p>Proportion of journeys to work other than by car.</p> <p>Percentage of residents living and working within Mid Sussex.</p> <p>Monetary investment in sustainable transport schemes (value of s.106 agreements).</p> <p>Number of Air Quality Management Areas (AQMAs) within the District.</p> <p>Change in CO2 emissions from transport.</p> <p>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).</p> <p>Number of households within 30min by public transport, or 15min by walking or cycling journey time from a convenience store.</p>
Climatic Factors; Material Assets	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>Domestic energy consumption per household.</p> <p>Number of renewable energy installations within Mid Sussex.</p> <p>Installed capacity of renewable energy installations within Mid Sussex.</p> <p>Domestic waste produced per head of population.</p> <p>Percentage of domestic waste that has been recycled.</p>

SA Receptor	SA Objective		Monitoring Indicators
Water; Biodiversity; Flora; Fauna; Material Assets	12	<p>Water resources: To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.</p>	<p>Stretches of watercourse that are, as a minimum, Water Framework Directive status "Moderate".</p> <p>Stretches of watercourse with no deterioration in Water Framework Directive status.</p> <p>Incidents of major and significant water pollution within the District.</p> <p>Number of planning applications approved contrary to advice given by the EA on water quality issues.</p> <p>Number of developments that minimise water consumption.</p>
Population; Material Assets	13	<p>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.</p>	<p>Total amount of floorspace for "Town Centre Uses" (A1, A2, B1a, D2).</p> <p>Number of households within a 15-minute walk (approx. 1.2km) from a town centre superstore/town centre/high street shopping facilities).</p> <p>Retail unit vacancy rate.</p> <p>Total amount of new commercial / business floorspace in rural areas.</p> <p>Number of vacant sites brought back into use in Town Centres.</p> <p>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).</p>

SA Receptor	SA Objective	Monitoring Indicators
Human Health; Population; Material Assets	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.	Net increase/decrease in commercial (Use Classes E, B2, B8) and office € 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).

8.2 Consultation

A key aspect of the SA process is consultation. The SA process provides a mechanism to ensure that stakeholder engagement requirements are achieved by providing interested parties/organisations and the public an opportunity to inform the process and comment on decisions taken. Stakeholder engagement also ensures that economic, environmental, and social issues, constraints, and opportunities are identified and assessed throughout the development of the DPR.

This Sustainability Appraisal Report will form part of the public consultation on the Publication Draft DPR. It will be sent to the statutory consultation bodies (Natural England, Historic England and the Environment Agency) and will be available for view on Mid Sussex District Council's website alongside the Publication Draft Plan.

8.3 Next steps

The Sustainability Appraisal Report will now be published for public and stakeholder consultation alongside the Draft Plan. The Draft Plan and SA Report will then be submitted for independent examination.

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A Appraisal of Spatial Options in the Mid Sussex District Plan Review 2021 - 2039

A.1 Introduction

As outlined in Section 4, an assessment of the spatial options for the distribution of development and their reasonable alternatives has been undertaken. A summary of these alternatives and the assessment findings was included in Section 4, with the full assessment presented below.

A.2 Principles

A.2.1 Protection of designated landscapes

The National Planning Policy Framework (NPPF) states that "*Planning policies and decisions should contribute to and enhance the natural and local environment by: a) protecting and enhancing valued landscapes*". The High Weald Area of Outstanding Natural Beauty (AONB) covers the north of the district, and so when developing spatial Options for the Plan period, this principle was included to ensure that the spatial options do not result in development that would bring harm to the landscape character or setting of the AONB.

There were no reasonable alternatives identified for 'protection of designated landscapes' as this principle requires consideration under current national planning policy. Under the SEA Regulations, alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g., the NPPF).

National planning policy and guidance outlines the importance of conserving and enhancing the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONBs) and its wildlife and cultural heritage. It is therefore reasonable to conclude that a 'do nothing' scenario is not a reasonable alternative and the only principle to assess is this spatial Option: "protection of designated landscapes".

A summary of the assessment scores is provided in Table A-1 below.

Table A-1: Assessment of the potential impacts of the principle: protection of designated landscapes.

Protection of Designated Landscapes	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+/-	+	0	0	+/-	+	++	++	+	+	0	+/-	0	0

It is uncertain the impact this principle would have on housing delivery. The impact could be negative under the assumption that housing developments would either not be allowed in the High Weald AONB or the size of the development would be limited to ensure that significant damage to the landscape character does not occur. However, the Strategic Housing and Employment Land Availability Assessment (SHELAA) and Site Selection process found that there is limited further growth potential at settlements within the AONB, and that the potential for growth is mostly in settlements out with the AONB.

However, this principle performs well against the natural resources objective, as it will help drive redevelopment of previously developed land and minimise the loss of open countryside to development.

It is also considered that this principle would have a minor positive impact on health and wellbeing, and climate change and transport as it would encourage development in the main towns outside the AONB ensuring residents have access to services and reduce the need for private car use, and its associated CO2 emissions.

This principle would have a major positive impact on biodiversity and geodiversity, and landscape objectives. Namely as it would protect landscape character and conserve the High Weald AONB, which also includes nationally designated land, such as Worth Forest SSSI and Wakehurst and Chiddingly Woods SSSI. Historic assets can be considered part of the landscape character, and so protection of the High Weald AONB, which contains many Listed Buildings and Scheduled Monuments, would have a major positive impact on the cultural heritage objective.

It is unclear on the impact this principle would have on the flooding and surface water objective or the water resources' objective. It may have a positive impact as protection of the landscape could help achieve Water Framework Directive Objectives; however, driving

development to existing areas may put pressure on water resources here and increase the number of properties at risk of flooding. Although if natural flood management and sustainable design and construction techniques are implemented, then the risk of flooding could be reduced.

It is considered that this principle would have a neutral impact on the other SA objectives. For example, this principle would not impact economic growth or regeneration, the approach to education and community and crime, or energy and waste consumption.

A.2.2 Making effective use of land

This principle is given a comprehensive definition in the NPPF which states that "*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land*". This principle was therefore included to ensure development over the plan period is considering the redevelopment of previously developed land where possible while meeting housing needs and achieving healthy communities, without causing unnecessary harm to the environment.

As with the first principle above, there were no reasonable alternatives identified for 'making effective use of land' since this principle requires consideration under current national planning policy. Ensuring that land within the district is used effectively is an important consideration in the preparation of the District Plan. National planning policy and guidance promotes the use of previously developed land and encourages consideration of various approaches to accommodating growth. It is therefore reasonable to conclude that a 'do nothing' scenario is also not a reasonable alternative and the only option to assess is this principle: "making effective use of land".

A summary of the assessment scores is provided in Table A-2 below.

Table A-2: Summary of assessments of potential impacts of the principle: making effective use of land.

Making Effective Use of Land	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+/-	+	+	+	+	++	+	+	+/-	++	+/-	+	+	+

This principle would have a major positive impact on the natural resources objective by supporting the redevelopment of previously developed land and reducing the need for development to encroach on open countryside and agricultural land. By bringing sites back to their full potential, it increases the vibrancy of a street making an area more attractive to live and work, and restores the character of the town without compromising the wider landscape character of the district. Through promoting development in existing settlements, new residents are more likely to have access to healthcare, schools, and community facilities, as well as public transport which in turn will reduce private car use, and the associated carbon emissions. This promotes town centre regeneration and supports the economic viability of existing businesses here and will reduce the need to commute out of the area.

The NPPF considers that making effective use of land is also looking at the potential for undeveloped land to provide "*wildlife, recreation, flood risk mitigation, cooling / shading, carbon storage or food production*". Therefore, this principle gives weight to achieving positive impacts for climate change, biodiversity, and flooding and surface water objectives. Nonetheless, without knowing the full details of the developments, it is difficult to conclude that this principle would not cause harm to local cultural heritage assets.

Furthermore, there is uncertainty on whether this principle would meet the housing needs of the district as it promotes the redevelopment of previously developed land which limits the provision of housing and the ability to deliver the range of type, tenure and mix of homes that the district requires. Mid Sussex has limited brownfield sites available for development - noting that only 12% of the district is within a defined Built-up Area.

A.2.3 Growth strategies

Alternatives were identified for the second two pillars to reflect alternative strategies for delivery of growth and meeting housing need.

The Options considered are outlined in Table A-3 below

Table A-3: Alternative spatial options for growth considered.

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.
Option 3	Creating a new sustainable settlement with associated facilities.
Option 4	Focus development in the three towns utilising existing facilities and transport links.
Option 5	Prioritise development on brownfield land.

Options 1 and 2 were considered as part of the Regulation 18 SA. The SA conclusions made by Lepus are largely considered to still be relevant. Some amendments have been made to the original assessment in light of increased understanding of the options.

Additional options were considered as a result of responses received during the Regulation 18 consultation, as outlined above, which were not included within the Regulation 18 SA. Option 3 was considered which would entail creation of a new sustainable settlement within the district. Option 4 would focus on development primarily being within the exiting three main towns (Burgess Hill, Haywards Heath and East Grinstead) since these have existing suitable facilities and transport links. Lastly Option 5 was considered which focussed on prioritising development on brownfield land.

A summary of the SA assessment scores and findings are provided in Table A-4 below, with the full assessments presented in sections 1.6 to 1.10.

Table A-4: Summary of 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 & surface water	Natural resources	Biodiversity & geodiversity	Landscape	Cultural heritage	Climate change & transport	Energy and waste	Water resources	Economic regeneration	Economic growth
1	+/-	+	++	++	0	--	-	--	-	+	+/-	+/-	++	++
2	++	+/-	+/-	+/-	0	--	-	-	0	-	+/-	+/-	+	+
3	+	+/-	+/-	+/-	0	--	-	-	0	-	+/-	+/-	-	+
4	+/-	++	++	++	0	+/-	-	+	+/-	+	+	+/-	++	++
5	+/-	+	++	++	+	++	+/-	+/-	+/-	+	+	+/-	++	++

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 (Burgess Hill, East Grinstead and Haywards Heath) accommodating greater levels of growth. This option would facilitate the proportionate delivery of housing across a range of existing settlements. This would enable residents to utilise existing services and infrastructure and would support economic growth within existing settlements. However, this option could lead to development within sensitive landscape areas, such as High Weald AONB (to the north of Haywards Heath and south/east of East Grinstead) and lead to adverse impacts on landscape, natural resources, biodiversity and geodiversity.

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. This option is more likely to provide protection for High Weald AONB by avoiding areas within the AONB. However, it may have a negative impact on climate change and transport objectives as new residents may not be located close to existing services and sustainable transport options, depending on the extent of services available. However, there is potential for new services to be provided where growth is outside of settlements with existing facilities.

Option 3: Creating a new and sustainable settlement with associated services and facilities. This option may have a significant negative impact on greenhouse gas emissions through increased energy use and emissions generated by the construction and occupation of the

new development, as well as increase private car use dependent on the provision of sustainable travel options.

Option 4: focus on development in the three towns. This would likely lead to a significant positive impact on economic growth and regeneration in the three towns, supporting existing businesses and supporting the vitality and viability of these town centres. By utilising existing facilities and transport routes, residents would be less dependent on private car use and would already have access to secondary schools and healthcare services. This would have a likely major positive impact on objectives for health and wellbeing, education, community and crime, climate change, and transport.

Option 5: prioritise development on brownfield land. As a predominantly rural district, brownfield sites are focussed in the three main towns and larger villages. Therefore, this Option performance on the social objectives (1 to 4) would be similar to option 4. New residents would be likely to be in proximity to healthcare services and schools, and it will also promote community cohesion by meeting housing need in the local area which reduces pressure on existing housing in the area. Proximity to services also performs well against the climate change and transport objective, as well as reducing the dependency of private car use, and associated GHG emissions. This Option would have a major positive impact on the natural resources objective by supporting the development of previously developed land and reducing the need for development to encroach on open countryside and agricultural land. Prioritising developments on brownfield land presents an opportunity for delivery of biodiversity net gain through bringing previously developed land back to its full potential without compromising land which may have established habitats and species. Furthermore, this Option avoids growth in the High Weald AONB and South Downs National Park and so limits impacts on these designated landscapes.

A.3 Feasibility of options

The SA considered the respective likely environmental and socio-economic impacts of each of the growth strategy options. However, as outlined in Section 1.4, the SA does not reflect the whole of the analysis needed and does not consider the likelihood and feasibility of implementation. It is also not a quantitative exercise; therefore some SA objectives carry greater weighting.

Housing need and the Site Selection process informed the feasibility of the Options. An overview of the feasibility of each option in meeting housing need is outlined below.

Option 1 (the adopted District Plan) proportioned housing need across the district based on settlement category (DP4) and settlement (DP6) based on proportion of households/population. For example, if one settlement contained 10% of current households within the district, it received 10% of the housing requirement. Following the site assessment process it became evident that there were insufficient sites deemed to be 'reasonable alternatives' to continue this, since a number of developments have already come forward since the adopted plan. Many settlements did not have sufficient sites to meet the need, whereas some settlements had a need of zero, but many sites to choose

from. Therefore continuing with this option would not be achievable since it would not enable sufficient sites to be allocated to meeting housing need within the district.

Option 2 would seek to support growth across settlements with existing facilities. It would allow allocation of sites to meet internal housing needs including the provision of affordable housing and a mix of type and tenures of housing. This would also allow allocation of a surplus of approximately 1000 dwellings. This would contribute to meeting unmet need in neighbouring authorities.

Option 3 would have a major positive impact on delivering housing in the district through a new settlement. One potential location was considered that met this spatial approach, known as 'Mayfield Market Town', on the western boundary of the district near Twineham, although the majority of the site boundary is within Horsham District. However, this site was previously ruled out during the site selection process due to a historic lack of support from Horsham District Council. The site has now been withdrawn from consideration by the site promoter. In addition, water neutrality considerations arising in this location have led to deliverability concerns over and above the previous reasons for rejection.. This option is therefore not considered feasible to address housing requirements since MSDC does not have available sites to deliver such a strategy in the pool of sites identified as reasonable alternatives.

Option 4 focussed development in the three towns. This Option is similar to Option 1 by focussing development in the three urban centres, however it does not incorporate proportionate growth across the other settlements in the district and would limit the ability to meet the whole district's housing need as it would exclude larger site allocations in rural areas. It is therefore unlikely that this Option would meet the required housing need for the district, particularly as the SHELAA and Site Selection process demonstrate there is very limited growth potential at East Grinstead and Haywards Heath.

Option 5 performs well against the SA objectives, however it would not be suitable to meet housing need alone since there are limited brownfield sites available within the reasonable alternatives identified following the site selection process. The two larger brownfield sites allocated in the Regulation 19 Plan are at Burgess Hill Station and Orchards Shopping Centre in Haywards Heath which would provide 400 homes. An Urban Capacity Study has been prepared by the District Council and this has informed a Brownfield element to the windfall allowance. Overall, this figure would not come close to meeting the district's housing need in full.

Overall, Option 2 is preferable since it will support the delivery of larger strategic sites in some locations, as well as supporting some growth to across the other categories of settlements. This will enable the internal housing need to be met, along with provision of a surplus of dwellings to support neighbouring authorities in meeting their need. In SA terms it will also have positive impacts on landscape through limiting growth in sensitive landscapes.

However, it will also incorporate elements of Option 1 to continue growth at existing sustainable settlements where available sites allow.

A.4 Option 1 Assessment

Table A-5: Assessment of Spatial Option 1.

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.		
SA Objective	Impact	Assessment
<p>1</p> <p>Housing: To ensure that everyone has the opportunity to live in a home for their need and which they can afford.</p>	+/-	<ul style="list-style-type: none"> • This Option has the potential to meet the identified housing need for the district, including the provision of affordable housing and mixed types / tenure housing. • This Option spreads new development across the main urban centres and other principal settlements within the district. It will therefore increase accessibility to new housing development across the district. • Lack of availability of sites for meeting housing need in each area. • Risk that smaller settlements in rural areas will not benefit from increased access to services.
<p>2</p> <p>Health and wellbeing: To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.</p>	+	<ul style="list-style-type: none"> • 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. • There are two NHS hospitals with an A&E department within the Plan area: Queen Victoria Hospital in East Grinstead and Princess Royal Hospital in Haywards Heath. • However, growth located in medium and smaller settlements may locate new residents at greater distances from hospital services.

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.			
3	<p>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</p>	++	<ul style="list-style-type: none"> As set out in the Mid Sussex SA Scoping Report, 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. As determined in the Reg 18 SA, this Option would locate housing growth in areas of existing settlements so new residents are likely to be in proximity to existing schools. It is noted that existing schools may be close to capacity, however it is assumed these schools can extend or adapt to predicted need.
4	<p>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.</p>	++	<ul style="list-style-type: none"> 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. This Option would be likely to locate new residents in proximity to existing community facilities and groups located within the main towns and other settlements. Improved access to housing and employment may contribute to a reduction in social inequalities and increase community cohesion and community health and wellbeing.

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.		
5	<p>Flooding and surface water: To reduce the risk to people, properties, the economy and the environment of flooding from all sources</p>	<p style="text-align: center;">0</p> <ul style="list-style-type: none"> The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.
6	<p>Natural resources: To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.</p>	<p style="text-align: center;">--</p> <ul style="list-style-type: none"> This Option is likely to lead to the allocation of development sites on greenfield land, with relatively few opportunities for the redevelopment of previously developed land. The development of greenfield sites is likely to lead to the loss of soils, which is a finite natural resource. Many of the proposed sites for development are within mineral safeguarding areas. The development of these sites would therefore lead to mineral sterilisation.

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.			
7	Biodiversity and geodiversity: To conserve and enhance the District’s biodiversity and geodiversity	-	<ul style="list-style-type: none"> • There are numerous Sites of Special Scientific Interest (SSSIs) within the district, predominately located within the High Weald AONB or in the South Downs National Park. 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 adverse impacts on this SSSI. • The provision of significant new development has the potential to cause negative impacts on biodiversity through loss of habitat and disturbance to species. Conversely, high quality design that protects and enhances environmental and ecological characteristics, has the potential to provide some benefits. Policies will be in place, including DPN2, to facilitate Biodiversity Net Gain which will achieve positive effects on biodiversity. However, on balance, increased development and increased population is more likely to have negative effects.
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	-	<ul style="list-style-type: none"> • This spatial strategy will follow the existing District Plan approach, which focuses new development in the main urban centres and other principal settlements across the district. • By focusing new development in existing urban areas / rural settlements, this could reduce the risk that new development could adversely affect the character of sensitive landscapes in more rural parts of the district. • Conversely, by allocating most of the new development in the Haywards Heath / East Grinstead / Burgess Hill areas, there is a greater risk of urban sprawl. • New development could have both positive and negative effects on landscape. The nature and scale of these impacts are related to the location of the development

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.			
			<p>and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design.</p> <ul style="list-style-type: none"> • Nonetheless, Option 1 is still likely to lead to the development of greenfield sites and adverse impacts on local landscape character, to some extent.
9	<p>Cultural heritage: To protect, enhance and make accessible for enjoyment, the District’s historic environment.</p>	-	<ul style="list-style-type: none"> • New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features. • There is potential that this spatial Option could contribute to this SA objective in several ways: it should focus development in existing urban areas, reducing the risk that heritage features and historic landscape character outside these areas could be affected, and it could provide a mechanism for the conservation and enhancement of heritage features through urban regeneration. • However, this Option has the potential to locate development in proximity to associated Conservation Areas as these are located in the main urban centres and smaller settlements.
10	<p>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</p>	+	<ul style="list-style-type: none"> • Most of the community, education and retail facilities are in existing town centres. The three main towns are also serviced by existing train stations. This Option supports growth in the main centres and proportionally across the other settlements in the hierarchy, which may reduce the need to travel by private car and support opportunities for the use of public transport and active travel.

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.

	district, thereby reducing the level of greenhouse gases from private cars and their impact on climate change.		<ul style="list-style-type: none"> • However, by focusing new development in/near existing urban areas, which are more likely to experience air quality issues, there is a greater risk of contributing to the formation of a significant local air quality issue if private car use is not reduced. • Appropriate policy and schemes would need to be implemented to encourage active travel, for example, the provision of safe cycle lanes and pedestrian walkways where possible, as well as reliable bus and train services.
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.	+/-	<ul style="list-style-type: none"> • Planning policy 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. • By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.
12	Water resources: To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.	+/-	<ul style="list-style-type: none"> • It is likely that the provision of new dwellings and employment sites will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision. • Appropriate policy will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.

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.

<p>13</p>	<p>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.</p>	<p>++</p>	<ul style="list-style-type: none"> • In seeking to deliver development proportionally across the settlement hierarchy, this Option 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.
<p>14</p>	<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>	<p>++</p>	<ul style="list-style-type: none"> • This Option 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.

A.5 Option 2 Assessment

Table A-6: Assessment of Spatial Option 2.

SA Objective		Impact	Assessment
1	Housing: To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	++	<ul style="list-style-type: none"> • This Option has the potential to meet the identified housing need for the district, including the provision of affordable housing and mixed types / tenure housing. • 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 large strategic sites in some locations as well as supporting some growth to meet local needs across the other settlements. As concluded in the Regulation 18 SA, this Option provides more certainty of the availability of sites and the deliverability of this Option in comparison to Option 1.
2	Health and wellbeing: To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.	+/-	<ul style="list-style-type: none"> • Growth located in medium and smaller settlements may locate new residents at greater distances from hospital and GP services. • This Option seeks support growth in settlements with existing facilities. The performance of this Option is dependent on the location of the main areas of housing growth in relation to hospital and GP services. This has been assessed as part of the site assessment process.

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	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	+/-	<ul style="list-style-type: none"> As determined in the Regulation 18 SA report, this Option would be likely to lead to the delivery of a large growth area which 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. However, access to schools would need to be ensured through sustainable means such as school bus services and cycle routes where possible. The performance of this Option is dependent on the location of the main areas of housing growth in relation to schools and travel provisions.
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.	+/-	<ul style="list-style-type: none"> Similar to above, 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. The performance of this Option is dependent on the location of the main areas of housing growth in relation to community facilities.

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.

<p>5</p>	<p>Flooding and surface water: To reduce the risk to people, properties, the economy and the environment of flooding from all sources</p>	<p>0</p>	<ul style="list-style-type: none"> • The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.
<p>6</p>	<p>Natural resources: To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.</p>	<p>--</p>	<ul style="list-style-type: none"> • This Option is likely to lead to the allocation of development sites on greenfield land, with relatively few opportunities for the redevelopment of previously developed land. The development of greenfield sites is likely to lead to the loss of soils, which is a finite natural resource. • Many of the proposed sites for development are within mineral safeguarding areas. The development of these sites would therefore lead to mineral sterilisation.

<p>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.</p>			
7	<p>Biodiversity and geodiversity: To conserve and enhance the District's biodiversity and geodiversity</p>	-	<ul style="list-style-type: none"> • There are numerous SSSIs and areas of ancient woodland, 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 be likely to have fewer adverse impacts on these features within the AONB. Overall, this Option supports development in a sustainable location and has the potential to have fewer impacts on locally designated biodiversity sites. • Nonetheless, this Option is 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. Policies will be in place, including DPN2, to facilitate Biodiversity Net Gain which will achieve positive effects on 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>	-	<ul style="list-style-type: none"> • This Option seeks to avoid growth in protected landscapes. The High Weald AONB covers almost half of the district. This Option is more likely to lead to development in land that is less accommodating to change than Option 1; however, it will better protect the AONB. • However, Option 2 is still likely to lead to the development of greenfield sites and adverse impacts on local landscape character, to some extent.

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.			
9	Cultural heritage: To protect, enhance and make accessible for enjoyment, the District's historic environment.	0	<ul style="list-style-type: none"> 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.
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.	-	<ul style="list-style-type: none"> This Option supports new growth 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, would be greater than if development was in an existing urban centre. The nature of the impact would depend on the location of the growth area in relation to existing public transport services and the types of facilities and services proposed as part of the development.

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.

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>	+/-	<ul style="list-style-type: none"> • Planning policy 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. • By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.
12	<p>Water resources: To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.</p>	+/-	<ul style="list-style-type: none"> • It is likely that any new development, particularly large-scale, will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision. • This would likely require the provision of significant new water supply and treatment infrastructure. • Appropriate policy provisions will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.

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.			
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.	+	<ul style="list-style-type: none"> • This Option seeks to deliver a new growth area in the district, 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 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, this Option may limit the viability of delivering new business opportunities associated with these settlements and have a negligible impact on village centre regeneration.
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.	+	<ul style="list-style-type: none"> • As above, this Option seeks to deliver new growth areas in the district at a level which can support new retail opportunities, employment (as well as through construction activities) and support economic growth and competitiveness which is spread across the district. • "Significant sites" may provide some element of local employment space. The location of the growth area 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 there is likely to be lower levels of development in some of the main settlements. • It should be noted that this Option may limit the viability of delivering new business opportunities associated with these settlements.

A.6 Option 3 Assessment

Table A-7: Assessment of Spatial Option 3.

Option 3: Creating a new sustainable settlement with associated facilities.		
SA Objective	Impact	Assessment
1	+	<ul style="list-style-type: none"> This Option provides a means to deliver strategic-scale new housing development which would incorporate a range of housing to address various needs.
2	+/-	<ul style="list-style-type: none"> A largescale new settlement may support the delivery of new healthcare facilities, such as a new GP practice. However, should this not come forward, existing facilities may not be in close proximity. This spatial strategy acknowledges that the creation of a new settlement provides opportunities to create new community facilities, such as open spaces and playing fields, which could benefit local community health and wellbeing. In addition, a holistically planned new development could promote walking and cycling, which could further contribute to healthy and active lifestyles.

Option 3: Creating a new sustainable settlement with associated facilities.			
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	+/-	<ul style="list-style-type: none"> • This spatial Option is likely to include the provision of / access to education. • A large scale new settlement would require the provision of a primary school, as well as sustainable access routes to this school for the residents. • Dependent on the scale of the settlement a new secondary school may be provided. However, should this be unfeasible, access to the existing secondary schools in the district would need to be ensured through sustainable means such as school bus services and cycle routes where possible.
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.	+/-	<ul style="list-style-type: none"> • This spatial Option is likely to include the provision of significant new community services and facilities that will benefit the new community. • This Option may compromise social cohesion in other areas of the district, particularly where residents are unable to remain in their current settlement due to lack of housing provision. • However, there is a risk that other urban areas and particularly smaller settlements in rural areas will not benefit from increased access to community services and facilities.
5	Flooding and surface water: To reduce the risk to people, properties, the economy and the environment of flooding from all sources	0	<ul style="list-style-type: none"> • The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water. • Nonetheless, this spatial strategy is not likely to support the reduction of flood risk to existing communities.

Option 3: Creating a new sustainable settlement with associated facilities.			
6	Natural resources: To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	--	<ul style="list-style-type: none"> Most of the district (63.7%) is classified as Grade 3 Agricultural Land. It is likely that some of this land would be classified as Grade 3a and therefore Best and Most Versatile (BMV) land. Grade 3 land surrounds many settlements, including main settlements as well as the lower order settlements. Due to the distribution of potential BMV land across the district, it is likely that the delivery of new settlement would lead to the loss of BMV land.
7	Biodiversity and geodiversity: To conserve and enhance the District's biodiversity and geodiversity	-	<p>This spatial strategy would likely involve the loss of a large area of (greenfield) countryside to accommodate the new settlement and a range of ancillary development (highways, energy supply, sewerage, water supply, etc). This would result in significant habitat loss and create long-term damage and disturbance to habitats and species. Overall, it is anticipated that this would likely result in an overall loss of biodiversity in the district. Policies will be in place, including DPN2, to facilitate Biodiversity Net Gain which will achieve positive effects on biodiversity.</p>
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	-	<ul style="list-style-type: none"> This spatial Option will focus development in a new settlement. This is likely to have a significant local landscape impact, which would need to be comprehensively mitigated through sensitive site selection and ensuring high-quality design. By focusing most new development in one main area, this could reduce the risk that new development could adversely affect the character of sensitive landscapes in other parts of the district. New development could have both positive and negative effects on landscape. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact

Option 3: Creating a new sustainable settlement with associated facilities.			
			could be mitigated in part by ensuring all new development achieves a balanced, high-quality design.
9	Cultural heritage: To protect, enhance and make accessible for enjoyment, the District's historic environment.	0	<ul style="list-style-type: none"> • New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features. • However, this spatial strategy approach could contribute to this SA objective by focusing development in one area, reducing the risk that heritage features and historic landscape character outside this area could be affected.
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.	-	<ul style="list-style-type: none"> • It is likely that the creation of a new settlement will have a negative effect on local air quality within the district, through major new construction works and increased traffic emissions. Focusing major new development in one area creates a greater risk of contributing to the formation of a significant local air quality issue. • It is possible that this spatial strategy will have a significant negative effect on greenhouse gas emissions, through increased energy use and emissions generated by the construction and occupation of the new development. • Such an approach has the potential to cause a significant increase in greenhouse gas emissions associated with private car use. • Appropriate policy provisions will be required to ensure that greenhouse gas emissions associated with new development are minimised. This should include measures to minimise emissions at source, through the promotion of

Option 3: Creating a new sustainable settlement with associated facilities.			
			low-carbon design and energy efficient design, and measures to minimise the reliance on private car use.
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.	+/-	<ul style="list-style-type: none"> • A new settlement would likely require the provision of new waste management infrastructure. By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities/services. • However, it also presents the opportunity to incorporate energy efficient design and implement renewable energy provisions.
12	Water resources: To maintain and improve the water quality of the District’s watercourses and aquifers, and to achieve sustainable water resources management.	-	<ul style="list-style-type: none"> • It is likely that large-scale new development will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision. • This would likely require the provision of significant new water supply and treatment infrastructure as the new settlement would likely be in a location without existing infrastructure. • Appropriate policy provisions will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.

Option 3: Creating a new sustainable settlement with associated facilities.			
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.	-	<ul style="list-style-type: none"> • This spatial Option would not support the regeneration of existing Town Centres and villages in the district. • Through appropriate design and ensuring the required services and facilities are provided with a new settlement, then residents would be unlikely to travel into existing town centres within the district.
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.	+	<ul style="list-style-type: none"> • The scale of new development required by this spatial strategy has the potential to create a significant economic stimulus and promote employment opportunities across the district and within communities, as opposed to focused mainly in the town centres. • Furthermore, should provision of transport links be secured, this could encourage inward investment in the district.

A.7 Option 4 Assessment

Table A-8: Assessment of Spatial Option 4.

Option 4: Focus development in the three towns utilising existing facilities and transport links.			
SA Objective		Impact	Assessment
1	Housing: To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	+/-	<ul style="list-style-type: none"> This Option focuses new development to the main urban centres in district. It will therefore increase accessibility to new housing development in existing Town Centres. However, there would not be increased access to housing within rural areas of the district and this approach could lead to urban sprawl of the three towns.
2	Health and wellbeing: To maintain and improve access to health, leisure and open space facilities and reduce inequalities in health.	+	<ul style="list-style-type: none"> Increasing growth at the three main towns 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. The main A&E department for the district is located in Haywards Heath, with Queen Victoria Hospital in East Grinstead and Priory Hospital on the outskirts of Burgess Hill. Therefore, new residents will be located with sustainable access to medical services. Health and wellbeing also include active travel and so, development in town centres allows residents to walk or cycle daily to a range of services and recreational offerings as well as work. This in turn encourages a more social community environment where all residents have access to community facilities.

Option 4: Focus development in the three towns utilising existing facilities and transport links.			
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	+	<ul style="list-style-type: none"> There are existing secondary schools in the three towns - Burgess Hill (Oakmeads Community College and St Paul’s Catholic College), East Grinstead (Sackville Community College and Imberhorne School), Haywards Heath (Oathall Community College). Therefore, residents would already have access to secondary schools and so would have a positive impact on this objective. It is noted that these schools may be nearing capacity, however MSDC would be able to plan for extending or adapting these school to meet predicted need.
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.	++	<ul style="list-style-type: none"> Facilities which promote social interaction and community cohesion are often located in existing towns (such as primary schools, community halls, libraries, public open spaces, parks, and active community groups). Therefore, like Option 1, this Option would be likely to locate new residents in proximity to existing community facilities and groups located within the main towns. Furthermore, by providing more housing in the main towns, this will prevent inflated housing and rental prices and reduce social inequalities due to a lack of available housing.
5	Flooding and surface water: To reduce the risk to people, properties, the economy and the environment of flooding from all sources	0	<ul style="list-style-type: none"> The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. As this is a key planning consideration, it is considered that this Option will have a neutral impact on flooding and surface water.

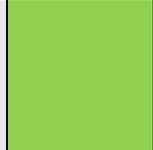
Option 4: Focus development in the three towns utilising existing facilities and transport links.			
6	Natural resources: To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	+/-	<ul style="list-style-type: none"> • Focusing development in the main town centres will provide opportunities to redevelop previously developed land. • However, it will still be 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 could lead to the loss of soils, which is a finite natural resource. •
7	Biodiversity and geodiversity: To conserve and enhance the District's biodiversity and geodiversity	-	<ul style="list-style-type: none"> • There are numerous SSSIs within the district, predominately located within the High Weald AONB or in the South Downs National Park. Ditchling Common SSSI is located in close proximity to the eastern edge of Burgess Hill. Focussing development around the three towns including Burgess Hill, has the potential to have adverse impacts on this SSSI.
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	+	<ul style="list-style-type: none"> • By focusing new development in existing urban areas, this could reduce the risk that new development could adversely affect the character of sensitive landscapes in more rural parts of the district. • New development could have both positive and negative effects on landscape. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design. • It should be noted that by allocating most new development in the Haywards Heath / East Grinstead / Burgess Hill areas, there is a greater risk of urban sprawl.

Option 4: Focus development in the three towns utilising existing facilities and transport links.			
9	Cultural heritage: To protect, enhance and make accessible for enjoyment, the District's historic environment.	+/-	<ul style="list-style-type: none"> • New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features. • However, this Option could contribute to this SA objective. By focusing development in existing urban areas, this reduces the risk that heritage features and historic landscape character outside these areas could be affected. In addition, it could provide a mechanism for the conservation and enhancement of heritage features through urban regeneration.
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.	+	<ul style="list-style-type: none"> • Most of the community, education and retail facilities are in existing town centres. The three main towns are also serviced by existing train stations. This Option supports growth in the main centres and proportionally across the other settlements in the hierarchy, which may reduce the need to travel by private car and support opportunities for the use of public transport and active travel. • However, by focusing new development in/near existing urban areas, which are more likely to experience air quality issues, there is a greater risk of contributing to the formation of a significant local air quality issue if private car use is not reduced. • Appropriate policy and schemes would need to be implemented to encourage active travel, for example, the provision of safe cycle lanes and pedestrian walkways where possible, as well as reliable bus and train services.

Option 4: Focus development in the three towns utilising existing facilities and transport links.			
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.	+	<ul style="list-style-type: none"> • Planning policy 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. • By supporting provision of land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.
12	Water resources: To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.	+/-	<ul style="list-style-type: none"> • It is likely that the provision of new dwellings and employment sites will have a negative effect on water quality and water resources in the district, through increased potential for pollution and increased need for water provision. • Appropriate policy will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources.
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.	++	<ul style="list-style-type: none"> • This Option prioritises development in the three main towns - Burgess Hill, Haywards Heath, and East Grinstead - so would deliver housing growth in locations which would help to support existing businesses located in the main centres, supporting the vitality and viability of town centre regeneration.
14	Economic growth: To promote and sustain economic growth and competitiveness across the District to ensure high and	+	<ul style="list-style-type: none"> • This Option would have a minor positive impact on economic growth by reducing out commuting.

Option 4: Focus development in the three towns utilising existing facilities and transport links.

stable levels of employment including the opportunity for people to live and work within their communities.



- However, this growth would be focused in the main towns, whereas developments in both main towns and new or smaller areas would provide more opportunities for employment across the District.

A.8 Option 5 Assessment

Table A-9: Assessment of Spatial Option 5.

Option 5: Prioritise development on brownfield land.		
SA Objective	Impact	Assessment
1	Housing: To ensure that everyone has the opportunity to live in a home for their need and which they can afford.	+/- <ul style="list-style-type: none"> • Prioritising brownfield sites limits the location and size of developments and would be unlikely to have a significant contribution to meeting all housing need. • Mid Sussex has limited brownfield sites available for development. The two larger brownfield sites allocated in the plan are at Burgess Hill Station and Orchards Shopping Centre.
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	++

Option 5: Prioritise development on brownfield land.			
	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	+	<ul style="list-style-type: none"> The Regulation 18 SA and SA Scoping Report provide the flood risk baseline and flooding considerations for the district. All future planning applications will require site specific assessments to mitigate flood risk through appropriate design and Sustainable Urban Drainage methods. Implementation of sustainable drainage at all brownfield developments is required in accordance with Policy DPS4 of the revised Plan Strategy. Therefore, this Option would have a minor positive impact on the flooding and surface water objective as it may reduce the flood risk at existing brownfield sites.
6	Natural resources: To improve efficiency in land use through the re-use of previously developed land and existing buildings, including reuse of materials from buildings, and encourage urban renaissance.	++	<ul style="list-style-type: none"> Option 5 would have a major positive impact on the natural resources objective by supporting the redevelopment of previously developed land and reducing the need for development on greenfield sites, Mineral Safeguarding Areas or the encroachment of open countryside and agricultural land.
7	Biodiversity and geodiversity: To conserve and enhance the District's biodiversity and geodiversity	+/-	<ul style="list-style-type: none"> Prioritising developments on brownfield land presents an opportunity for biodiversity net gain. Despite a focus on regeneration of brownfield sites in existing urban areas, this spatial strategy would likely still require some new development in rural areas and greenfield sites due to limited brownfield sites available for redevelopment.
8	Landscape: To protect, enhance and make accessible for enjoyment, the District's	+/-	<ul style="list-style-type: none"> Prioritising developments on brownfield land presents an opportunity for introducing high quality design in the context of local landscape

Option 5: Prioritise development on brownfield land.			
	countryside and ensure no harm to protected landscapes, maintaining and strengthening local distinctiveness and sense of place		<p>character. Furthermore, it avoids growth in the High Weald AONB and South Downs National Park and so limits impacts on these designated landscapes.</p> <ul style="list-style-type: none"> • Despite a focus on regeneration of brownfield sites in existing urban areas, this spatial strategy would likely still require some new development in rural areas and greenfield sites due to limited brownfield sites available for redevelopment.
9	Cultural heritage: To protect, enhance and make accessible for enjoyment, the District’s historic environment.	+/-	<ul style="list-style-type: none"> • New development could have both positive and negative effects on the historic environment. The nature and scale of these impacts are related to the location of the development and the quality of its design. Risks of an adverse impact could be mitigated in part by ensuring all new development achieves a balanced, high-quality design that protects heritage features. • There is potential that this spatial Option could contribute to this SA objective in several ways: it should focus development in existing urban areas, reducing the risk that heritage features and historic landscape character outside these areas could be affected, and it could provide a mechanism for the conservation and enhancement of heritage features through urban regeneration.
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,	+	<ul style="list-style-type: none"> • Residents will be less reliant on private car use and associated GHG emissions since most brownfield sites are located in existing towns with existing transport and infrastructure provision.

Option 5: Prioritise development on brownfield land.			
	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.	+	<ul style="list-style-type: none"> • Planning policy 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. • By supporting provision of brownfield land for development, regardless of the approach taken to this, it is likely that the provision of new dwellings and employment sites will increase the volume of waste produced in the district and place additional pressures on waste management facilities / services. It should be ensured that suitable preparation is in place for this.
12	Water resources: To maintain and improve the water quality of the District's watercourses and aquifers, and to achieve sustainable water resources management.	+/-	<ul style="list-style-type: none"> • It is possible that the redevelopment of brownfield land would negatively impact water quality and water resources in the district, through increased potential for pollution and increased need for water provision. • Appropriate policy provisions will be required to ensure the negative impacts of new development are avoided or mitigated and to promote protection of water resources. • However, due to limited brownfield sites available, this may also limit the pressure on water resources.

Option 5: Prioritise development on brownfield land.			
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.	++	<ul style="list-style-type: none"> This Option would revitalise areas of the Town Centres which are currently vacant or in disrepair. The delivery of new development on brownfield sites - particularly at Burgess Hill and Orchards Shopping Centre - should promote development in these urban centres where services and jobs are most accessible.
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.	++	<ul style="list-style-type: none"> By delivering new development on brownfield sites in Town Centres (such as at Burgess Hill Station and Oaklands Shopping Centre in Haywards Heath), this will place new residents in areas where services and jobs are accessible and existing businesses can be supported.

B Appraisal of Policies in the Mid Sussex District Plan Review 2021 – 2039

B.1 Introduction

As outlined in Section 5, an assessment of the 85 draft policies against the SA framework was undertaken and presented in the Regulation 18 SA, 26 of these are site allocation policies which set site specific requirements to guide development.

Following consultation on the Regulation 18 Plan and SA, several updates have been made to these policies.

B.2 Reasonable Alternatives

For all policies that were reviewed and amended, the Council could potentially have included a range of different alternative wordings or approaches.

The SEA Regulations require the Council to identify 'reasonable alternatives' for all policies and proposals, where feasible. More specifically, Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of '*an outline of the reasons for selecting the alternatives dealt with*'.

The SEA Regulations require that the alternative policies considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g., the National Planning Policy Framework (NPPF)).

For all new policies and existing policies where major updates were proposed to form part of the updated District Plan, the Council identified a range of reasonable alternatives. Alternatives were not identified where no updates to adopted policies were required, or a minor update was undertaken, since these were assessed against the SA framework for the adopted District Plan in 2014 and the policy purpose/meaning has not changed. These policies are also known to conform with the Plan's objectives.

However, an assessment of alternative policies was not included in the Regulation 18 SA. As a result, to provide this context, assessment of the sustainability performance of all reasonable alternatives to major policy updates and new policies considered since the adopted plan is included below to provide justification of the reasoning behind selection of the preferred option.

B.3 Overview of policy updates

Table B-1 below presents an overview of where alternatives were considered for policies and the updates included in the Regulation 19 Plan following the Regulation 18 Plan consultation period.

All of the policies, as well as their reasonable alternatives, have been assessed to the same level of detail to identify their likely sustainability impacts. This assessment is presented in Sections B.5 to B.14 below.

The SEA Regulations require the Council to identify 'reasonable alternatives' for all policies and proposals, where feasible. More specifically, Schedule 2 (h) of the SEA Regulations requires that the Environmental Report includes a description of '*an outline of the reasons for selecting the alternatives dealt with*'.

The SEA Regulations require that the alternative policies considered for inclusion in a plan that must be subject to SA are 'reasonable', therefore alternatives that are not reasonable do not need to be subject to appraisal. Examples of unreasonable alternatives could include policy options that do not meet the objectives of the plan or national policy (e.g., the National Planning Policy Framework (NPPF)).

For all new policies and existing policies where major updates were proposed to form part of the updated District Plan, the Council identified a range of reasonable alternatives. Alternatives were not identified where no updates to adopted policies were required, or a minor update was undertaken, since these were assessed against the SA framework for the adopted District Plan in 2014 and the policy purpose/meaning has not changed. These policies are also known to conform with the Plan's objectives.

However, an assessment of alternative policies was not included in the Regulation 18 SA. As a result, to provide this context, assessment of the sustainability performance of all reasonable alternatives to major policy updates and new policies considered since the adopted plan is included below to provide justification of the reasoning behind selection of the preferred option.

Table B-1: Overview of Policy updates and reasonable alternatives.

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
Sustainability					
DPS1	DPS1	Climate change	New policy	n/a	No alternatives since the NPPF includes requirement to mitigate climate change
DPS2	DPS2	Sustainable Design and Construction	Major update	n/a	See Section B.5.2 below for further details. Energy: five alternatives; Water: two alternatives; Renewable and low carbon energy: three alternatives; Existing buildings: three alternatives; Carbon sequestration: two alternatives
DPS3	DPS3	Renewable and Low Carbon Energy Schemes	Minor update	n/a	n/a as minor update
DPS4	DPS4	Flood Risk and Sustainable Drainage	No update	Major update	No alternatives as update required following major Planning Practice Guidance update.
DPS5	criteria covered under DPN6	Water Environment	Minor update	n/a	n/a as minor update
	DPI7	Water and Wastewater Infrastructure	n/a	New Policy	
DPS6	DPS6	Health and Wellbeing	New Policy	n/a	No alternative option, resulted from introduction of other policies (DPB1, DPT3, DPT2, DPN3 and other DPN policies, DPI1, DPI5, DPI6, DPE policies, DPS1)

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
n/a	DPS5	Water neutrality	n/a	New policy	<p>1) Follow 'optional' Building Regulations Approved Document Part G (the standard required in currently adopted local plans within Sussex North Water Resource Zone)</p> <p>2) Follow more ambitious standard recommended for local plan adoption in the Water Neutrality Study Part C.</p>
Natural Environment and GI					
DPN1	DPN1	Biodiversity, Geodiversity and Nature Recovery	Major update	n/a	No alternatives. Updated to include reference to nature recovery and Local Nature Recovery Strategy and to reflect best practice, required under legislation.
DPN2	DPN2	Biodiversity Net Gain	New Policy	n/a	<p>1) No Policy - rely on legislation and national policy and guidance</p> <p>2) Local policy reflects to meet national requirement and add a local perspective</p> <p>3) Have a policy that goes beyond national requirement</p>
DPN3	DPN3	Green and Blue Infrastructure	New Policy	n/a	<p>1) have a policy that contributes to the establishment of GI and supports development of connected network of multi-functional green space.</p> <p>2) As option 1 but safeguards land around Burgess Hill for delivery of multi-functional</p>

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
					'Green Circle'. 3) To not have a policy and rely on national policy and guidance
DPN4	DPN4	Trees, Woodland and Hedgerows	Minor update	n/a	n/a as minor update
DPN5	DPN5	Historic Parks and Gardens	No update	Minor update	n/a as minor update
DPN6	DPN6	Pollution	New Policy	n/a	No alternatives as came from general update of DP29 which has been split into three policies. Required under changes in national guidance.
DPN7	DPN7	Noise Impacts	Minor update	n/a	n/a as minor update
DPN8	DPN8	Light Impacts and Dark Skies	Minor update	n/a	n/a as minor update
DPN9	DPN9	Air Quality	Minor update	n/a	n/a as minor update
DPN10	DPN10	Land Stability and Contaminated Land	New policy	n/a	No options as required under national legislation.
Countryside					
DPC1	DPC1	Protection and Enhancement of Countryside	Minor update	n/a	n/a as minor update

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPC2	DPC2	Preventing Coalescence	No update	Minor	n/a as minor update
DPC3	DPC3	New Homes in the Countryside	Minor update	n/a	n/a as minor update
DPC4	DPC4	High Weald Area of Outstanding Natural Beauty	Minor update	n/a	n/a as minor update
DPC5	DPC5	Setting of the South Downs National Park	No update	Minor update	n/a as minor update
DPC6	DPC6	Ashdown Forest SPA and SAC	Minor update	n/a	n/a as minor update
Built Environment					
DPB1	DPB1	Character and Design	Minor update	n/a	n/a as minor update
DPB2	DPB2	Listed Buildings and Other Heritage Assets	Minor update	n/a	n/a as minor update
DPB3	DPB3	Conservation Areas	No update	Minor update	n/a as minor update
	DPB4	Aerodrome Safeguarding	n/a	New Policy	1) add a policy on aerodrome safeguarding 2) Do not include a policy on aerodrome safeguarding and continue to rely on Planning Circular 01/2003
Transport					

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPT1	DPT1	Placemaking and Connectivity	Major update	n/a	1) simple update to existing policy to address changes to NPPF 2) Provide granular policies to maximise outcome
DPT2	DTP2	Rights of Way and Other Recreational Routes	No update	n/a	n/a as no update
DPT3	DPT3	Active Travel	New Policy	n/a	1) Rely on West Sussex transport plan 2) Create policy with specific emphasis on active travel for greater emphasis
DPT4	DPT4	Parking and Electric Vehicle Charging Infrastructure	New Policy	n/a	1) Rely on West Sussex Transport Plan 2) Seek higher standards locally
DPT5	DPT5	Off-Airport Car Parking	New Policy	n/a	Rely on non-specific West Sussex transport plan / sustainable travel policies.
Economy					
DPE1	DPE1	Sustainable Economic Development	Major Update	n/a	No options as updated to reflect changes in NPPF.
DPE2	DPE2	Existing Employment Sites	Minor update	n/a	n/a as minor update

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPE3	DPE3	Employment Allocations	New policy	n/a	1) Need approach: no allocations 2) Opportunity approach: provide mix used development on significant sites to create sustainable communities 3) over-supply approach: allocate site above and beyond Option 1 and 2 (spatial strategy principles)
DPE4	DPE4	Town and Village Centres	Major update	n/a	No options as updated to reflect changes in NPPF.
DPE5	DPE5	Within Town and Village Centre Boundaries	Major update	n/a	No options as updated to reflect changes in NPPF.
DPE6	DPE6	Within Primary Shopping Areas	Major update	n/a	No options as updated to reflect changes in NPPF.
DPE7	DPE7	Smaller Village and Neighbourhood Centres	Major update	n/a	No options as updated to reflect changes to Permitted Development Rights and NPPF.
DPE8	DPE8	Sustainable Rural Development and the Rural Economy	Minor update	n/a	n/a as minor update
DEP9	DPE9	Sustainable Tourism and the Visitor Economy	Minor update	n/a	n/a as minor update
Sustainable Communities					

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPSC1	DPSC1	Land to the West of Burgess Hill and north of Hurstpierpoint	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPSC2	DPSC3	Land to the South of Reeds Lane, Sayers Common	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPSC3	DPSC2	Land at Crabbet Park	New policy	n/a	Site allocation - alternatives assessed within site assessment
	DPSC GEN	Significant Site Requirements	n/a	New policy	n/a - includes the criteria relevant to Significant Sites from Policy DPH4
Housing Policy and Allocations					
DPH1	DPH1	Housing	Major update	n/a	1) Housing requirement approach: meet the housing requirement calculated for Mid Sussex by allocating the most suitable sites in line with the site selection methodology 2) higher growth approach: identify sites above and beyond housing requirement
DPH2	DPH2	Sustainable Development - Outside the Built Up Area	New Policy	n/a	No reasonable alternatives as policy is required to support plan delivery.
DPH3	DPH3	Sustainable Development - Inside the Built Up Area	New Policy	n/a	No reasonable alternatives as policy is required to support plan delivery.

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPH4	DPH4	General Principles for Housing Allocations	New Policy	Deleted	This policy was a list of criteria reflecting other policies in the plan and national guidance. Criteria within the policy have been moved to other relevant policies within the plan.
DPH5	DPA1	Batchelors Farm, Keymer Road, Burgess Hill	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH6	DPA2	Land at South of Appletree Close, Janes Lane, Burgess Hill	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH7	DPA3	Burgess Hill Station, Burgess Hill	New policy	n/a	Site allocation - alternatives assessed within site assessment
	DPA3a	Allotment site: Nightingale Lane, Burgess Hill	n/a	New policy	1) Allocate the Burgess Hill Station site with a policy requirement for the reprovision of allotments in line with policy DPI5 2) Allocate the Burgess Hill Station site and a site for the reprovision of allotments
DPH8	DPA4	Land off West Hoathly Road, East Grinstead	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH9	DPA5	Land at Hurstwood Lane, Haywards Heath	New policy	n/a	Site allocation - alternatives assessed within site assessment

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPH10	DPA6	Land at Junction of Hurstwood Lane and Colewell Lane, Haywards Heath	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH11	DPA7	Land east of Borde Hill Lane, Haywards Heath	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH12	DPA8	Orchards Shopping Centre, Haywards Heath	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH13	DPA9	Land to West of Turners Hill Road, Crawley Down	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH14	DPA10	Hurst Farm, Turners Hill Road, Crawley Down	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH15	DPA11	Land rear of 2 Hurst Road, Hassocks	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH16	DPA12	Land west of Kemps, Hustpierpoint	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH17	DPA13	The Paddocks, Lewes Road, Ashurst Wood	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH18	DPA14	Land at Foxhole Farm, Bolney	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH19	DPSC4	Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common	New policy	n/a	Site allocation - alternatives assessed within site assessment

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPH20	DPSC5	Land at Coombe Farm, London Road, Sayers Common	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH21	DPSC6	Land to the West of Kings Business Centre, Reeds Lane, Sayers Common	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH22	DPSC7	Land at LVS Hassocks, London Road, Sayers Common	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH23	DPA15	Ham Lane Farm House, Ham Lane, Scaynes Hill	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH24	DPA16	Challoners, Cuckfield Road, Ansty	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH25	DPA17	Land to the west of Marwick Close, Bolney Road, Ansty	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH26	DPH4	Older Persons Housing and Specialist Accommodation	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH27	DPA18	Land at Byanda, Hassoccks	New policy	n/a	Site allocation - alternatives assessed within site assessment
DPH28	DPA19	Land at Hyde Lodge, Handcross	New policy	n/a	Site allocation - alternatives assessed within site assessment

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
DPH29	DPH5	Gypsies, Travellers and Travelling Showpeople	Major update	n/a	1) address need during the plan period 2) allocate site to address surplus need from neighbouring authorities
DPH30	DPH6	Self and Custom Build Housing	New policy	n/a	1) rely on other policies in the plan and existing guidance for self and custom build housing to come forward: national guidance provide advice on how to meet the identified need so this could be addressed without a district-wide policy in place 2) develop policy led by local evidence to secure dedicated plots for self and custom build housing within proposed allocations
DPH31	DPH7	Housing Mix	Major update	n/a	No reasonable alternatives - evidence led
DPH32	DPH8	Affordable Housing	Minor update	n/a	n/a as minor update
DPH33	DPH9	First Homes	New Policy	n/a	No reasonable alternatives - evidence led
DPH34	DPH10	Rural Exception Sites	Minor update	n/a	n/a as minor update
DPH35	DPH11	Dwelling Space Standards	No update	n/a	n/a as no update
DPH36	DPH12	Accessibility	Minor update	n/a	n/a as minor update

Existing plan policy number (Reg 18)	Updated policy number (Reg 19)	Policy Name	Status (Reg 18)	Status (Reg 19)	Alternatives
Infrastructure					
DPI1	DPI1	Securing Infrastructure	Major update	n/a	1) have a detailed policy with expectation for all proposals 2) to rely on national policy
DPI2	DPI2	Planning Obligations	New policy	n/a	No options as driven by requirements of Planning Practice Guidance (sets out developer obligation requirements within plan), regulations and evidence
DPI3	DPI3	Major Infrastructure Projects	New policy	n/a	No reasonable alternatives identified
DPI4	DPI4	Communications Infrastructure	Minor update	n/a	n/a as minor update
DPI5	DPI5	Open Space, Sport and Recreational Facilities	Minor update	n/a	n/a as minor update
DPI6	DPI6	Community and Cultural Facilities and Local Services	Minor update	n/a	n/a as minor update
DPI7	DPI8	Viability	Minor update	n/a	n/a as minor update

B.4 Policy Assessment

The following section presents an assessment of each preferred policy and the alternative options considered, where relevant, to support the inclusion of the preferred policy option within the plan.

The 85 preferred draft policies (including 26 site allocation policies) were assessed at the Regulation 18 stage by Lepus Consulting. This assessment remains valid and therefore policies have not been re-assessed unless updates were made following the Regulation 18 consultation, as summarised in Table B-1 above and detailed below.

The below section therefore presents the findings of the assessment undertaken by Lepus Consulting, along with a new assessment of the alternatives that were considered, and any updates following consultation.

B.5 Sustainability

B.5.1 DPS1: Climate Change

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 District Plan 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.

There were no alternatives considered for this policy since the NPPF includes a requirement to mitigate climate change. There has been no update to this policy since the Regulation 18 Plan, except for minor wording changes, and so the Regulation 18 SA assessment undertaken by Lepus remains unchanged. Lepus' full assessment summary is included below with the relevant edits.

Table B-2: Sustainability performance of Policy DPS1.

Policy Option DPS1	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	+	+	+	0	0	++	+	+	0	0

The policy covers a wide range of themes to provide support and guidance for development proposals. This includes stating that new developments “will be required 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 “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).

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 Plan, 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 scarceness, a minor positive impact on water resources could result (SA Objective 12) by improving infrastructure preparedness to these events.

The policy outlines that “development will be required 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).

B.5.2 DPS2: Sustainable Design and Construction

Policy DPS2 seeks to ensure that all development proposals will be expected to “*contribute to the reduction of greenhouse gas emissions, increase resilience to the impacts of climate change and improve sustainability*” within every phase of a project. Additionally, the policy sets out various design standard 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.

Since the Regulation 18 Plan, this policy has been reworded. Five alternative policies were also considered since Regulation 18, which are outlined in

Table B-3 below and assessed against the SA Objectives in Table B-4.

Table B-3: Reasonable alternatives for Policy DPS2.

Alternatives for Policy DPS2	
Energy	<ol style="list-style-type: none"> 1: Rely on building regulations 2: Set a requirement to reduce emissions by a certain percentage 3: Set a target via third-party assessment scheme 4: Set performance targets 5: Introduce post-occupancy monitoring of building requirement
Water	<ol style="list-style-type: none"> 1: Continue using current guideline and policy 2: Set tighter water efficiency standards
Renewable and low carbon energy	<ol style="list-style-type: none"> 1: Set out overarching criteria 2: Set out criteria for each type of energy technology 3: Actively support community renewable energy schemes
Existing buildings	<ol style="list-style-type: none"> 1: Provide guidance on sustainable retrofitting 2: Support consequential improvement as part of works to smaller building
Carbon sequestration	<ol style="list-style-type: none"> 1: Continue with reg 18 policy 2: Strengthen policy wording

Table B-4: Sustainability performance of reasonable alternatives for Policy DPS2.

Policy 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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
DPS2	0	+	0	0	+	+	+	0	0	+	++	++	0	0
Alternatives: Energy														
1	0	+	0	0	0	0	0	0	0	+	+	0	0	0
2	0	+	0	0	0	+	0	0	0	++	++	0	0	0
3	0	+	0	0	0	0	0	0	0	++	++	0	0	0
4	0	+	0	0	0	0	0	0	0	++	++	0	0	0
5	0	++	0	0	0	+	0	0	0	++	++	0	0	0
Alternatives: Water														
1	0	0	0	0	0	0	+	0	0	0	0	+	0	0
2	0	0	0	0	0	0	+	0	0	0	0	++	0	0
Alternatives: Renewable and low carbon energy														
1	0	0	0	0	0	0	0	0	0	+	+	0	0	0
2	0	0	0	0	0	0	0	0	0	+	+	0	0	0
3	0	+	+	+	0	0	0	0	0	++	++	0	0	+
Alternatives: Existing buildings														
1	0	0	0	0	0	+	0	0	0	+	+	0	0	0
2	0	0	0	0	0	+	0	0	0	+	+	0	0	0
3	0	0	0	0	0	+	0	0	0	++	++	0	0	0
Alternatives: Carbon sequestration														
1	0	0	0	0	0	0	0	0	0	+	+	0	0	0
2	0	0	0	0	0	0	0	0	0	+	+	0	0	0

Energy

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. Drawing upon building

regulations and introducing post-occupancy monitoring of building requirements will help to monitor this contribution to the reduction of carbon emissions.

It is considered that the introduction of post-occupancy monitoring of building requirements would have a significant positive impact on the health and wellbeing of building users. In contrast, simply setting targets for reduction in emissions would be a step in the right direction but there would need to be a requirement to meet these targets.

Water

Policy DPS3 also regards water resource management within the district and establishes criteria for proposals to meet to be supported by the Council. Setting tighter water efficiency standards would have a positive impact on water resources. Additionally, this policy states that new developments are to incorporate designs which maximise efficient use of water resources through rainwater harvesting, greywater recycling and the integration of SUDs. This could have positive impacts on biodiversity through habitat creation.

Renewable and low carbon energy

Supporting community renewable energy schemes may improve the wellbeing of the community. This may also facilitate learning and education of renewable energy across the community.

Existing buildings

All of the options considered for existing buildings would likely have minor or major positive impacts on climate change and managing energy and waste. All developments would be expected to be energy efficient and follow the waste hierarchy to minimise the amount of waste produced.

Carbon sequestration

Policy seeks to improve energy efficiency of developments which could lead to the reduction of overall carbon emissions and help mitigate climate change.

B.5.3 DPS3: Renewable and Low Carbon Energy Schemes

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.

There has been a minor update to this policy to include requirements for biodiversity and landscape mitigation. 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, it is still considered there would be minor negative impacts on SA Objectives 7 and 8 due to the nature of such schemes.

Lepus' assessment summary is included below with the relevant edits.

Table B-5: Sustainability performance of Policy DPS3.

Policy Option DPS3	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	0	+	-	-	0	0	++	0	0	0

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).

Additionally, through ensuring that all proposals submit an End of Life Removal Scheme which includes timeline for decommissioning and restoration, and any biodiversity net gain, 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.

B.5.4 DPS4: Flood Risk and Sustainable Drainage

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.

Since the Regulation 18 Plan, this policy has been expanded to reflect national planning policy guidance. No alternatives were considered as the update was required following major Planning Practice Guidance changes.

The policy states: "Proposals for development will need to follow a sequential risk-based approach directing development away from areas at highest risk (whether existing or future risk), ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. All development should consider flood risk in line with national guidance at the time of assessment, including the need to consider and assess flood risk from all sources consistently".

The policy now seeks to ensure that new development makes suitable drainage provisions, and that no development is approved on any land within the functional floodplain. The policy wording has been strengthened to direct development away from areas of flood risk and make clear the requirement for sustainable drainage measures in new development. Otherwise, Lepus' assessment outcome from the SA Regulation 18 SA remains unchanged and is included below.

Table B-6: Sustainability assessment of Policy DPS4.

Policy Option DPS4	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	++	0	+	+	0	0	0	+	0	0

The policy in the Regulation 18 Plan required SuDS in developments of over ten dwellings (or equivalent mixed use); however, the policy update now requires the implementation of SuDS in all new developments, including replacement structures and brownfield development. 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 still be anticipated (SA Objective 5).

The policy now states "Green infrastructure will be incorporated, where possible, to improve biodiversity and water quality", which will further reinforce the minor positive impact the policy will have on biodiversity (SA Objectives 7).

The policy's wording remains the same in relation to landscape and water resources (SA Objective 8 and 12) and the policy will have a neutral impact on the other SA Objectives, as

assessed in the Regulation 18 SA.

B.5.5 DPS5: Water Neutrality

All of Horsham District, most of Crawley Borough, and parts of Chichester District and the South Downs National Park fall within the Southern Water Sussex North Water Resource Zone (WRZ). A small part of Mid Sussex is within this WRZ. Therefore, to protect the nature conservation sites and to provide the necessary certainty that development will not have an adverse effect on the Arun Valley sites, development within the WRZ must demonstrate that it is water neutral.

Policy DPS5 requires all development to be designed to achieve water efficiency standards, as well as offsetting the demand for water against existing supplies.

Two options have been considered for this policy. These were:

1. Follow 'optional' Building Regulations Approved Document Part G (the standard required in currently adopted local plans within Sussex North Water Resource Zone).
2. Follow more ambitious standard recommended for local plan adoption in the Water Neutrality Study Part C (CBC, 2023).

This policy has been added to the District Plan since the Regulation 18 Plan, and so was not assessed as part of the previous SA. An assessment of this policy and its alternatives is presented below.

Policy Option DPS5	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	0	0	0	0	0	+	0	0	0	0	+	0	0
2	0	0	0	0	0	0	+	0	0	0	0	++	0	0

It is considered that both Options would have a negligible impact on most SA Objectives.

Sussex North WRZ is supplied from groundwater abstraction on the river Arun, close to Pulborough in Horsham district. The abstraction site is located close to a group of nature

conservation sites, known as the Arun Valley Sites, that are nationally or internationally designated as SAC, SPA and Ramsar. The Options perform well against the biodiversity objective as it protects these sites from harm as a result of development (SA Objective 7).

Options 1 and 2 will both provide benefits for the local water resources through promoting the sustainable use of water and ensuring that all development incorporates a sustainable water efficient design. However, Option 1 requires 110 mains litres of mains supplied water per person per day whereas Option 2 goes further by setting a more ambitious water efficiency target of 85 mains litres of mains supplied water per person per day. Therefore, although both options perform well against the water resource objective, Option 2 would deliver a greater positive impact (SA Objective 11).

Option 2 was therefore chosen as it requires lower levels of water supply offsetting over the plan period, than Option 1, and would help deliver more housing in the district.

B.5.6 DPS6: Health and Wellbeing

Policy DPS6 aims to help the Council plan for 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.

There has been a minor wording update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-7: Sustainability performance of Policy DPS6.

Policy Option DPS6	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Housing	0	++	+	++	+	0	+	+	0	+	0	0	+	+
Health and Wellbeing														
Education														
Community and Crime														
Flooding & Surface Water														
Natural Resources														
Biodiversity & Geodiversity														
Landscape														
Cultural Heritage														
Climate change & transport														
Energy and Waste														
Water Resources														
Economic regeneration														
Economic growth														

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 2015 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 as a focus on tackling noise and air quality issues, would also be expected to improve human health. Overall, a major positive impact on current and future residents' health and wellbeing can be expected (SA Objective 2).

The policy states that all new development *“must be designed to achieve healthy, inclusive and safe places by embedding the principles of the 20-minute neighbourhood and 'local living'”*. 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).

Through seeking to ensure that development proposals *“incorporate green and blue infrastructure and biodiversity enhancements”* 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).

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).

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).

B.6 Natural Environment and Green Infrastructure

B.6.1 DPN1: Biodiversity, Geodiversity and Nature Recovery

No alternatives were considered for this policy. However, Policy DPN1 has been updated since the District Plan to include references to nature recovery strategies, as well as to reflect best practice, required under legislation.

Since the Regulation 18 Plan, the policy wording has been strengthened around protecting biodiversity in all developments and incorporating biodiversity into new developments. The impact on the SA biodiversity objective remains a major positive and Lepus' Regulation 18 SA assessment is unchanged. Lepus' full assessment summary is included below.

Table B-8: Sustainability performance of Policy DPN1.

Policy Option DPN1	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	+	+	++	+	0	+	0	+	0	0

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.

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 GI initiatives.

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.

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.

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).

B.6.2 DPN2: Biodiversity Net Gain

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.

Three reasonable alternatives were considered for this policy. These were:

1. No Policy - rely on legislation and national policy and guidance.
2. Local policy reflects to meet national requirement and add a local perspective.
3. Have a policy that goes beyond national requirement.

The assessment of these alternatives against the SA Objectives are in Table B-9 below.

Table B-9: Sustainability performance of reasonable alternatives for Policy DPN2.

Policy Option DPN2	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	+	0	0	+	+	+	0	0	+	0	+	0	0

Policy Option DPN2	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
2	0	+	0	0	+	+	++	0	0	+	0	+	0	0
3	0	+	0	0	+	+	++	0	0	+	0	+	0	0

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, which is expected to become law from January 2024. However, Mid Sussex requires a 20% net gain for Significant Sites allocation in the Plan policies DPSC1 - DPSC3.

It is considered that all options would perform similarly against the SA Objectives. Although Option 1 would provide less biodiversity benefit than Options 2 and 3 as it does not enforce additional BNG requirements for Significant Sites within the District.

Option 2 was brought forward to specify this additional BNG requirement, with all other sites complying with national policy. Option 3 was not brought forward as it is unlikely that the Council would be able to impose a 20% BNG across all sites.

There were minor wording changes to this policy since the Regulation 18 Plan. It is considered that Lepus' Regulation 18 SA assessment of Option 2 remains unchanged, and the full assessment summary is included below.

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 DPSC1-7, 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).

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).

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.

B.6.3 DPN3: Green and Blue Infrastructure

Policy DPN3 aims to ensure the provision and safeguarding of Green Infrastructure (GI) and aims to ensure that all development proposals contribute positively to the improvement and connectivity of GI across the Plan area. This policy was assessed as part of the Adopted Plan, however, was not included as part of the Adopted Plan. It is now considered that green and blue infrastructure is an important delivery mechanism for sustainable infrastructure.

Since the Regulation 18 Plan, there have been minor updates to this policy which includes reference to Blue Infrastructure. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below and in Table B-10.

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 steppingstone 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).

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.

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).

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.

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 will need to 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).

Three reasonable alternatives were considered for this policy and were assessed as part of the Adopted Plan. These were:

1. Have a policy that contributes to the establishment of GI and supports development of connected network of multi-functional green space.
2. As option 1, but safeguards land around Burgess Hill for delivery of multi-functional 'Green Circle'.
3. To not have a policy and rely on national policy and guidance.

The assessment of these alternatives against the SA Objectives are in Table B-10 below. The assessment undertaken to inform the adopted plan was against the previous SA framework. These findings have been adapted to fit the current SA framework for consistency.

Table B-10: Sustainability performance of the reasonable alternatives for Policy DPN3.

Policy 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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
DPN3	0	+	0	+	+	0	+	+	0	+	0	+	0	0
Alternatives (adapted from Adopted Plan SA assessment)														
1	+/-	+	0	0	+	0	++	++	+/-	+/-	0	+	0	0
2	+/-	++	0	0	+	0	++	++	+/-	+/-	0	+	0	0

Policy 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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
3	0	+/-	0	0	+/-	0	+/-	+/-	0	0	0	+/-	0	0
Further assessment of Option 2 in the short, medium, and long term														
Short	+/-	+	0	0	+/-	0	+	+	+/-	+/-	0	+	0	0
Med	+/-	++	0	0	+	0	++	++	+/-	+/-	0	+	0	0
Long	+/-	++	0	0	+	0	++	++	+/-	+/-	0	+	0	0

It was determined as part of the Adopted Plan SA assessment that Option 1 would address the causes of climate change and would likely reduce road congestion, however there was uncertainty around this. Option 1 would have a major positive impact on conserving and enhancing biodiversity and protecting and enhancing the countryside (SA Objectives 7 and 8), as the policy promotes the establishment of GI and its associated functions. GI would have a minor positive impact on flood risk management (SA Objective 5). Option 2 would also promote positive benefits for biodiversity, landscape, and flooding, and would have a major positive impact on health and wellbeing (SA Objective 2) as it safeguards land for informal open space.

Overall, Option 2 would likely result in positive impacts for the SA Objectives, particularly the Environmental Objectives (SA Objectives 5-12). These positive benefits would increase over the longer term with the strongest impacts seen through the conserving and enhancing biodiversity and protecting and enhancing the countryside (SA Objectives 7 and 8).

It was concluded that Option 3 would not perform as well against these objectives as relying on national policy and guidance would not go far enough in terms of protecting, improving, enhancing, managing, and restoring a connected network of multi-functional greenspace and the associated GI.

B.6.4 DPN4: Trees, Woodland and Hedgerows

Mid Sussex has a large abundance of woodland, with two thirds of the district's woodland resources occupied by areas of ancient woodland, 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. 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.

Minor wording updates have been made to this policy since the Regulation 18 Plan to offer additional protection to the district's ancient woodland; to avoid fragmentation of these habitats; and to establish tree related considerations in relation to new development.

Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B-11: Sustainability performance of Policy DPN4.

Policy Option DPN4	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Housing	-	+	0	0	+	+	++	+	+	+	0	+	0	0
Health and Wellbeing														
Education														
Community and Crime														
Flooding & Surface Water														
Natural Resources														
Biodiversity & Geodiversity														
Landscape														
Cultural Heritage														
Climate change & transport														
Energy and Waste														
Water Resources														
Economic regeneration														
Economic growth														

This 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.

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.

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).

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.

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 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).

B.6.5 DPN5: Historic Parks and Gardens

Policy DPN5 outlines that development which is located within or adjacent to a historic park or garden will be permitted only where it *“protects and enhances its special features, setting and views into and out of the park or garden”*.

There has been a minor update to this policy since the Regulation 18 Plan with the addition of the following text: *“Buildings or structures within a registered park or garden, or park or garden of special local historic interest will also be protected where they form part of or contribute to the character, appearance and setting of a registered park or garden, or park or garden of special local historic interest”*.

It is considered that Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B-12: Sustainability performance of Policy DPN5.

Policy Option DPN5	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	0	0	+	+	+	0	0	0	0	0

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. 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).

B.6.6 DPN6: Pollution

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. There have been minor wording updates to this policy to include the provision of pollution prevention practices and to include matters related to the water environment. The policy requirements of DPS5: Water and Wastewater Infrastructure from the Regulation 18 Plan have been split between Policy DPN6 and a new policy DPI7, which encompasses criteria on water and wastewater infrastructure. The sustainability credentials of the policy remain unchanged.

No alternatives are considered as this was a general update of DP29 which has now been split into three policies, and the update was required under changes in national guidance.

Lepus’ Regulation 18 SA assessment remains unchanged, and Lepus’ full assessment summary is included below.

Table B-13: Sustainability performance of Policy DPN6.

Policy Option DPN6	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	+	+	0	0	0	0	+	0	0

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.

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.

B.6.7 DPN7: Noise Impacts

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*”.

There have been minor wording updates to this policy and Lepus’ Regulation 18 SA assessment remains unchanged. Lepus’ full assessment summary is included below.

Table B-14: Sustainability performance of Policy DPN7.

Policy Option DPN7	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	+	+	+	0	0	0	0	0

Mid Sussex is a largely rural district where high standards of amenity and tranquillity are a key part of life for residents. 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.

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).

Policy DPN7 seeks to protect areas that are “valued for tranquility 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).

B.6.8 DPN8: Light Impacts and Dark Skies

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”.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-15: Sustainability performance of Policy DPN8.

Policy Option DPN8	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	+	+	+	0	0	0	0	0

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.

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).

Policy DPN8 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 DPN8 therefore could have a minor positive impact on local landscape and cultural heritage settings (SA Objectives 8 and 9).

B.6.9 DPN9: Air Quality

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.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-16: Sustainability performance of Policy DPN9.

Policy Option DPN9	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	+	0	0	+	0	0	0	0

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.

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).

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).

B.6.10 DPN10: Land Stability and Contaminated Land

Policy DPN10 seeks to protect land stability and land quality by ensuring all development proposals taken ground conditions, and stability and contamination risks in to consideration.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-17: Sustainability performance of Policy DPN10.

Policy Option DPN10	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	+	+	0	0	0	0	+	0	0

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).

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).

B.7 Countryside

B.7.1 DPC1: Protection and Enhancement of the Countryside

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"*.

There have been minor wording updates to this policy to, which includes the provision of additional assessments and mineral policy considerations. Lepus' Regulation 18 SA

assessment remains unchanged though, and Lepus' full assessment summary is included below.

Table B-18: Sustainability performance of Policy DPC1.

Policy Option DPC1	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	+	+	+	+	0	0	0	0	0

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. This policy 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).

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).

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.

B.7.2 DPC2: Preventing Coalescence

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”.

Since the Regulation 18 Plan, there has been a minor update to this policy. This is an additional sentence which states that *“Development proposals should demonstrate they are landscape-led and informed by evidence such as landscape and visual impact assessments”*. Notwithstanding this update, it is considered that Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B- 19: Sustainability performance of Policy DPC2.

Policy Option DPC2	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	+	0	+	0	++	+	0	0	0	0	0

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).

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.

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).

B.7.3 DPC3: New Homes in the Countryside

Policy DPC3 sets out criteria for residential development to meet if located within the countryside (outside of defined BUABs).

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-20: Sustainability performance of Policy DPC3.

Policy Option DPC3	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	0	0	0	0	0	+	+	0	0	0	0	+

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).

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).

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).

B.7.4 DPC4: High Weald Area of Outstanding Natural Beauty

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 of this AONB.

There have been minor updates to this policy to include further considerations of the setting of the AONB and related policy documents. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B-21: Sustainability performance of Policy DPC4.

Policy Option DPC4	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	-	0	0	+	0	0	+	++	+	0	0	0	0	+

This policy would be expected to support development within the High Weald AONB “where it conserves and enhances landscape and scenic beauty of the area, with reference 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).

The protection afforded to the AONB under this policy would 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.

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.

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).

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).

B.7.5 DPC5: Setting of the South Downs National Park

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.

Since the Regulation 18 Plan, there has been a minor update to this policy. This change is to ensure no adverse effect on the *"transitional landscape character in the setting of the National Park"*. Lepus' Regulation 18 SA assessment has been updated, as outlined below.

Table B-22: Sustainability performance of Policy DPC5.

Policy Option DPC5	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	-	0	0	+	0	0	+	++	+	0	0	0	0	+

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).

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 2037, 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).

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).

B.7.6 DPC6: Ashdown Forest SPA and SAC

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 schemes (MSDC, 2022a).

There has been no update to this policy, only minor wording additions, and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-23: Sustainability performance of Policy DPC6.

Policy Option DPC6	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	+	+	0	+	0	0	0	0

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.

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).

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 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).

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 increases 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.

B.8 Built Environment

B.8.1 DPB1: Character and Design

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.

This wording of the original policy remains unchanged since the Regulation 18 Plan, although the policy has been updated to consider the 20-minute neighbourhood.

Lepus' Regulation 18 SA assessment remains mostly unchanged, and Lepus' full assessment summary is included below. Notably, economic growth (Objective 14) performs better under the updated policy as it requires major residential and mixed-use proposals to “*exploit opportunities to improve access to local employment, community health and wellbeing facilities, either by connecting to existing facilities or providing new*”.

Table B-24: Sustainability performance of Policy DPB1.

Policy Option DPB1	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	++	+	+	+	+	+	+	+	0	0	+

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. Building for Life 12 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.

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).

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 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).

The policy supports development which “incorporates sustainable construction principles and is designed for adaptation and future weather events”, additionally, proposals which incorporate a GI 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).

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.

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 identify, heritage assets 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.

The policy sets out that development proposals should be *“organised around green transport principles”* and should *“creates 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.

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.

B.8.2 DPB2: Listed Buildings and Other Heritage Assets

The diverse range of heritage assets throughout the Plan area provides a strong sense of place and character to their surroundings. Policy DPB2 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.

There have been minor wording updates to this policy, which includes additional assessment requirements. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B-25: Sustainability performance of Policy DPB2.

Policy Option DPB2	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	0	0	0	+	++	0	0	0	0	0

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).

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.

B.8.3 DPB3: Conservation Areas

Policy DPB3 seeks to ensure, through various criteria, that development within each of the district's Conservation Areas (CAs) “*preserve 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*”.

There has been a minor wording update to this policy to include the consideration of trees. Lepus' Regulation 18 SA assessment has been updated as required, as is presented below.

Table B-26: Sustainability performance of Policy DPB3.

Policy Option DPB3	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	0	0	0	+	++	0	0	0	0	0

There are 36 CAs located within the Mid Sussex District, concentrated in various settlement areas such as East Grinstead, Haywards Heath, and Burgess Hill. 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.

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).

B.8.4 DPB4: Aerodrome Safeguarding

Policy DPH4 was deleted since the Regulation 18 Plan and Aerodrome Safeguarding Requirements from the policy has been added to this new policy DPB4 with updated text as recommended during the consultation phase.

Two reasonable alternatives were considered for this policy. These were:

1. Add a policy on aerodrome safeguarding.
2. Do not include a policy on aerodrome safeguarding and continue to rely on Planning Circular 01/2003.

The assessment of these alternatives against the SA Objectives are in Table B- 27 below.

Table B- 27: Sustainability performance of reasonable alternatives for Policy DPB4.

Policy Option DPB4	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Aerodrome Safeguarding and the requirements to consult are set out under Planning Circular 01/2003. Therefore, relying on Planning Circular 01/2003 rather than a specific policy would enable aerodrome safeguarding to be considered. However, recently published evidence (Lichfield, 2018) finds that, in general terms, the guidance in Planning Circular 01/2003 is not being applied consistently by local planning authorities, and suggests that for clarity, where administrative areas contain an EASA certified aerodrome, a dedicated aerodrome safeguarding policy should be included in Local Plans.

By not including a dedicated policy, the District Plan would not provide the necessary clarity to the planning process. Option 2 would not address the issues necessitating a policy that are discussed under Option 1 and was therefore not supported.

Option 1 has been brought forward to identify the requirements of Aerodrome Safeguarding to support the safe operation of Gatwick Airport and is also considered the most sustainable approach. Including a dedicated aerodrome safeguarding policy will enable the District Plan to make clear that aerodrome safeguarding is a borough-wide requirement that will need to be considered in the planning process. Making applicants aware of this at an early stage will simplify the planning process and ensure that aerodrome safeguarding requirements are planned into development.

Both alternatives would have a neutral impact on all SA Objectives, although it can be considered that the measures would mitigate against attracting birds which could then be susceptible to bird strike.

B.9 Transport

B.9.1 DPT1: Placemaking and connectivity

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 2022-2036, by providing relevant criteria for proposals to achieve to attain sustainable transport focused infrastructure within the Plan area.

Two reasonable alternatives were considered for this policy. These were:

1. Simple update to existing policy to address changes to NPPF.
2. Provide granular policies to maximise outcome.

The assessment of these alternatives against the SA Objectives are in Table B-28 below.

Table B-28: Sustainability performance of reasonable alternatives for Policy DPT1.

Policy Option DPT1	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	+	0	+	0	0	0	0	0	+	0	0	0	+
2	0	++	0	+	0	0	0	0	0	++	0	0	0	+

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.

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).

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).

Option 1 entails a simple update to reflect changes to the NPPF, however, Option 2 provides further detail to support active travel measures and maximise their benefit, including the creation of 20-minute neighbourhoods. It is therefore considered to be the preferred Option to deliver these benefits.

B.9.2 DPT2: Rights of Way and Other Recreational Routes

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.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-29: Sustainability performance of Policy DPT2.

Policy Option DPT2	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	0	+	0	+	0	0	0	0

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).

B.9.3 DPT3: Active and Sustainable Travel

Policy DPT3 seeks to deliver development with promotes a health environment for residents by embedding the principles of the 20-minute neighbourhood and promoting active travel infrastructure, while also removing any barriers to active and sustainable travel.

Two reasonable alternatives were considered for this policy. These were:

1. Rely on West Sussex transport plan.
2. Create policy with specific emphasis on active travel for greater emphasis.

The assessment of these alternatives against the SA Objectives are in Table B-30 below.

Table B-30: Sustainability performance of reasonable alternatives for Policy DPT3.

Policy Option DPT3	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	+	0	+	0	0	0	0	0	+	0	0	0	0
2	0	++	0	++	0	0	+	0	0	++	0	0	0	+

Option 1 relies on the active travel guidance in the West Sussex Transport Plan (WSTP) (WSCC, 2022), which provides a broad strategy for extending walking and cycling routes across West Sussex. Through this strategy, a minor positive impact on health and wellbeing, community and climate change and transport could be reached (SA Objectives 2, 4 and 10).

Option 2 was brought forward in order to embed more ambitious active travel measures which go beyond those outlined in the WSTP. Since the Regulation 18 Plan, the policy wording has been updated to embed the principles of the 20-minute neighbourhood, as well as incorporating cycle hubs and supporting the delivery of bus service improvements.

This policy seeks to improve access to active travel facilities by requiring developments to provide “*high quality, attractive, fit for purpose and convenient active travel infrastructure, within the development which links to existing networks and key facilities / services*” and to build upon various cycling and walking infrastructure schemes.

By ensuring that new developments offer more than just cycle parking but also cycle hubs which include parking e-bike hire, showers and changing 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, the policy now performs better against the health and wellbeing, community cohesion, transport, and economic growth objectives as it seeks to improve active travel connections between settlements as well as connect residents to facilities and services (SA Objective 2, 4, 10 and 14).

The policy also now seeks for new active travel infrastructure to connect with existing green networks where possible and incorporate green infrastructure would have a minor positive impact on biodiversity (SA Objective 7), which is an improvement from the neutral impact assessed as part of the Regulation 18 SA.

B.9.4 DPT4: Parking and Electric Vehicle Charging Infrastructure

Policy DPT4 seeks to ensure that all new developments provide “adequate and well-integrated car parking”, “accessibility of the site to services and sustainable travel infrastructure” (depending on type, mix and use of the development) and that Electric Vehicle Charging (EVC) points are provided in non-residential developments.

Two reasonable alternatives were considered for this policy. These were:

1. Rely on West Sussex Transport Plan.
2. Seek higher standards locally.

The assessment of these alternatives against the SA Objectives are in Table B-31 below.

Table B-31: Sustainability performance of reasonable alternatives for Policy DPT4.

Policy Option DPT4	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	0	0	0	0	0	0	0	0	+	0	0	0	0
2	0	0	0	+	0	0	0	0	0	++	+	0	0	0

Option 1 requires the policy to rely on guidance within the WSTP which focuses on providing on-street electric vehicle charging infrastructure. This would provide a minor positive impact on climate change and transport by increasing the support for residents with EVs (SA Objective 10).

Option 2 was chosen to be brought forward, which seeks to achieve higher standards locally through measures such as EV charging points within non-residential developments. Since the Regulation 18 Plan, significant wording updates have been made to this policy. The updated assessment is shown in Table B-31 above, and the assessment summary is included below.

In the Regulation 18 Plan, EVC points were to be provided in 5% of parking spaces in a non-residential development with more than 10 parking spaces, and cable routes were to be provided in 50% of the remaining spaces. The policy has been updated to now state that *"a minimum of 25% of all parking spaces with 'Fast' (7kW) or faster, Electric Vehicle Charging points; cable routes shall be provided for 100% of the remaining total number of spaces"* for all non-residential developments. Furthermore, the policy has also been updated since the Regulation 18 Plan to include the Council's support of Car Clubs, of which the vehicles are to be powered by alternative non-fossil fuels which would help achieve energy benefits (Objective 11). This would reduce resident's private car use by providing shared cars for short term hire in public spaces. The policy therefore performs better against the climate change and transport objective and has increased from minor positive to major positive (SA Objective 10) and would change the energy and waste impact from neutral to minor positive. Additionally, Car Clubs can be community organised and therefore would promote community cohesion, providing a minor positive impact on SA Objective 4.

B.9.5 DPT5: Off Airport Car Parking

Policy DPT5 aims to resist additional car parking developments at Gatwick Airport, associated with the Northern Runway Project. This was a new policy in the Regulation 18 Plan and two alternatives were considered for this policy. These were:

1. Rely on non-specific West Sussex transport plan / sustainable travel policies.
2. New specific policy.

The assessment of these alternatives against the SA Objectives are in Table B-32 below.

Table B-32: Sustainability performance of reasonable alternatives for Policy DPT5.

Policy Option DPT5	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	0	0	0	0	0	0	0	0	+	0	0	0	0
2	0	0	0	0	0	0	0	0	0	+	0	0	0	0

Option 1 requires the policy to rely on guidance within the WSTP; whereas Option 2 allows the council to specify the most sustainable option for airport parking as set out in Gatwick Airport Limited's published Surface Access Strategy (GAL, 2022).

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).

B.10 Economy

B.10.1 DPE1: Sustainable Economic Development

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.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-33: Sustainability performance of Policy DPE1.

Policy Option DPE1	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	+	-	-	-	-	-	0	-	-	++	++

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 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).

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.

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.

B.10.2 DPE2: Existing Employment Sites

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”*.

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.

There have been minor wording updates to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-34: Sustainability performance of Policy DPE2.

Policy Option DPE2	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	-	-	-	-	-	0	-	-	++	++

By protecting these key employment areas from non-employment related redevelopment (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).

Policy DPE2 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 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.

B.10.3 DPE3: Employment Allocations

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. Policy DPSC1 relates to Site 740, and DPSC2 relates to Site 18, both of which were assessed alongside reasonable alternatives.

Three reasonable alternatives were considered for this policy. These were:

1. Need approach with no allocations.
2. Opportunity approach which provides mix use development on significant sites to create sustainable communities.
3. Over-supply approach which allocates a site above and beyond Option 1 and 2 (spatial strategy principles).

The assessment of these alternatives against the SA Objectives are in Table B-35 below.

Table B-35: Sustainability performance of reasonable alternatives for Policy DPE3.

Policy Option DPE3	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	0	+	0	+	0	-	-	-	-	0	-	0	+	+
3	+	+	0	+	0	-	-	-	-	0	-	0	+	+

These alternatives were considered to determine the feasibility of delivery of over-supply approaches.

Option 2 was chosen as the Economic Growth Assessment Update (Lichfields, 2022) identified no outstanding residual employment need due to sufficient supply through planning permissions and allocations already planned for. However, the sustainable settlements allocated in policies DPSC2 and DPSC3 present opportunities for a mix of uses to create sustainable communities.

There have been no updates to this policy and Lepus' Regulation 18 assessment remains unchanged. Lepus' assessment is included in Table B-35 above and the summary is included below.

The proposed employment areas within the Significant Sites referenced in this policy 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).

The pre-mitigation assessments of the sites 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).

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 multifunctional 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.

A minor negative impact would be likely to remain for biodiversity (SA Objective 7), due to potential for disturbance or degradation of ancient woodland and priority habitat within the sites. Furthermore, the large-scale nature of the sites situated on previously undeveloped land means that despite proposed master planning 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).

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) because of the development, and potential sterilisation of mineral resources within the MSA.

B.10.4 DPE4: Town and Village Centre Development

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.

No alternatives were considered for this policy and the policy has only been updated since the District Plan to reflect changes to national planning policy.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-36: Sustainability performance of Policy DPE4.

Policy Option DPE4	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	+	0	0	0	0	0	0	0	0	+	+

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).

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.

B.10.5 DPE5: Within Town and Village Centre Boundaries

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.

No alternatives were considered for this policy and the policy has only been updated since the District Plan to reflect changes to national planning policy.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus’ Regulation 18 SA assessment remains unchanged. Lepus’ full assessment summary is included below.

Table B-37: Sustainability performance of Policy DPE5.

Policy Option DPE5	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	+	0	0	0	0	0	0	0	0	+	0

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).

B.10.6 DPE6: Development Within Primary Shopping Areas

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.

No alternatives were considered for this policy and the policy has only been updated since the District Plan to reflect changes to national planning policy.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-38: Sustainability performance of Policy DPE6.

Policy Option DPE6	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	0	+	0	0	0	+	0	0	0	0	+	0

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).

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).

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).

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 street scene, this policy could potentially result in a minor positive impact on the local landscape character (SA Objective 8).

B.10.7 DPE7: Smaller Villages and Neighbourhood Centres

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.

No alternatives were considered for this policy and the policy has only been updated since the District Plan to reflect changes to national planning policy and Permitted Development Rights.

Since the Regulation 18 Plan, there has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-39: Sustainability performance of Policy DPE7.

Policy Option DPE7	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	+	0	0	0	0	0	+	0	0	+	+

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 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).

B.10.8 DPE8: Sustainable Rural Development and the Rural Economy

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.

There has been no significant update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-40: Sustainability performance of Policy DPE8.

Policy Option DPE8	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	0	0	0	+	0	0	+	0

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. 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).

B.10.9 DPE9: Sustainable Tourism and the Visitor Economy

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 to be supported.

There have only been minor wording changes to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-41: Sustainability performance of Policy DPE9.

Policy Option DPE9	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	0	0	+	+	0	0	+	+

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).

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).

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).

B.11 Sustainable Communities

B.11.1 DPSC GEN: Significant Site Requirements

DPSC GEN is a new policy since the Regulation 18 Plan and incorporates the relevant criteria for Significant Sites from the deleted Policy DPH4.

Table B-42: Sustainability performance of Policy DPSC GEN.

Policy Option DPSC GEN	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 & Surface Water														
Natural Resources														
Biodiversity & Geodiversity														
Landscape														
Cultural Heritage														
Climate change & transport														
Energy and Waste														
Water Resources														
Economic regeneration														
Economic growth														
	++	++	+	++	++	+	++	++	++	++	++	++	+	+

The policy outlines various requirements for Significant Sites, including the requirement to provide new and/or improved educational facilities. Policy DPSC GEN also states that Significant Sites must provide access to sustainable infrastructure, such as public transport and active transport links (SA Objective 10), 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.

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 secure a minimum of 20% biodiversity net gain and to “develop a strategy for the long-term management and stewardship of open space and green infrastructure including initiatives for income generation that could be integrated into the scheme”. 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.

B.11.2 DPSC1: Broad location to the west of Burgess Hill and north of Hurstpierpoint

Policy DPSC1 relates to Site 740, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a major update to the wording of this policy since the Regulation 18 Plan however the site it relates to remains the same therefore Lepus Consulting's Regulation 18 SA assessment summary is included below with relevant edits.

Table B-43: Sustainability performance of Policy DPSC1.

Policy Option DPSC1	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 & Surface Water														
Natural Resources														
Biodiversity & Geodiversity														
Landscape														
Cultural Heritage														
Climate change & transport														
Energy and Waste														
Water Resources														
Economic regeneration														
Economic growth														
	++	+	++	++	0	-	0	-	0	0	-	0	0	++

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 active travel throughout with links to the ‘Green Circle’*”. 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 1,350 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.

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.

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.

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).

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 1,350 new dwellings, which would be expected to lead to increased energy consumption and waste generation to some extent.

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 1,350 new dwellings in proximity to these woodlands would be likely to introduce risks of increased disturbance or habitat degradation. Through the requirement of a 20% biodiversity net gain as set out in Policy DPSC GEN, a neutral impact on biodiversity is expected (SA Objective 7).

The east of the site is located within ‘West Burgess Hill Low Weald’ which has ‘high’ capacity, according to the Landscape Capacity Study; 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 / play space / 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.

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 “*preserves the setting of Grade II Listing Buildings at North End Farm to the west, The Sportsman Inn to the north and Kent’s Farm House to the south of the site*” which would help to inform

appropriate mitigation measures, with a negligible impact expected overall for cultural heritage (SA Objective 9).

A minor 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.

B.11.3 DPSC2: Land at Crabbet Park, Cophthorne

Policy DPSC2 relates to Site 18 in this Regulation 19 SA. It related to site 799 at Regulation 18.). 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 pre-mitigation assessment findings for this site.

There have been wording additions to this policy since the Regulation 18 Plan. Relevant to this assess include addressing any issues to the adjacent ancient woodland, protecting the setting of Grade II* Listed Crabbet Park, the Orangery and Tennis Court and Grade II Listed Pear Tree House, Ley House, Rowfant Mill, Rowfant Mill House and Rushmore Cottage, and retaining and enhancing PROWs which cross the site.

An updated assessment of this policy is included below.

Table B-44: Sustainability performance of Policy DPSC2.

Policy Option DPSC2	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Housing	++	+	++	++	0	--	-	-	-	0	-	0	+	++
Health and Wellbeing														
Education														
Community and Crime														
Flooding & Surface Water														
Natural Resources														
Biodiversity & Geodiversity														
Landscape														
Cultural Heritage														
Climate change & transport														
Energy and Waste														
Water Resources														
Economic regeneration														
Economic growth														

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.

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.

However, the A220 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 master planning, 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.

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).

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.

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).

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 Study. 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.

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).

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.

B.11.4 DPSC3: Land to the south of Reeds Lane, Sayers Common

Policy DPSC3 relates to Site 799, which was assessed alongside reasonable alternatives. This policy related to Site 18 at the Regulation 18 stage. 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 pre-mitigation assessment findings for this site.

There have been wording updates to this policy since the Regulation 18 Plan. Primarily in the delivery of the 20-minute neighbourhood through coordinated public transport services and the retention and enhancement of PROWs which cross the site. It is considered that these additions have improved the policy's climate change and transport impact from negligible to minor positive as it should reduce residents reliance on private cars (SA Objective 10).

The development must also provide "*protection of setting of Grade II Listed Wellington Cottage and Grade II Listed North Pottersfield and South Potterfield Cottages*". This would

improve the cultural heritage impact performance from minor negative to negligible (SA Objective 9).

The policy also now acknowledges that the site is within a Mineral Safeguarding Area and that any development should consider the potential for minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a major negative due to the large development of undeveloped land, loss of open countryside and agricultural land.

Regarding the other objectives, the Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' assessment summary for these objectives is included below with relevant edits.

Table B-45: Sustainability performance of Policy DPSC3.

Policy Option DPSC3	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	++	++	+	-	0	-	0	+	-	0	+	++

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 approximately 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.

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.

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, with early years and potential SEND”. 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).

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.

Much 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 DPSC3 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.

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. The policy could potentially result in a negligible impact on biodiversity (SA Objective 7).

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) because of the development.

B.11.5 DPSC4: Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common

Policy DPSC4, previously DPH19, relates to site 1026, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that this would have a minor positive impact on climate change and transport, health and wellbeing, education and community and crime.

It also includes an intention to “*avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience*”. This is considered to have a minor positive impact on biodiversity and landscape.

The site is located within ‘Hickstead – Sayers Common Low Weald’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study. The site is relatively small-scale and enclosed by trees and existing development. Policy DPSC4 previously stated 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*” and it was considered in the Regulation 18 SA that 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). However, this has been removed from the policy and should trees be lost this would result in a minor negative impact on landscape character.

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.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains otherwise unchanged.

Table B-46: Sustainability performance of Policy DPSC4.

Policy Option DPSC4	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	+	-	0	+	0	0	0	+

B.11.6 DPSC5: Land at Coombe Farm, London Road, Sayers Common

Policy DPSC5, previously DPH20, relates to site 601, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that this would have a minor positive impact on climate change and transport, health and wellbeing, education (which had a neutral impact at the Regulation 18 stage), and community and crime.

It also includes an intention to 'avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience. This is considered to have a minor positive impact on biodiversity (previously a neutral impact) and landscape (previously a minor negative impact).

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains otherwise unchanged.

Table B-47: Sustainability performance of Policy DPSC5.

Policy Option DPSC5	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	+	+	+	-	+	+	0	+	0	0	0	+

B.11.7 DPSC6: Land to the West of Kings Business Centre, Reeds Lane, Sayers Common

Policy DPSC6, previously DPH21, relates to site 830, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that this would have a minor positive impact on climate change and transport, health and wellbeing, education and community and crime.

It also includes an intention to 'avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience. This is considered to have a minor positive impact on biodiversity and landscape, which is a better impact than at the Regulation 18 stage which found a neutral impact.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains otherwise unchanged.

Table B-48: Sustainability performance of Policy DPSC6.

Policy Option DPSC6	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth	
	++	+	+	+	+	-	+	+	0	+	-	0	0	+

B.11.8 DPSC7: Land at LVS Hassocks, London Road, Sayers Common

Policy DPSC7, previously DPH22, relates to site 1003, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There have been minor policy wording updates since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to demonstrate a coordinated approach and collaboration with other housing allocations in the Plan within Sayers Common to deliver high-quality placemaking which supports the 20-minute neighbourhood principles. It is therefore considered that these perform better than in the Regulation 18 SA and would have a minor positive impact on climate change and transport, health and wellbeing, education and community and crime.

It also includes an intention to “avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to delivery biodiversity/environmental improvements and flood resilience”. This is considered to have a minor positive impact on biodiversity and landscape, which had a minor negative impact at the Regulation 18 stage.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains otherwise unchanged.

Table B-49: Sustainability performance of Policy DPSC7.

Policy Option DPSC7	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth	
	++	+	+	+	+	-	+	+	0	0	-	0	0	+

B.12 Housing

B.12.1 DPH1: Housing

Policy DPH1 sets out the district’s local housing need over the Plan period, against the housing supply identified within the Plan.

A minor update been made to this policy since the Regulation 18 Plan to update the site references and the housing need which will be met by the site allocations.

Two alternatives were considered for this policy. These were:

1. Housing requirement approach: meet the housing requirement calculated for Mid Sussex by allocating the most suitable sites in line with the site selection methodology.
2. High growth approach: identify sites above and beyond the housing requirement.

The assessment of these alternatives against the SA Objectives are in Table B-50 below.

Table B-50: Sustainability performance of reasonable alternatives for Policy DPH1.

Policy Option DPH1	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	+/-	0	+/-	-	--	+/-	--	-	-	-	0	0	0
2	++	+/-	0	+/-	-	--	+/-	--	-	-	-	0	0	0

Both Options will have a similar impact on the SA Objectives; however, by surpassing the required housing need, Option 2 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 whereas by meeting the housing supply a minor positive impact is expected for Option 1 (SA Objective 1). Option 1 was brought forward as this was the more realistic Option for the delivery of housing in the district.

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).

Impacts on biodiversity within the Ashdown SAC and SPA (SA Objective 8) could be expected from the development of the sites associated with this policy. The HRA will provide analysis of the likely impacts, the identification of impact pathways and mitigation measures.

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 of this assessment.

B.12.2 DPH2: Sustainable Development - Outside the Built-Up Area

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.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-51: Sustainability performance of Policy DPH2.

Policy Option DPH2	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	0	+	0	-	0	+	0	0	0	0	+	+

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 District 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.

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.

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.

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).

B.12.3 DPH3: Sustainable Development - Inside the Built-Up Area

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.

There have been wording updates to this policy. However, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-52: Sustainability performance of Policy DPH3.

Policy Option DPH3	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	0	+	0	+	0	+	0	+	0	0	+	+

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.

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.

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.

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.

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).

B.12.4 DPH4: Older Persons' Housing and Specialist Accommodation

Policy DPH4 previously concerned General Development Principles for Housing Allocations, which has been deleted since the Regulation 18 Plan and the criteria within the policy has been moved into other relevant policies within the plan.

The new Policy DPH4, previously DPH26, sets criteria for related development proposals and aims to provide adequate accommodation for older residents and those with specialist needs within Mid Sussex.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-53: Sustainability performance of Policy DPH4.

Policy Option DPH4	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth	
	+	+	0	+	0	0	0	+	0	+	0	0	0	0

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. This policy would be likely to have a minor positive impact on housing and specialist accommodation provision (SA Objective 1).

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).

Additionally, Policy DPH4 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).

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).

B.12.5 DPH5: Gypsies, Travellers and Travelling Showpeople

Policy DPH5, previously DPH29, seeks to ensure a sufficient amount of suitable permanent accommodation for Gypsies, Travellers and Travelling Showpeople is delivered to meet identified needs.

An alternative to the policy was identified, as outlined below:

1. Address need during the plan period.
2. Allocated site to address surplus need from neighbouring authorities.

Table B-54: Sustainability performance of reasonable alternatives for Policy DPH5.

Policy Option DPH5	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	+	0	+	0	0	0	0	0	0	0	0	0	0
2	++	+	0	+	0	0	0	0	0	0	0	0	0	0

Whilst Option 2 would facilitate allocation of further sites, it is not considered feasible and therefore Option 1 has been taken forward.

The policy is expected to meet the identified pitch targets for Travellers and Travelling Show people which address the likely permanent and transit accommodation needs and as such, have a positive impact on housing (Objective 1). Allocating surplus sites to address need from neighbouring authorities would have a major positive impact on housing.

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) for both alternative options.

Policy DPH5 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.

B.12.6 DPH6: Self and Custom Build Housing

Policy DPH6, previously DPH30, relates to self and custom build housing and seeks to ensure a register is maintained of parties interested in building their own home.

There were two alternative policies identified to delivery this:

3. Rely on other policies in the plan and existing guidance for self and custom build housing to come forward: national guidance provide advice on how to meet the identified need so this could be addressed without a district-wide policy in place.
4. Develop policy led by local evidence to secure dedicated plots for self and custom build housing within proposed allocations.

Table B-55: Sustainability performance of reasonable alternatives for Policy DPH6.

Policy Option DPH6	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	+	0	0	0	0	0	0	+	0	0	0	0	0	0
2	+	0	0	0	0	0	0	+	0	0	0	0	0	0

This policy aims to secure a proportion of residential sites of 100 or more units to be available for self-build housing.

Both options for 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).

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).

Option 2 was considered preferable and chosen as the preferred option for the Regulation 19 Plan since it was led by local evidence and didn't rely on other policies and guidance to come forward.

B.12.7 DPH7: Housing Mix

Policy DPH7, previously DPH31, seeks to “provide a mix of dwelling types and sizes that reflects current and future local housing needs”, including the provision of affordable housing, as well as accommodation for older people (Policy DPH4), people with disabilities (Policy DPH12), build to rent, co-living, and Gypsy and Traveller communities (Policy DPH5).

There has been a minor update to this policy since the Regulation 18 Plan and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-56: Sustainability performance of Policy DPH7.

Policy Option DPH7	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth	
	+	+	0	+	0	0	0	0	0	0	0	0	0	0

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.

This policy 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).

B.12.8 DPH8: Affordable Housing

Policy DPH8, previously 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.

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-57: Sustainability performance of Policy DPH8.

Policy Option DPH8	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	0	+	0	0	0	0	0	0	0	0	0	0

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 DPH8 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).

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.

B.12.9 DPH9: First Homes

Policy DPH9, previously 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 the policy, will make up 25% of the total number of affordable housing units (as set within Policy DPH32).

There has been a minor update to this policy to include consideration of members and family of the Armed Forces. Lepus' Regulation 18 SA assessment remains unchanged, and Lepus' full assessment summary is included below.

Table B-58: Sustainability performance of Policy DPH9.

Policy Option DPH9	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 & Surface Water														
Natural Resources														
Biodiversity & Geodiversity														
Landscape														
Cultural Heritage														
Climate change & transport														
Energy and Waste														
Water Resources														
Economic regeneration														
Economic growth														
	+	+	0	+	0	0	0	0	0	0	0	0	0	0

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 DPH9 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).

B.12.10DPH10: Rural Exception Sites

Rural exception sites are small sites used for affordable housing in perpetuity where sites would not typically be used for housing. Policy DPH10, previously DPH34, makes provision for these as required under national planning policy.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-59: Sustainability performance of Policy DPH10.

Policy Option DPH10	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	+	0	0	-	0	+	0	+	0	0	0	0

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).

Through Policy DPH10, 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).

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).

B.12.11 DPH11: Dwelling Space Standards

The Nationally Described Space Standards help to ensure that all development satisfies the requirement for internal space ensuring more affordable homes still provide new residents with enough internal space. Policy DPH11 was previously DPH35 in the Regulation 18 Plan.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-60: Sustainability performance of Policy DPH11.

Policy Option DPH11	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	0	0	0	0	0	0	0	0

It is expected that the greater the internal space within a property, the better the standard of living for residents. 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).

B.12.12DPH12: Accessibility

Policy DPH12, previously DPH36, ensures all development meets and maintains a high standard of accessibility for the safe and easy use for all.

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-61: Sustainability performance of Policy DPH12.

Policy Option DPH12	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	0	0	0	0	0	0	0	0	0	0	0	0

Mid Sussex is an area with an increasingly high population of older people, with approximately 21% of the population aged 65 or over in 2021 (ONS, 2021). 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.

Policy DPH12 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).

B.13 Site Allocations

B.13.1 DPA1: Batchelors Farm, Keymer Road, Burgess Hill

Policy DPA1, previously DPH5, relates to Site 573, which was assessed alongside reasonable alternatives in pre-mitigation 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-62: Sustainability performance of Policy DPA1.

Policy Option DPA1	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth	
	+	+	++	+	+	-	0	0	0	0	0	0	0	0	+

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 with direct links to the Batchelors Farm Nature Reserve to the west”*. 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.

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.

Policy DPA1 also sets out to *“ensure development provides a positive edge to Batchelors Farm Nature Reserve to the west”* and *“minimise impacts on the most visible parts of the site on the wider countryside and the settings of and any potential views from the South Downs National Park by ensuring that the scale, siting and design of the development avoids harms to this character”*, 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. A negligible impact on biodiversity (SA Objective 7) would also be expected.

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.

B.13.2 DPA2: Land at South of Appletree Close, Janes Lane, Burgess Hill

Policy DPA2, previously DPH6 relates to Site 1030, which was assessed alongside reasonable alternatives in pre-mitigation (Appendix E) and post-mitigation (Appendix D). 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-63: Sustainability performance of Policy DPA2.

Policy Option DPA2	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	+	+	+	-	0	-	0	0	0	0	0	+

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).

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.

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.

The site is located within ‘Lunce Low Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study. Policy DPA2 set 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” in the Regulation 18 Plan, which may have helped to reduce adverse effects on the surrounding landscape character. This has been removed and the policy now states “provide suitable access from Janes Lane which avoids loss of mature trees”; however, there now could be a minor negative impact overall for landscape (SA Objective 8).

These measures could also help to retain and enhance ecological corridors and habitats. A negligible impact on biodiversity (SA Objective 7) would also be expected.

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.

B.13.3 DPA3: Burgess Hill Station, Burgess Hill

Policy DPA3, previously DPH7, relates to Site 1123, which was assessed alongside reasonable alternatives in pre-mitigation and 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that to ensure that the site is connected to the sewerage system. Nonetheless, it is still considered that the development would have a minor negative impact on energy and waste due to the increased energy consumption and waste generation. Therefore, Lepus Consulting's Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-64: Sustainability performance of Policy DPA3.

Policy Option DPA3	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	++	++	++	+	+	0	+	0	++	-	0	++	+

The policy requires consideration of new children’s equipped play space 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.

Policy DPA3 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).

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.

B.13.4 DPA3a: Allotment Site - Nightingale Lane, Burgess Hill

Policy DPA3a is a new policy since the Regulation 18 Plan and has been included to address the loss of allotments at 0.85ha of land at Chantonbury Road allotments as a result of the DPA3 allocation.

1. Allocate the Burgess Hill Station site with a policy requirement for the reprovision of allotments in line with policy DPI5.
2. Allocate the Burgess Hill Station site and a site for the reprovision of allotments.

Table B-65: Sustainability performance of Policy DPH1.

Policy Option DPH1	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	+	0	+	0	0	0	0	0	0	0	0	0	0
2	0	+	0	+	0	0	0	0	0	0	0	0	0	0

Option 2 has been chosen and a 1ha site has been allocated at Nightingale Lane which is 0.15ha larger than the Chantonbury Road allotment site that is being lost due to the development. It is considered this policy would have a minor positive impact on health and wellbeing and community and crime by furthering access to outdoor leisure activities and community facilities (SA Objectives 2 and 4).

B.13.5 DPA4: Land off West Hoathly Road, East Grinstead

Policy DPA4, previously DPH8, relates to Site 198, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-66: Sustainability performance of Policy DPA4.

Policy Option DPA4	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	0	-	0	0	0	0	0	+

The policy sets out the requirement for a new parkland and link to Sunnyside Recreation Ground, as well as a “provide appropriate pedestrian crossing from the site to the pavement 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).

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.

Furthermore, the policy requires financial contributions towards education and a Library. 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).

Landscape officer comments provided by the Council during the Regulation 18 stage 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 Study. Policy DPA4 requires “*to conserve and enhance the High Weald AONB, taking account of the landscape and natural features of the site and the surrounding settlement*”. Whilst this 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.

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 and Priority habitat (deciduous woodland) within the site and to the east of the site*” and states that hedgerow fronting West Hoathly Road should be retained and enhanced as much as possible. 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. A negligible impact on biodiversity (SA Objective 7) would be expected overall.

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.

B.13.6 DPA5: Land at Hurstwood Lane, Haywards Heath

Policy DPA5, previously 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 pre-mitigation and 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 pre-mitigation assessment findings for this site.

Table B-67: Sustainability performance of Policy DPA5.

Policy Option DPA5	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	0	-	0	0	0	0	0	+

The policy states that “sustainable transport measures” and improved active travel links should be provided. 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.

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.

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 policy requires financial contributions towards education. The proposed active travel links within Policy DPA5 may also help to provide sustainable access to the proposed new school in the adjacent Hurst Farm allocation within the Haywards Heath Neighbourhood Plan (HHTC, 2016). 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 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 DPA5 sets out the requirement for enhanced GI, to "*Retain and enhance the trees and retain the ground levels along Hurstwood Lane*" and to "*Provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the east 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. A negligible impact on biodiversity (SA Objective 7) would be expected overall.

The site is located within 'Haywards Heath South-eastern Fringe' which has 'low' capacity, according to the Landscape Capacity Study. 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).

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.

B.13.7 DPA6: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath

Policy DPA6, previously DPH10, relates to Site 508, which was assessed alongside reasonable alternatives in pre-mitigation and 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy; however, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-68: Sustainability performance of Policy DPA6.

Policy Option DPA6	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	0	0	0	0	0	0	+	+

The policy outlines required improvements to travel choice, including “sustainable transport measures”. This would be expected to result in a benefit to transport; 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.

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.

The policy requires financial contributions towards education. The proposed active travel and green infrastructure links within Policy DPA6 may also help to provide sustainable access to the proposed new school in the adjacent Hurst Farm allocation within the Haywards Heath Neighbourhood Plan. 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).

Policy DPA6 states that the development should “*Retain and enhance the trees on the site boundaries to provide a landscape buffer to the wider countryside*” and incorporate GI and ecological corridors. These measures may help to retain and enhance biodiversity assets. A negligible impact on biodiversity (SA Objective 7) would be expected.

The site is located within ‘Haywards Heath South-eastern Fringe’ which has ‘low’ capacity, according to the Landscape Capacity Study. Policy DPA6 seeks to ensure that the development integrates well with the adjacent allocation DPA5 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 and enhance 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 anticipated that adverse impacts on the landscape character could be reduced, with a negligible impact overall for landscape (SA Objective 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.

B.13.8 DPA7: Land east of Borde Hill Lane Haywards Heath

Policy DPA7, previously DPH11, relates to Site 556. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

The policy also now states *"avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to deliver biodiversity / environmental improvements and flood resilience"*. In the Regulation 18 SA post-mitigation assessment the policy had a neutral impact on flooding, improved from a pre-mitigation major negative impact on flooding due to mitigation applied through District Plan policies. It is considered that the policy would still have a neutral impact on flooding. The impact on biodiversity also remains unchanged, as a minor negative impact, due to the loss of semi-improved grassland priority habitat and the site being within 7km of Ashdown Forest SAC/SPA.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-69: Sustainability performance of Policy DPA7.

Policy Option DPA7	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	0	-	0	0	0	+	0	0	0	+

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.

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.

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).

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 because of the proposed development. The policy requires on-site ‘natural, semi-natural and amenity greenspace’ as well as ensuring SuDS deliver biodiversity / environmental improvements. Overall, a neutral impact on biodiversity would be expected (SA Objective 7).

The site is located within ‘Horsgate High Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study (Hankinson Duckett Associates, 2007). Policy DPA7 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)*”. These measures, along with careful design and layout, may help to mitigate adverse effects and a neutral impact on the landscape character (SA Objective 8) would be likely.

Policy DPA7 requires the development to “*Provide appropriate layout and design which preserves the setting of 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.

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.

B.13.9 DPA8: Orchards Shopping Centre, Haywards Heath

Policy DPA8, previously DPH12, relates to Site 1121, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that to ensure that the site is connected to the sewerage system. Nonetheless, it is still considered that the development would have a minor negative impact on energy and waste due to the increased energy consumption and waste generation. Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-70: Sustainability performance of Policy DPA8.

Policy Option DPHA8	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
Housing	++	++	++	++	+	+	0	+	0	++	-	0	++	+
Health and Wellbeing														
Education														
Community and Crime														
Flooding & Surface Water														
Natural Resources														
Biodiversity & Geodiversity														
Landscape														
Cultural Heritage														
Climate change & transport														
Energy and Waste														
Water Resources														
Economic regeneration														
Economic growth														

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.

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.

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).

The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. A negligible impact on biodiversity (SA Objective 7) would be expected.

Policy DPA8 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.

B.13.10DPA9: Land to west of Turners Hill Road, Crawley Down

Policy DPA9, previously DPH13, relates to site 688, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a major policy update since Regulation 18, however, the site remains the same and the meaning remains largely the same. The policy now seeks to integrate development with the site to the north (DPA10) such as through design of the site layout and by providing pedestrian and cycling connections, green infrastructure and ecological corridors which would now have a minor positive impact for biodiversity and landscape. The policy also now states that development should be *“directing development away from areas of flood risk and mitigate impacts through integration of SUDS to deliver biodiversity /*

environmental improvements and flood resilience". It is considered that the policy would still have a minor positive impact on flooding, and also on health and wellbeing.

Aside from this, Lepus Consulting's Regulation 18 SA assessment remains mostly unchanged, and Lepus' assessment summary is included below with the relevant edits.

Table B-71: Sustainability performance of Policy DPA9.

Policy Option DPA9	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	+	+	+	+	-	0	-	0	0	-	0	0	+

The policy sets out provision of sustainable transport measures which would be expected to improve travel choice, with requirement to “Provide suitable access to Turners Hill Road to each of the three areas of the site”. 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.

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, and sports pitches to serve the new development, as well as financial contributions towards further community facilities, emergency services, 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.

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).

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.

The site lies within the identified 7km recreational ZOI for Ashdown Forest SAC/SPA, and so would be subject to agreed mitigation measures. The policy requires the development to *“address any impacts associated with Ancient Woodland (on and adjacent to the site); including Front Wood, Wallage Wood, Wallage Lodge Shaw, Bushy Wood, Pescotts Wood (east and west parcels) which will be excluded from development”* and *“avoid development in most sensitive areas, including the central ridge”*. A negligible impact on biodiversity would be expected (SA Objective 7).

The site is located within ‘Crawley Down Northern Fringe’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study. The range of measures to reduce or mitigate adverse impacts on the rural landscape has been updated since the Regulation 18 Plan to include *“provide woodland buffer to existing vegetation along southern boundary and set development back from the Worth Way to mitigate potential visual impact to the route and help enhance its setting”, “a 5m landscape buffer to existing hedgerows”* and *“Provision of a county park in southern part of site and along western boundary linking to the north and south parts of the site”*. These measures, along with careful design and layout, may help to mitigate adverse effects to some extent, overall, a negligible impact on the landscape character would be expected (SA Objective 8), an improvement from the minor negative impact in the Regulation 18 SA.

Heritage officer comments provided by the Council during the Regulation 18 stage indicate that the development of the site could lead to a ‘moderate’ adverse impact on archaeology. The policy has been updated to *“Assess the areas of archaeological interest – Crest of Sandstone Ridge and stream running through the High Weald that has a potential pre-historic bank”*,” which would help to inform appropriate mitigation measures, with a negligible impact expected overall for cultural heritage (SA Objective 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.

B.13.11 DPA10: Hurst Farm, Turners Hill Road, Crawley Down

Policy DPA10, previously DPH14, relates to Site 743, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy since Regulation 18. The policy now states "avoid developing areas of existing and future flood risk and mitigate impacts through integration of SUDS to deliver biodiversity / environmental improvements and flood resilience". It is considered that the policy would still have a minor positive impact on flooding. The impact on biodiversity could now be considered a minor positive impact, instead of negligible, through the introduction of natural flood management measures that deliver environmental improvements.

Lepus Consulting's Regulation 18 SA assessment remains mostly unchanged, and Lepus' assessment summary is included below.

Table B-72: Sustainability performance of Policy DPA10.

Policy Option DPA10	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	0	+	0	+	0	0	0	0	0	0	+

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.

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.

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 DPA9 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.

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).

The site is adjacent to two stands of ancient woodland: ‘Pescotts Wood West’ and ‘Pescotts Wood East’. Policy DPA10 states *“address any impacts associated with ancient woodland along the western and south eastern edges of the site”* 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. A negligible impact on biodiversity (SA Objective 7) would be expected.

The site is located within ‘Crawley Down Northern Fringe’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study. Policy DPA10 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).

Policy DPA10 requires the development to be *“informed by a Heritage Statement, provide layout and design which preserves the setting of Grade II listed building ‘Westlands’”*. An overall negligible impact on cultural heritage (SA Objective 9) would be expected.

B.13.12DPA11: Land rear of 2 Hurst Road, Hassocks

Policy DPA11, previously DPH15, relates to Site 210, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor

negative due to development on undeveloped land, loss of open countryside and agricultural land.

Table B-73: Sustainability performance of Policy DPA11.

Policy Option DPA11	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	++	+	+	-	0	0	0	++	0	0	++	+

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 DPA11 seeks to further improve sustainable transport for the site, including *“suitable vehicular, pedestrian and cycle access including necessary offsite highways improvements”* 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.

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 *“Provide air quality mitigation to address impacts on the Stonepound Crossroads AQMA”* and *“Provide good acoustic design to address noise impacts associated with the A273”*, which may help 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 AQMA (MSDC, 2022b), 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).

Policy DPA11 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).

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.

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.

B.13.13DPA12: Land west of Kemps, Hurstpierpoint

Policy DPA12, previously DPH16, relates to Site 13, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-74: Sustainability performance of Policy DPA12.

Policy Option DPA12	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	++	+	-	0	-	-	++	0	0	++	+

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 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 an onsite play area and informal outdoor space, as well as financial contributions towards the provision of

community buildings, local community infrastructure and health. 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.

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 policy seeks to “*provide appropriate landscaping and an appropriate transition between the built development and the wider countryside to the west of the site, including ecological corridors*” and “*protect and enhance the streams on the western boundaries and crossing the site*”. A negligible impact on biodiversity (SA Objective 7) would be expected. The site is located within ‘Hurstpierpoint Low Weald’ which has ‘negligible/low’ capacity, according to the Landscape Capacity Study. Whilst the measures in the policy, 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.

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).

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.

B.13.14DPA13: The Paddocks, Lewes Road, Ashurst Wood

Policy DPA13, previously DPH17, relates to Site 984, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely sewerage connections and that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Table B-75: Sustainability performance of Policy DPA13.

Policy Option DPA13	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	0	0	0	0	0	0	-	+

The site is located outside of sustainable travel times to some local facilities and services, including train stations. Policy DPA13 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 (SA Objective 2), and for the local community (SA Objective 4) which is already assessed positively.

However, the site is located adjacent to the A22, with potential adverse implications for the health of site end users. The policy states the development should “*take a landscape-led approach to development and take into account the existing trees in the design and layout of the site*”, which may help to provide a buffer by retaining the existing trees at the site boundaries to protect site end users from reduced air quality and noise pollution effects from the main road to some extent. The policy requires the development to “*provide suitable access from Lewes Road.*”. A negligible impact could be achieved with regard to transport (SA Objective 10).

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).

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 Study. Policy DPH17 states 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).

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.

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.

B.13.15 DPA14: Land at Foxhole Farm, Bolney

Policy DPA14, previously DPH18, relates to Site 1120, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely sewerage connections and that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Table B-76: Sustainability performance of Policy DPA14.

Policy Option DPA14	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	++	0	-	+	0	-	0	0	0	-	-	0	0	+

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 “provide pedestrian and cycle access to The Street into the north part of the site between the properties of Westmeadow and Downland. In addition, explore potential for additional pedestrian and cycle access to The Street into the south-central part of 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 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.

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 between the north and south development parcels” as well as on site allotments and community working hub, and financial contributions towards play area, outdoor sports, health and local community infrastructure. These measures would be likely to improve provision of and access to recreation and leisure facilities. A minor positive impact on community is therefore expected (SA Objective 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).

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.

The policy requires development to “*explore opportunities to enhance education provision in the village that meets an identified local need*”. The policy has an intention to improve the provision of and access to schools in the local area; however, it does not set out a commitment or details of the education provision. Therefore, a minor negative impact on education is still anticipated at this stage (SA Objective 3).

The site is located within ‘Bolney Sloping High Weald’ which has ‘low’ capacity, according to the Landscape Capacity Study. Policy DPA14 states that the proposal should “*retain the character of footpath 44Bo which runs along the site’s northern boundary and create a pedestrian link from the site*” and provide informal outdoor space including a community orchard and a Country Park which may help to promote access to outdoor space and enjoyment of the countryside. A negligible impact on the character of the landscape (SA Objective 8) and biodiversity (SA Objective 7) are anticipated.

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 DPA14 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).

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.

B.13.16DPA15: Ham Lane Farm House, Ham Lane, Scaynes Hill

Policy DPA15, previously DPH23, relates to Site 1020, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-77: Sustainability performance of Policy DPA15.

Policy Option DPA15	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	0	0	0	0	0	0	0	+

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”. 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.

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.

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 majority of site is located within ‘Scaynes Hill High Weald’ which has ‘low/medium’ capacity, according to the Landscape Capacity Study. Policy DPA15 states that the proposal should “address any impacts associated with ancient woodland in the south east corner of the site”. 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).

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.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land because of the development.

B.13.17 DPA16: Land at Ansty Fields and rear of North Cottages, Cuckfield Road, Ansty

Policy DPA16, previously DPH24, relates to Site 631, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy. Lepus' full assessment summary is included below with relevant updates.

Table B-78: Sustainability performance of Policy DPA16.

Policy Option DPA16	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	0	+	+	-	0	0	0	0	0	0	0	+

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 (DPA17) by providing pedestrian and cycling connections and GI 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.

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) and helps the site in its performance against the health and wellbeing objective.

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 “*the layout of the site should take into account the location of the trees and allow for their future retention*”, 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 by retaining trees along the site boundary. Overall, a negligible impact could be achieved with regard to health and wellbeing (SA Objective 2).

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 relatively small-scale and enclosed by hedgerows and adjacent existing residential development. Policy DPA16 also sets out to pay “*particular attention... to trees and hedgerows 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.

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.

B.13.18DPA17: Land to the west of Marwick Close, Bolney Road, Ansty

Policy DPA17, previously DPH25, relates to Site 784, which was assessed alongside reasonable alternatives in pre-mitigation and post-mitigation assessments. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged, namely related to tree retention and enhancement, and noise impacts. Lepus' full assessment summary is included below.

Table B-79: Sustainability performance of Policy DPA17.

Policy Option DPA17	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 & Surface Water														
Natural Resources														
Biodiversity & Geodiversity														
Landscape														
Cultural Heritage														
Climate change & transport														
Energy and Waste														
Water Resources														
Economic regeneration														
Economic growth														
	+	0	0	+	+	-	0	0	0	0	0	0	0	+

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 (DPA16) 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.

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).

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 the trees and retain the ground levels along the A272 Bolney Road which forms the western boundary of the site*”, 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).

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 relatively small-scale and enclosed by hedgerows and adjacent existing residential development. Policy DPA17 also states “*Particular attention should be given to trees and hedgerows 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. A negligible impact on biodiversity (SA Objective 7) would also be expected.

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.

B.13.19DPA18: Land at Byanda, Hassocks

Policy DPA18, previously DPH27, relates to Site 1101, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy, namely sewerage connections and that the site is within a Mineral Safeguarding Area and that any development should consider the potential for Minerals sterilisation in accordance with the West Sussex Joint Minerals Local Plan. However, it is considered that the impact on Natural Resources (SA Objective 6) remains a minor negative due to development on undeveloped land, loss of open countryside and agricultural land.

Therefore, Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below with relevant edits.

Table B-80: Sustainability performance of Policy DPA18.

Policy Option DPA18	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	0	0	++	+	-	0	0	0	0	+/-	0	++	++

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, taking into account the requirements of Policy DPH4, 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.

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. Considering the trend of improvements in NO2 levels within the AQMA (MSDC, 2022b), a negligible impact could be achieved overall with regard to health and wellbeing (SA Objective 2) and transport (SA Objective 10).

The site is located within ‘Hurstpierpoint Southern Fringe’ which has ‘negligible / low’ capacity, according to the Landscape Capacity Study. The site is relatively small-scale and enclosed by trees and existing development, with some buildings currently on site. Policy DPA18 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. A negligible impact on biodiversity (SA Objective 7) would also be expected.

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).

B.13.20DPA19: Land at Hyde Lodge, Handcross

Policy DPA19, previously DPH28, relates to Site 1106, which was assessed alongside reasonable alternatives. 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 pre-mitigation assessment findings for this site.

There has been a minor update to this policy and Lepus’ Regulation 18 SA assessment remains unchanged. Lepus’ full assessment summary is included below with relevant edits.

Table B-81: Sustainability performance of Policy DPA19.

Policy Option DPA19	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	0	+	+	-	0	-	0	0	+/-	0	0	++

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, taking into account Policy DPH4, 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 where there is an existing gateway” and “provide access from the B2114 London Road”, which would be expected to improve travel choice for site end users, including sustainable transport connections.

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 “provide good acoustic design to address any impacts from noise and air quality associated with 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.

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.

Landscape officer comments provided by the Council during the Regulation 18 stage 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 Study. Policy DPA19 requires an LVIA to be undertaken to "*inform an appropriate layout, design and landscaping to conserve and enhance the High Weald AONB*". Whilst these measures, along with considerate building design, 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.

The site coincides with deciduous woodland, along the western edge. Policy DPA19 seeks to "*provide an appropriate buffer to the Priority habitat (deciduous woodland) within the site on its western boundary*", with associated benefits to ecological corridors and habitat conservation. A negligible impact on biodiversity (SA Objective 7) would be expected.

A minor negative effect would be likely to remain in relation to natural resources (SA Objective 6) owing to the loss of undeveloped land because 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).

B.14 Infrastructure

B.14.1 DPI1: Infrastructure Provision

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.

Two reasonable alternatives were considered for this policy. These were:

1. Have a detailed policy with expectation for all proposals.
2. Rely on national policy.

The assessment of these alternatives against the SA Objectives are in Table B-82 below.

Table B-82: Sustainability performance of Policy DPI1.

Policy Option DPI1	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
1	0	+	+	+	+	0	0	0	0	+	+	+	+	+
2	0	+	+	+	+	0	0	0	0	+	+	+	+	+

Option 1 was brought forward as it would be more 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.

There has been a minor update to this policy since the Regulation 18 Plan to provide more clarity on delivering new infrastructure appropriately and safeguard existing infrastructure. Lepus' SA assessment remains unchanged, and the assessment is included in Table B-82 above and the full summary is included below.

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).

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).

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).

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).

B.14.2 DPI2: Planning Obligations

Policy DPI2 sets out the use of planning obligations in relation to the provision of affordable housing, appropriate mitigation of a multitude of potential development impacts, and monitoring of these obligations.

There has been a minor update to this policy which now provides more clarity on the impacts that a development may cause. The revised assessment since the Regulation 18 SA is included below.

Table B-83: Sustainability performance of Policy DPI2.

Policy Option DPI2	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	+	+	+	0	++	+	0	+	+	0	0	+

The impact of development criteria includes measures related to employment opportunities, health and wellbeing, education, social and community facilities, flood management, GI, biodiversity net gain and consideration of the integrity of the Ashdown Forest SAC and SPA, traffic improvements, active travel improvements, and waste management. The policy could help to ensure that site 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, 8, 10, 11 and 14) and a major positive impact on biodiversity (SA Objective 7).

B.14.3 DPI3: Major Infrastructure Projects

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”.

There has been a minor update to this policy since the Regulation 18 Plan. Lepus' assessment remains unchanged, and the full summary is included below with relevant edits.

Table B-84: Sustainability performance of Policy DPI3.

Policy Option DPI3	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	+	0	+	0	0	0	0	+	+	0	+	+

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.

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).

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.

B.14.4 DPI4: Communications Infrastructure

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.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-85: Sustainability performance of Policy DPI4.

Policy Option DPI4	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	0	0	0	0	+	0	0	0	+	0	0	+	+

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).

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).

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).

B.14.5 DPI5: Open Space, Sport and Recreational Facilities

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.

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-86: Sustainability performance of Policy DPI5.

Policy Option DPI5	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	+	0	0	+	+	0	0	0	0	0	0

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).

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).

B.14.6 DPI6: Community and Cultural Facilities and Local Services

Policy DPI6 seeks to protect existing community facilities and support development proposals for new or improved facilities.

There has been a minor update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-87: Sustainability performance of Policy DPI6.

Policy Option DPI6	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	+	0	0	0	0	0	0	0	0	0	+

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.

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).

B.14.7 DPI7: Water and Wastewater Infrastructure

Policy DPI7 outlines the standards which development proposals must meet to be supported, in relation to water infrastructure, and covers topics such as water resources, pollution, quantity and foul water / sewage facilities.

This is a new policy since the Regulation 18 Plan. The policy requirements of DPS5 have been split between policy DPN6 which now covers matters in the water environment and this new policy DPI7 which encompasses criteria on water and wastewater infrastructure. The sustainability credentials of the policy remain unchanged, and Lepus' Regulation 18 assessment of DPS5 remains valid.

Table B-88: Sustainability performance of Policy DPI7.

Policy Option DPI7	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	0	+	0	0	0	0	0	0	0	0	0	++	0	0

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.

The policy also states that development should connect to a public sewage treatment works, and where it cannot proposals must set out the long-term management and maintenance, and *“be supported by sufficient information to understand the potential implications for the water environment, biodiversity and climate change”*.

B.14.8 DPI8: Viability

Policy DPI8 (was Policy DPI7 at Regulation 18) 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.

There has been no update to this policy and Lepus' Regulation 18 SA assessment remains unchanged. Lepus' full assessment summary is included below.

Table B-89: Sustainability performance of Policy DPI8.

Policy Option DPI8	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 & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth	
+/-	+/-	+/-	+/-	0	0	0	0	0	+/-	+/-	+/-	+/-	+/-	+/-

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.

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 GI, 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. The policy would be unlikely to directly impact SA Objective 5, 6, 7, 8 and 9.

C Appraisal of Reasonable Alternative Sites Pre-Mitigation in the Mid Sussex District Plan Review 2021 - 2039

C.1 Introduction

The following sections provide an appraisal of each of the new reasonable alternative sites identified by Mid Sussex District Council in accordance with the SA framework and methodology.

The SA site assessment is structured based on the SA objectives and supporting questions outlined by Lepus Consulting which form the SA framework. Each subsection below focusses on a particular SA objective, presenting a scoring matrix for all sites assessed against each SA objective, supported by a rationale for the recorded impacts.

The SA process can rely upon professional judgement, and therefore the Regulation 18 SA and the decision-making used throughout that site assessment has been used to inform this site assessment.

C.2 Updates to site assessment criteria

The Site Selection process involved assessing sites against 14 assessment criteria, one of which focussed on Listed Buildings (Criterion 5: Listed Buildings), and another on Conservation Areas (Criterion 6: Conservation Area), to consider the location of a potential site in relation to these designations. Since the Regulation 18 Plan, MSDC have amended these two criteria to reflect comments received from consultees, as well as review of the National Planning Policy Framework (NPPF).

These updated criteria outlined that for the Site Selection process, any site where scoring concluded 'Less than substantial harm' for Criterion 5 and Criterion 6 would result in an updated assessment score of 'negative impact', unless an assessment or review of heritage assets has been undertaken to enable the consideration of potential suitable mitigation on the identified heritage assets of the proposed scheme. All other criteria used for the Site Selection process remained as per the Regulation 18 Plan. Following consultee comments relating to the travel time data used to calculate distances for sites, the Council checked and updated the Site Selection conclusions as required.

The SA site assessment process is a separate process to the Site Selection process, providing an independent assessment of the likely environmental and socio-economic impacts of a site. It is considered that the amended Site Selection criteria, and potential for inclusion of mitigation, would not have an impact on the SA site assessment, therefore all Regulation 18 SA site assessment findings remain valid. However, where amendments have been made to the Site Selection process to correct erroneous travel time data, the SA site assessment has been updated to reflect this updated travel time data. These changes are outlined in Table C-1 below.

An overview of the updated assessments for the 14 sites where MSDC received comments from consultees on the Site Selection Conclusions is outlined below.

Table C-1: Updated assessments results for 14 reasonable alternatives.

SHELAA Ref	Topic	Previous score	Current score	Comment
575	Pedestrian Access to Community Facilities and Local Services(SA Objective 4 & 10)	-	-	Changed from: Within to Over 20 minutes walk, over 30 minutes public transport
	Public Transport Access to Community Facilities and Local Services (SA Objective 4 & 10)	-	-	Changed from: Within to Over 20 minutes walk, over 30 minutes public transport
	Pedestrian Access to Primary Schools (SA Objective 3)	-	-	Changed from: Within to Over 20 minutes walk
	Pedestrian Access to GP surgery (SA Objective 2)	0	-	Changed from: Within to Over 20 minutes walk
	Pedestrian Access to Convenience Store (SA Objective 10)	-	-	Changed from: Within to Over 20 minutes walk
1022	Listed Buildings (SA Objective 9)	0	-	Replaced: No impact with: Less than substantial harm – Low impact
1030	Pedestrian Access to Community Facilities and Local Services(SA Objective 4 & 10)	-	-	Changed from: Within to Over 20 minutes walk, still within 30 minutes public transport

C.3 New reasonable alternative sites

C.3.1 SA Objective 1 - Housing

SA Objective 1 is to ensure that everyone has the opportunity to live in a home for their need and which they can afford. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to:

- Meet the housing requirement of the whole community, including of older people?
- Deliver a range of type, tenures and mix of homes the district needs over the plan period?

- Increase the supply of affordable homes?
- Provide for the housing need of an ageing population?
- Meet Gypsy and Traveller accommodation needs?

Table C-2: Site assessment matrix for Objective 1 - Housing.

Site ref.	Score
1146	+
1135	+
1141	+
1148	+
1133	+
1137	++
1122	++
29	+

- Of the eight new sites identified, those identified as having a yield of 100 or more dwellings would be expected to have major positive impacts on housing provision. Sites which have been identified as having an expected yield of less than 100 dwellings are expected to have a minor positive impact on dwelling provision.
- Sites 1122, and 1137 are expected to provide a yield of 100, and 400 dwellings respectively, they are therefore assessed as having a major positive impact on housing. The remaining sites are assessed as having a minor positive impact on housing provision as they provide a yield ranging from 6-10 dwellings.

C.3.2 SA Objective 2 - Health and Wellbeing

SA Objective 2 is to maintain and improve access to health, leisure and open space facilities and reduce inequalities in health. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Provide for additional facilities to support the need of new and growing communities?
- Improve access to health care facilities and social care services?
- Promote health and encourage healthy lifestyle by maintaining, connecting, creating and enhancing multifunctional open spaces, green infrastructure and recreation and sports facilities?
- Promote healthy lifestyle choices by encouraging and facilitating walking and cycling?
- Support special needs and ageing populations?
- Increase access to open space facilities including the countryside?

Table C-3: Sites impact matrix for SA Objective 2 - Health and Wellbeing.

Site Ref.	Hospital with A&E	Access to GP Surgery	Leisure Centres	AQMAs	Main Road	Access to Green-space	Loss of Green-space	PROW/ Cycle Paths
1146	-	-	-	+	+	+	-	+
1135	+	-	-	+	-	+	-	+
1141	+	-	-	+	+	+	-	+
1148	+	-	-	+	-	+	-	+
1133	-	-	-	+	-	+	-	+
1137	+	-	-	+	+	+	-	+
1122	+	+	+	+	+	+	-	+
29	+	+	-	+	-	+	-	+

NHS hospital with A&E Department

There are two NHS hospitals with A&E Departments in Mid Sussex district, the Princess Royal in Haywards Heath and Queen Victoria in East Grinstead. The target distance, outlined by Lepus Consulting within Regulation 18 SA, for sustainable access to an NHS hospital with A&E department is 5km. Sites 29, 1141, 1135, 1148, 1122 and 771 are within a 5km buffer of either hospital, therefore the proposed development of these five sites is expected to have a minor positive impact on access to essential healthcare.

Sites 1146 and 1133 are located outside of the target distance, and therefore proposed development at these sites are expected to have a minor negative impact on access to essential healthcare.

Pedestrian Access to GP Surgery

There are twenty-six GP surgeries in Mid Sussex district, the target distance for sustainable access outlined by Lepus Consulting within the Regulation 18 SA to a GP surgery is approximately 1.2km or a 15-minute walk.

Sites 29 and 1122 are located within the target distance of 15 minutes' walk from the nearest GP surgery, therefore, proposed development of this site would be expected to have a minor positive impact on access to healthcare.

Sites 1133, 1135, 1137, 1141, 1146, 1148, are located over 20 minutes' walk from the nearest GP surgery. It would be expected that proposed development of these sites would have a minor negative impact on access to healthcare.

Leisure Centres

There are three leisure centres located in Mid Sussex district, these are located in Haywards Heath, East Grinstead and Burgess Hill. In the Regulation 18 SA by Lepus Consulting, the target sustainable distance from the proposed developments to a leisure centre is 1.5km.

All of the additional proposed development sites are located outside of the 1.5km target distance except for Site 1122, therefore, the remaining sites would be expected to have a minor negative impact on access to these facilities.

The development of site 1122 would be expected to have a minor positive impact on the health and wellbeing of site users.

Air Quality Management Areas (AQMAs)

The target distance outlined by Lepus Consulting within Regulation 18 SA from an AQMA is 200m.

All of the additional proposed development sites are located at least 200m from an AQMA therefore, a minor positive impact on human health would be expected for site users at these sites.

Main Roads

As outlined by Lepus Consulting within Regulation 18 SA, proposed sites located within 200m from a main road would be expected to have a minor impact on the health and wellbeing of site users. Development in these locations may have the potential to expose site users to higher levels of transport associated air and noise pollution.

Sites 1133, 1135, 1148, 29 are located less than 200m from main roads. The proposed development of these four sites is therefore expected to have a minor negative impact on the health and wellbeing of site users.

Sites 1137, 1141, 1146, and 1122 are located at least 200m from a main road and are therefore expected to have a minor positive impact on the health and wellbeing of site users.

Access to Greenspace

Access to greenspace is associated with a range of mental and physical health benefits. As outlined by Lepus Consulting within Regulation 18 SA, if a site is located within 300m of an OS Greenspace site (OS Greenspace, 2022), or a multi-functional greenspace, a minor positive impact is expected on site users' health and wellbeing.

All of the additional sites are located within 300m of OS Greenspace sites or multi-functional greenspaces; therefore development of these sites is expected to have a minor positive impact on site users health and wellbeing.

Net Loss of Greenspace

None of the proposed additional sites coincide with OS Greenspaces or multi-functional greenspace. Therefore no net loss of greenspace is expected from the additional sites.

PRoW/Cycle Paths

Proposed sites which have good accessibility to the PRoW and/or National Cycle Network would likely encourage engagement in physical activity and active travel resulting in a minor positive impact on health and wellbeing.

All sites are expected to provide access to Mid Sussex's PRoW network and therefore, are likely to provide a minor positive impact on access to this amenity and health benefits.

C.3.3 SA Objective 3 - Education

SA Objective 3 is 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. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to:

- Reduce crime/ fear of crime and anti-social activity?
- Promote sustainable mixed-use environments?
- Improve access to community facilities?
- Maintain existing community facilities and encourage the delivery of new ones?

Table C-4: Site impact matrix for SA Objective 3 - Education.

Site ref.	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Further Education
1146	++	-	+
1135	-	-	+
1141	-	-	+
1148	-	-	+
1133	++	-	-
1137	-	-	+
1122	+	+	+
29	+	-	+

Pedestrian Access to Primary Schools

As outlined by Lepus Consulting within Regulation 18 SA, the sustainable target distance for a residential site to a primary school is within a 15-minute walk (approximately 1.2km).

Sites 1146 and 1133 are located within a 10-minute walk from a primary school. This is expected to have a major positive impact on access to primary school education for site users.

Sites 1122 and 29 are located within a 15-minute walk from a primary school. This is expected to have a minor positive impact on access to primary school education for site users.

Sites 1135, 1141, 1148 and 1137 are located over a 20-minute walk from a primary school. This is expected to have a minor negative impact on the access to primary school education for site users.

Pedestrian Access to Secondary Schools

As outlined by Lepus Consulting within Regulation 18 SA, the sustainable distance to secondary education has been identified as 1.5km from a residential site.

Site 1122 is located within 1.5km of the Oathall Community College. Therefore, development of this site is expected to have a minor positive impact on access to secondary education for site users.

Sites 1133, 1137, 1141, 1145, 1146, 1148, and 29 are located outside of the target distance. Therefore it is expected that proposed development of these sites will likely have a minor negative impact on access to secondary education for site users.

Further Education

As outlined by Lepus Consulting within Regulation 18 SA, residential sites which are located within 3km from a further education facilities are expected to have good access to these facilities.

The majority of the additional proposed sites are located within 3km of further educational facilities in Mid Sussex District. Therefore, the development of these proposed sites could be expected to have a minor positive impact on access to further education for site users.

Site 1133 is not located within 3km of a further educational facility and therefore a minor negative impact on access to further education could be expected for site users.

C.3.4 SA Objective 4 - Community and Crime

SA Objective 4 is to maintain and improve access to health, leisure and open space facilities and reduce inequalities in health. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Reduce crime/ fear of crime and anti-social activity?
- Promote design that discourages crime?
- Promote sustainable mixed-use environments?
- Improve access to community facilities?
- Maintain existing community facilities and encourage the delivery of new ones?

Table C-5: Site impact matrix for SA Objective 4 - Community and Crime.

Site Ref	IMD	Pedestrian Access to Community Facilities	Public Transport Access to Community Facilities	Loss of Community Facilities	Built Up Area Boundary
1146	0	-	-	0	0
1135	0	-	-	0	0
1141	0	-	-	0	0
1148	0	-	-	0	0
1133	0	-	-	0	0
1137	0	-	+	0	0
1122	0	+	+	-	0
29	0	-	-	0	0

Index of Multiple Deprivation

The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation across Lower Layer Super Output Areas (LSOA), which is a geographical region of a population size of approximately 1,500. LSOAs are used for the reporting of small area statistics in England and Wales. The IMD utilises seven key domains and 39 indicators of deprivation which are weighted and used to calculate the index, all LSOAs are ranked into deciles. As outlined by Lepus Consulting within Regulation 18 SA, for the purposes of this analysis the proposed sites have been assessed for their location in an LSOA within the 10% most deprived in England and Wales.

Deprivation across the district varies, however, none of the proposed sites fall within an LSOA within the 10% most deprived areas, therefore each site has been given a neutral score.

Pedestrian Access to Community Facilities

For the purposes of this assessment, the term community facilities refer to convenience shops community halls, places of worship and libraries. As outlined by Lepus Consulting within Regulation 18 SA, the target distance from the proposed sites and community facilities is within a 15-minute walk.

Site 1122 is located within a 15 minute-walk from community facilities, therefore development at this site is expected to have a minor positive impact on access to community facilities.

Sites 1133, 1135, 1137, 1141, 1146, 1148, and 29 are located over 20 minutes-walk from community facilities. Therefore, development at these sites is expected to have a minor negative impact on access to community facilities.

Public Transport Access to Community Facilities

As outlined by Lepus Consulting within Regulation 18 SA, sites which 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 library would be expected to have a minor positive impact on accessibility of community facilities for site users.

Sites 1133, 1135, 1141, 1146, 1148, and 29 are located over a 30-minute journey using public transport to community facilities. Therefore, development at these proposed sites would be expected to have a minor negative impact on access to community facilities.

Sites 1137 and 1122 are located within a 20-minute journey using public transport to community facilities. Therefore, development at these locations would be expected to have a minor positive impact on access to community facilities.

Loss of Community Facilities

Site 1122 coincides with the location of a convenience store and post office; therefore, the proposed development of this site could result in the loss of these amenities. Following the decision-making process applied by Lepus Consulting in the Regulation 18 SA, this could therefore be expected to have a minor impact on the provision of community facilities.

None of the remaining proposed development sites coincide with existing community facilities.

Built Up Area Boundary

As outlined by Lepus Consulting within Regulation 18 SA, proposed sites which are located over 150m from a built-up area boundary are expected to have a negative impact on community cohesion and integration with existing local communities. However, none of the additional sites proposed are located over 150m from a built-up area boundary, therefore each site has been given a neutral score.

C.3.5 SA Objective 5 - Flooding

SA Objective 5 is to reduce the risk to people, properties, the economy and the environment of flooding from all sources. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to:

- 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?
- Promote the use of Natural Flood Management schemes, SuDS and flood resilient design?
- Incorporate sustainable design and construction techniques?

Table C-6: Site impact matrix for SA Objective 5 - Flooding.

Site Ref	Fluvial Flood Risk	Surface Water Flood Risk
1146	+	-
1135	+	+
1141	+	-
1148	+	+
1133	+	--
1137	+	--
1122	+	-
29	+	-

Fluvial Flood Risk

All of the additional proposed sites are located in Flood Zone 1, where the risk of flooding is less than 0.1% each year. Therefore proposed development at this site would place site users at a low risk of flooding therefore a minor positive impact could be expected.

Surface Water Flood Risk

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.

Sites 1122, 1141, and 1146 coincide with areas of low risk from surface water flooding and Site 29 is at medium risk of surface water flooding. Therefore, the development of these sites could have a minor negative impact on flooding.

Sites 1133 and 1137 coincide with areas of high risk from surface water flooding. Therefore, the development of these sites could have a major negative impact for site users.

Sites 1135 and 1148 do not coincide with areas at risk of surface water flooding. Therefore development of these sites would be expected to have a minor positive impact.

C.3.6 SA Objective 6 - Natural Resources

SA Objective 6 is 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. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Support the redevelopment of previously developed land?
- Make best use of land?
- Encourage the construction of more sustainable homes?
- Minimise the loss of open countryside to development?
- Minimise the loss of the best and most versatile agricultural land to development?

- Maintain and enhance soil quality?

Table C-7: Site impact matrix for SA Objective 6 - Natural Resources.

Site Ref	Previously Developed Land	Agricultural Land Classification	Mineral Safeguarding Area
1146	-	-	-
1135	-	-	0
1141	-	-	-
1148	-	-	0
1133	-	-	-
1137	-	--	-
1122	+	0	0
29	-	-	0

Previously Developed Land

Site 1122 is largely comprised of previously developed land, so development at this location would have a minor positive impact on natural resources through efficient use of land.

Sites 1133, 1135, 1146, 1141, 29, 1137 and 1148 partially or wholly comprise undeveloped land which may have minor negative impacts on natural resources through their permanent and irreversible loss.

Agricultural Land Classification (ALC)

Site 1122 is located upon land which is classified as urban, therefore is expected to have negligible impacts on agricultural land.

Sites 1133, 1141, 1135, 1146, 1148 and 29 are located upon land in ALC Grade 3, and are less than 20ha. The proposed development of these sites would likely have a minor negative impact on agricultural land through the irreversible loss of Best and Most Versatile (BMV) soil resources.

Site 1137 is located upon ALC Grade 3 and is over 20ha. The proposed development at this site would be expected to have a major negative impact on agricultural land through the irreversible loss of BMV soil resources.

Mineral Safeguarding Area

Areas of nationally and locally important mineral resources which should be protected from unnecessary sterilisation are designated as Mineral Safeguarding Areas (MSAs).

Sites 1122 and 1135, 1148 and 29 do not coincide with MSAs and therefore proposed development of these sites is expected to have a negligible impact on mineral resources.

Sites 1133, 1137, and 1146 are located within a MSA for Brick clay and Site 1141 is located within MSA for Consolidated bedrock. The development of these sites could potentially lead to the sterilisation of these mineral resources. Therefore, the proposed sites would have a minor negative impact on natural resources.

C.3.7 SA Objective 7 - Biodiversity and Geodiversity

SA Objective 7 is to conserve and enhance the district's biodiversity and geodiversity. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to:

- Avoid adverse effects on internally and nationally designated biodiversity and geodiversity assets within and outside the district, including Ancient Woodland?
- Seek to protect and enhance ecological networks, promoting the achievement of net gain where possible, whilst taking into account the impacts of climate change?
- Provide and manage the opportunities for young people to come into contact with wildlife whilst encouraging respect for and raising awareness of the sensitivity of biodiversity?

Table C-8: Site impact matrix for SA Objective 6 – Biodiversity and Geodiversity.

Site Ref	Habitat Sites	SSSI	Ancient Woodlands	Veteran Trees	Local Nature Reserves	Local Wildlife Sites	Priority Habitats
1146	0	0	0	0	0	0	0
1135	0	0	0	0	0	0	0
1141	0	0	0	0	0	0	0
1148	0	0	0	0	0	0	0
1133	0	0	0	0	0	0	0
1137	0	0	--	0	0	0	-
1122	0	0	0	0	0	0	0
29	0	0	--	0	0	0	0

Habitat Sites

Habitat sites are designated environmental sites which have been identified and protected for their ecological interest. There are no Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites located in the district. However Ashdown Forest SPA and SAC is located to the east in a neighbouring authority (East Sussex). As outlined by Lepus Consulting within Regulation 18 SA, the proposed sites have been assessed for their location within Ashdown Forest SPA and SAC 7km Zone of Influence (MSDC, 2022a), previously established by MSDC.

None of the proposed development sites are located within the 7km Zone of Influence, therefore, their development is likely to have negligible impacts on Ashdown Forest SPA and SAC.

Sites of Special Scientific Interest

None of the proposed development sites are located within a SSSI impact risk zone, therefore, their development is likely to have negligible impacts on SSSIs in MSDC.

Ancient Woodlands

There are several large areas of Ancient Woodland concentrated to the north of the district, including Worth Forest and Wakehurst Park.

Sites 1137 and 29 are located adjacent to or within Ancient Woodland within the district and therefore development at these locations are expected to result in a direct loss of these assets and a major negative impact.

Sites 1122, 1133, 1141, 1135, 1146, and 1148 are not located within or in proximity to Ancient Woodland, therefore development of these sites is expected to have a negligible impact on these biodiversity assets.

Veteran Trees

None of the proposed development sites coincide with the location of veteran trees. Therefore development at these locations would have a negligible impact on veteran trees.

Local Nature Reserves

None of the proposed development sites are located in proximity to Local Nature Reserves, therefore a negligible impact is expected.

Local Wildlife Sites

There are several Local Wildlife Sites (LWSs) located across the district. All of the proposed sites are not located within or in proximity to an LWS. Therefore a negligible impact can be expected.

Priority Habitats

Priority habitats are prevalent throughout the district and include deciduous woodland, grass moorland and traditional orchards. Site 1137 coincides with areas of priority habitat, Therefore, development at this site could result in the loss or degradation of these habitats. As a result, a minor negative impact is assessed.

None of the other proposed sites coincide with priority habitat, therefore a negligible impact is assessed.

C.3.8 SA Objective 8 – Landscape

SA Objective 8 is 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. The appraisal questions associated with this SA objective are as follows:

Will the proposal help to:

- Conserve and enhance the High Weald ANOB?
- Conserve and enhance the settings of the South Downs National Park?
- Protect and enhance settlements and their settings within the landscape across the district?
- Protect and enhance landscape character?
- Promote high quality design in context with its rural and urban landscape?
- Maintain and where possible increase accessibility to the countryside and more generally to open spaces?

Table C-9: Site impact matrix for SA Objective 7 – Landscape.

Site ref	AONB	National Park	Landscape Capacity	County Park	Alter Views	Coalescence	Urban Sprawl	Multifunctional Green-space	Tree Preservation Order
1146	0	0	-	0	-	0	0	+	-
1135	0	0	-	0	-	0	0	+	0
1141	0	0	-	0	-	0	0	+	0
1148	0	0	-	0	-	0	0	+	0
1133	0	0	-	0	-	-	0	+	0
1137	0	-	-	0	-	0	-	+	0
1122	0	0	+	0	-	0	0	+	0
29	0	0	0	0	0	0	0	+	0

High Weald Area of Natural Beauty

The High Weald Area of Natural Beauty (ANOB) is located to the north of Mid Sussex district. None of the proposed development sites are located in the AONB and therefore a negligible impact can be expected.

South Downs National Park

The South Downs National Park is located to the south of the district. Site 1137 is located in proximity to the National Park, therefore development in this location may alter the park’s setting resulting in a minor negative impact.

None of the other additional sites are located within proximity to the National Park and therefore, a negligible impact can be expected.

Landscape Capacity

As outlined by Lepus Consulting within the Regulation 18 SA, 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” (Natural England, 2013).

Site 1122 is located in an area of high landscape capacity, therefore, development at this location could have a minor positive impact on local landscape.

Site 29 is located in an area of medium landscape capacity. Proposed development at this location is assessed as having a negligible impact on the landscape setting.

Sites 1137, 1135, 1141, 1146, 1148 and 1133 are located in an area of low or low to medium landscape capacity where development in this area could have the potential to significantly impact landscape character and setting. Therefore, development at this site could be expected to have a minor negative impact on landscape.

Country Park

There are several Country Parks located across the district. None of the proposed sites are located within or in proximity to a Country Park, therefore a negligible impact is expected for the development of all additional sites.

Alter Views for ProW Network Users

All proposed sites, except for site 29, are located in the vicinity of the ProW network and the development of these sites could potentially alter the views of countryside or open space currently experienced by the users of ProW. Therefore a minor negative impact on local landscape can be expected.

Site 29 is separated from ProWs by existing built form, and its development would therefore be unlikely to significantly alter views experienced by ProW users, therefore having a neutral impact.

Increased Risk of Coalescence

Site 1133 is located between the existing settlements of Crosspost and Bolney. Development at this location could lead to the loss of separation between settlements and potentially have a minor negative impacts in relation to coalescence.

The other proposed sites would be expected to have a negligible impact in relation to coalescence.

Urban Sprawl

Site 1137 is located outside of existing settlements within Mid Sussex, therefore development at this location could increase the risk of urban sprawl resulting in a minor negative impact on landscape.

All other sites proposed are located adjacent to or within to existing settlements, therefore a negligible impact is assessed.

Multi-functional Greenspace

As outlined by Lepus Consulting within the Regulation 18 SA, sites located within 300m of a multi-functional greenspace would expect to improve accessibility of countryside and open space for site users.

All of the proposed sites are located within target distance of multi-function greenspace, improving accessibility to the countryside and open space for site users resulting in a minor positive impact.

Tree Preservation Order

A Tree Preservation Order (TPO) is an order created by local authorities in England to protect individual trees, groups of trees or areas of woodland. Site 1146 coincides with an individual tree designated under a TPO. The development of this site could directly harm this protected tree during construction and operational pressures, therefore a minor negative impact is expected.

C.3.9 SA Objective 9 – Cultural Heritage

SA Objective 9 is to protect, enhance and make accessible for enjoyment, the district's historic environment. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- 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?
- Protect and enhance sites, features and areas of archaeological value in both urban and rural areas?
- Reduce the number of buildings at risk?
- Support the undertaking of archaeological investigations and where appropriate recommend mitigation strategies?
- Enhance accessibility to cultural heritage assets?

Table C-10: Site impact matrix for SA Objective 9 – Cultural Heritage.

Site ref.	Listed Buildings	Conservation Area	Scheduled Monument	Registered Parks and Gardens	Archaeology
1146	-	0	0	0	0
1135	-	0	0	0	-
1141	-	0	0	0	0
1148	-	0	0	0	0
1133	-	-	0	0	-
1137	0	0	0	0	-
1122	0	-	0	0	0
29	-	-	0	0	0

Listed Buildings (Grades I, II* and II)

There are numerous Listed Buildings across the district.

Sites 1133, 1135, 1141, 1146, 1148 and 29 are located in proximity to Listed Buildings and therefore have been identified to have potential to cause ‘medium’ or ‘high’ impact on these heritage assets. Therefore, development of these proposed sites would be expected to have a minor negative impact.

Sites 1122 and 1137 are identified as being unlikely to have significant impacts on the setting of any Listed Building.

Conservation Area

There are 36 Conservation Areas (Cas) across Mid Sussex.

Sites 1122, 1133 and 29 are located in close proximity to Cas and have been identified with potential to cause moderate impact on the designation. Therefore a minor negative impact from the development of the proposed sites would be expected.

Sites 1135, 1137, 1141, 1146, 1148 are not located near to any CA and are therefore identified as being unlikely to have significant impacts on Cas.

Scheduled Monument

None of the proposed additional sites are located in proximity to any Scheduled Monuments (SM) across the district. The proposed development at these sites is likely to have negligible impact on SMs.

Registered Park and Gardens

None of the proposed additional sites are located in proximity from a Registered Park and Gardens, therefore, development at these sites is assessed as having a negligible impact on the setting of any Registered Park and Gardens.

Archaeology

Sites 1122, 1141, 1146, 1148, and 29 are not located in areas of archaeological interest. Therefore the development at these locations is unlikely to have significant impacts on archaeological assets, for the purposes of this assessment a negligible impact is recorded.

Site 1133, 1135, 1137 is located in an area of archaeological interest. Therefore, development at these locations would be expected to have minor negative impact on archaeological assets.

C.3.10 SA Objective 10 – Climate Change and Transport

SA Objective 10 is 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. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- 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?
- Reduce CO2 emissions to contribute to identified national targets?
- Improve accessibility to work and services by public transport, walking and cycling?
- Protect and improve air quality?
- Avoid exacerbating existing air quality issues in designated AQMAs?
- Achieve a healthy living environment?

Table C-11: Site impact matrix for SA Objective 10 – Climate Change and Transport.

Site Ref.	AQMA	Main Road	Bus Services	Railway Station	Public Transport access to Local Services	Pedestrian Access to Local Services	Pedestrian Access to Convenience Store
1146	+	+	+	-	-	-	-
1135	+	-	+	-	-	-	++
1141	+	+	+	-	-	-	++
1148	+	-	+	-	-	-	++
1133	+	-	0	-	-	-	++
1137	+	+	0	-	+	-	-
1122	+	+	++	+	+	+	++
29	+	-	0	-	-	-	++

Air Quality Management Areas

The target distance outlined by Lepus Consulting within the Regulation 18 SA from an AQMA is 200m.

All of the proposed additional development sites are located at least 200m from an AQMA therefore, a minor positive impact on climate change and transport is assessed as these sites are not expected to contribute further to areas generally associated with traffic congestion.

Main Road

The target distance outlined by Lepus Consulting within Regulation 18 SA from a main road is 200m.

Sites 1133, 1135, 1148 and 29 are located less than 200m from main roads. Proposed development at these sites could have a minor negative impact on transport related emissions by potentially increasing congestion in the local area.

Sites 1137, 1141, 1146, and 1122 are located at least 200m from a main road. Proposed development at these sites would be expected to have a minor positive impact on congestion and consequential emissions.

Bus Services

Bus service provision varies across the rural settlements in Mid Sussex District. Site 1122 has been identified as having the potential for excellent bus transport access.

Sites 1133, 1137 and 29 have been identified as having the potential for fair bus transport access. Therefore, proposed development at these sites would be expected to have a negligible impact on access to sustainable transport for site users.

Sites 1135, 1141, 1146 and 1148 have been identified as having the potential for good bus transport access. Proposed development at these sites would be expected to have a minor positive impact on access to sustainable transport for site users.

Site 1122 has been identified as having the potential for excellent bus transport access. Proposed development at this site would be expected to have a major positive impact on access to sustainable transport for site users.

Railway Station

There are two railway lines through Mid Sussex running from north to south. There are several train stations including Haywards Heath and Burgess Hill. As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance of a 1.2km has been applied.

Site 1122 is located within the target distance and are therefore, expected to have a major positive impact on sustainable access to rail services.

Sites 1133, 1137, 1141, 1135, 1146, 1148 and 29 are located outside the target distance and therefore, proposed development at these locations is expected to have a minor negative impact on sustainable access to rail services.

Public Transport Access to Local Services

As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to local services is a 30-minute journey by public transport.

Sites 1133, 1135, 1141, 1146, 1148, and 29 are located over a 30-minute journey using public transport to local services. Therefore, development at these proposed sites would be expected to have a minor negative impact on transport and accessibility.

Site 1137 and 1122 is located within a 20-minute journey using public transport to local services. Therefore, development at this location would be expected to have a minor positive impact on transport and accessibility.

Pedestrian Access to Local Services

As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to local services is a 15-minute walk or cycle (1.2km).

Site 1122 is located within 15 minutes-walk from local services, therefore development at this site is expected to have a minor positive impact on accessibility.

Sites 1133, 1135, 1137, 1141, 1146, 1148, and 29 are located over 20 minutes-walk from community facilities. Therefore, development at the proposed sites is expected to have a minor negative impact on accessibility.

Pedestrian Access to Convenience Store

As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to a convenience store is a 15-minute walk or cycle (1.2km).

Sites 1122, 1133, 1135, 1141, 1148 and 29 are within a 15-minute walk of a convenience store. Therefore, a major positive impact on accessibility to these facilities for site users would be expected.

Sites 1146 and 1137 are located outside this target distance and therefore development at these sites would be expected to have a minor negative impact on site users accessibility to these facilities.

C.3.11 SA Objective 11 - Energy and Waste

SA Objective 11 is 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. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Reduce energy consumption?
- Reduce waste generated per head of population?
- Increase rate per head of population of waste reuse and recycling?
- Encourage recycling (including building materials)?
- Incorporate sustainable design and construction techniques?

Table C-12: Site impact matrix for SA Objective 11 - Energy Consumption.

Site ref.	Household Waste Generation	Energy Consumption related to GHGs
1146	0	0
1135	0	0
1141	0	0
1148	0	0
1133	0	0
1137	-	-
1122	0	-
29	0	0

Increase in Household Waste Generation

As outlined by Lepus Consulting within the Regulation 18 SA, to some degree, residential development is likely to result in an increase in household waste generation.

Site 1137 is expected to yield approximately 400 dwellings, therefore, development of this site would be expected to increase household waste generation by more than 0.1% compared to current levels. Therefore, this could result in a minor negative impact on household waste generation.

All of the other proposed developments are expected to produce a yield of 100 dwellings or less, therefore, development of this site is expected to have negligible impacts on household waste generation in comparison to current levels.

Increase in Energy Consumption Related Green House Gas Emissions (GHG)

As outlined by Lepus Consulting within the Regulation 18 SA to an extent, residential development is likely to result in an increase in energy related GHG emissions through the use of electricity sourced from fossil fuels.

Sites 1137 and 1122 are expected to have a yield of 100 dwellings or more. The proposed development at these sites could have major negative impacts on GHG emissions relating to energy consumption.

The remaining sites are expected to have a yield of less than 100 dwellings, therefore the proposed development at these sites could have a negligible impact on GHG emissions relating to energy consumption.

C.3.12 SA Objective 12 - Water Resources

SA Objective 12 is to maintain and improve the water quality of the district’s watercourses and aquifers, and to achieve sustainable water resources management. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Protect and enhance water resources?
- Support the achievement of Water Framework Directive targets?
- Promote sustainable use of water?
- Maintain water availability or water dependant habitats?
- Support the provision of sufficient water supply and treatment infrastructure?
- Incorporate sustainable design and construction techniques?

Table C-13: Site impact matrix on SA Objective 12 - Water Resources.

Site ref.	Watercourse	Groundwater Source Protection Zones
1146	0	0
1135	0	0
1141	0	0
1148	0	0
1133	0	0
1137	-	0
1122	0	0
29	0	0

Watercourse

There are several minor and major watercourses across the district. As outlined by Lepus Consulting within the Regulation 18 SA, sites have been assessed for their proximity (within 200m) to a watercourse.

Site 1137 is located within 200m of a watercourse and therefore, proposed development at this site could potentially increase the risk of contamination of the watercourse during construction and operation. A minor negative impact on watercourse quality can be expected.

Sites 1122, 1133, 1141, 1135, 1146, 1148 and 29 are located outside a 200m buffer of a watercourse therefore, a negligible impact is assessed.

Groundwater Source Protection Zones (SPZ)

None of the proposed sites coincide with any groundwater SPZ and are therefore not expected to increase the risk of groundwater contamination within these protected areas. Proposed development of these sites could therefore be expected to have a negligible impact on protected groundwater resources.

C.3.13 SA Objective 13 - Economic Regeneration

SA Objective 13 is to encourage the regeneration and prosperity of the district's existing Town Centres and support the viability and vitality of village and neighbourhood centres. The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Protect key retail areas?
- Encourage rural diversification?
- Make land available for business development?
- Increase the range of employment opportunities, shops and services available in the town centres across the district?
- Decrease the number of vacant units in town centres?
- Enhance the viability and vitality of the district's town centres?
- Improve access to the district's town centres and services?
- Enhance the local distinctiveness in the town centres?
- Provide new or improved leisure, recreational or cultural activities?
- Maintain or increase the amount of floorspace provided for town centre uses within the town centres?

Table C-14: Site impact matrix on SA Objective 13 - Economic Regeneration.

Site ref.	Pedestrian Access to Local Services	Public Transport Access to Local Services
1146	-	-
1135	-	-
1141	-	-
1148	-	-
1133	-	-
1137	-	+
1122	+	+
29	-	-

Pedestrian Access to Local Services

Access to local services including supermarkets, town centres or a high street shopping centre, can result in economic stimulation and regeneration. Increases in footfall could positively impact the local economy and provide opportunities for residents. As outlined by Lepus Consulting within Regulation 18 SA, the target sustainable distance to local services is a 15-minute walk or cycle (1.2km).

Site 1122 is located within 15 minutes-walk from local services, therefore development at this site is expected to have a minor positive impact on accessibility.

Sites 1133, 1135, 1137, 1141, 1146, 1148, and 29 are located over 20 minutes-walk from community facilities. Therefore, development at these proposed sites is expected to have a minor negative impact on accessibility.

Public Transport Access to Local Services

As outlined by Lepus Consulting within the Regulation 18 SA, the target sustainable distance to local services is a 30-minute journey on public transport.

Sites 1133, 1135, 1141, 1146, 1148, and 29 are located over a 30-minute journey using public transport to local services. Therefore, development at these proposed sites would be expected to have a minor negative impact on accessibility.

Site 1137 and 1122 is located within a 20-minute journey using public transport to local services. Therefore, development at this location would be expected to have a minor positive impact on accessibility.

C.3.14 SA Objective 14 - Economic Growth

SA Objective 14 is 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.

The appraisal questions associated with this SA objectives are as follows:

Will the proposal help to:

- Improve business development and enhance competitiveness?
- Improve the resilience of business and the economy?
- Promote growth in key sectors?
- Reduce out commuting?
- At least maintain and possibly improve employment rate across the district?
- Increase the range of employment opportunities?
- Facilitate the provision of good quality infrastructure to promote economic growth?

Table C-15: Site impact matrix on SA Objective 14 - Economic Growth.

Site ref.	Employment floorspace	Access to Primary Employment Locations
1146	0	+
1135	0	+
1141	0	+
1148	0	+
1133	0	+
1137	0	+
1122	0	+

Site ref.	Employment floorspace	Access to Primary Employment Locations
29	0	+

Employment floorspace

All of the additional proposed sites are for residential use only and as a consequence are likely to have a negligible impact on economic growth through employment floorspace provision.

Access to Primary Employment Locations

There is a number of employment locations within the district within or in proximity to settlements such as Burgess Hill, Haywards Heath and East Grinstead. As outlined by Lepus Consulting within the Regulation 18 SA, the target distance to key employment areas has been assessed as 5km from proposed sites.

All of the proposed sites are located within this target distance, therefore a minor positive impact on the local economy could be expected following development.

D Appraisal of Reasonable Alternative Sites Post-Mitigation in the Mid Sussex District Plan Review 2021 - 2039

D.1 Introduction

As outlined in the Regulation 18 SA by Lepus Consulting, the process of appraising reasonable alternative sites has been separated into two distinct stages. The first stage of assessment assesses the potential impacts of the proposed sites on the SA Framework outlined in Section 3.2, prior to consideration of any mitigation measures.

The second phase of assessment reviews the potential impacts identified at stage one, in light of any likely relevant mitigation contained within the emerging policies. The purpose of this stage is to identify the potential adverse impacts which would need to be overcome for sustainable development of a site.

The following post mitigation assessment draws upon that completed by Lepus Consulting at Regulation 18 within the Regulation 18 SA. Table D-1 to Table D-13 below have been updated to reflect all potential adverse effects identified within the site assessment against each SA objective. Relevant policies have been outlined which may mitigate potential adverse effects identified either cumulatively or on their own.

D.2 Pre-Mitigation Assessment

A total of 8 additional reasonable alternative sites have come forward since the Regulation 18 DPR and have been assessed in this Regulation 19 SA. These assessments are presented in Appendix C of the Regulation 19 SA Report. Table 6-2 in Section 6 represents the pre-mitigation impacts identified for each of the 8 additional reasonable alternative sites. Where an SA objective has multiple sub-objectives with differing likely impacts, the modal score has been taken across the sub-objective results for each of the new sites. Where there is no clear modal value, a worst-case scenario has been adopted to capture potential adverse impacts.

The pre and post mitigation assessment findings identified for all reasonable alternative sites assessed at Regulation 18 by Lepus Consulting have also been included. It was unclear from the Regulation 18 SA which methodology was applied to calculate the overall score for each SA objective. The overall scores for each site following the pre-mitigation assessment undertaken at the Regulation 18 stage has therefore been updated to reflect this use of a modal score for consistency.

D.3 Mitigating effects of draft policies

The sustainable appraisal of eight additional alternative site allocations against baseline sustainability information has identified a number of potential adverse effects associated with the SA Objectives in the SA Framework (Table 3-6). The purpose of this chapter is to

consider if and how effects can be mitigated through policies in the emerging Regulation 19 District Plan.

Table D-1 to Table D-13 highlight the identified potential adverse impacts according to SA Objectives and lists the policies from the draft Regulation 19 District Plan that might reasonably be expected to help mitigate identified adverse effects. Table D-1 also considers the cumulative impact of sites and policies together.

Each table has three columns; the first listing the potential adverse effects identified, the second outlining relevant planning policies and final column indicating the extent to which these policies would be expected to mitigate each of the identified potential adverse effects.

D.4 SA Objective 1 - Housing

No adverse impacts are anticipated as a result of the proposed development at any of the additional reasonable alternative sites.

D.5 SA Objective 2 - Health and Wellbeing

Table D-1 presents the identified adverse impacts on health and wellbeing, and likely impacts.

Table D-1: Identified adverse impacts and potential mitigation for SA Objective 2 - Health and Wellbeing post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
<p>Limited access to emergency and routine healthcare</p>	<p>Site Allocation Policies DPA1-DPA17 state financial contributions should be made to 'Health'.</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. Policy DPI2 also states that financial contributions should be made to 'emergency services'.</p> <p>Various policies including DPS6, DPB1, DPT1, DPT3, DPH3, and DPH12 could help to ensure new residents have good access to public transport to reach community facilities.</p> <p>As outlined under Policy DPS6: Health and Wellbeing, all proposals for major development will be required to undertake Health Impact Assessment screening to identify potential health impacts and ensure future health and</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>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
	wellbeing needs are met.	
<p>Limited access to leisure facilities impacting health and wellbeing</p>	<p>Most of the site allocations state financial contributions should be made for 'open space and leisure', 'outdoor sports', 'other outdoor provision' and 'sports facilities'.</p> <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 DPI6 outlines the need to protect and maintain existing community facilities, with support for new facilities.</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>Site allocation policy DPA3 (site 1123) seeks to orientate development positively to address existing open space at Queens Park Crescent along with any proposed areas of open space.</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>
<p>Limited access to, and the net loss of greenspace</p>	<p>Most site allocations include 'natural, semi-natural and amenity greenspace' on site.</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</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. These policies would also seek to promote creation of publicly accessible green space (where appropriate).</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
	<p>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>Policy DPS6: Health and Wellbeing outlines that all new development must provide high quality outdoor space and publicly accessible open and green space (where applicable for the type of development proposed).</p> <p>Site allocation policy DPA4 (site 198) outlines a commitment to provide a link to the existing Sunnyside Recreation Ground.</p>	

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
<p>Increase in, and exposure to, air and noise pollution from Main Roads and AQMAs</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 DPN6 seeks to ensure development does not cause adverse effects from pollution including air and noise.</p> <p>Policy DPN7 outlines that development would be expected to be located, designed and controlled to avoid significant adverse impacts or minimise adverse impacts from noise.</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>Site allocation policy DPA7 (site 556) and DPA15 (site 1020), DPA17 (site 784) and DPA19 (site 1106) outlines a commitment to provide good acoustic design to address noise impacts associated with the railway.</p>	<p>These policies would likely reduce adverse effects but would not be expected to fully mitigate the impacts of transport associated emissions and noise pollution from new development proposals located near the AQMA or main road.</p>
<p>Limited access to the PRoW or cycle network</p>	<p>Policy DPT2 and DPT3 recognises the importance of maintaining and enhancing the existing PRoW and other recreational routes. In particular, DPT2 states that new development will be required to take full account of existing provision of PRoW and does not adversely affect a route without replacing with an equivalent route.</p>	<p>These policies would not be expected to mitigate the potential adverse impacts on limited access to PRoW or cycle network. However, several site allocation policies will seek to integrate and</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
	Several site allocation policies including seek to integrate and/or enhance the existing PRowS that cross the site to improve connectivity.	enhance existing PRowS which cross the site to improve connectivity where possible.

The policies in the DPR are likely to have a cumulative positive impact on residents' access to greenspace, leisure activities, and facilities which support the community. For example, Policy DPI5 sets out standards for new open space and recreational facilities while Policy DPE8 supports leisure related development, and Policies DPI1, DPI3 and DPI6 seek to protect existing leisure and community facilities. However, these policies will perform better near urban centres and would not be expected to fully mitigate the existing restricted access to these services for residents of more rural areas within Mid Sussex.

D.6 SA Objective 3 – Education

Table D-2 presents the identifies adverse impacts on education and the likely impacts post-mitigation.

Table D-2: Identified adverse impacts and potential mitigation for SA Objective 3 - Education post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Limited access to primary, secondary and further educational facilities	Sustainable community allocations DPSC1-DPSC7 include land for education provision and library services on site. Site Allocation Policies DPA1-DPA17 state financial contributions should be made to 'Education' and 'Library'. Policy DPS6 seeks to improve access to education where opportunities arise. Policy DPI2 could help to ensure that impacts of development on infrastructure, including education, are mitigated through setting out the process of planning obligations. Policy DPH10 outlines the criteria in which rural exception sites should meet in order to be deemed sustainable, including	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. 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

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
	<p>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 DPH5 seeks to ensure that sites proposed for Gypsy and Traveller accommodation are in a reasonably accessible location to educational facilities.</p> <p>Site allocation DPSC7 includes provision for relocation of the Special Educational Needs and Disabilities (SEND) school.</p> <p>Site allocation policy DPA14 (site 1120) outlines a commitment to explore opportunities on-site to enhance education provision in the village to meet local need.</p>	<p>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 most 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>

Policies specifically related to a site are, on the most part, likely to lead to beneficial effects for that development. However, the cumulative effect of other policies within the plan are unlikely to lead to a beneficial impact on SA Objective 3, particularly for sites in rural locations, where education provision is supported but not necessarily committed to. Nonetheless, various policies including DPS6, DPB1, DPT1, DPT3, DPH3, and DPH12 could help to ensure new residents have good access to public transport to reach community facilities which would have a beneficial impact on the education objective.

D.7 SA Objective 4 - Community and Crime

Table D-3 presents the identified adverse impacts on education and the likely impacts post-mitigation.

Table D-3: Identified adverse impacts and potential mitigation for SA Objective 4 - Community and Crime post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Limited access to or loss of	Site Allocation Policies DPA1-DPA17 state financial contributions should be made to 'Community buildings' and 'local community	Although these policies are likely to improve access to local services and facilities

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
community facilities	<p>infrastructure'.</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>Policy DPA3 (site 1123) outlines a commitment to delivering compensatory community allotments through site allocation policy DPA3a.</p>	<p>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>

Given the range of policies promoting access to services and facilities across the range of policy themes, it is considered that overall, there will be a cumulative positive effect in relation to SA Objective 4. However, sites which are located in the more rural areas would be more likely to be dependent on the financial contributions for local community infrastructure and outdoor space in their related policy. Further planning considerations may be required for those sites without a related policy.

D.8 SA Objective 5 - Flooding

Table D-4 presents the identified adverse impacts on flooding and the likely impacts post-mitigation.

Table D-4: Identified adverse impacts and potential mitigation for SA Objective 5 - Flooding post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
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. This would seek to ensure that sites are located in appropriate areas, considering flood risk from all sources. This policy requires developers 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. Policy DPN3 seeks to ensure that development proposals make contributions to green and blue infrastructure networks.</p> <p>Policy DPS2 sets out criteria to ensure all development is of sustainable design and construction, including use of SuDS as outlined within Policy DPS4.</p> <p>Site allocation policy DPA7 (site 556), DPA14 (site 1120) and DPA18 (site 1101) outlines a commitment to follow a sequential approach by directing development away from areas of flood risk and mitigate impacts through integration of SUDS to deliver biodiversity/environmental improvements and flood resilience.</p>	<p>These policies would not be expected to fully mitigate risk of fluvial flooding within proposed development sites where the entirety or much of the area coincides with high-risk areas (Flood Zone 3).</p> <p>However, as outlined under Policy DPS4, development proposals in areas at risk of flooding should be supported by site-specific flood risk assessments in accordance with the NPPF.</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
<p>Risk of surface water flooding</p>	<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 DPN3 the protection and provision of blue infrastructure such as vegetated SuDS.</p> <p>Site allocation policies DPA7, DPA9, DPA10 and DPA12 should help integrate SuDS in new development.</p> <p>Site allocation policy DPA7 (site 556), DPA14 (site 1120) and DPA18 (site 1101) outlines a commitment to follow a sequential approach by directing development away from areas of flood risk and mitigate impacts through integration of SUDS to deliver biodiversity/environmental improvements and flood resilience.</p>	<p>These policies would not be expected to fully mitigate risk of surface water flooding within proposed development sites which are at high risk of surface water flooding.</p> <p>However, as outlined under Policy DPS4, development proposals in areas at risk of flooding should be supported by site-specific flood risk assessments in accordance with the NPPF. This would seek to mitigate the risk of surface water flooding and prevent the exacerbation of surface water flood risk in surrounding areas.</p>

These policies would not be expected to fully mitigate risk of surface water flooding within proposed development sites which are at high risk of fluvial or surface water flooding. However, Policy DPS4 alongside Policy DPS2 will ensure development is of sustainable construction with appropriate blue infrastructure and SUDS which would lead to an overall beneficial impact on SA Objective 5.

D.9 SA Objective 6 - Natural Resources

Table D-5 presents the identified adverse impacts on natural resources and the likely impacts post-mitigation.

Table D-5: Identified adverse impacts and potential mitigation for SA Objective 6 - Natural Resources post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
<p>Loss of previously developed land and loss of Best and Most Versatile Soil</p>	<p>Policy DPN10 supports the remediation of contaminated land.</p> <p>Policy DPC1 supports the projection of countryside by minimising the land taken for development and states that BMV soil should be protected from development.</p> <p>Policy DPN1 recognises the importance of soils and outlines a commitment to their protection and enhancement by avoiding development on BMV soil.</p>	<p>Most additional development sites in Mid Sussex comprise previously undeveloped land.</p> <p>These policies would not be expected to fully mitigate the loss of previously developed land. However, it is anticipated that Policy DPC1 and DPN1 should provide some protection to BMV soils.</p>
<p>Sterilisation of mineral resources within Mineral Safeguarding Areas</p>	<p>Policy DPC1 sets out that any development located within a Mineral Safeguarding Zone must consult the Minerals Planning Authority to identify whether minerals are accessible in sufficient amounts to be economically viable to extract.</p> <p>Site allocation policy DPA15 (site 1020) outlines a commitment to address any impacts with the Building Stone (Cuckfield and Ardingly) Minerals Consultation Area.</p> <p>Site allocation policy DPA4 (site 198), DPA13 (site 984), DPA14 (site 1120) and DPA18 (site 1101) outlines a requirement for consideration of the potential for mineral sterilisation in accordance with the requirements of the West Sussex Joint Minerals Local Plan and associated Safeguarding Guidance.</p> <p>Site allocation policy DPA12 (site 13) outlines a commitment to address any impacts associated with Mineral Safeguarding Areas.</p>	<p>This policy seeks to prevent the sterilisation of mineral resources from development. This policy would be expected to ensure that safeguarded minerals are protected or extracted prior to development where possible.</p>

Policy DPC1 and the site allocation policies within mineral safeguarding areas are likely to prevent the sterilisation of mineral resources in the District. However, it is not expected that the policies would prevent the development of undeveloped land or fully prevent the development on BMV soil. Overall, the policies would cumulatively not have a significant impact on mitigate adverse impacts under SA Objective 6.

D.10 SA Objective 7 - Biodiversity and Geodiversity

Table D-6 presents the identified adverse impacts on biodiversity and likely impact post-mitigation.

Table D-6: Identified adverse impacts and potential mitigation for SA Objective 7 - Biodiversity and Geodiversity post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Threats or pressures to Habitat sites (SAC, SPA and Ramsar sites)	Policy DPN1 to DPN4 sets out a series of requirements for new developments regarding designated ecological sites including demonstrating the implementation of the mitigation hierarchy. Policy DPC6 refers directly to Ashdown Forest SPA, and the requirement of development to demonstrate adequate measures are put in place to avoid or mitigate any potential adverse effects where likely.	At the time of writing, a Habitats Regulations Assessment (HRA) is being produced which would consider the potential for likely significant impact on internationally important habitat sites. The HRA found that no adverse effects both alone and in combination can be expected.
Threats or pressures to nationally designated sites (SSSIs)	Policy DPN1 to DPN4 sets out a series of requirements for new developments regarding designated ecological sites including demonstrating the implementation of the mitigation hierarchy.	The policy would be expected to mitigate potential impacts of development on SSSIs. At this stage, there remains the potential for some residual effect which would require consideration in future planning stages.
Threats or pressures to ancient woodland and veteran trees	Policies DPN1 and DPN4 identify the importance of ancient woodland and veteran trees and their contribution to irreplaceable habitats and complex ecological conditions. Several allocation policies including DPSC1, DPSC5, DPSC7, DPA4, DPA9 and DPA10 seek to address any impacts associated with areas of	These policies would be expected to contribute to the protection of ancient woodland and veteran trees. However, there is still potential for adverse impacts on ancient woodlands and veteran trees.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
	<p>ancient woodland and ensure their exclusion from development, e.g., through an appropriate buffer.</p> <p>Site allocation policy DPA16 (site 1148) outlines a commitment to retain and provide an appropriate buffer to the mature English oak tree in the centre of the site unless it can be demonstrated and justified through survey and assessment evidence that it requires removal.</p>	<p>It is anticipated that further consideration would be required in future planning stages.</p>
<p>Threats or pressures to locally designated sites and non-designated sites including priority habitats</p>	<p>Policies DPN1 to DPN4 recognises the need to avoid indirect harm and damage to existing areas of locally designated sites and priority habitats. The policies outline the need for development proposals to deliver biodiversity net gain.</p> <p>Site allocation policies including DPA4, DPA13 and DPA19 outline that an appropriate buffer will be provided for priority habitat (deciduous woodland) within the site.</p> <p>Site allocation policy DPA1 (site 573) outlines that development must provide a positive edge to Batchelors Farm Nature Reserve to the west.</p> <p>Site allocation Policy DP17 (site 784) outlines that particular attention should be given to trees and hedgerows on the southern boundary adjacent to the PRow.</p>	<p>These policies would make a positive contribution to protecting designated and non-designated biodiversity assets. However, degradation of priority habitat would be anticipated with the development of some sites.</p> <p>It is anticipated that further consideration would be required in future planning stages.</p>
<p>Loss / degradation of GI and ecological networks</p>	<p>Policies DPN1 to DPN4 recognises the need to avoid indirect harm and damage to ecological networks. DPN2 requires all developments to deliver biodiversity net gain.</p> <p>Policy DPN sets out the requirement of development to provides new green blue infrastructure integrated into design and contributes to wider blue green infrastructure development.</p>	<p>These policies would be expected to mitigate potential negative ecological impacts associated with development as they ensure that development contributes to the creation, enhancement and protection of Mid Sussex's Green Infrastructure network</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
		and ecological assets including biodiversity net gain.

Given the range of policy provision across the policies which encompass nature conservation, the delivery of biodiversity net gain, the creation of ecological corridors, and the range of associated effects that are predicted, it is considered that overall, there will be a beneficial cumulative impact from development on SA Objective 7.

D.11 SA Objective 8 - Landscape

Table D-7 presents identified adverse impacts on landscape and the likely impacts post-mitigation.

Table D-7: Identified adverse impacts and potential mitigation for SA Objective 8 - Landscape post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Effects on the setting of the High Weald AONB	<p>Policy DPC4 refers directly to AONB and the requirement for development to conserve and enhance its qualities.</p> <p>Policy DPC1 aims to protect and enhance the countryside and seeks to ensure that development proposals are informed by the local landscape.</p> <p>Policies DPC3 and DPB1 include the criteria for developments to meet including those located within the High Weald AONB.</p> <p>Site allocation policy DPA7 (site 556) outlines a commitment to containing development to central and eastern parts of the site to reduce potential impacts on the setting of High Weald AONB. This will be informed by a Landscape and Visual Impact Assessment (LVIA).</p> <p>Site allocation policy DPA19 (site 1106) outlines a commitment to outline a building design that is appropriate for the location on the edge of a settlement and in the High Weald AONB.</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. However, a level of uncertainty remains as to the potential for adverse impacts arising from 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.</p> <p>It is anticipated that further consideration would be required in future planning stages (such as undertaking an LVIA).</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
<p>Effects on the setting of the South Downs National Park</p>	<p>Policy DPC5 refers directly to the impact of development on the setting of the South Downs National Park. The policy states that development proposals will only be permitted where they do not detract from, or cause detriment to the visual and species qualities, tranquillity, and essential characteristics of the National Park. Developments must also consider and address potential impacts on roads within the National Park and or in the setting of the National Park.</p> <p>DPB1 promotes high quality design and seeks to make positive contributions to the landscape and respond appropriately.</p> <p>Policy DPC1 aims to protect and enhance the countryside and ensures that development proposals, to be supported, are informed by landscape character assessment.</p> <p>Site allocation policies included reflect the requirements of DPC5 to minimise visual impacts on the National Park by ensuring that the scale, setting and design of the development avoids harm to its character.</p> <p>Site allocation Policy DPA18 (site 1101) outlines a requirement for building design to be appropriate to the site's edge of the settlement location and address any sensitive views from within the South Downs National Park,</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. However, a level of uncertainty remains as to the potential for adverse impacts arising from development proposals or 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 fully mitigate adverse impacts at these sites.</p> <p>It is anticipated that further consideration would be required in future planning stages.</p>
<p>Threaten or result in the loss of rural and locally distinctive landscape character</p>	<p>There are policies which would be expected to ensure that development proposals consider landscape character including policies DPC1 to DPC6 and building design requirements set out by DPB1 to DPB4.</p> <p>Policies DPH1 and DPH2 regard sustainable development within and outside of built-up areas.</p> <p>Site allocation policy DPA5 (site 858)</p>	<p>These policies would help to mitigate adverse impacts on the landscape character arising from the proposed development to some extent. However, some sites are identified as being of low to negligible capacity for residential development. These policies are not</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
	and DPA6 (508) outlines a commitment to respecting, retaining and enhancing the rural character of Hurstwood Lane and any unavoidable loss of trees required for access should be justified.	expected to fully mitigate the potential impacts on landscape character in Mid Sussex and there remains the potential for minor adverse impacts.
Development threatens area of high landscape sensitivity/capacity	<p>Policies DPC1 to DPC6 and DPB1, would be expected to contribute towards the protection of sensitive landscapes from development pressures.</p> <p>Policy DPC2 works in collaboration with DPC1 to prevent development which may harm separate identity of settlements.</p> <p>Site allocation policies seek to comply with the above policies through inclusion of necessary measures to mitigate the impact of development on the landscape character of the surrounding area (including a landscape buffer on the site boundary at site 858).</p> <p>Site allocation policy DPA13 (site 984) and DPA18 (site 1106) includes a commitment to take a landscape-led approach to development and take into account existing trees in design.</p>	<p>These policies could help reduce adverse impacts on sensitive landscapes. However, it is unlikely an adverse impact on landscape capacity could be mitigated as areas of high landscape sensitivity are unable to accommodate development without minor adverse impact on landscape character.</p> <p>It is anticipated that further consideration would be required in future planning stages.</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 of high-quality design, well-related to their surroundings and incorporate GI.</p> <p>Site allocation policy DPA14 (site 1120) outlines a commitment to provide a country park between north and south development parcels.</p>	<p>There are several Country Parks located across the district. None of the proposed sites are located within or in proximity to a Country Park.</p> <p>District plan policies would be expected to mitigate identified adverse impacts on Country Parks.</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Change in views experienced by users of PRow network/ local residents	Policies DPB1 to DPB3 outlines design principles which will be treated as a material consideration in the assessment of planning schemes. Site allocation DPA17 seeks to maintain the rural character of the PRow on the southern boundary of the site. Site allocation DPA14 (site 1120) outlines a commitment to retain the character of the footpath which runs along the sites' northern boundary and create a pedestrian link from the site.	These policies are unlikely to mitigate the impact of development on views experienced by users of the PRow network and local residents.
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 DPB1 and DPN3 seeks to promote high quality design and integration of green blue infrastructure amongst development proposals. These policies may help mitigate some negative impacts associated with new development and limit 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.

Given the range of landscape protection provided across the range of proposed policies, it is considered that overall, there will be a minor beneficial cumulative effect in relation to SA Objective 8. However, due to the scale of the developments it is unlikely that the policies will be able to fully mitigate adverse impacts on landscape character across the District.

D.12 SA Objective 9 - Cultural Heritage

Table D-8 presents identified adverse impacts on cultural heritage post-mitigation.

Table D-8: Identified adverse impacts and potential mitigation for SA Objective 9 - Cultural Heritage post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Potential direct impact on heritage assets (including	Policies DPB1 to DPB3 outlines design principles which will be treated as a material consideration in the assessment of planning schemes.	These policies would be expected to mitigate some potential negative impacts on character and setting of

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Listed Buildings, Scheduled Monuments and Conservation Areas)	<p>These policies particularly focus on design of development within the setting of heritage assets.</p> <p>Policy DPS2 outlines that where proposals could impact existing heritage assets, they will be required to demonstrate how any alteration will preserve their significance, in line with the NPPF.</p> <p>Site allocation policies DPSC1, DPSC2, DPSC3, DPSC5, DPA7, DPA8, DPA10 and DPA14 require that prior to the development of sites 740, 18, 799, 601, 556 1121, 743 and 1120 respectively, a Heritage Statement must be produced to inform the layout and design of the development to preserve the Grade II Listed Buildings present.</p>	<p>heritage assets. However, at this stage there is still the potential for adverse impacts to occur as the result of development.</p> <p>It is anticipated that further consideration would be required in future planning stages</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
<p>Alteration of character or setting of heritage asset (including Listed Buildings, Scheduled Monuments and Conservation Areas.</p>	<p>Policy DPB2 specifically references the protection of Listed Buildings and other heritage assets within the Plan area. Policy DPB3 outlines criteria for proposed developments within Conservation Areas.</p> <p>Policy DPB1 sets out various criteria to achieve high-quality design including 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 of the High Weald AONB historic landscape features including the conservation of cultural heritage assets.</p> <p>Site allocation policies DPSC1, DPSC2, DPSC3, DPSC5, DPA7, DPA8, DPA10 and DPA14 require that prior to the development of sites 740, 18, 799, 601, 556 1121, 743 and 1120 respectively, a Heritage Statement or Heritage Impact Assessment must be produced to inform the layout and design of the development to preserve the Grade II Listed Buildings present.</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> <p>It is anticipated that further consideration would be required in future planning stages (such as through undertaking a Heritage Statement or Heritage Impact Assessment).</p>
<p>Alteration of character or setting of archaeological features</p>	<p>Policy DPB2 outlines that any proposed development must undertake a pre-determination evaluation of archaeological potential and appropriate mitigation will be required depending on the outcome.</p> <p>Site allocation policy DPA3a outlines that since part of the allotment site is within an Archaeological Notification Area, pre-determination evaluation of potential archaeological features on site will be required prior to any planning application being submitted.</p> <p>Site allocation policy DPA9 (site 688) outlines that assessment of areas of</p>	<p>This policy would not be expected to mitigate impacts to archaeology without greater understanding of significance of assets and potential for undiscovered below ground assets. At this stage of the planning, it is uncertain how development would impact the historic environment.</p> <p>It is anticipated that further consideration would be required in future planning</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
	archaeological interest must be undertaken.	stages (such as through assessment of areas of archaeological interest).

Eight policies specifically incorporate controls on new development proposals, requiring development to assess its impact on the historic environment, and provide appropriate mitigation or demonstrate that it will not have an unacceptable adverse effect. Several site allocation policies require development proposals to include Heritage Impact Assessments. However, it is anticipated that further consideration and detail would be required in future planning stages for the sites and the policies alone do not fully mitigate adverse impacts on the historic environment.

D.13 SA Objective 10 - Climate Change and Transport

Table D-9 presents identified adverse impacts on climate change and transport post-mitigation.

Table D-9: Identified adverse impacts and potential mitigation for SA Objective 9 - Climate Change and Transport post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Generation of carbon emissions from increased traffic	Policy DPS1 seeks to reduce carbon emissions through embedding the principles of local living and prioritise active travel and sustainable transport. Policy DPT2 and DPT3 and refer to the provision of active travel provision. All site allocation policies will be required to contribute to active travel provisions and access to sustainable travel. Site allocation DPA3 (site 1123) commits to delivering a transport mobility hub which prioritises sustainable and active travel.	Whilst these policies seek to reduce current carbon emissions within the Plan area, it is unlikely these policies would fully mitigate the impacts from new development on traffic related carbon emissions.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
<p>Limited access to bus services and train stations</p>	<p>DPT3 refers to the requirement of developments to ensure they provide an environment which makes active and sustainable travel an easy and attractive choice. Several other policies refer to the provision and access to sustainable transport.</p> <p>All site allocation policies reference provision of or financial contribution to sustainable transport measures and provision.</p>	<p>These policies would not improve access to train stations. Other policies may contribute to the improvement of bus services; however, this cannot be fully mitigated.</p>
<p>Limited access to local services and facilities</p>	<p>Policies DPT1 to DPT3 refer to the delivery of 20-minute neighbourhoods and the consideration of development proposals in relation to the location of services.</p> <p>Site allocation policies DPSC1, DPSC2 and DPSC3 include on-site provision of local services. Policies DPSC4, DPSC5, DPSC6 and DPSC7 include financial contribution towards the provision of local services.</p>	<p>These policies would be expected to improve access to local services and facilities.</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
<p>Lack of safe pedestrian / cycle access</p>	<p>Policies DPT2 and DPT3 support protection and enhancement of PRow, recreational routes and cycleways through new development which should link to the existing cycle and pedestrian network.</p> <p>Various other policies, including DPS1, DPB1, DPT1 encourage proposals to explore opportunities for integrating PRow, footpaths, bridleways and cycle routes into current networks to improve connectivity.</p> <p>Site allocation policy DPSC GEN requires all development allocation sites to provide a layout that prioritises sustainable and active modes of travel, providing safe and convenient routes for walking, wheeling and cycling through the development and linking with existing and enhanced networks beyond.</p> <p>Site allocation policies DPA1 (site 573), DPA2 (1030), DPA5 (858), DPA6 (508), DPA8 (1121) outline a commitment to prioritise cycle and pedestrian connections through the site.</p> <p>Site allocation policy DPA12 (site 13) and DPA15 (site 1020) outlines a commitment to create new pedestrian and cycle links to connect to the existing PRow network.</p> <p>Site allocation policy DPA14 (site 1120) provides a commitment to provide pedestrian and cycle access to The Street into the north part of the site between properties of Westmeadow and Download.</p>	<p>These policies would be expected to mitigate adverse impacts on accessibility to PRow and cycle networks for several of the proposed development sites.</p>

Many of the policies embed the 20-minute neighbourhood principle. These policies seek to deliver development that manages and mitigates climate change risks, whilst the transport-related policies promote low carbon modes of transport in preference to private car usage. Furthermore, the Sustainable Communities site allocation and DPSC GEN policies seek to deliver all the needs of a community and are predicted to have largely beneficial effects. Nonetheless, the Housing and Site Allocation Policies propose significant new development

which will cumulatively lead to greenhouse gas emissions during the construction and will not fully mitigate emissions during the occupation of the developments.

D.14 SA Objective 11 - Energy and Waste

Table D-10 presents identified adverse impacts on energy and waste post-mitigation.

Table D-10: Identified adverse impacts and potential mitigation for SA Objective 11 - Energy and Waste post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
<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.</p> <p>Policies DPS1 also supports net zero carbon development and improvements in energy efficiency to achieve these goals through sustainable design and construction methods.</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>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Increase in household waste	<p>Although there are no policies within the plan which regard reducing household waste, various policies contribute to the aim. The provision of on-site site-specific waste and recycling provision is expected as part of good design for development in line with Policy DPB1: Character and Design. 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>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>	These policies seek to mitigate waste production to help to mitigate identified adverse impacts through implementing the waste hierarchy for all developments.

Although these policies would be expected to have a beneficial effect on reducing 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. It is not clear if the policies will fully mitigate the adverse impacts of increased waste production from new development, which perhaps reflects the lack of a specific policy encompassing the management of household waste.

D.15 SA Objective 12 - Water Resources

Table D-11 presents identified adverse impacts on water resources post-mitigation.

Table D-11: Identified adverse impacts and potential mitigation for SA Objective 12 - Water Resources post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Increased risk of watercourse pollution	Policy DPN6 requires development to protect and enhance water resources and water quality and take measures to control pollution of the water environment. The policy encourages mitigation measures and nature-based solutions. Policy DPS2 sets out criteria	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

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
	<p>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 requires development sites adjacent to or with a main river or ordinary watercourses within its boundaries must include an undeveloped minimum 10m buffer zone and should take opportunities for river restoration where possible.</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.</p> <p>Policy DPN10 sets requirements for effective measures which avoid impacts or contamination of watercourses.</p> <p>Policy DPSC1 (site 740 which has watercourses within its boundaries) requires a detailed site survey of watercourses on site.</p> <p>Site allocation policy DPA12 (site 13) outlines a commitment to protecting and enhancing the streams on the western boundaries and crossing the site.</p>	<p>development proposals.</p>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Unsustainable levels of water consumption	<p>Policy DPS5 requires all development within the Sussex North Water Resource Zone to demonstrate water neutrality through water efficient design and offsetting of additional water use. It goes beyond the Building Regulations and sets the more ambitious standard of 85 lpd for new residential development, as opposed to 110 lpd. Additionally, the policy supports development or expansion of water supply infrastructure to serve current or future development or to improve long-term water supply.</p> <p>Policies DPI1, DPI2 and DPI3 seek to support infrastructure provisions and provides criteria for these developments.</p> <p>Policy DPI7 sets out how development proposals must demonstrate adequate water infrastructure provision.</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>	These policies, along with adherence to national legislation and guidance from relevant studies on water provision in the area, 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.

Given the consideration of water resources and water neutrality across the policies, it is considered that development will at least not result in an adverse cumulative effect in relation to SA Objective 12.

D.16 SA Objective 13 - Economic Regeneration

Table D-12 presents identified adverse impacts on economic regeneration post-mitigation.

Table D-12: Identified adverse impacts and potential mitigation for SA Objective 13 Economic Regeneration post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
Limited access to local	Site allocation policies DPA1-DPA17 and significant site allocation policies	Although these policies are likely to improve access to

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
services and facilities	<p>DPSC1-7 require financial contributions towards 'local community infrastructure'. 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.</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. Policy DPE7 seeks to protect smaller village and neighbourhood centres, to help meet the needs of local communities. Policy DPE8 sets out accessibility standards for strategic developments in relation to local services and community facilities within rural areas.</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>Site allocation policies DPSC1, DPSC2 and DPSC3 include on-site provision of local services. Policies DPSC4, DPSC5, DPSC6 and DPSC7 include financial contribution towards the provision of local services.</p> <p>Site allocation policy DPA8 (site 1121) outlines a commitment to deliver a mixed-use development including retail, leisure, residential and other complementary town centre uses to help provide a central and diverse hub for the town centre.</p>	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

Overall, it is considered that these policies would not have a significant cumulative effect on development, particularly in rural locations.

D.17 SA Objective 14 - Economic Growth

Table D-13 presents identified adverse impacts on economic growth post-mitigation.

Table D-13: Identified adverse impacts and potential mitigation for SA Objective 13 Economic Regeneration post-mitigation.

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
<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>Policy DPI2 sets out a planning obligation to provide access to employment opportunities created by development.</p> <p>Policy DPSC GEN requires all Significant Site developments to submit an Employment and Skills Plan to enable residents to take advantage of employment opportunities. Policy DPE3</p>	<p>It would be anticipated that these policies would mitigate any loss of employment floorspace because of residential development, with sufficient provision made elsewhere in the Plan area. 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>

Identified adverse impact	Potential mitigating influence of emerging Local Plan policies	Will the policies mitigate the identified adverse impact?
	allocates employment land within the sites allocated in Policies DPSC2 (site 18) and DPSC3 (site 799).	

Overall, the cumulative effect of the policies grouped into the Economy, Sustainable Communities and Infrastructure themes would have a positive impact on development in Mid Sussex through the delivery of economic improvements in the form of employment opportunities, increased tourism and leisure related development, and investment in businesses.

D.18 Post-mitigation site assessment

Following the identification of mitigating effects of the emerging updated District Plan policies on the pre-mitigation site assessment findings, the findings of this assessment for the new eight reasonable alternative sites is shown in Table 7-1 in Section 7.

E Regulation 18 SA Pre-Mitigation Site Assessment undertaken by Lepus Consulting (2022)

E.1 Overview

As outlined in Section 6, MSDC received several comments from members of the public and consultees on the results of the site assessment undertaken by Lepus Consulting presented within the Regulation 18 SA.

These comments and questions have been reviewed by JBA Consulting, and amendments have been made to site assessment scoring assigned where it is deemed within the remit of the SA and in accordance with the topic specific methodologies and assumptions outlined in section 3.4 above. Where comments relate to scores based off travel time data provided by MSDC, provision of mitigation (such as Biodiversity Net Gain), or methodologies and assumptions outlined by Lepus Consulting, scores remain as per the Regulation 18 SA.

The full site assessment undertaken by Lepus Consulting during the Regulation 18 SA is presented in this Appendix, with tracked changes used to denote amendments made to scoring as appropriate.

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)

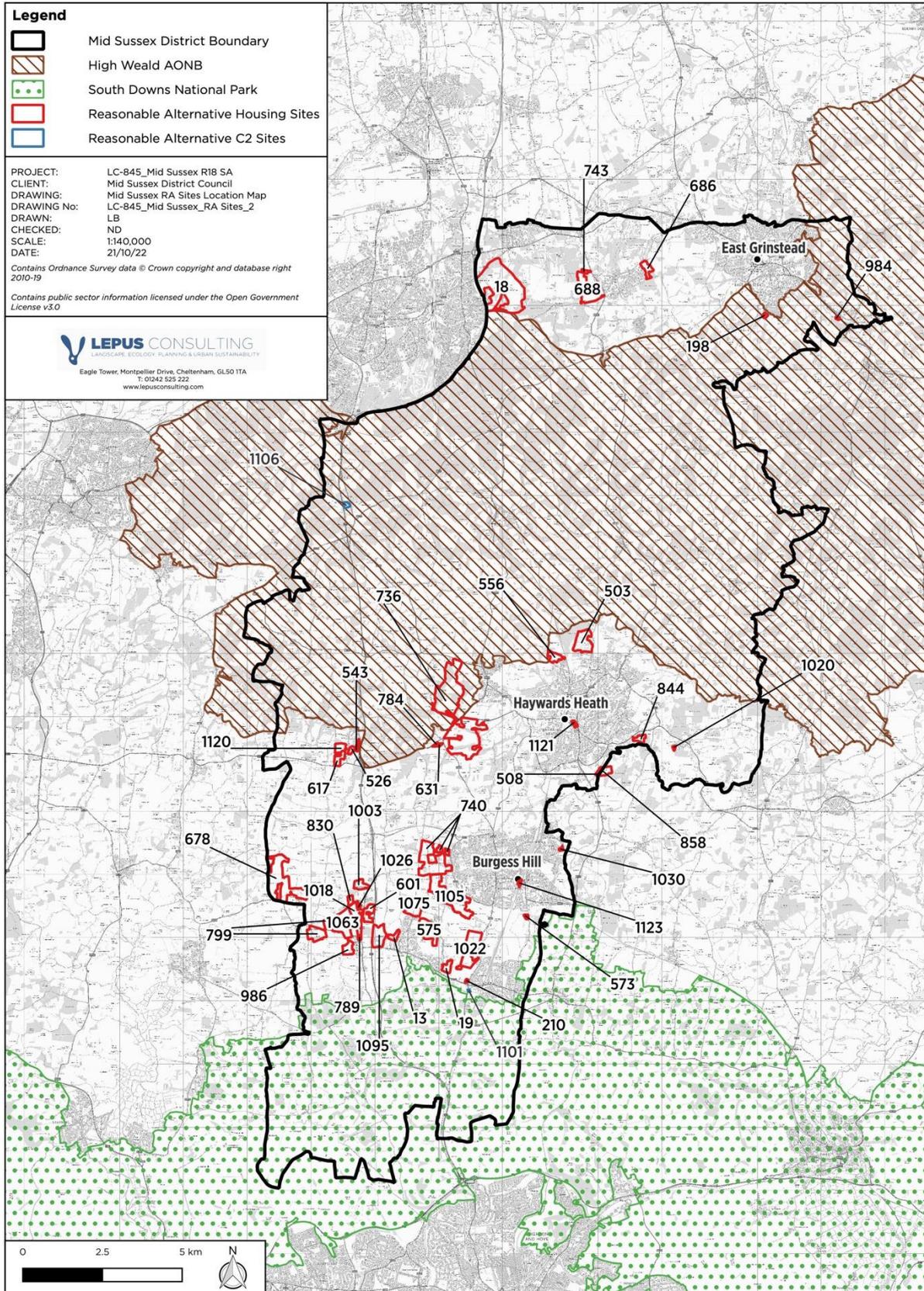


Figure C.1.1: Location map of the reasonable alternative sites within Mid Sussex

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. It is not anticipated that any of the reasonable alternative sites would result in a net loss of publicly accessible greenspace.~~

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+	-	+	+	-	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	-	-	-	+	-	+	0	+
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

[Appendix E Lepus Consulting Site Assessment 2022 tracked changes](#)
[Appendix E Lepus Consulting Site Assessment 2022 tracked changes](#)
[LC 045_Appendix_C_Site Assessments_11_211022LB.docx](#)

Site Ref	Pedestrian Access to Primary School	Pedestrian Access to Secondary School	Further Education
1063	++	-	0
1075	0	-	+
1095	0	-	0
1101	0	0	0
1105	-	+	+
1106	0	0	0
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~~C.5.2.4 The remaining sites are located over the threshold of a 2015-minute walk from community facilities and therefore the proposed development on these ~~36-39~~ 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

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]

be expected to have minor positive impacts for site end users relating to the accessibility to these facilities.

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

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]

likely to 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 ~~and~~, 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.

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.9.3.5 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.

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	+	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	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

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
1095	0	-	-	0	-	-	0	0
1101	0	0	-	0	0	0	0	0
1105	0	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, [556](#), 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 [if required](#).

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	-	-
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

Site Ref	Listed Buildings (Grades I, II* and II)	Conservation Area	Scheduled Monument	Registered Park and Gardens	Archaeology
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
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~~ minor 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	+	+	+	-	-	-	-

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
1030	+	+	++	++	+	-	++
1063	+	+	+	-	-	-	-
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	--

~~Appendix E Lepus Consulting Site Assessment 2022 tracked changes~~
~~Appendix E Lepus Consulting Site Assessment 2022 tracked changes~~
~~LC 045_Appendix_C_Site Assessments_11_211022LB.docx~~

1123	-	--
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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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Doncaster
Dublin
Edinburgh
Exeter
Glasgow
Haywards Heath
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Habitats Regulations Assessment of the Mid Sussex District Plan

Regulation 19

Mid Sussex District Council

Project number: 60671970

November 2023

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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 District Plan. A Habitats Regulations Assessment examines the effects of the District 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 District Plan: an initial high-level stage (called the Likely Significant Effect 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 District 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 Effect (LSE) 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 repeated for the Regulation 19 HRA.

Appropriate Assessment (AA)

Water Neutrality

- 1.3 Natural England raised concerns over the impact of Southern Water abstraction in the Pulborough area of Horsham District on the integrity of Arun Valley SAC, with specific regard to lowering water levels to a damaging degree. Net new housing that is supplied by abstraction in the Sussex North Water Resource Zone (WRZ) of Southern Water could therefore result in combination in an adverse effect on integrity of the SAC without mitigation. No actual allocations are made in the Sussex North Water Resource Zone in the Mid Sussex District Plan; however, a small part of Mid Sussex lies within the WRZ. Therefore, windfall development could still occur in the Sussex North WRZ.
- 1.4 In order to ensure that water supplies can be maintained and the environment protected, the affected local authorities within Southern Water's Sussex North Water Resource Zone (Horsham District, Crawley Borough, Chichester District, Mid Sussex District, South Downs National Park, and West Sussex County) have worked with consultants, Natural England, Southern Water, the Environment Agency and others to produce a Water Neutrality Strategy. Part C of the study develops a Strategy to achieve water neutrality. The purpose of the Strategy is to demonstrate that the Local Plan growth of the commissioning LPAs (Horsham District, Crawley Borough, Chichester District, Mid Sussex District, South Downs National Park, and West Sussex County) can be delivered in compliance with the Habitat Regulations (i.e., that the Local Plans will be water neutral).
- 1.5 All new development will need to be highly water efficient. This can be achieved by designing in water efficiency measures such as low flush toilets, rainwater harvesting and greywater recycling in new development. This will be achieved by Policy DPS5: Water Neutrality.

- 1.6 However, all new development will still require some additional water. This additional water demand will need to be offset by reducing the demand for water in existing development within the Sussex North Water Resource Zone. This might include fixing leaks or retrofitting existing buildings with more water efficient technology. The affected authorities are looking to introduce an offsetting scheme which planned development could utilise to achieve water neutrality based on the principles outlined in the 'Part C' Study.
- 1.7 It is considered that the water efficiency measures outlined above would make it more feasible for Southern Water to reduce reliance on the Pulborough groundwater abstraction during periods of high demand and/or low flow, this would protect the SAC and Ramsar site.

Atmospheric Pollution

- 1.8 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 Mid Sussex District Plan) and a Do Something scenario (future emission rates accounting for growth in adjoining authorities and the growth scenario proposed for Mid Sussex District). Air quality modelling was undertaken for 13 transects up to 200m from the roadside, in increments of 10m perpendicular to relevant roads.
- 1.9 In summary, the modelling analysed four key pollutants shown to affect ecosystems, namely ammonia (NH₃), oxides of nitrogen (NO_x) and total nitrogen and acid 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 by 2039 except immediately adjacent to the A26 where there is no heathland in any event.
- 1.10 Along many modelled transects, nitrogen and acid deposition rates and ammonia concentrations will remain elevated above the critical load and critical level, but are forecast to be lower, or no higher, with the Mid Sussex District Plan in place than they will be without the District Plan, most likely due to changes in employment and housing within the district changing journey to work patterns through the SAC, to 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 because of the pattern of future development in the district being away from Ashdown Forest. At these locations the Mid Sussex District Plan will therefore not contribute to an increase in pollution.
- 1.11 There are seven transects (T5, T6, T9, T10, T11, T12, T14) where growth in the Mid Sussex District Plan will make a contribution to nitrogen deposition and ammonia concentrations. However, with the exception of transect T10 the contribution of the District Plan is not visible in the model (i.e. is forecast as 0.00) more than 10m from the roadside.
- 1.12 This distance information is relevant because no SAC habitat is present within 10m of modelled road links. 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 nitrogen 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.
- 1.13 For transect T10 (Hindleap Lane west of Wych Cross) the contribution of Mid Sussex District Plan shows in the model up to 40m from the roadside. According to survey and aerial photography data the heathland on this section of road is c. 20m from the roadside at its closest. Within the zone 20-40m from the roadside (amounting to 1.2ha of heathland) the contribution of

the District Plan is 0.01 kgN/ha/yr (0.2% of the lowest part of the critical load range). Total ammonia concentrations in the same area are forecast to be 0.71 to 0.78 μgm^{-3} , even allowing for all traffic growth in combination. No adverse effect from ammonia is therefore forecast as the critical level of 1 μgm^{-3} to 3 μgm^{-3} will not be exceeded.

- 1.14 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. The forecast contribution of Mid Sussex District Plan can be considered very small indeed, being barely above zero.
- 1.15 Moreover, the 'in combination' dose from all forecast traffic growth on the network from 2019 to 2039 is forecast to be 0.06 kgN/ha/yr to 0.1 kgN/ha/yr (1.2% to 2% of the critical load) over the same area. Without traffic growth nitrogen deposition at this location is forecast to have fallen to 13.89 kgN/ha/yr by 2039. An improvement of 2.49 kgN/ha/yr, or 0.12 kgN/ha/yr every year on average. With all forecast growth the nitrogen deposition rate in 2039 is forecast to be 13.99 kgN/ha/yr. The forecast worst case in combination nitrogen deposition will therefore show the rate of forecast improvement by one year (0.1 kgN/ha/yr). This will have a negligible impact on restoration of air quality at this part of Ashdown Forest SAC.
- 1.16 Furthermore, 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 rather 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 condition assessment on a unit by unit basis 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 at the SAC stems from agriculture (fertiliser and livestock) than traffic and 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 Natural England's ability to restore good quality heathland through improved management and the implementation of the SNAP.
- 1.17 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 Mid Sussex District Plan growth either alone or in combination with other plans or projects.

Recreational Pressure

- 1.18 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.
- 1.19 The District Plan allocates a net increase of up to 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 9ha 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 Hill Place Farm) and SANGs that are to be delivered as part of emerging development proposals and allocations (e.g. Imberhorne Farm). Provided that these are delivered as planned, it is considered that sufficient residual capacity is available to accommodate the additional growth coming forward in the Mid Sussex District Plan. 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).

- 1.20 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

Water neutrality

- 1.21 All new development will need to be highly water efficient. This can be achieved by designing in water efficiency measures such as low flush toilets, rainwater harvesting and greywater recycling in new development. This will be achieved by Policy DPS5: Water Neutrality. Coupled with the water efficiency measures in the Part C Water Neutrality Study no adverse effect on the integrity of Arun Valley SAC will arise alone or in combination with other projects or plans.

Atmospheric Pollution

- 1.22 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 Mid Sussex District Plan 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

- 1.23 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 District 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 Mid Sussex District Plan. The Council would have to ensure that sufficient SANG capacity is or will be available prior to giving planning consent and 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 Mid Sussex Local Plan 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 Mid Sussex District Plan (the Local Plan) (MSDP). 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 current adopted Mid Sussex District Plan 2014-2031 has commenced. The new MSDP will cover the years between 2021 and 2039. It is understood that the MSLP Review will update and revise some Plan policies, while others remain unchanged, and include several new policies. However, this HRA examines all District 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.

Legislation

- 2.4 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 2019¹.
- 2.5 The HRA process applies the ‘Precautionary Principle’² 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.
- 2.6 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.

¹ These don't replace the 2017 Regulations but are just another set of amendments.

² 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*”.

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

- 2.7 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’.
- 2.8 In spring 2018 the ‘Sweetman’ European Court of Justice ruling³ 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

- 2.9 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).
- 2.10 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.
- 2.11 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.
- 2.12 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 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).
- 2.13 This basic principle has also been reflected in court rulings. The Court of Appeal⁴ 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,

³ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

⁴No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

then this would suffice. This ruling has since been applied to planning permissions (rather than a Plan level document)⁵. 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*’.

2.14 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 District 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).

2.15 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.

2.16 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 District 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).

Quality Assurance

2.17 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.

⁵High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

- 2.18 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 HRA⁶ and general guidance on HRA published by government in July 2019⁷. 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.

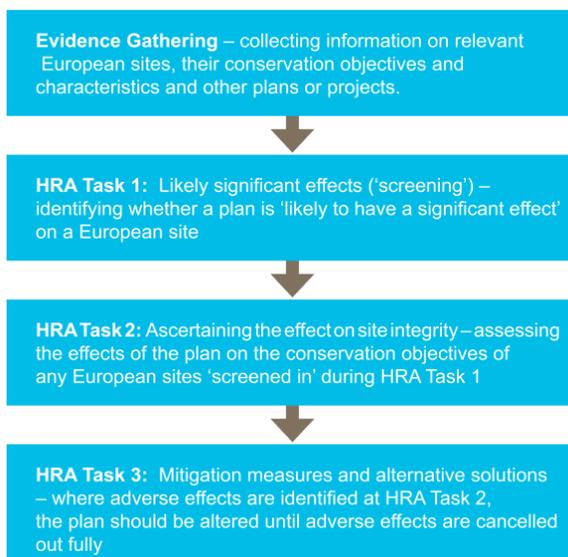


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source EC, 2001¹.

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.

⁶ 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.

⁷ <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 Justice⁸ 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 ruling⁹ 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

⁸ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

⁹ 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 Kokott¹⁰ 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].

¹⁰ 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

Arun Valley SAC

Introduction

4.1 The Arun Valley SAC, largely overlapping with the Arun Valley SPA / Ramsar, is a 487.48ha site comprising humid / mesophile grassland (95%), inland water bodies (2%) and bogs / marshes (2%). Given the overlap with the SPA / Ramsar (discussed in the previous section), the ecological characteristics are similar. However, the SAC is primarily designated for the little whirlpool ram's-horn snail *Anisus vorticulus*. The snail occurs across a range of sites in southern and eastern England, with the Arun Valley being one of the three main population centres in the UK. Two of the core sites for the little whirlpool ram's-horn snail lie in the wash lands of the Arun floodplain: the Pulborough Brooks and Amberley Wild Brooks SSSIs.

Qualifying Features¹¹

4.2 Annex II species that are a primary reason for selection of this site:

- Little whirlpool ram's-horn snail *Anisus vorticulus*

Conservation Objectives¹²

4.3 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;

4.4 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 the habitats of qualifying species
- The structure and function of the habitats of qualifying species
- The supporting processes on which the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

Threats / Pressures to Site Integrity¹³

4.5 The following threats / pressures to the site integrity of the Arun Valley SAC have been identified in Natural England's Site Improvement Plan:

- Inappropriate water levels
- Water pollution
- Inappropriate ditch management

4.6 Potential loss of functionally linked habitat has also been identified as a concern, although it is not mentioned in the Site Improvement Plan.

¹¹ <https://sac.jncc.gov.uk/site/UK0030366> [Accessed on the 02/03/2020]

¹² <http://publications.naturalengland.org.uk/publication/4924283725807616> [Accessed on the 02/03/2020]

¹³ <http://publications.naturalengland.org.uk/publication/5353882309885952> [Accessed on the 02/03/2020]

Ashdown Forest SAC

Introduction

- 4.7 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.
- 4.8 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).
- 4.9 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 Features¹⁴

4.10 Annex I habitats:

- Northern Atlantic wet heathland with *Erica tetralix*
- European dry heaths

4.11 Annex II species present as a qualifying feature, but not a primary reason for site selection:

- Great-crested newt *Triturus cristatus*

Conservation Objectives¹⁵

- 4.12 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;
- 4.13 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
 - 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.

¹⁴ Available at: <https://sac.jncc.gov.uk/site/UK0030080> [Accessed on the 21/10/2021]

¹⁵ Available at: <http://publications.naturalengland.org.uk/publication/6183967367626752> [Accessed on the 21/10/2021]

Threats / Pressures to Site Integrity

- 4.14 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

- 4.15 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.
- 4.16 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 Species¹⁶

- 4.17 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 Objectives¹⁷

- 4.18 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;
- 4.19 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.

¹⁶ Available at: <http://publications.naturalengland.org.uk/publication/6399918323269632> [Accessed on the 21/10/2021]

¹⁷ Available at: <http://publications.naturalengland.org.uk/publication/6399918323269632> [Accessed on the 21/10/2021]

Threats / Pressures to Site Integrity^{18 19}

4.20 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

4.21 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*.

4.22 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, linnet and whitethroat. A rich orthopteran fauna is also associated with the site, including great green bush cricket and wart-biter grasshopper.

Qualifying Features²⁰

4.23 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)

4.24 Annex II species present as a qualifying feature, but not a primary reason for site selection:

- Early gentian *Gentianella anglica*

Conservation Objectives²¹

4.25 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;

4.26 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

¹⁸ Available at: <http://publications.naturalengland.org.uk/publication/5793096570765312> [Accessed on the 21/10/2021]

¹⁹

<http://publications.naturalengland.org.uk/publication/6183967367626752#:~:text=Downloads%20available%20for%20this%20re cord%20%20%20.PDF%2C%2031.0%20K%20...%20%20%202014%2F09%2F09%20> [Accessed on the 21/12/2021]

²⁰ Available at: <https://sac.jncc.gov.uk/site/UK0012836> [Accessed on the 21/10/2021]

²¹ 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 Integrity²²

4.27 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

²² Available at: <http://publications.naturalengland.org.uk/publication/6241234389565440> [Accessed on the 21/10/2021]

5. Identified Impact Pathways

Water Resources

- 5.1 The unique nature of wetlands combines shallow water, high levels of nutrients and high primary productivity. These conditions are ideal for the growth of organisms at the basal level of food webs, which feed many species of birds, mammals, fish and amphibians. Overwintering and migrating wetland bird species are particularly reliant on these food sources, as they need to build up enough nutritional reserves to sustain their long migration routes.
- 5.2 Maintaining a steady water supply is of critical importance for many hydrologically dependent SPAs, SACs and Ramsars. For example, in many wetlands winter flooding is essential for sustaining a variety of foraging habitats for SPA / Ramsar wader and waterbird species. However, different species vary in their requirements for specific water levels. Splash and / or shallow flooding is required to provide suitable feeding areas and roosting sites for ducks and waders. In contrast, deeper flooding is essential to provide foraging habitats for Bewick's swans and other ducks.
- 5.3 Wetland habitats (and thus the fauna they support) rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant supply of water is fundamental to maintaining the ecological integrity of sites. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range of qualifying birds, invertebrate or plant species. This might lead to the loss of the structure and functioning of wetland habitats. There are two mechanisms through which urban development might negatively affect the water level in European Sites:
- The supply of new housing with potable water will require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may reduce the water levels in European Sites sharing the same catchment.
 - The proliferation of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. Often this pluvial flooding results in downstream inundation of watercourses and the potential flooding of wetland habitats.

Atmospheric Pollution (Nitrogen Deposition)

- 5.4 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 verges²³. 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^{24 25}.

²³ http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.

²⁴ 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.

²⁵ 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.

Table 1: Main sources and effects of air pollutants on habitats and species²⁶

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>
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</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))</p>

²⁶ Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>).

Pollutant	Source	Effects on habitats and species
	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 by 2035 (recently postponed from 2030).	contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. 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.
Nitrogen (N) deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidized (e.g. NO _x) or reduced (e.g. NH ₃) nitrogen emissions (described separately above). While oxidized nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The nitrogen pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but too much overall N is regarded as the major driver of biodiversity change globally. 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. Nitrogen deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O ₃)	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). 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.	Concentrations of O ₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O ₃ 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.

5.5 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) shipping²⁷. As such these will not be associated with Local Plan growth. Ammonia emissions originate from agricultural practices²⁸, with some chemical processes also making notable contributions and traffic also contributing materially at a local scale. NO_x 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 NO_x footprint (92%) through associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison²⁹. Therefore, emissions of NO_x 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.

5.6 The World Health Organisation has the following critical thresholds for plant communities: The critical NO_x 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'³⁰ of atmospheric nitrogen deposition (that is, NO_x combined with ammonia NH₃).

²⁷ http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.

²⁸ 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.

²⁹ 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]

³⁰ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.

- 5.7 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 ³¹). 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.

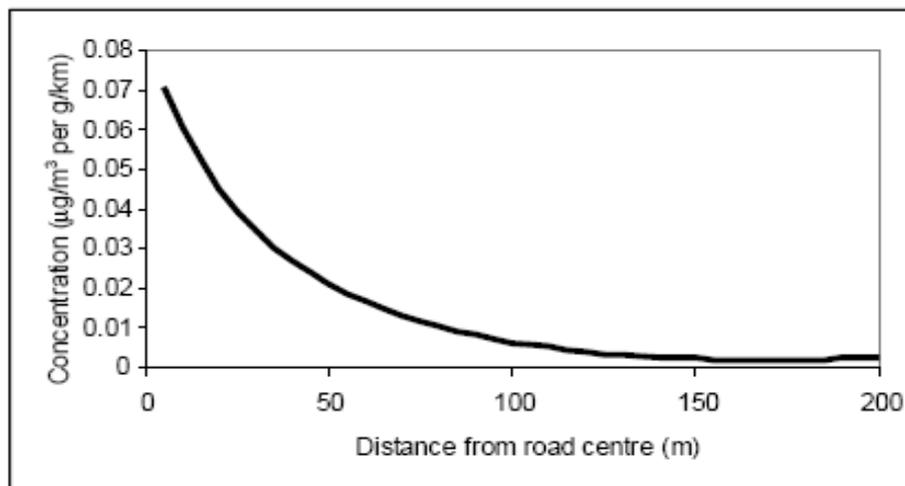


Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT³²)

- 5.8 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 NO_x 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 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.
- 5.9 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)**

³¹ Available at: <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013> [Accessed on the 21/10/2021]

³² Available at: <http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf> [Accessed on the 21/10/2021]

- **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

5.10 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 levels³³, and impacts on European protected sites^{34 35}. 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 residents³⁶.

Trampling Damage, Nutrient Enrichment and Wildfires

5.11 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 & Seney³⁷ 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.
- Cole et al³⁸ 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.

³³ 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/ijuz019>

³⁴ 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.

³⁵ 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.

³⁶ The RTP1 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'.

³⁷ 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

³⁸ 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

- Cole³⁹ 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 & Spildie⁴⁰ 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 invertebrates⁴¹. 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.

5.12 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.⁴²). 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 annually⁴³. While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components⁴⁴. 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

5.13 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 / death⁴⁵.

³⁹ 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.

⁴⁰ 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

⁴¹ 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.

⁴² Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.

⁴³ 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.

⁴⁴ 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.

⁴⁵ Riley, J. (2003). Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

- 5.14 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 feeding⁴⁶. 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 birds⁴⁷. 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^{48 49}.
- 5.15 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 hiking⁵⁰. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers⁵¹. 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

- 5.16 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 Mid Sussex District Plan will lead to an increase in the local population and demand for access to outdoor spaces. The HRA process needs to adequately assess potential recreational pressure effects of the Plan on these European sites.
- 5.17 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 Mid Sussex District Plan (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)**

⁴⁶ Riddington, R. *et al.* (1996). The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* **43**:269-279.

⁴⁷ Gill, J.A., Sutherland, W.J. & Norris, K. (1998). The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* **12**: 67-72.

⁴⁸ 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>.

⁴⁹ 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.

⁵⁰ Banks P.B., Bryant J.Y. (2007). Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* **3**: 14pp.

⁵¹ Miller S.G., Knight R.L., Miller C.K. (2001). Wildlife responses to pedestrians and dogs. *Wildlife Society Bulletin* **29**: 124-132.

6. Screening for Likely Significant Effects (LSEs)

Water neutrality

Arun Valley SAC

- 6.1 The following policies were screened in for Appropriate Assessment with regard to water resource impacts, because LSEs could not be excluded in combination if growth is delivered within the Sussex North Water Resource Zone:
- Policy DPH1: Housing (identifies a local housing need of 19,620 dwellings in the Plan period with the potential to increase the local population by approx. 47,088);
 - Policy DPH5: 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 potentially increase water consumption); 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 water consumption).
- 6.2 The unique nature of wetlands combines shallow water, high levels of nutrients and high primary productivity. These conditions are ideal for the growth of organisms at the basal level of food webs, which feed many species of birds, mammals, fish and amphibians. Overwintering and migrating wetland bird species are particularly reliant on these food sources, as they need to build up enough nutritional reserves to sustain their long migration routes.
- 6.3 Wetland habitats (and thus the fauna they support) rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant supply of water is fundamental to maintaining the ecological integrity of sites. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range of qualifying birds, invertebrate or plant species. This might lead to the loss of the structure and functioning of wetland habitats.
- 6.4 The Arun Valley SAC is designated for its population of little whirlpool ram's-horn snails and Natural England's Site Improvement Plan highlights that a maintenance of adequate water levels (0.3cm below ditch neck) is critical to the survival and migration of this species. Furthermore, the Ramsar is designated for its outstanding assemblage of wetland plants and invertebrates, all of which depend on appropriate water levels throughout at least parts of their life cycle. The SAC has a relatively narrow hydrological catchment and its water level is primarily maintained by a few key rivers that traverse the plain.
- 6.5 The Site Improvement Plans for Arun Valley SAC/SPA/Ramsar identify inappropriate water levels as threats to the respective sites. Increases to the quantity and rate of water delivery can result in summer flooding and prolonged / deeper winter flooding. This in turn results in the reduction of feeding and roosting sites for birds and be harmful to the little whirlpool ram's-horn snail, which has very specific water level requirements.
- 6.6 A small part of Mid Sussex District lies within the Southern Water Sussex North WRZ. The emerging District Plan could result in changes to the water quantity, level and flow in the catchment of the River Arun European sites if it required additional abstraction from such sites

or the continuance of existing damaging abstraction. This could alter the water level within the designated sites themselves with potential cascading effects on qualifying species. Natural England provided interim advice to Southern Water (December 2020) that identified that the existing abstraction near Pulborough could provide likely significant effects on the Amberley Wild Brooks SSSI part of the Arun Valley internationally designated site. In addition, Natural England could not conclude no adverse effects on the integrity with regards to the Pulborough Brooks SSSI part of the internationally designated site.

- 6.7 Note that no actual allocations are made in the Sussex North Water Resource Zone in the Mid Sussex District Plan and only a small part of Mid Sussex lies within the WRZ.

Atmospheric Pollution (Nitrogen Deposition)

Ashdown Forest SPA / SAC

- 6.8 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.
- 6.9 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 issue⁵² 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*'.
- 6.10 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.
- 6.11 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 Mid Sussex District Plan (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,**

⁵² '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>

Likely Significant Effects (LSEs) cannot be excluded and the site is screened in for Appropriate Assessment regarding this impact pathway.

- 6.12 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 (identifies a local housing need of 19,620 dwellings in the Plan period with the potential to increase the local population by approx. 47,088);
 - Policy DPH5: 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 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 maximised); 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).
- 6.13 Modelling undertaken for the Mid Sussex District Plan 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 Mid Sussex District Plan 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.
- 6.14 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

- 6.15 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

- 6.16 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.
- 6.17 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.
- 6.18 **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.**
- 6.19 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 (identifies a local housing need of 19,620 dwellings in the Plan period with the potential to increase the local population by approx. 47,088);
 - Policy DPH5: 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 vehicular traffic).

Castle Hill SAC

- 6.20 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.
- 6.21 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

Water neutrality

Arun Valley SAC

- 7.1 The following policies were screened in for Appropriate Assessment with regard to water resource impacts, because LSEs could not be excluded in combination if growth is delivered within the Sussex North Water Resource Zone:
- Policy DPH1: Housing (identifies a local housing need of 19,620 dwellings in the Plan period with the potential to increase the local population by approx. 47,088);
 - Policy DPH5: 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 potentially increase water consumption); 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 water consumption).
- 7.2 Note that no actual allocations are made in the Sussex North Water Resource Zone in the Mid Sussex District Plan and only a small part of Mid Sussex lies within the WRZ.
- 7.3 In order to ensure that water supplies can be maintained and the environment protected, the affected local authorities within Southern Water's Sussex North Water Resource Zone (Horsham District, Crawley Borough, Chichester District, Mid Sussex District, South Downs National Park, and West Sussex County) have worked with consultants, Natural England, Southern Water, the Environment Agency and others to produce a Water Neutrality Strategy. Part C of the study develops a Strategy to achieve water neutrality. The purpose of the Strategy is to demonstrate that the Local Plan growth of the commissioning LPAs (Horsham District, Crawley Borough, Chichester District, Mid Sussex District, South Downs National Park, and West Sussex County) can be delivered in compliance with the Habitat Regulations (i.e., that the Local Plans will be water neutral).
- 7.4 All new development will need to be highly water efficient. This can be achieved by designing in water efficiency measures such as low flush toilets, rainwater harvesting and greywater recycling in new development. This will be achieved by Policy DPS5: Water Neutrality.
- 7.5 However, all new development will still require some additional water. This additional water demand will need to be offset by reducing the demand for water in existing development within the Sussex North Water Resource Zone. This might include fixing leaks or retrofitting existing buildings with more water efficient technology. The affected authorities are looking to introduce an offsetting scheme which planned development could utilise to achieve water neutrality based on the principles outlined in the 'Part C' Study.
- 7.6 The strategy includes a summary and further update of the growth accounted for in the study from each LPA in the water resource zone; a recommendation for a new build water efficiency standard, including how this may be achieved and an indicative cost; and options for offsetting remaining water demand, including Southern Water's existing contribution, and indicative costs for each offsetting option(s). A strategy to achieve water neutrality is presented, including recommendations for appropriate measures, how these may be funded, delivered, and monitored. Part C states that 'Further work will be required to implement the Strategy that is not

- included within this scope of work. This will include setting up the appropriate governance structure, conducting a procurement exercise to obtain accurate costings for implementing mitigation measures or offsetting, and development of the detailed processes and procedures for running and reporting a neutrality scheme. Until such a time as a strategy is agreed and implemented, development management applications will remain subject to the Natural England position statement.
- 7.7 The Strategy that has been identified to offset water demand can be utilised anywhere in the WRZ, except the area around Upper Beeding as in normal conditions these measures will not reduce water demand in the wider WRZ.
- 7.8 The Strategy reiterates that water neutrality measures are required for any development that has not already been granted outline or full planning permission, although the *C G Fry & Son Limited vs Secretary of State for Levelling Up, Housing and Communities* and *Somerset Council High Court* decision handed down in June 2023 also requires that development granted before the Natural England position statement was issued, where there are outstanding consents to be issued, also need to demonstrate water neutrality. The Strategy also reiterates that it must be demonstrated that water neutrality can be achieved and be in place prior to the demand occurring.
- 7.9 The Strategy notes that Southern Water will provide alternative water sources to replace the groundwater abstraction at Pulborough, however, this will not be in place until c. 2030 or later. As such, development provided before an alternative and sufficient long term water supply is identified and functional, any net new development in the water resource zone (including that provided within the Horsham, Crawley, Chichester, Mid Sussex, South Downs and West Sussex Development Plans) will be required to ensure they are water neutral, to ensure no adverse effect on the integrity of the Arun Valley designated site results. It may be that once these new long-term water sources are functioning, water neutrality will no longer need consideration with regard to the Arun Valley. As such the Strategy only covers until 2030, and an extension may be required to cover the entire Local Plan period i.e. until 2039.
- 7.10 The Strategy makes the following key recommendations:
- The Water Neutrality Strategy should cover the period up to the end of a combined Local Plan periods of the commissioning LPAs (up to 2039).
 - A water efficiency target of 85l/p/d should be adopted for new build housing.
 - Non-household development should achieve a score of three credits within the water (Wat 01 Water Consumption) issue category for BREEAM New Construction Standard, achieving 40% reduction compared to baseline standards.
 - The Strategy will include an Offsetting Scheme which will run up to the end of 2029/30. This should be reviewed in 2030 based on whether a long-term solution has been implemented by Southern Water.
 - The Offsetting Scheme should be LPA-led, and operated collectively across LPAs, with the costs and benefits shared.
 - Developer contributions should be collected via Section 106 agreements.
 - Flow regulators are most appropriate for providing offsetting in the early part of the Strategy.
 - Pilot studies for a water efficiency programme in schools, non-household rainwater harvesting, and reduction in golf course irrigation should be set up, and if successful implemented alongside the flow regulator in the Offsetting Scheme.
 - A procurement process for delivering offsetting measures should be started as soon as possible to obtain accurate costing for offsetting measures.
- 7.11 It is considered that the water efficiency measures outlined above, and the commitment in Policy DPS5 Water Neutrality, would make it more feasible for Southern Water to reduce reliance on the Pulborough groundwater abstraction during periods of high demand and/or low flow, this would protect the SAC and Ramsar site.

Atmospheric Pollution

7.12 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 (identifies a local housing need of 19,620 dwellings in the Plan period with the potential to increase the local population by approx.47,088);
- Policy DPH5: 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 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 maximised); 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

7.13 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.

7.14 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.

7.15 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 5-15 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 µg NH₃/m³. 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 5 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 Mid Sussex District Plan

7.16 Traffic and air quality modelling has been undertaken to support the Mid Sussex District Plan. The air quality modelling for the Regulation 19 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 Mid Sussex District Plan 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 Scenario (2039): future assessment year which includes the influence of planned development from the Mid Sussex District Plan 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

7.17 The four future scenarios modelled for Air Quality Impact Assessment (AQIA) use different model parameters. The Future Baseline scenario effectively uses present-day AADT, but 2039 emissions factors and background concentrations. In contrast, the 'Do Minimum' and 'Do Something' scenarios utilise 2039 projected AADT, 2039 emission factors and background concentrations, without and with the Mid Sussex District Plan respectively.

7.18 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.

7.19 The modelling is deliberately precautionary to allow for variation in factors such as actual growth rates. For example:

- the CREAM tool to model ammonia which more recent evidence suggests overestimates ammonia emissions for future years; 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.

7.20 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.

7.21 In summary, the modelling analysed four key pollutants shown to affect ecosystems, namely ammonia (NH_3), oxides of nitrogen (NO_x) and total nitrogen and acid 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 by 2039 except immediately adjacent to the A26 where there is no heathland in any event.
- 7.22 Along many modelled transects, nitrogen and acid deposition rates and ammonia concentrations will remain elevated above the critical load and critical level, but are forecast to be lower, or no higher, with the Mid Sussex District Plan in place than they will be without the District Plan, most likely due to changes in employment and housing within the district changing journey to work patterns through the SAC, to 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 because of the pattern of future development in the district being away from Ashdown Forest. At these locations the Mid Sussex District Plan will therefore not contribute to an increase in pollution.
- 7.23 There are seven transects (T5, T6, T9, T10, T11, T12, T14) where growth in the Mid Sussex District Plan will make a contribution to nitrogen deposition and ammonia concentrations. However, with the exception of transect T10 the contribution of the District Plan is not visible in the model (i.e. is forecast as 0.00) more than 10m from the roadside.
- 7.24 This distance information is relevant because no SAC habitat is present within 10m of modelled road links. 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 nitrogen 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.
- 7.25 For transect T10 (Hindleap Lane west of Wych Cross) the contribution of Mid Sussex District Plan shows in the model up to 40m from the roadside. According to survey and aerial photography data the heathland on this section of road is c. 20m from the roadside at its closest. Within the zone 20-40m from the roadside (amounting to 1.2ha of heathland) the contribution of the District Plan is 0.01 kgN/ha/yr (0.2% of the lowest part of the critical load range). Total ammonia concentrations in the same area are forecast to be 0.71 to 0.78 µg^m-³, even allowing for all traffic growth in combination. No adverse effect from ammonia is therefore forecast as the critical level of 1 µg^m-³ to 3 µg^m-³ will not be exceeded.
- 7.26 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. The forecast contribution of Mid Sussex District Plan can be considered very small indeed, being barely above zero.
- 7.27 Moreover, the 'in combination' dose from all forecast traffic growth on the network from 2019 to 2039 is forecast to be 0.06 kgN/ha/yr to 0.1 kgN/ha/yr (1.2% to 2% of the critical load) over the same area. Without traffic growth nitrogen deposition at this location is forecast to have fallen to 13.89 kgN/ha/yr by 2039. An improvement of 2.49 kgN/ha/yr, or 0.12 kgN/ha/yr every year on average. With all forecast growth the nitrogen deposition rate in 2039 is forecast to be 13.99 kgN/ha/yr. The forecast worst case in combination nitrogen deposition will therefore show the

rate of forecast improvement by one year (0.1 kgN/ha/yr). This will have a negligible impact on restoration of air quality at this part of Ashdown Forest SAC.

- 7.28 Furthermore, 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 rather 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 condition assessment on a unit by unit basis 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 at the SAC stems from agriculture (fertiliser and livestock) than traffic and 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 Natural England's ability to restore good quality heathland through improved management and the implementation of the SNAP.
- 7.29 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 Mid Sussex District Plan growth either alone or in combination with other plans or projects.
- 7.30 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 must 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 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 SPA and SAC.'* Moreover, Policy DPC6 (Ashdown Forest SAC/SPA) addresses potential atmospheric pollution impacts by requiring site-specific air quality assessments. The modelling for the District Plan indicates that no adverse effect on integrity will arise due to the District Plan in combination with other plans and projects, but this policy wording will provide a further protective safeguard to the SAC.

Conclusion

- 7.31 The ability of the SAC and SPA to achieve its conservation objectives would not be significantly compromised by the Mid Sussex District Plan growth either alone or in combination with other plans or projects.

Recreational Pressure

- 7.32 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 (identifies a local housing need of 19,620 dwellings in the Plan period with the potential to increase the local population by approx.47,088); and
 - Policy DPH5: 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 vehicular traffic).

Ashdown Forest SPA / SAC

Sensitivity of the SPA / SAC

- 7.33 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.
- 7.34 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.
- 7.35 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

- 7.36 A study in 2010⁵³ 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.

⁵³ Clarke RT, Sharp J & Liley D. 2010. Ashdown Forest Visitor Survey Data Analysis (Natural England Commissioned Reports, Number 048)

Visitor Surveys

- 7.37 In 2009 an analysis of visitor data for the Ashdown Forest SPA / SAC was undertaken⁵⁴, 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.
- 7.38 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 effective⁵⁵; 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 England⁵⁶. 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.
- 7.39 In 2016 Footprint Ecology undertook a further visitor survey⁵⁷ 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.
- 7.40 The same six local authorities commissioned a repeat visitor survey, which was undertaken in summer 2021. This replicated the methodology and 18 of the 20 survey 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

- 7.41 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.

⁵⁴ UE Associates and University of Brighton. 2009. Visitor Access Patterns on the Ashdown Forest: Recreational Use and Nature Conservation

⁵⁵ 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>

⁵⁶ UE Associates. October 2011. Habitat Regulations Assessment for the Mid Sussex District Plan

⁵⁷ 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.

2016 Survey Results as Relevant to Mid Sussex District

- 7.42 When considering the magnitude of impact of the Mid Sussex District Plan, 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.
- 7.43 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.
- 7.44 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)
- 7.45 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.

SANG and SAMM Mitigation

- 7.46 The District Plan 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 DPA9 and DPA10). 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 a total of 9ha 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)
Land off West Hoathly Road, East Grinstead (DPA4)	Up to 45	3.07

Site Name	Number of Proposed New Dwellings	Distance to Ashdown Forest SPA / SAC (km)
Land to West of Turners Hill Road, Crawley Down ⁵⁸ (DPA9)	350	6.82
Hurst Farm, Turners Hill Road, Crawley Down (DPA10)	37	7.50
The Paddocks, Lewes Road, 8 – 12 Ashurst Wood (DPA13)	12	2.51
Maximum Residential Allocations	Proposed 444	

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	1,066 (444 * 2.4)	8.5ha (1,066 * 0.008)

- 7.47 There is an existing agreed mitigation strategy for recreational pressure at 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.
- 7.48 It is noted that Mid Sussex District Council already has 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. The Hill Place Farm SANG in East Grinstead is also now operational. It is a strategic SANG and at the time it was operational, it had capacity for 554 dwellings. 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.
- 7.49 The Imberhome 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

⁵⁸ 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 will 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.

'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 District Plan.

- 7.50 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. These dwellings within the 7km zone of influence would require the support of 9ha 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 an excess of 70ha of additional land available, most of it being SANG), is sufficiently and is situated adequately to provide an effective mitigation solution (see proximity to proposed residential sites in East Grinstead). Mid Sussex District Council would have to ensure that sufficient SANG capacity is available prior to giving planning consent and any proposed residential allocations lie within the relevant SANG catchment zone.
- 7.51 To ensure that the SANG programme delivers ongoing effective mitigation, long-term and regular monitoring should be undertaken in designated SANG, the details of which to be agreed in partnership with the other local authorities affected by Ashdown Forest. 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 anecdotal evidence suggests that site use has increased in line with housing delivery. However, AECOM recommends that visitor surveys should be undertaken to provide empirical evidence for SANG effectiveness, particularly with regard to future housing delivery. SANG monitoring should also be undertaken in the other SANGs once they are established and operational.
- 7.52 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 2019⁵⁹. 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 walkers⁶⁰

⁵⁹ (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]

⁶⁰ 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]

- 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

7.53 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 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

7.54 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 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 Ashdown Forest SPA and SAC, new development likely to have an adverse 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.

7.55 The MSLP also maximises 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 and Blue Infrastructure)** sets out that *'Green and blue 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 and blue infrastructure into the development design and layout; and*
- *Provides new green and blue infrastructure integrated into the development design; and*
- *Contributes to the wider green and blue infrastructure network by taking opportunities to improve, enhance, manage and restore green and blue infrastructure, and providing and reinforcing links to existing green and blue infrastructure including outside the development's boundaries to develop a connected network of multi-functional greenspace, including incorporating opportunities to contribute to strategic green and blue infrastructure.'*

7.56 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.'* Ensuring the continuing appeal of alternative recreation destinations as set out in Policy DPN5 is a key mechanism for shifting some of the recreational footprint away from more sensitive European sites.

Conclusion

7.57 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. 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 will be delivered in line with the anticipated housing delivery, it is concluded that the Mid Sussex District Plan 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 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 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 9ha 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. The Hill Place Farm SANG in East Grinstead is also now operational. It is a strategic SANG and at the time it was operational, it had capacity for 554 dwellings. 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.
- 8.6 The Imberhome 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 District Plan. Mid Sussex District Council will have to ensure that sufficient SANG capacity is available prior to giving planning consent and any proposed residential allocations lie within the relevant SANG catchment zone.
- 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 2019⁶¹.
- 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 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.**

⁶¹ (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 Mid Sussex Local Plan Review, European sites within 10km of the district boundary and the 7km mitigation zone surrounding the Ashdown Forest SPA / SAC.

Appendix B LSEs Screening

Table 4: Likely Significant Effects (LSEs) screening assessment of the policies contained in the Mid Sussex District Plan. 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
<p>Habitats Regulations Asses Supplementary Planning Policy DPS1 Climate Change</p>	<p>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>	<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>
<p>Policy DPS2: Sustainable Design and Construction</p>	<p>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 and water efficiency measures.</p>	<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 and energy use. 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>
<p>Policy DPS3: Renewable and Low Carbon Energy Schemes</p>	<p>Policy DPS3 provides support for renewable and low carbon energy schemes, including wind turbines (one or more wind turbines) and solar energy. The policy also indicates support for heating and cooling distribution networks, energy storage and community led energy projects.</p>	<p>There are no LSEs of Policy DPS3 on European sites.</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>

		There are no impact pathways present and Policy DPS3 is screened out from Appropriate Assessment.
Policy DPS4: Flood Risk and Sustainable Drainage	Policy DPS4 addresses flood risk and drainage to ensure that development is safe across its lifetime. The Strategic Flood Risk Assessment (SFRA) should be utilized to identify areas at risk with certain development not permitted to be constructed within certain flood zones. 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. Surface water cannot be drained into the sewage system.	<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>
Policy DPS5: Water Neutrality	This policy establishes that developments within the Sussex North Water Resource Zone must demonstrate water neutrality. This should incorporate water efficient design and offsetting of additional water use.	<p>There are no LSEs of Policy DPS5 on European sites.</p> <p>This policy protects the Sussex North Water Resource Area from a reduction in water resources due to development. 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>
Policy DPS6: Health and Wellbeing	Policy DPS6 details the Council's approach to achieving healthy, inclusive and safe places. This is to be achieved with incorporating the principles of 20 minute cities and "Local living". 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>
Natural Environment and Green Infrastructure		
Policy DPN1: Biodiversity,	Policy DPN1 protects the biodiversity and geodiversity of Mid Sussex. Development proposals need to conduct appropriate habitat and species surveys, retain features of interest, reduce disturbance to sensitive	There are no LSEs of Policy DPN1 on European sites.

<p>Geodiversity and Nature Recovery</p>	<p>habitats / species, result in a net gain in biodiversity, and avoid damage. Designated sites and other ecological assets are given protection according to their importance to nature conservation. This policy also covers protecting and enhancing soils, water and geodiversity.</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 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>
<p>Policy DPN2: Biodiversity Net Gain</p>	<p>Policy DPN2 highlights that biodiversity net gain will contribute to the delivery of 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 biodiversity net gain of 20% will be required. Gains will take place on site where feasible and offsite mitigation should consider the Local Nature Recovery Strategy.</p>	<p>There are no LSEs of Policy DPN2 on European sites.</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 and Blue Infrastructure</p>	<p>Policy DPN3 protects green and blue infrastructure assets by requiring development to incorporate existing green infrastructure into design, provide new green infrastructure and strengthen connectivity of ecological networks. Green and blue infrastructure designs should be informed by and respond to existing evidence and guidance including local nature recovery networks, Biodiversity Opportunity area statements and priority and irreplaceable habitats.</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, particularly in the form of safeguarding 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, prevent damage to root systems, provide new planting of suitable species and apply appropriate protection measures. There</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>should be a 15m buffer between development and ancient woodland, and a buffer of 2m either side of hedgerows. Development within 15m of any tree must submit an arboricultural impact assessment and method statement.</p>	<p>There are no impact pathways present and Policy DPN4 is screened out from Appropriate Assessment.</p>
<p>Policy DPN5: Historic Parks and Gardens</p>	<p>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>	<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. If a historic park or garden is open to the public it 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>
<p>Policy DPN6: Pollution</p>	<p>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 is to be protected.</p>	<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, water 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>
<p>Policy DPN7: Noise Impacts</p>	<p>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 proposals may be required to undertake noise impact assessment and consider the Council's noise guidance.</p>	<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>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) particularly in the South Downs International Dark Skies Reserve. 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. Additionally developments should consider parking layout in order to minimize the impact of headlights</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, air quality assessment will be required and the Council's guidance (Air Quality and Emissions Mitigation Guidance for Sussex) must be followed. Sites in proximity to Air Quality Management Areas (AQMAs) 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.</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>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</p>

		<p>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>
Countryside		
<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 and 3b in the High Weald AONB) will be protected from non-agricultural uses. Major applications must have a Landscape and Visual Impact Assessment or Appraisal. Economically viable mineral reserves in the district will be safeguarded.</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> <p>There are no impact pathways present and Policy DPC1 is screened out from Appropriate Assessment.</p>
<p>Policy DPC2: Preventing Coalescence</p>	<p>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>	<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>
<p>Policy DPC3: New Homes in the Countryside</p>	<p>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>	<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>

		There are no impact pathways present and Policy DPC3 is screened out from Appropriate Assessment.
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 special qualities (e.g. dark skies, tranquility, views, etc.). Development should consider the impacts on roads in the National Park	<p>There are no LSEs of Policy DPC5 on European sites.</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>
Policy DPC6: Ashdown Forest SPA and SAC	Policy DPC6 prevents adverse effects on the Ashdown Forest SPA / SAC regarding 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>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</p>

		<p>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>
Built Environment		
Policy DPB1: Character and Design	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. Major residential and mixed-use developments must demonstrate 20-minute neighborhood principles.	<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>
Policy DPB2: Listed Buildings and Other Heritage Assets	This policy protects listed buildings and their settings, such as through the use of traditional building materials. Other heritage assets of architectural or historic merit will also need to be considered by development proposals. Archeological features on proposed development sites must be evaluated prior to determination.	<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>
Policy DPB3: Conservation Areas	Development in Conservation Areas will need to conserve and enhance its special character and appearance. This should be achieved through sensitive design, open spaces / gardens, preservation of traditional shop fronts and appropriate urban surfaces (e.g. pavements, roads).	<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>

		There are no impact pathways present and Policy DPB3 is screened out from Appropriate Assessment.
Policy DPB4: Aerodrome Safeguarding Requirements (Air Safety)	Development proposals must comply with Aerodrome Safeguarding requirements to ensure that the operational integrity and safety of Gatwick Airport are not compromised. Proposals that cannot be mitigated to the satisfaction of the statutory consultees will be refused	<p>There are no LSEs of Policy DPB4 on European sites.</p> <p>This development management policy ensures development do not hinder the safe operation of Gatwick Airport. This policy has no bearing on European sites.</p> <p>There are no impact pathways present and Policy DPB4 is screened out from Appropriate Assessment.</p>
Transport		
Policy DPT1: Placemaking and Connectivity	Policy DTP1 sets out that development proposals shall support the West Sussex 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. Some developments will be required to produce a travel plan if they produce significant movement.	<p>There are no LSEs of Policy DPT1 on European sites.</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>
Policy DPT2: Rights Of Way and Other Recreational Routes	Policy DTP2 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, encouraging accessible development of rights of way and promoting multi-functional routes.	<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: Active and Sustainable Travel</p>	<p>Development proposals are expected to encourage sustainable travel by removing barriers to cycling, embedding 20-minute neighbourhood principles into development and contributing to infrastructure improvements. This includes providing adequate cycle parking facilities and high-quality cycleways. 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 cycling (as set out in the Mid Sussex Local Cycling and Walking Infrastructure Plan (LCWIP)). Enhancing this mode of 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 requires that all developments provide adequate parking and electric vehicle charging points in line with existing guidance documents. supports appropriate parking and electric vehicle charging infrastructure across Mid Sussex. Policy also requires the provision of electric vehicle charging points at non-residential building car parks.</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 Charging points. Promoting the use of electric vehicle 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>
<p>Policy DPT5: Off-Airport Car Parking</p>	<p>This policy states that proposals for the provision of additional off-airport parking or extension of airport related parking will not be permitted nor</p>	<p>There are no LSEs of Policy DPT5 on European sites.</p>

	will relocations of existing airport parking that would result in increased parking spaces.	<p>This is a development management policy that prohibits development of further airport related parking within the Local Plan Area.</p> <p>There are no impact pathways present and Policy DPT5 is screened out from Appropriate Assessment</p>
Economy		
Policy DPE1: Sustainable Economic Development	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) • Water resources <p>Due to this linking impact pathway, Policy DPE1 is screened in for Appropriate Assessment.</p>
Policy DPE2: Existing Employment Sites	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>

		There are no impact pathways present and Policy DPE2 is screened out from Appropriate Assessment.
Policy DPE3: Employment Allocations	Policy DPE3 provides for employment land on Significant Sites, including on Land at Crabbet Park (Cophorne) and Land to South of Reeds (Sayers Common).	<p>Likely Significant Effects of Policy DPE3 on European sites cannot be excluded.</p> <p>This policy allocates employment sites across Mid Sussex, thereby influencing the volume of commuter traffic and routes of new commuter journeys (potentially leading within 200m of air quality sensitive habitats).</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 DPE3 is screened in for Appropriate Assessment.</p>
Policy DPE4: Town and Village Centre Development	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.	<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. This may include the creation of high-quality premises.	There are no LSEs of Policy DPE5 on European sites.

		<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>
<p>Policy DPE6: Development within Primary Shopping Areas</p>	<p>Policy DPE6 promotes thriving centres by maintaining a dominance of Class E uses. New developments for retail, food, beverage and service uses will be supported. The policy also restricts residential uses to upper storeys.</p>	<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 villages and Neighborhood Centres</p>	<p>This policy states that neighbourhood centres and parades will be protected unless the current use is no longer viable.</p>	<p>There are no LSEs of Policy DPE7 on European sites.</p> <p>This is a development management policy that preserves the function of village centres. This policy does not make any allocations for additional development.</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 DPE9 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. The route of the proposed reinstatement Bluebell Railway is safeguarded from alternative development.</p>	<p>Likely Significant Effects of Policy DPE9 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, lead to an increase in 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 • Water resources <p>Due to these linking impact pathways, Policy DPE9 is screened in for Appropriate Assessment.</p>
<p>Housing</p>		
<p>Policy DPH1: Housing</p>	<p>Policy DPH1 specifies the District's Local Housing Need as 19,620 dwellings over the Plan period 2021 – 2039. This will be met with 20,616 new dwellings over the plan period. This includes existing commitments and completions of 12,161 dwellings, 6,687 dwellings at allocated sites, and a windfall allowance of 1,768 dwellings.</p>	<p>Likely Significant Effects of Policy DPH1 on European sites cannot be excluded.</p> <p>This policy provides for a minimum of 19,620 new dwellings in the Plan period. 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 • Water demand <p>Due to these linking impact pathways, Policy DPH1 is screened in for Appropriate Assessment.</p>
Policy DPH2: Sustainable Development – Outside the Built-up Area	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. This is under the condition that the development is allocated in another planning document or is less than 10 dwellings, is contiguous with existing built-up area and is sustainable.	<p>There are no LSEs of Policy DPH2 on European sites.</p> <p>Policy DPH2 supports the sustainable expansion of settlements out of 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>
Policy DPH3: Sustainable Development – Inside the Built-up Area	Policy DPH3 supports infilling and redevelopment within built-up areas provided it is of an appropriate scale. Areas with good accessibility to shops, services and sustainable transport links may provide an opportunity for a greater concentration of development.	<p>There are no LSEs of Policy DPH3 on European sites.</p> <p>Policy DPH3 supports development within Mid Sussex’s 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>
<i>See following table for DPH5 to DPH29 and DPH31 to DPH32</i>		
Policy DPH4: Older Persons’ Housing and Specialist Accommodation	Policy DPH4 sets out that 1,887 additional dwellings with support or care capacities are provided over the Plan period. Overall, six 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>There are no LSEs of Policy DPH4 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 DPH4 is screened out from Appropriate Assessment.</p>
<p>Policy DPH5: Gypsies, Travellers and Travelling Showpeople</p>	<p>Policy DPH5 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. 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 adequate mitigation measures. Existing and new traveller pitches are safeguarded for that use.</p>	<p>Likely Significant Effects of Policy DPH5 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>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 • Water resources <p>Due to these linking impact pathways, Policy DPH5 is screened in for Appropriate Assessment.</p>
<p>Policy DPH6: Self and Custom Build Housing</p>	<p>Policy DPH6 supports the important role that self and custom build housing is to play in the future housing in the district. A minimum of 2% 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. Plots must be available at competitive prices and self-builds must conform to a design code for each site.</p>	<p>There are no LSEs of Policy DPH6 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>

		There are no impact pathways present and Policy DPH6 is screened out from Appropriate Assessment.
Policy DPH7: Housing Mix	Policy DPH7 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 with disabilities) are also highlighted.	There are no LSEs of Policy DPH7 on European sites. 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. There are no impact pathways present and Policy DPH7 is screened out from Appropriate Assessment.
Policy DPH8: 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.	There are no LSEs of Policy DPH8 on European sites. 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. There are no impact pathways present and Policy DPH8 is screened out from Appropriate Assessment.
Policy DPH9: First Homes	Policy DPH9 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.	There are no LSEs of Policy DPH9 on European sites. 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. There are no impact pathways present and Policy DPH9 is screened out from Appropriate Assessment.
Policy DPH10: Rural Exception Sites	This policy identifies that rural exception sites for affordable housing will be permitted, provided that certain criteria are met. Rural exception sites will primarily be delivered by Parish Councils.	There are no LSEs of Policy DPH10 on European sites.

		<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 DPH10 is screened out from Appropriate Assessment.</p>
Policy DPH11: Dwelling Space Standards	Policy DPH11 stipulates that all new residential development will need to meet nationally set space standards for internal floorspace and storage space. These will be applied to the full range of dwelling types.	<p>There are no LSEs of Policy DPH11 on European sites.</p> <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 DPH11 is screened out from Appropriate Assessment.</p>
Policy DPH12: Accessibility	This policy provides the Council's approach to accessibility. It outlines the requirements for accessible / adaptable dwellings and wheelchair-user dwellings.	<p>There are no LSEs of Policy DPH12 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 DPH12 is screened out from Appropriate Assessment.</p>
Infrastructure		
Policy DPI1: Infrastructure Provision	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. 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. Existing infrastructure is protected unless there is an equivalent or improved replacement.	<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 secure affordable housing, address the impacts of development, and secure an appropriate contribution towards monitoring of planning obligations.	<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>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>
Policy DPI3: Major Infrastructure Projects	Policy DPI3 addresses how the Council will approach major infrastructure projects. Such proposals should contribute positively to the implementation of the spatial strategy and may require a Delivery Plan. 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>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>
Policy DPI4: Communications Infrastructure	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>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</p>

		<p>direct bearing on the European sites relevant to the Mid Sussex Local 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 generally not be supported unless conditions are met.</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>
<p>Policy DPI7: Water and Wastewater Infrastructure</p>	<p>Policy regards the provision of water and wastewater infrastructure. Proposals that require off-site water service infrastructure must demonstrate that sufficient capacity exists or will be developed with the water company. Development should connect to a public sewage treatment works</p>	<p>There are no LSEs of Policy DPI7 on European sites.</p> <p>This is a development management policy that requires there be adequate capacity in off-site water infrastructure where required for development.</p>

		<p>The policy does not stipulate a quantum and / or location of growth.</p> <p>There are no impact pathways present and Policy DPI7 is screened out from Appropriate Assessment.</p>
<p>Policy Viability</p>	<p>DPI8: Policy outlines the requirement for a Viability Assessment when a proposal is non-compliant regarding affordable housing or infrastructure contributions. A Viability Review must also be conducted.</p>	<p>There are no LSEs of Policy DPI8 on European sites.</p> <p>This is a development management policy which outlines the process by which viability can be assessed if a developer asserts that the contributions to infrastructure or affordable housing make the development non-viable.</p> <p>There are no impact pathways present and Policy DPI8 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.

Policy	Site Area (ha)	Capacity	Approx. Distance to the Ashdown Forest SPA / SAC (km)
DPSC1: Land to the west of Burgess Hill/North of Hurstpierpoint	57.81	1,350 dwellings, 300m ² of employment floorspace, 500m ² retail/community space	15.9
DPSC2: Land at Crabbet Park	172	2,300 dwellings (approx. 1,500 to 2039) and 1000m ² E class employment space	8.7
DPSC3: Land to South of Reeds Lane, Sayers Common	90.05	2,000 dwellings (approx. 1,850 to 2039), 5,000 - 9,000m ² of employment uses, and 6 permanent Gypsy and Traveller Pitches	19.2
DPSC4: Land at Chesapeake and Meadow View, Reeds Lane, Sayers Common	1.5	33 dwellings	18.8
DPSC5: Land at Coombe Farm, London Road, Sayers Common	14.2	210 dwellings	18.4
DPSC6: Land to the West of Kings Business Centre, Reeds Lane, Sayers Common	3.3	100 dwellings	18.7
DPSC7: Land at LVS Hassocks, London Road, Sayers Common	10.2	200 dwellings	18.1
DPA1: Batchelors Farm, Keymer Road, Burgess Hill	1.5	33 dwellings	15.4
DPA2: Land South of Appletree Close, Janes Lane, Burgess Hill	1.2	25 dwellings	13.1
DPA3: Burgess Hill Station, Burgess Hill	3.5	300 dwellings	14.7
DPA3a: Allotment Site – Nightingale Lane, Burgess Hill	1	Allotments	15.9
DPA4: Land off West Hoathly Road, East Grinstead	1.8	Up to 45 dwellings	3.1
DPA5: Land at Hurstwood Lane, Haywards Heath	1.8	36 dwellings	10.3
DPA6: Land at Junction of Hurstwood Lane and Colwell Lane, Haywards Heath	1	40 dwellings	10.6

DPA7: Land east of Borde Hill Lane, Haywards Heath	10.5	60 dwellings	8.7
DPA8: Orchards Shopping Centre, Haywards Heath	1.9	100 dwellings	10.3
DPA9: Land to west of Turners Hill Road, Crawley Down	33.7	350 dwellings	6.8
DPA10: Hurst Farm, Turners Hill Road, Crawley Down	2.2	37 dwellings	7.5 (included as a precaution as lies close to the 7km zone)
DPA11: Land Rear of 2 Hurst Road, Hassocks	0.9	25 Dwellings	18.6
DPA12: Land west of Kemps, Hurstpierpoint	5.8	90 dwellings	18.7
DPA13: The Paddocks, Lewes Road, Ashurst Wood	0.84	8 – 12 dwellings	2.5
DPA14: Land at Foxhole Farm, Bolney	18.4	200 dwellings	16
DPA15: Ham Lane Farm House, Ham Lane, Scaynes Hill	0.97	30 dwellings	8.27
DPA16: Land West of North Cottages and Challoners, Cuckfield Road, Ansty	1.3	30 dwellings	13.5
DPA17: Land to the west of Marwick Close, Bolney Road, Ansty	1.5	45 dwellings	14.5
DPA18: Land at Byanda, Hassocks	0.4	60 bed residential care home	18.7
DPA19: Land at Hyde Lodge, Handcross	3	Contribution towards identified Older Persons' Accommodation need	13.6

Appendix C Air Quality Impact Assessment

C.1 Methodology

Ashdown Forest SAC - Air Quality Modelling

Mid Sussex District Council - Regulation 19

Mid Sussex District Council

Project number: 60671970

23rd November 2023

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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 19 Mid Sussex District Plan (MSDP) (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 2021-2039 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 2021-2039;
 - 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 2021-2039 but does allow for strategic planned development in neighbouring local authorities;
 - 2039 'Do Something' Scenario: future assessment year which each include the influence of planned development from the Mid Sussex District Plan 2021-2039 and from strategic planned development in neighbouring local authorities.
 - 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 (HRA) of the Mid Sussex District Plan'.

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 being finalised by Defra⁶².

Habitats Regulations Assessment

- 10.4 While the UK is no longer a member of the EU, a requirement for 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'⁶³ 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. This is in accordance with Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (Natural England, 2018).
- 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, 2020), 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.

⁶² <https://www.gov.uk/government/news/update-on-progress-on-environmental-targets>

⁶³ 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, 2020a);
- Defra's Vehicle Emission Factors (Defra, 2020b);
- Driver Vehicle Licencing Agency (DVLA) statistics on licensed road-using cars and light goods vehicles dataset for 2022 (DVLA, 2022);
- Department for Transport (DfT)'s Transport Decarbonisation Plan of future vehicle fleet projections (DfT, 2022);
- Emission rates as published in the Calculator for Road Emissions of Ammonia (CREAM) tool (Air Quality Consultants, 2020);
- 1x1 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(22) Technical Guidance (Defra, 2022), and guidance contained within documents from Natural England (Natural England, 2018), the Institute of Air Quality Management (IAQM) (IAQM, 2020) 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, ammonia (NH₃), and nitrogen and acid deposition. Modelling of these pollutants is undertaken to assess the air quality impacts of planned development in the District 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 NH₃ 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). 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 (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 2035 (recently postponed from 2030) are not accounted for in the fleet information within the current version of the EFT. As such, a more up-to-date fleet projection for the future year fleet has been used, in line with recent DfT policy, which is discussed in more detail below in the "Modelled Vehicle Fleet" subsection. This takes account of the fact that a significant shift in the constitution of the UK vehicle fleet will arise during the 2030s.
- 11.9 As the latest year for which emission factors are available in EFT v11 is 2030, AECOM has used 2030 information for any later modelled years. This therefore offers a precautionary approach for District 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 c.2025 or the ban on the sale of new petrol and diesel cars and vans from 2035, recently postponed 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 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 NO_x.

Traffic Data

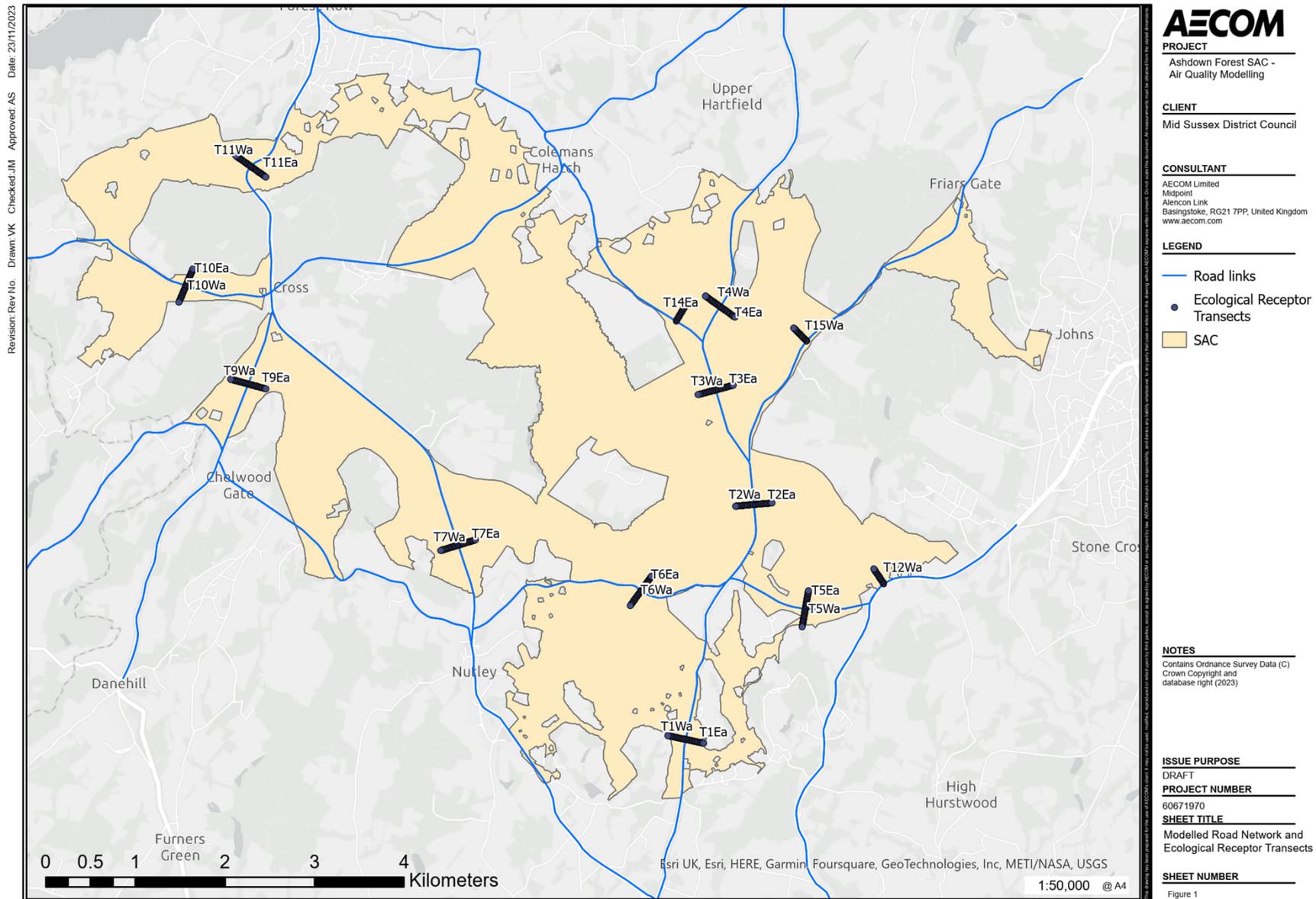
- 11.14 Traffic data were provided by the SYSTRA Transport Team for a series of road links within 200m of the Ashdown Forest SAC. These links were chosen as they are located on the busiest roads in the area that are expected to experience the greatest increase in flows over the District Plan period to 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' Scenario. A summary of the traffic data used in the air quality assessment is given in Annex A.1.
- 11.16 The DS scenario includes 8,455 homes in addition to the Reference Case. These are distributed across 35 development sites. The larger sites with over 1000 homes are West of Burgess Hill (1350 homes), Crabtree Park near Crawley (1850 homes) and Land south of Reeds Lane, Albourne (1500 homes). The DS also includes windfall sites and these are assumed to total an additional 1768 homes by 2039, distributed pro-rata across the Reference Case housing developments.

Modelled Vehicle Fleet

- 11.17 For the baseline modelling of the SAC, the nominal EFT v11 “Basic Split” rural fleet for the 2019 year was used, as this aligns well with the 2019 base year traffic data, 2019 meteorological data, and 2019 Ashdown Forest SAC monitoring data.
- 11.18 For the future year (2039) modelling, an approach has been taken to determine the vehicle fleet used in the modelling to apply a more up-to-date projection than that published in the EFT v11 in relation to the uptake of hybrid and zero emission / battery electric vehicles. A current vehicle fleet representative of the local area was determined, which was then projected forward to the future year (2039) following the methodology below.
- 11.19 The current (2022) fleet composition, from which the 2039 fleet projection is based, is derived from the most up-to-date available full-year dataset (2022) of registered light-duty vehicles (LDV) from DVLA (DVLA, 2022). A high-level review of the fleet characteristics for Mid Sussex District, neighbouring districts, and West and East Sussex counties, revealed a high level of similarity at local and county levels. Given this similarity, and to incorporate a dataset with a greater number of overall vehicles, it was decided to use the fleet characteristics at the combined East Sussex and West Sussex county level as the starting point for the fleet projections.
- 11.20 Light Duty Vehicles (LDVs), which are mainly cars and light goods vehicles (LGVs), comprise the majority of vehicles in the overall fleet (approximately 95%), and therefore this dataset will give a robust and accurate starting point for future fleet projections. HDVs (buses/coaches and Heavy Goods Vehicles- HGVs), which comprise the remaining ~5% of the fleet, have been apportioned based on the EFT basic split for 2039. The exact LDV/HDV split varies according to the provided traffic data and depends on the road link, and the fleet breakdown for each road link takes this split into account.
- 11.21 Transport projections out to 2050 of UK’s intended decarbonisation of the fleet and alignment with Net Zero became available from the DfT’s Transport Decarbonisation Plan (TDP) (DfT, 2022). These projections are based on high and low ambition for rates of decarbonisation for every year up to 2050. These projections were adjusted to determine the breakdown of individual fuel types in line with the EFT v11.
- 11.22 To take a more cautious approach, the lower ambition “Decarbonising Transport Upper” projection was used to project the 2022-based current fleet out to the future year of 2039, by using the calculated year-on-year car, LGV and HDV growth rates for each vehicle fuel type. This projection was deemed to represent a more cautiously realistic scenario than either the EFT v11 or TDP baseline projections.

Figure 5: Modelled Road Network and Ecological Receptor Transects

Council - 13 December 2023



Receptors

- 11.23 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.
- 11.24 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.
- 11.25 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.
- 11.26 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.
- 11.27 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

- 11.28 As detailed above, road traffic emissions of NO_x were derived using the latest version of Defra's Emissions Factor Toolkit (EFT v11) at the time of assessment, and associated guidance and tools (Defra, 2022). For the base year (2019), the nominal EFT "Basic Split" rural vehicle fleet for 2019 was used, whereas for all the future year (2039) scenarios, the 2039 projected fleet as described in the methodology above was used with the default 2030 EFT emission factors. Road traffic emissions of NH₃ were derived using emission rates CREAM V1A (Air Quality Consultants, 2020) combined with the EFT v11 vehicle fleet for the relevant year, using the same vehicle fleet methodology as described above for NO_x.
- 11.29 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 "Basic Split" fleet, and 2019 background concentrations;
 - 2039 Future Baseline – 2019 AADT, 2030 emission factors (latest available year), 2039 projected vehicle fleet, and 2030 background concentrations (the latest projected year available from Defra);
 - 2039 Do Minimum (Reference Case) – 2039 AADT without District Plan, 2030 emission factors, 2039 projected vehicle fleet, and 2030 background concentrations;
 - 2039 Do Something – 2039 AADT with District Plan, 2030 emission factors, 2039 projected vehicle fleet, and 2030 background concentrations.
- 11.30 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 District 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.

11.31 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.

11.32 The difference between the 'do something' and the 'do minimum' scenarios provides the impact of the planned development within the District 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 District Plan 'in combination', as the 'future baseline' accounts for no future growth.

11.33 Version 11 of the EFT and Defra's associated tools provide data from 2018 to 2030. 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 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.

Plume Depletion

11.34 Plume depletion due to dry deposition onto vegetation was taken into account in the model. This was enabled by using the ADMS-Roads 'Dry Deposition' module, applying the 'grassland' deposition rates presented in the Air Quality Technical Advisory Group (AQTAG) deposition velocities that are cited in 2020 IAQM guidance (IAQM, 2020), as shown in Table 8.

11.35 The deposition velocity for NO₂ was applied to raw modelled NO_x. This assumes that 100% of NO_x is emitted as NO₂, and therefore represents an optimistic depletion of NO_x from the atmosphere.

Table 8: Nitrogen Deposition Velocities and Conversion Rates

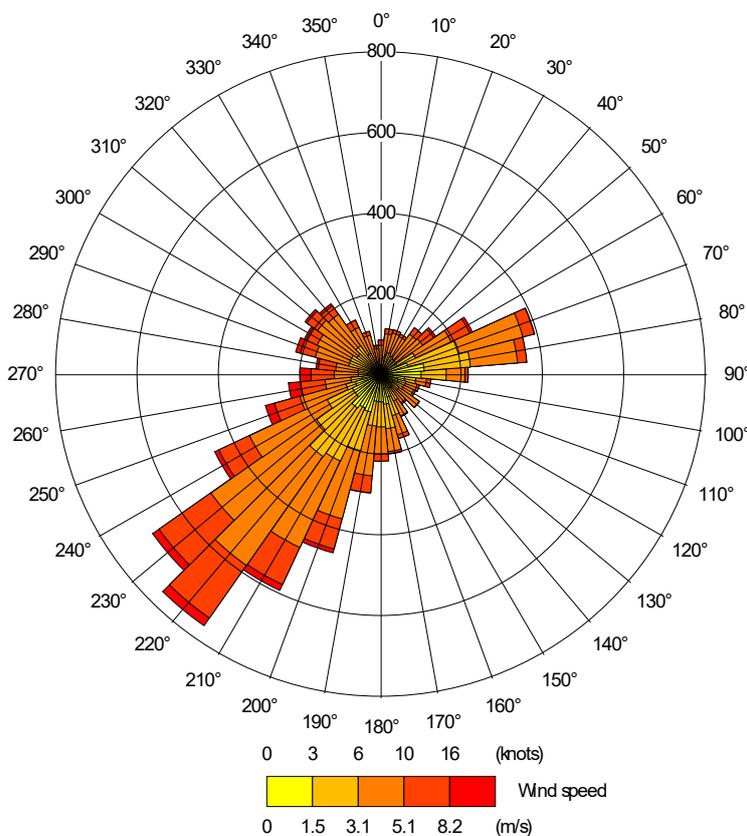
Pollutant	Habitat	Nitrogen deposition conversion rates	Deposition velocity
NO ₂	Grassland / short vegetation	1 µg/m ³ NO ₂ = 0.14 kgN/ha/yr	0.0015 m/s
NH ₃	Grassland / short vegetation	1 µg/m ³ NH ₃ = 5.2 kgN/ha/yr	0.020 m/s

Meteorological Data

11.36 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 northwest 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

- 11.37 Background concentrations of nitrogen dioxide (NO₂) and NO_x for 2019 and 2030 were sourced from Defra’s 2018-based 1x1km background maps (Defra, 2020a). As outlined above, version 11 of Defra’s EFT and associated tools provide data from 2018 to 2030. 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.
- 11.38 Contributions from explicitly modelled source sectors were removed from the NO₂ and NO_x background concentrations, as outlined in Table 9, in accordance with Defra guidance (Defra, 2022). The data presented in Table 9 show that the concentrations are predicted to decrease between 2019 and 2030.
- 11.39 Background monitoring data for 2019 were reviewed, and an average of 8.1 µg/m³ calculated using 27 background monitoring locations, shown in Table 10. Defra mapped background NO₂ concentrations were identified as being approximately 5-15% lower than this average monitored concentration. As such, Defra background NO₂ and NO_x were uplifted by the calculated ratio for both the base and future years for use in the modelling assessment, as presented in Table 9.
- 11.40 The NH₃ 2019 monitored background concentrations using Alpha and Delta samplers are presented in Table 11. The NH₃ background concentrations from APIS are presented in Table 12.

Table 9: Defra Mapped Background Pollutant Concentrations (Uplifted)

Transects	Road Name	Grid Square (X, Y)	Annual Mean Concentrations ($\mu\text{g}/\text{m}^3$)			
			2019 NO ₂	2019 NO _x	2030 NO ₂	2030 NO _x
T1E, T1W	B2026	546500, 127500	8.1	10.4	6.0	7.7
T2E, T2W	B2026	547500, 129500	8.1	10.4	6.1	7.8
T3E, T3W	B2026	546500, 130500	8.1	10.4	6.1	7.9
T4E, T4W	B2026	546500, 131500	8.1	10.4	6.1	7.9
T5E, T5W	New Road	547500, 128500	8.1	10.4	6.1	7.8
T6E, T6W	Crowborough Road	546500, 128500	8.1	10.4	6.1	7.8
T7E, T7W	A22	544500, 129500	8.1	10.4	6.2	8.0
T8E	Kidd's Hill	542500, 131500	8.1	10.5	6.4	8.2
T9E, T9W	A275	541500, 131500	8.1	10.5	6.2	8.1
T10E, T10W	Hindleap Lane	541500, 132500	8.1	10.5	6.4	8.3
T11E, T11W	Colemans Hatch Road	541500, 133500	8.1	10.5	6.4	8.2
T12W	A26	548500, 128500	8.1	10.4	6.4	8.2
T14E	Kidd's Hill	546500, 131500	8.1	10.4	6.1	7.9
T15W	B2188	547500, 131500	8.1	10.4	6.2	7.9

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)

Table 10: WDC 2019 Monitored Background NO₂ Concentrations

Site ID	2019 annual mean NO ₂ ($\mu\text{g}/\text{m}^3$) concentration
T7	8.4
T8	7.3
T9	7.2
T12	7.2
T18	9.0
T26	8.1
T27	4.9
T30	7.9
T39	7.3
T41	10.0
T43	10.4
T45	6.9
T46	7.5
T50	7.5
T55	6.9
T57	6.7
T60	9.5
T63	10.3
T64	8.8
T69	8.4
R1.7	10.0
R1.8	8.3

Site ID	2019 annual mean NO ₂ (µg/m ³) concentration
R2.7	7.2
R2.8	6.7
R3.7	8.4
R3.8	10.1
R4.7	8.5
Average	8.1

Table 11: WDC 2019 Monitored Background NH₃ Concentrations

Site ID	Distance from road (m)	2019 annual mean NH ₃ (µg/m ³)
T69	181	0.72
T70	226	0.72
R1.7	100	0.78
R2.7	100	0.57
R3.7	100	0.64
D2	660	0.60
D5	390	0.43
Average		0.64

Ecological Data

- 11.41 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 12.
- 11.42 Background concentrations of ammonia were also sourced from 5x5 km modelled maps available from APIS, whereas background concentrations of NO_x and NO₂ were sourced from Defra's latest 1x1 km maps, thereby accounting for all sources that are not explicitly defined in the model.
- 11.43 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.
- 11.44 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.
- 11.45 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).

- 11.46 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.
- 11.47 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.).
- 11.48 Over the 20-year period, this equates to a reduction in the APIS background nitrogen deposition rate presented in Table 12 (3-year average, 2019-21) of 1.40 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 0.105 keq/ha/yr N.).
- 11.49 No other changes to the APIS data have been made from those presented (3-year average, 2019-21) for any modelled scenario.
- 11.50 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.
- 11.51 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*'⁶⁴ [emphasis added].
- 11.52 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, 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 District Plan period (2039).

⁶⁴ 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 vehicle emission factors within the air quality modelling tools available only project out to 2030. While the fuel technology is projected out to 2039 following the DfT decarbonisation pathway, as described earlier, the breakdown of euro classifications published in the EFT extends to 2030, and so the 2039 assessment year does not recognise continued uptake of more stringent emissions standards. Therefore the results are likely to be cautious in terms of emissions related to vehicle age.

Table 12: APIS Data for Ecological Transects for 2019-2021

Transect	Av. N Dep kgN/ha/yr [§]	Critical Load N Dep kgN/ha/yr	Total Av. Acid Dep keq/ha/yr N [§]	Total Av. Acid Dep keq/ha/yr S	Critical Load N Acid Dep keq/ha/yr MaxCLMinN- MaxCLMaxN	Background NH ₃ (µg/m ³)*
T1E, T1W	13.32	5 - 15	0.98	0.14	0.499 - 0.952	1.12
T2E, T2W	13.49	5 - 15	0.99	0.14	0.499 - 0.952	1.03
T3E, T3W	13.77	5 - 15	1.01	0.15	0.499 - 0.952	1.02
T4E, T4W	13.92	5 - 15	1.02	0.15	0.499 - 0.952	1.00
T5E, T5W	13.34	5 - 15	0.98	0.14	0.499 - 0.952	1.05
T6E, T6W	13.47	5 - 15	0.99	0.14	0.499 - 0.952	1.06
T7E, T7W	13.87	5 - 15	1.02	0.15	0.499 - 0.952	1.06
T8E	14.43	5 - 15	1.06	0.15	0.499 - 0.952	1.05
T9E, T9W	14.41	5 - 15	1.06	0.16	0.499 - 0.952	1.07
T10E, T10W	14.55	5 - 15	1.07	0.16	0.499 - 0.952	1.08
T11E, T11W	14.40	5 - 15	1.06	0.16	0.499 - 0.952	1.09
T12W	14.34	5 - 15	0.99	0.14	0.499 - 0.952	1.05
T14E	13.92	5 - 15	1.02	0.15	0.499 - 0.952	1.00
T15W	13.80	5 - 15	1.01	0.15	0.499 - 0.952	1.00

Note: [§] Average nitrogen deposition rate (kgN/ha/yr) projected to decrease by 1.40 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 0.10 keq/ha/yr N.
* Average 2019 monitored NH₃ background concentration applied in modelling assessment = 0.64 µg/m³

Verification

11.53 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.

11.54 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.

11.55 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.

11.56 Defra provide guidance regarding verification of NO_x and NO₂ concentrations (Defra, 2022). 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.

11.57 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

11.58 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.

11.59 Following detailed analysis of each monitoring location in the study area, a total of 51 roadside monitoring sites were taken forward in the model verification process. Table 13 details the sites used in model verification.

Table 13: Local Authority NO₂ Monitoring Sites used in Model Verification

Site ID	Distance from Road (m)	Grid reference (X, Y)	Total 2019 monitored NO ₂ (µg/m ³)	Total modelled NO ₂ before adjustment (µg/m ³)	Total modelled NO ₂ after adjustment (µg/m ³)
T1	1.5	542199, 134088	20.5	11.9	18.8
T2	2.1	542047, 133770	15.6	11.8	18.6
T3	1.6	541850, 133050	20.8	11.6	18.1
T4	1.7	541953, 132229	24.3	11.7	18.2
T5	1.0	543446, 132334	10.2	9.7	12.7
T6	3.7	546890, 131049	12.7	10.8	15.7
T10	0.8	546533, 131670	11.0	8.7	10.0
T11	0.7	545640, 132411	11.1	8.6	9.5
T13	1.0	547085, 132595	14.9	10.3	14.3
T14	2.5	546990, 131906	11.4	11.0	16.3
T15	1.3	547401, 130704	11.8	8.8	10.0
T16	1.6	549374, 132561	11.3	8.7	9.7
T19	2.6	549090, 128879	25.6	13.7	23.7
T20	1.2	548709, 128701	25.3	14.1	24.7
T21	1.3	548892, 128853	33.2	15.8	29.4
T22	2.6	549140, 128880	24.9	14.2	25.0
T23	3.5	547885, 128514	16.2	10.4	14.6
T24	4.8	546788, 127981	12.9	9.6	12.5
T25	1.4	546665, 127421	15.1	9.7	12.8
T28	2.3	545028, 126584	20.7	11.7	18.4
T29	1.5	544600, 127196	15.4	11.3	17.3
T31	2.7	544020, 129316	25.3	14.1	24.7
T33	1.3	543978, 129407	25.9	13.2	22.5
T34	1.7	542302, 131412	13.9	12.5	20.4
T35	2.9	542861, 130963	18.4	11.6	18.1
T36	2.0	543617, 130337	21.6	12.2	19.6
T37	1.2	543887, 129685	18.2	12.6	20.8
T38	1.0	545412, 128806	10.6	9.8	13.1

Site ID	Distance from Road (m)	Grid reference (X, Y)	Total 2019 monitored NO ₂ (µg/m ³)	Total modelled NO ₂ before adjustment (µg/m ³)	Total modelled NO ₂ after adjustment (µg/m ³)
T40	1.8	546248, 128652	10.9	10.8	15.8
T42	1.4	547353, 129600	12.3	11.7	18.4
T44	1.4	542621, 128998	9.7	8.8	10.0
T47	0.9	541418, 130304	15.2	11.0	16.4
T48	1.4	541856, 131411	12.7	10.9	16.0
T49	2.3	541722, 131040	10.5	10.7	15.5
T51	1.0	541345, 131995	15.6	12.8	21.4
T52	1.3	540142, 132591	13.9	11.3	17.3
T56	1.2	544299, 134305	21.1	10.4	14.7
T58	1.5	544902, 133078	14.6	9.1	11.1
T59	2.0	545642, 128828	12.0	9.7	12.8
T61	2.8	546952, 128775	16.0	10.4	14.5
T62	2.4	546790, 128069	21.3	10.2	14.0
T65	1.4	548189, 128518	15.3	11.7	18.4
T66	1.6	547347, 129311	9.8	10.1	13.9
T67	1.8	547290, 130126	12.6	10.7	15.4
T68	2.1	544027, 132499	11.3	9.6	12.5
T71	5.5	547438, 128711	11.0	10.8	15.7
R1.1	1.7	543931, 129550	31.8	13.9	24.3
R2.1	1.7	543960, 129493	21.9	14.8	26.6
R3.1	1.0	547368, 129373	15.5	12.0	19.1
R4.1	2.0	548787, 128796	13.6	16.6	31.2
A1	1.7	547294, 129153	13.8	11.6	18.1

11.60 Model performance was analysed at these monitoring sites. Without adjustment the root mean square error (RMSE) was 7.6 µg/m³. A model adjustment factor was calculated (2.91) and applied to the model results. After adjustment the RMSE was reduced to 3.8 µg/m³ as shown in Table 14.

Table 14: NO₂ Model Verification details

Number of Sites	Number of Monitoring Sites within ±10% of the Monitored Concentration Pre-Adjustment	RMSE pre-adjustment (µg/m ³)	Model Adjustment Factor	Number of Sites within ±10% of the Monitored Concentration Post Adjustment	RMSE post adjustment (µg/m ³)	Fractional Bias post adjustment)
51	10	7.6	2.91	14	3.8	0.0

NH₃ Verification

11.61 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.

11.62 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 15 details the sites used in model verification.

Table 15: Local Authority NH₃ Monitoring Sites used in Model Verification

Site ID	Distance from Road (m)	Grid reference (X, Y)	Total 2019 monitored NH ₃ (µg/m ³)	Total modelled NH ₃ before adjustment (µg/m ³)	Total modelled NH ₃ after adjustment (µg/m ³)
T14*	2.5	546990, 131906	0.93	0.95	0.94
T59*	2.0	545642, 128828	1.10	0.81	0.81
T61*	2.8	546952, 128775	1.08	0.87	0.87
T62*	2.4	546790, 128069	1.16	0.87	0.87
T65*	1.4	548189, 128518	0.98	1.03	1.02
T67*	1.8	547290, 130126	1.13	0.92	0.91
T68*	2.1	544027, 132499	0.89	0.80	0.80
R1.1*	1.7	543931, 129550	1.68	1.34	1.33
R1.2*	2.5	543930, 129549	1.42	1.23	1.22
R1.3*	5	543928, 129549	0.98	1.09	1.08
R1.4*	10	543923, 129547	0.88	0.95	0.94
R2.1*	1.7	543960, 129493	1.26	1.48	1.46
R2.2*	2.5	543961, 129494	1.23	1.46	1.45
R2.3*	5	543963, 129494	1.37	1.29	1.28
R2.4*	10	543968, 129496	1.00	1.10	1.09
R3.1*	1.0	547368, 129373	0.77	1.07	1.07
R3.2*	2.5	547370, 129373	0.83	1.03	1.02
R3.3*	6	547373, 129373	0.89	0.90	0.90
R3.4*	10	547377, 129373	0.84	0.84	0.83
D3**	1.7	547294, 129153	0.94	1.02	1.01
D6**	5.0	548785, 128800	1.42	1.39	1.37

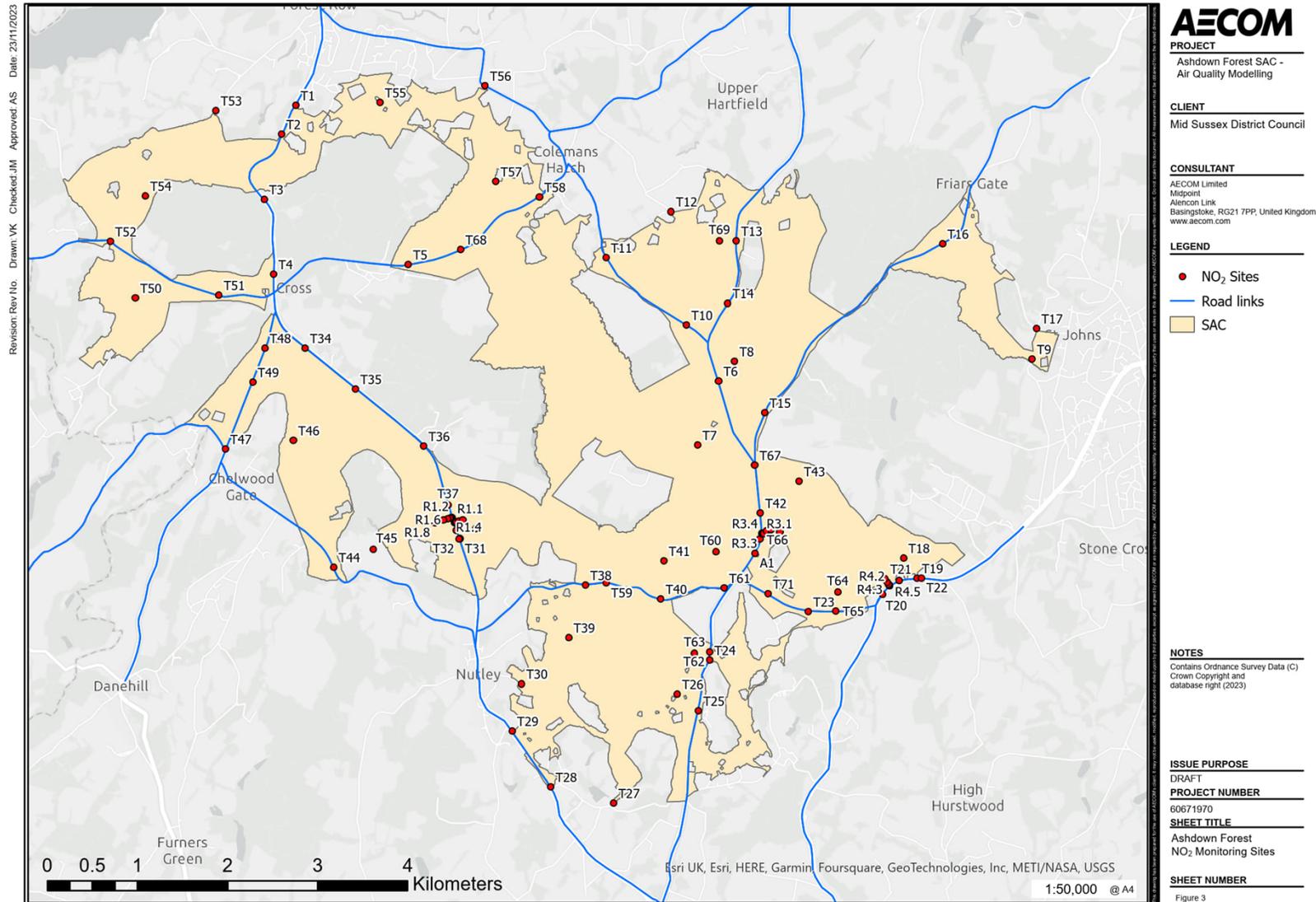
Note: * NH₃ monitoring undertaken using ALPHA samplers; ** NH₃ monitoring undertaken using DELTA samplers

11.63 A model adjustment factor was calculated (0.98) and applied to the model results. After adjustment the RMSE was 0.2 µg/m³.

Deposition velocities

11.64 Deposited nitrogen from road traffic derived NH_3 and NO_2 was estimated using the deposition velocities presented in Table 8. The conversion rates were applied to the final modelled NO_2 and NH_3 concentrations from road traffic, to provide kgN/ha/year . All of the transects were modelled and analysed as heathland / grassland i.e. 'short vegetation' was used at all locations as Ashdown Forest SAC is designated for heathland.

Figure 7: WDC Air Quality NO₂ Monitoring Sites in relation to Ashdown Forest SAC



AECOM

PROJECT
Ashdown Forest SAC - Air Quality Modelling

CLIENT
Mid Sussex District Council

CONSULTANT
AECOM Limited
Midpoint
Alencon Link
Basingstoke, RG21 7PP, United Kingdom
www.aecom.com

LEGEND
● NO₂ Sites
— Road links
■ SAC

NOTES
Contains Ordnance Survey Data (C)
Crown Copyright and database right (2023)

ISSUE PURPOSE
DRAFT

PROJECT NUMBER
60671970

SHEET TITLE
Ashdown Forest
NO₂ Monitoring Sites

SHEET NUMBER
Figure 3

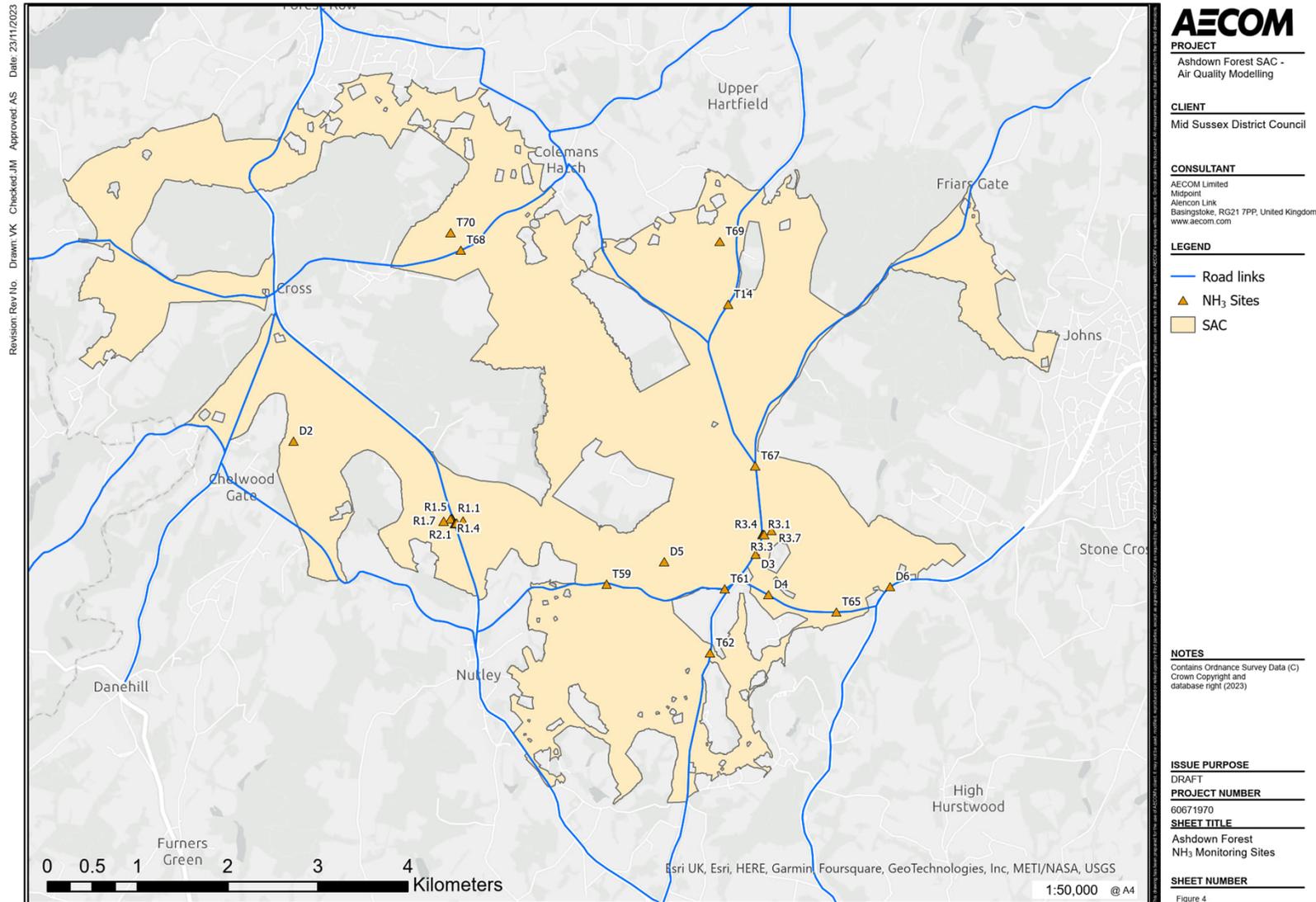
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0 0.5 1 2 3 4 Kilometers

Figure 8: WDC NH₃ Monitoring Sites in relation to Ashdown Forest SAC

Council - 13 December 2023



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5. Annexes

C.2 Traffic Data

Link	2019 Base AADT	2019 Base HDV %	2019 Base Speed (kph)	2039 DM AADT	2039 DM HDV %	2039 DM Speed (kph)	2039 DS AADT	2039 DS HDV %	2039 DS Speed (kph)
18129_11829	6,894	2.1	54.0	7,279	2.3	54.0	7,273	2.4	54.0
14096_11829	9,287	2.2	54.0	10,859	2.1	54.0	10,881	2.0	54.0
15539_13422	6,023	3.6	52.7	7,013	3.1	52.0	6,970	3.2	52.0
15538_13426	2,207	1.3	51.5	1,834	1.5	51.8	1,818	1.5	51.8
13920_13780	2,093	2.4	31.5	2,782	2.2	30.3	2,804	2.2	30.3
13920_13782	1,591	3.5	61.9	2,792	2.5	61.9	2,940	2.4	61.9
14096_13920	3,014	2.5	43.7	4,178	2.2	43.7	4,279	2.1	43.7
18130_13920	678	4.6	43.7	1,404	2.8	43.7	1,470	2.7	43.7
13780_13920	2,148	3.3	31.3	2,435	2.6	30.9	2,427	2.4	30.9
13782_13920	1,408	0.7	61.5	2,053	1.1	61.5	2,076	1.1	61.5
14114_14096	10,335	2.3	41.3	12,605	2.2	40.5	12,703	2.2	40.5
11829_14096	7,530	2.2	53.0	7,992	2.3	53.0	8,014	2.3	52.9
13920_14096	2,953	2.7	42.8	3,287	2.1	42.2	3,279	2.0	42.2
14348_14114	5,966	2.9	59.7	7,044	2.7	57.6	7,093	2.7	56.9
18128_14114	1,181	2.3	41.5	1,990	2.1	41.4	2,112	2.3	41.4
14096_14114	8,516	2.4	27.5	8,847	2.4	26.1	8,837	2.5	25.7
15607_14114	4,983	0.8	35.3	5,740	0.8	32.4	5,794	0.7	32.3
18132_14154	4,207	0.9	61.5	4,580	1.0	61.5	4,652	1.1	61.5
14114_14348	4,697	3.1	64.2	4,976	3.1	64.2	4,990	3.0	64.2
18127_14348	2,180	2.4	31.7	2,468	2.2	31.5	2,480	2.0	31.5
15536_15336	2,915	1.0	42.9	2,718	0.8	42.9	2,702	0.8	42.9
15537_15336	2,666	1.7	42.9	2,748	1.9	42.9	2,759	1.8	42.9
18128_15336	718	1.0	42.7	831	1.0	42.7	855	1.0	42.7
15540_15340	2,438	1.7	29.8	2,700	1.7	29.8	2,692	1.7	29.8

Link	2019 Base AADT	2019 Base HDV %	2019 Base Speed (kph)	2039 DM AADT	2039 DM HDV %	2039 DM Speed (kph)	2039 DS AADT	2039 DS HDV %	2039 DS Speed (kph)
18127_15536	3,416	1.0	42.9	3,321	1.1	42.9	3,311	1.1	42.9
15336_15536	2,741	1.1	42.7	2,885	1.3	42.7	2,890	1.3	42.7
15538_15537	3,248	1.5	42.7	3,445	1.6	42.7	3,456	1.6	42.7
15336_15537	2,750	1.0	42.9	2,517	0.8	42.9	2,501	0.8	42.9
15553_15537	571	0.8	42.9	681	0.9	42.9	678	0.8	42.9
13426_15538	2,420	1.3	51.5	2,510	1.4	51.5	2,504	1.4	51.5
18129_15538	1,929	2.7	41.6	2,535	2.4	41.6	2,530	2.4	41.6
15537_15538	3,321	1.0	42.8	3,198	0.8	42.8	3,179	0.8	42.8
15539_15538	3,082	1.0	41.3	3,492	1.2	41.3	3,526	1.2	41.3
15540_15539	8,335	2.8	52.5	9,692	2.6	52.4	9,686	2.6	52.4
13422_15539	5,667	2.8	52.9	6,253	2.8	52.9	6,332	2.8	52.9
15538_15539	3,191	1.7	41.3	4,010	1.6	41.1	3,990	1.6	41.1
15539_15540	8,934	2.5	52.7	10,385	2.4	52.6	10,448	2.4	52.6
15541_15540	5,136	4.0	41.9	6,303	3.5	41.9	6,283	3.5	41.9
15340_15540	2,304	1.1	29.6	2,381	1.3	29.6	2,362	1.3	29.6
15540_15541	5,441	3.0	39.9	6,438	2.9	39.4	6,473	2.9	39.4
15537_15553	583	0.5	43.0	697	0.4	43.0	696	0.4	43.0
18132_15607	4,983	0.8	43.0	5,740	0.8	43.0	5,794	0.7	43.0
14114_15607	4,207	0.9	43.0	4,580	1.0	43.0	4,652	1.1	43.0
14348_18127	2,917	1.2	31.9	2,996	1.3	31.9	2,976	1.3	31.9
15536_18127	2,589	2.0	42.9	3,596	1.9	42.9	3,697	1.9	42.9
18128_18127	1,912	1.8	40.9	1,915	1.9	40.9	1,925	1.8	40.9
14114_18128	1,238	0.6	42.9	1,160	0.7	42.9	1,192	0.6	42.9
18127_18128	1,795	1.9	42.4	2,707	1.9	42.4	2,800	2.0	42.4
15336_18128	778	3.6	42.7	868	3.3	42.7	900	3.0	42.6
18130_18129	5,074	2.7	65.6	5,891	2.8	65.1	5,928	2.9	65.1

Link	2019 Base AADT	2019 Base HDV %	2019 Base Speed (kph)	2039 DM AADT	2039 DM HDV %	2039 DM Speed (kph)	2039 DS AADT	2039 DS HDV %	2039 DS Speed (kph)
11829_18129	7,679	2.4	53.9	8,928	2.3	53.8	8,927	2.3	53.8
15538_18129	2,188	0.7	41.5	2,528	0.6	41.4	2,557	0.7	41.4
18131_18130	5,390	3.0	66.8	6,167	3.1	66.8	6,200	3.1	66.8
13920_18130	588	0.4	43.7	1,188	1.4	43.6	1,210	1.4	43.6
18129_18130	6,103	2.3	53.1	7,532	2.1	52.9	7,609	2.1	52.9
18130_18131	6,333	2.2	66.5	7,567	2.1	66.5	7,595	2.1	66.5
14154_18132	4,983	0.8	61.6	5,740	0.8	61.6	5,794	0.7	61.6
15607_18132	4,207	0.9	42.7	4,580	1.0	42.7	4,652	1.1	42.7
21117_21102	6,542	3.1	18.3	8,100	2.1	17.3	8,227	2.1	17.2
21230_21102	4,169	1.8	23.5	5,297	2.6	21.3	5,345	2.5	21.1
12814_21102	5,251	5.0	21.6	4,613	5.9	19.4	4,631	5.8	19.3
21224_21102	4,618	2.0	27.1	6,014	1.9	25.4	6,330	1.7	24.0
21102_21117	7,843	2.2	32.0	8,154	2.2	31.2	8,621	2.0	31.1
21102_21230	2,062	3.7	31.8	2,754	3.1	31.8	2,963	2.9	31.8
21102_12814	6,513	2.4	32.0	8,237	2.1	32.0	7,818	2.0	32.0
21102_21224	4,137	5.3	31.7	4,034	5.8	31.7	4,175	5.6	31.7
18131_13426	4,065	1.2	39.9	4,542	0.9	39.8	4,528	0.9	39.8
13426_18131	3,249	3.9	36.3	2,670	6.5	36.1	2,795	6.3	36.1

C.3 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 14Ea	X co-ordinate (m)	Y co-ordinate (m)
T14Ea_1m	546476	131704
T14Ea_10m	546481	131712
T14Ea_20m	546486	131721
T14Ea_30m	546491	131729
T14Ea_40m	546496	131738
T14Ea_50m	546501	131746
T14Ea_60m	546506	131755
T14Ea_70m	546512	131764

T14Ea_80m	546517	131772
T14Ea_90m	546522	131781
T14Ea_100m	546527	131789
T14Ea_110m	546532	131798
T14Ea_120m	546537	131806
T14Ea_130m	546543	131815
T14Ea_140m	546548	131824
T14Ea_150m	546553	131832
T14Ea_160m	546558	131841
T14Ea_170m	546563	131849
T14Ea_180m	546568	131858
T14Ea_190m	546573	131866
T14Ea_200m	546579	131875
Transect 15Wa	X co-ordinate (m)	Y co-ordinate (m)
T15Wa_1m	547928	131484
T15Wa_10m	547922	131490
T15Wa_20m	547915	131497
T15Wa_30m	547908	131504
T15Wa_40m	547901	131511
T15Wa_50m	547894	131518
T15Wa_60m	547887	131525
T15Wa_70m	547880	131532
T15Wa_80m	547872	131540
T15Wa_90m	547865	131547
T15Wa_100m	547858	131554
T15Wa_110m	547851	131561
T15Wa_120m	547844	131568
T15Wa_130m	547837	131575
T15Wa_140m	547830	131582
T15Wa_150m	547823	131589
T15Wa_160m	547816	131596
T15Wa_170m	547809	131603
T15Wa_180m	547802	131610
T15Wa_190m	547795	131617
T15Wa_200m	547788	131624

C.4 Results

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T1Ea_1m	1m	30.62	10.00	9.89	9.88	1.05	0.91	0.90	0.90	17.00	13.52	13.43	13.42	1.21	0.97	0.96	0.96
T1Ea_10m	10m	18.26	8.62	8.59	8.58	0.79	0.74	0.73	0.73	14.70	12.50	12.47	12.47	1.05	0.89	0.89	0.89
T1Ea_20m	20m	15.32	8.30	8.28	8.27	0.72	0.69	0.69	0.69	14.15	12.26	12.25	12.24	1.01	0.88	0.87	0.87
T1Ea_30m	30m	14.07	8.16	8.15	8.14	0.70	0.68	0.68	0.68	13.93	12.16	12.16	12.15	0.99	0.87	0.87	0.87
T1Ea_40m	40m	13.38	8.08	8.07	8.07	0.69	0.67	0.67	0.67	13.80	12.11	12.11	12.10	0.99	0.87	0.86	0.86
T1Ea_50m	50m	12.94	8.03	8.03	8.03	0.68	0.66	0.66	0.66	13.73	12.08	12.07	12.07	0.98	0.86	0.86	0.86
T1Ea_60m	60m	12.63	8.00	7.99	7.99	0.67	0.66	0.66	0.66	13.67	12.06	12.05	12.05	0.98	0.86	0.86	0.86
T1Ea_70m	70m	12.41	7.97	7.97	7.97	0.67	0.66	0.66	0.66	13.63	12.04	12.04	12.04	0.97	0.86	0.86	0.86
T1Ea_80m	80m	12.24	7.95	7.95	7.95	0.66	0.66	0.65	0.65	13.60	12.03	12.03	12.03	0.97	0.86	0.86	0.86
T1Ea_90m	90m	12.11	7.94	7.94	7.94	0.66	0.65	0.65	0.65	13.58	12.02	12.02	12.02	0.97	0.86	0.86	0.86
T1Ea_100m	100m	12.00	7.93	7.93	7.93	0.66	0.65	0.65	0.65	13.56	12.01	12.01	12.01	0.97	0.86	0.86	0.86
T1Ea_110m	110m	11.91	7.92	7.92	7.92	0.66	0.65	0.65	0.65	13.55	12.00	12.00	12.00	0.97	0.86	0.86	0.86
T1Ea_120m	120m	11.84	7.91	7.91	7.91	0.66	0.65	0.65	0.65	13.53	12.00	12.00	12.00	0.97	0.86	0.86	0.86
T1Ea_130m	130m	11.77	7.90	7.90	7.90	0.66	0.65	0.65	0.65	13.52	11.99	12.00	12.00	0.97	0.86	0.86	0.86
T1Ea_140m	140m	11.72	7.89	7.90	7.90	0.66	0.65	0.65	0.65	13.51	11.99	11.99	11.99	0.97	0.86	0.86	0.86
T1Ea_150m	150m	11.67	7.89	7.89	7.89	0.65	0.65	0.65	0.65	13.51	11.99	11.99	11.99	0.96	0.86	0.86	0.86
T1Ea_160m	160m	11.62	7.88	7.89	7.89	0.65	0.65	0.65	0.65	13.50	11.98	11.99	11.99	0.96	0.86	0.86	0.86
T1Ea_170m	170m	11.59	7.88	7.88	7.88	0.65	0.65	0.65	0.65	13.49	11.98	11.98	11.98	0.96	0.86	0.86	0.86
T1Ea_180m	180m	11.55	7.88	7.88	7.88	0.65	0.65	0.65	0.65	13.49	11.98	11.98	11.98	0.96	0.86	0.86	0.86
T1Ea_190m	190m	11.52	7.87	7.88	7.88	0.65	0.65	0.65	0.65	13.48	11.98	11.98	11.98	0.96	0.86	0.86	0.86
T1Ea_200m	200m	11.49	7.87	7.87	7.87	0.65	0.65	0.65	0.65	13.48	11.98	11.98	11.98	0.96	0.86	0.86	0.86
T1Wa_1m	1m	28.99	9.82	9.71	9.71	1.02	0.89	0.87	0.87	16.69	13.38	13.30	13.29	1.19	0.96	0.95	0.95
T1Wa_10m	10m	17.21	8.51	8.47	8.47	0.76	0.72	0.72	0.72	14.50	12.41	12.39	12.38	1.04	0.89	0.88	0.88
T1Wa_20m	20m	14.59	8.21	8.20	8.20	0.71	0.68	0.68	0.68	14.02	12.20	12.19	12.19	1.00	0.87	0.87	0.87
T1Wa_30m	30m	13.51	8.09	8.09	8.08	0.69	0.67	0.67	0.67	13.82	12.12	12.11	12.11	0.99	0.87	0.87	0.87
T1Wa_40m	40m	12.91	8.03	8.02	8.02	0.68	0.66	0.66	0.66	13.72	12.07	12.07	12.07	0.98	0.86	0.86	0.86
T1Wa_50m	50m	12.54	7.99	7.98	7.98	0.67	0.66	0.66	0.66	13.65	12.05	12.05	12.05	0.98	0.86	0.86	0.86
T1Wa_60m	60m	12.28	7.96	7.96	7.96	0.66	0.66	0.66	0.66	13.61	12.03	12.03	12.03	0.97	0.86	0.86	0.86
T1Wa_70m	70m	12.09	7.94	7.94	7.94	0.66	0.65	0.65	0.65	13.58	12.02	12.02	12.02	0.97	0.86	0.86	0.86
T1Wa_80m	80m	11.95	7.92	7.92	7.92	0.66	0.65	0.65	0.65	13.55	12.01	12.01	12.01	0.97	0.86	0.86	0.86
T1Wa_90m	90m	11.84	7.91	7.91	7.91	0.66	0.65	0.65	0.65	13.53	12.00	12.00	12.00	0.97	0.86	0.86	0.86
T1Wa_100m	100m	11.75	7.90	7.90	7.90	0.66	0.65	0.65	0.65	13.52	11.99	11.99	11.99	0.97	0.86	0.86	0.86
T1Wa_110m	110m	11.68	7.89	7.89	7.89	0.65	0.65	0.65	0.65	13.51	11.99	11.99	11.99	0.96	0.86	0.86	0.86
T1Wa_120m	120m	11.62	7.88	7.89	7.89	0.65	0.65	0.65	0.65	13.50	11.98	11.99	11.99	0.96	0.86	0.86	0.86
T1Wa_130m	130m	11.57	7.88	7.88	7.88	0.65	0.65	0.65	0.65	13.49	11.98	11.98	11.98	0.96	0.86	0.86	0.86
T1Wa_140m	140m	11.52	7.87	7.88	7.88	0.65	0.65	0.65	0.65	13.48	11.98	11.98	11.98	0.96	0.86	0.86	0.86
T1Wa_150m	150m	11.48	7.87	7.87	7.87	0.65	0.65	0.65	0.65	13.47	11.98	11.98	11.98	0.96	0.86	0.86	0.86

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T1Wa_160m	160m	11.45	7.86	7.87	7.87	0.65	0.65	0.65	0.65	13.47	11.97	11.98	11.98	0.96	0.86	0.86	0.86
T1Wa_170m	170m	11.42	7.86	7.87	7.87	0.65	0.65	0.65	0.65	13.46	11.97	11.97	11.97	0.96	0.86	0.86	0.86
T1Wa_180m	180m	11.39	7.86	7.86	7.86	0.65	0.65	0.65	0.65	13.46	11.97	11.97	11.97	0.96	0.85	0.86	0.86
T1Wa_190m	190m	11.37	7.86	7.86	7.86	0.65	0.64	0.65	0.65	13.46	11.97	11.97	11.97	0.96	0.85	0.85	0.85
T1Wa_200m	200m	11.35	7.85	7.86	7.86	0.65	0.64	0.65	0.65	13.45	11.97	11.97	11.97	0.96	0.85	0.85	0.85
T2Ea_1m	1m	41.28	11.14	11.18	11.17	1.24	1.03	1.04	1.04	18.88	14.40	14.43	14.43	1.35	1.03	1.03	1.03
T2Ea_10m	10m	22.75	9.14	9.16	9.16	0.86	0.78	0.79	0.79	15.60	12.96	12.97	12.97	1.11	0.93	0.93	0.93
T2Ea_20m	20m	18.12	8.64	8.66	8.66	0.77	0.72	0.73	0.73	14.77	12.61	12.62	12.62	1.06	0.90	0.90	0.90
T2Ea_30m	30m	16.11	8.43	8.44	8.44	0.73	0.70	0.70	0.70	14.42	12.46	12.47	12.47	1.03	0.89	0.89	0.89
T2Ea_40m	40m	15.00	8.31	8.32	8.32	0.71	0.69	0.69	0.69	14.23	12.38	12.39	12.39	1.02	0.88	0.88	0.88
T2Ea_50m	50m	14.29	8.23	8.24	8.24	0.70	0.68	0.68	0.68	14.11	12.33	12.34	12.34	1.01	0.88	0.88	0.88
T2Ea_60m	60m	13.80	8.18	8.19	8.19	0.69	0.67	0.67	0.67	14.02	12.30	12.30	12.30	1.00	0.88	0.88	0.88
T2Ea_70m	70m	13.43	8.14	8.15	8.15	0.68	0.67	0.67	0.67	13.96	12.27	12.28	12.28	1.00	0.88	0.88	0.88
T2Ea_80m	80m	13.16	8.11	8.12	8.12	0.68	0.66	0.66	0.66	13.92	12.25	12.26	12.26	0.99	0.88	0.88	0.88
T2Ea_90m	90m	12.93	8.08	8.10	8.10	0.67	0.66	0.66	0.66	13.88	12.24	12.24	12.24	0.99	0.87	0.87	0.87
T2Ea_100m	100m	12.76	8.07	8.08	8.08	0.67	0.66	0.66	0.66	13.85	12.23	12.23	12.23	0.99	0.87	0.87	0.87
T2Ea_110m	110m	12.61	8.05	8.06	8.06	0.67	0.66	0.66	0.66	13.82	12.22	12.22	12.22	0.99	0.87	0.87	0.87
T2Ea_120m	120m	12.48	8.04	8.05	8.05	0.67	0.66	0.66	0.66	13.80	12.21	12.21	12.21	0.99	0.87	0.87	0.87
T2Ea_130m	130m	12.37	8.02	8.03	8.03	0.66	0.65	0.66	0.66	13.79	12.20	12.21	12.21	0.98	0.87	0.87	0.87
T2Ea_140m	140m	12.28	8.01	8.02	8.02	0.66	0.65	0.65	0.65	13.77	12.20	12.20	12.20	0.98	0.87	0.87	0.87
T2Ea_150m	150m	12.20	8.01	8.02	8.02	0.66	0.65	0.65	0.65	13.76	12.19	12.19	12.19	0.98	0.87	0.87	0.87
T2Ea_160m	160m	12.12	8.00	8.01	8.01	0.66	0.65	0.65	0.65	13.75	12.19	12.19	12.19	0.98	0.87	0.87	0.87
T2Ea_170m	170m	12.06	7.99	8.00	8.00	0.66	0.65	0.65	0.65	13.74	12.18	12.19	12.19	0.98	0.87	0.87	0.87
T2Ea_180m	180m	12.00	7.98	7.99	7.99	0.66	0.65	0.65	0.65	13.73	12.18	12.18	12.18	0.98	0.87	0.87	0.87
T2Ea_190m	190m	11.95	7.98	7.99	7.99	0.66	0.65	0.65	0.65	13.72	12.17	12.18	12.18	0.98	0.87	0.87	0.87
T2Ea_200m	200m	11.90	7.97	7.98	7.98	0.66	0.65	0.65	0.65	13.71	12.17	12.18	12.18	0.98	0.87	0.87	0.87
T2Wa_1m	1m	34.46	10.40	10.44	10.43	1.10	0.94	0.95	0.95	17.70	13.88	13.91	13.90	1.26	0.99	0.99	0.99
T2Wa_10m	10m	19.43	8.78	8.80	8.80	0.80	0.74	0.74	0.74	15.02	12.72	12.73	12.73	1.07	0.91	0.91	0.91
T2Wa_20m	20m	15.96	8.41	8.43	8.42	0.73	0.70	0.70	0.70	14.40	12.45	12.46	12.46	1.03	0.89	0.89	0.89
T2Wa_30m	30m	14.52	8.26	8.27	8.27	0.70	0.68	0.68	0.68	14.15	12.35	12.36	12.36	1.01	0.88	0.88	0.88
T2Wa_40m	40m	13.72	8.17	8.18	8.18	0.69	0.67	0.67	0.67	14.01	12.29	12.30	12.30	1.00	0.88	0.88	0.88
T2Wa_50m	50m	13.22	8.12	8.13	8.13	0.68	0.66	0.67	0.67	13.93	12.26	12.27	12.26	0.99	0.88	0.88	0.88
T2Wa_60m	60m	12.88	8.08	8.09	8.09	0.67	0.66	0.66	0.66	13.87	12.24	12.24	12.24	0.99	0.87	0.87	0.87
T2Wa_70m	70m	12.62	8.05	8.06	8.06	0.67	0.66	0.66	0.66	13.83	12.22	12.22	12.22	0.99	0.87	0.87	0.87
T2Wa_80m	80m	12.43	8.03	8.04	8.04	0.66	0.66	0.66	0.66	13.80	12.21	12.21	12.21	0.99	0.87	0.87	0.87
T2Wa_90m	90m	12.27	8.01	8.02	8.02	0.66	0.65	0.65	0.65	13.77	12.20	12.20	12.20	0.98	0.87	0.87	0.87
T2Wa_100m	100m	12.15	8.00	8.01	8.01	0.66	0.65	0.65	0.65	13.75	12.19	12.19	12.19	0.98	0.87	0.87	0.87
T2Wa_110m	110m	12.05	7.99	8.00	8.00	0.66	0.65	0.65	0.65	13.73	12.18	12.19	12.19	0.98	0.87	0.87	0.87
T2Wa_120m	120m	11.96	7.98	7.99	7.99	0.66	0.65	0.65	0.65	13.72	12.18	12.18	12.18	0.98	0.87	0.87	0.87
T2Wa_130m	130m	11.89	7.97	7.98	7.98	0.66	0.65	0.65	0.65	13.71	12.17	12.18	12.18	0.98	0.87	0.87	0.87

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T2Wa_140m	140m	11.83	7.97	7.98	7.98	0.66	0.65	0.65	0.65	13.70	12.17	12.17	12.17	0.98	0.87	0.87	0.87
T2Wa_150m	150m	11.77	7.96	7.97	7.97	0.65	0.65	0.65	0.65	13.69	12.16	12.17	12.17	0.98	0.87	0.87	0.87
T2Wa_160m	160m	11.73	7.95	7.96	7.96	0.65	0.65	0.65	0.65	13.68	12.16	12.17	12.17	0.98	0.87	0.87	0.87
T2Wa_170m	170m	11.68	7.95	7.96	7.96	0.65	0.65	0.65	0.65	13.68	12.16	12.16	12.16	0.98	0.87	0.87	0.87
T2Wa_180m	180m	11.64	7.95	7.96	7.96	0.65	0.65	0.65	0.65	13.67	12.16	12.16	12.16	0.98	0.87	0.87	0.87
T2Wa_190m	190m	11.61	7.94	7.95	7.95	0.65	0.65	0.65	0.65	13.67	12.15	12.16	12.16	0.98	0.87	0.87	0.87
T2Wa_200m	200m	11.58	7.94	7.95	7.95	0.65	0.65	0.65	0.65	13.66	12.15	12.16	12.16	0.98	0.87	0.87	0.87
T3Ea_1m	1m	37.41	10.79	10.72	10.71	1.17	0.99	0.98	0.98	18.53	14.41	14.36	14.36	1.32	1.03	1.03	1.03
T3Ea_10m	10m	20.99	9.01	8.99	8.99	0.83	0.76	0.76	0.76	15.58	13.12	13.10	13.10	1.11	0.94	0.94	0.94
T3Ea_20m	20m	16.96	8.58	8.57	8.57	0.75	0.71	0.71	0.71	14.86	12.81	12.80	12.80	1.06	0.91	0.91	0.91
T3Ea_30m	30m	15.24	8.39	8.39	8.39	0.72	0.69	0.69	0.69	14.56	12.68	12.68	12.68	1.04	0.91	0.91	0.91
T3Ea_40m	40m	14.29	8.29	8.29	8.29	0.70	0.68	0.68	0.68	14.39	12.61	12.61	12.61	1.03	0.90	0.90	0.90
T3Ea_50m	50m	13.68	8.23	8.23	8.23	0.69	0.67	0.67	0.67	14.29	12.57	12.57	12.57	1.02	0.90	0.90	0.90
T3Ea_60m	60m	13.26	8.18	8.18	8.18	0.68	0.67	0.66	0.66	14.22	12.54	12.54	12.54	1.02	0.90	0.90	0.90
T3Ea_70m	70m	12.96	8.15	8.15	8.15	0.67	0.66	0.66	0.66	14.16	12.52	12.52	12.52	1.01	0.89	0.89	0.89
T3Ea_80m	80m	12.72	8.12	8.13	8.13	0.67	0.66	0.66	0.66	14.12	12.50	12.50	12.50	1.01	0.89	0.89	0.89
T3Ea_90m	90m	12.53	8.10	8.11	8.11	0.67	0.66	0.66	0.66	14.09	12.49	12.49	12.49	1.01	0.89	0.89	0.89
T3Ea_100m	100m	12.38	8.09	8.09	8.09	0.66	0.66	0.66	0.66	14.07	12.48	12.48	12.48	1.00	0.89	0.89	0.89
T3Ea_110m	110m	12.26	8.07	8.08	8.08	0.66	0.65	0.65	0.65	14.05	12.47	12.47	12.47	1.00	0.89	0.89	0.89
T3Ea_120m	120m	12.15	8.06	8.07	8.07	0.66	0.65	0.65	0.65	14.03	12.47	12.47	12.47	1.00	0.89	0.89	0.89
T3Ea_130m	130m	12.06	8.05	8.06	8.06	0.66	0.65	0.65	0.65	14.01	12.46	12.46	12.46	1.00	0.89	0.89	0.89
T3Ea_140m	140m	11.99	8.04	8.05	8.05	0.66	0.65	0.65	0.65	14.00	12.45	12.46	12.46	1.00	0.89	0.89	0.89
T3Ea_150m	150m	11.92	8.04	8.04	8.04	0.66	0.65	0.65	0.65	13.99	12.45	12.45	12.45	1.00	0.89	0.89	0.89
T3Ea_160m	160m	11.86	8.03	8.04	8.04	0.66	0.65	0.65	0.65	13.98	12.45	12.45	12.45	1.00	0.89	0.89	0.89
T3Ea_170m	170m	11.81	8.02	8.03	8.03	0.65	0.65	0.65	0.65	13.97	12.44	12.45	12.45	1.00	0.89	0.89	0.89
T3Ea_180m	180m	11.76	8.02	8.02	8.02	0.65	0.65	0.65	0.65	13.97	12.44	12.44	12.44	1.00	0.89	0.89	0.89
T3Ea_190m	190m	11.72	8.01	8.02	8.02	0.65	0.65	0.65	0.65	13.96	12.44	12.44	12.44	1.00	0.89	0.89	0.89
T3Ea_200m	200m	11.68	8.01	8.02	8.02	0.65	0.65	0.65	0.65	13.95	12.44	12.44	12.44	1.00	0.89	0.89	0.89
T3Wa_1m	1m	30.70	10.06	10.01	10.01	1.03	0.90	0.89	0.89	17.34	13.89	13.85	13.84	1.24	0.99	0.99	0.99
T3Wa_10m	10m	17.70	8.66	8.65	8.65	0.77	0.72	0.72	0.72	15.00	12.87	12.86	12.86	1.07	0.92	0.92	0.92
T3Wa_20m	20m	14.85	8.35	8.35	8.35	0.71	0.69	0.68	0.68	14.50	12.66	12.65	12.65	1.04	0.90	0.90	0.90
T3Wa_30m	30m	13.68	8.23	8.23	8.23	0.69	0.67	0.67	0.67	14.29	12.57	12.57	12.57	1.02	0.90	0.90	0.90
T3Wa_40m	40m	13.04	8.16	8.16	8.16	0.68	0.66	0.66	0.66	14.18	12.53	12.53	12.53	1.01	0.89	0.89	0.89
T3Wa_50m	50m	12.64	8.11	8.12	8.12	0.67	0.66	0.66	0.66	14.11	12.50	12.50	12.50	1.01	0.89	0.89	0.89
T3Wa_60m	60m	12.36	8.08	8.09	8.09	0.66	0.66	0.66	0.66	14.07	12.48	12.48	12.48	1.00	0.89	0.89	0.89
T3Wa_70m	70m	12.17	8.06	8.07	8.07	0.66	0.65	0.65	0.65	14.03	12.47	12.47	12.47	1.00	0.89	0.89	0.89
T3Wa_80m	80m	12.01	8.05	8.05	8.05	0.66	0.65	0.65	0.65	14.01	12.46	12.46	12.46	1.00	0.89	0.89	0.89
T3Wa_90m	90m	11.89	8.03	8.04	8.04	0.66	0.65	0.65	0.65	13.99	12.45	12.45	12.45	1.00	0.89	0.89	0.89
T3Wa_100m	100m	11.80	8.02	8.03	8.03	0.65	0.65	0.65	0.65	13.97	12.44	12.45	12.45	1.00	0.89	0.89	0.89
T3Wa_110m	110m	11.72	8.01	8.02	8.02	0.65	0.65	0.65	0.65	13.96	12.44	12.44	12.44	1.00	0.89	0.89	0.89

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T3Wa_120m	120m	11.65	8.01	8.01	8.01	0.65	0.65	0.65	0.65	13.95	12.43	12.44	12.44	1.00	0.89	0.89	0.89
T3Wa_130m	130m	11.60	8.00	8.01	8.01	0.65	0.65	0.65	0.65	13.94	12.43	12.43	12.43	1.00	0.89	0.89	0.89
T3Wa_140m	140m	11.55	8.00	8.00	8.00	0.65	0.65	0.65	0.65	13.93	12.43	12.43	12.43	1.00	0.89	0.89	0.89
T3Wa_150m	150m	11.50	7.99	8.00	8.00	0.65	0.65	0.65	0.65	13.93	12.43	12.43	12.43	0.99	0.89	0.89	0.89
T3Wa_160m	160m	11.47	7.99	7.99	7.99	0.65	0.65	0.65	0.65	13.92	12.42	12.43	12.43	0.99	0.89	0.89	0.89
T3Wa_170m	170m	11.43	7.98	7.99	7.99	0.65	0.65	0.65	0.65	13.91	12.42	12.42	12.42	0.99	0.89	0.89	0.89
T3Wa_180m	180m	11.40	7.98	7.99	7.99	0.65	0.64	0.65	0.65	13.91	12.42	12.42	12.42	0.99	0.89	0.89	0.89
T3Wa_190m	190m	11.38	7.98	7.98	7.98	0.65	0.64	0.64	0.64	13.91	12.42	12.42	12.42	0.99	0.89	0.89	0.89
T3Wa_200m	200m	11.35	7.97	7.98	7.98	0.65	0.64	0.64	0.64	13.90	12.42	12.42	12.42	0.99	0.89	0.89	0.89
T4Ea_1m	1m	37.40	10.76	10.74	10.74	1.16	0.98	0.98	0.98	18.64	14.54	14.52	14.52	1.33	1.04	1.04	1.04
T4Ea_10m	10m	19.77	8.86	8.86	8.86	0.80	0.75	0.75	0.75	15.50	13.17	13.17	13.17	1.11	0.94	0.94	0.94
T4Ea_20m	20m	16.06	8.47	8.47	8.47	0.73	0.70	0.70	0.70	14.85	12.89	12.89	12.89	1.06	0.92	0.92	0.92
T4Ea_30m	30m	14.54	8.30	8.31	8.31	0.70	0.68	0.68	0.68	14.58	12.78	12.78	12.78	1.04	0.91	0.91	0.91
T4Ea_40m	40m	13.70	8.21	8.22	8.22	0.69	0.67	0.67	0.67	14.44	12.72	12.72	12.72	1.03	0.91	0.91	0.91
T4Ea_50m	50m	13.18	8.16	8.16	8.16	0.68	0.66	0.66	0.66	14.35	12.68	12.69	12.69	1.02	0.91	0.91	0.91
T4Ea_60m	60m	12.82	8.12	8.12	8.12	0.67	0.66	0.66	0.66	14.29	12.66	12.66	12.66	1.02	0.90	0.90	0.90
T4Ea_70m	70m	12.57	8.09	8.10	8.10	0.67	0.66	0.66	0.66	14.25	12.64	12.64	12.64	1.02	0.90	0.90	0.90
T4Ea_80m	80m	12.37	8.07	8.07	8.07	0.66	0.65	0.65	0.65	14.21	12.63	12.63	12.63	1.02	0.90	0.90	0.90
T4Ea_90m	90m	12.21	8.05	8.06	8.06	0.66	0.65	0.65	0.65	14.19	12.62	12.62	12.62	1.01	0.90	0.90	0.90
T4Ea_100m	100m	12.09	8.04	8.04	8.04	0.66	0.65	0.65	0.65	14.17	12.61	12.61	12.61	1.01	0.90	0.90	0.90
T4Ea_110m	110m	11.98	8.03	8.03	8.03	0.66	0.65	0.65	0.65	14.15	12.60	12.61	12.61	1.01	0.90	0.90	0.90
T4Ea_120m	120m	11.90	8.02	8.02	8.02	0.66	0.65	0.65	0.65	14.14	12.60	12.60	12.60	1.01	0.90	0.90	0.90
T4Ea_130m	130m	11.82	8.01	8.02	8.02	0.65	0.65	0.65	0.65	14.12	12.59	12.60	12.60	1.01	0.90	0.90	0.90
T4Ea_140m	140m	11.76	8.00	8.01	8.01	0.65	0.65	0.65	0.65	14.11	12.59	12.59	12.59	1.01	0.90	0.90	0.90
T4Ea_150m	150m	11.71	8.00	8.00	8.00	0.65	0.65	0.65	0.65	14.11	12.59	12.59	12.59	1.01	0.90	0.90	0.90
T4Ea_160m	160m	11.66	7.99	8.00	8.00	0.65	0.65	0.65	0.65	14.10	12.58	12.59	12.59	1.01	0.90	0.90	0.90
T4Ea_170m	170m	11.62	7.99	7.99	7.99	0.65	0.65	0.65	0.65	14.09	12.58	12.58	12.58	1.01	0.90	0.90	0.90
T4Ea_180m	180m	11.58	7.98	7.99	7.99	0.65	0.65	0.65	0.65	14.09	12.58	12.58	12.58	1.01	0.90	0.90	0.90
T4Ea_190m	190m	11.55	7.98	7.99	7.99	0.65	0.65	0.65	0.65	14.08	12.58	12.58	12.58	1.01	0.90	0.90	0.90
T4Ea_200m	200m	11.52	7.98	7.98	7.98	0.65	0.65	0.65	0.65	14.07	12.58	12.58	12.58	1.01	0.90	0.90	0.90
T4Wa_1m	1m	41.02	11.15	11.13	11.12	1.22	1.02	1.02	1.02	19.22	14.79	14.77	14.77	1.37	1.06	1.06	1.05
T4Wa_10m	10m	21.08	9.00	9.00	9.00	0.82	0.76	0.76	0.76	15.71	13.25	13.25	13.25	1.12	0.95	0.95	0.95
T4Wa_20m	20m	16.84	8.55	8.55	8.55	0.74	0.71	0.71	0.71	14.96	12.94	12.93	12.93	1.07	0.92	0.92	0.92
T4Wa_30m	30m	15.08	8.36	8.36	8.36	0.71	0.68	0.68	0.68	14.66	12.81	12.81	12.81	1.05	0.92	0.92	0.92
T4Wa_40m	40m	14.12	8.26	8.26	8.26	0.69	0.67	0.67	0.67	14.50	12.74	12.74	12.74	1.04	0.91	0.91	0.91
T4Wa_50m	50m	13.51	8.19	8.20	8.20	0.68	0.67	0.67	0.67	14.40	12.70	12.70	12.70	1.03	0.91	0.91	0.91
T4Wa_60m	60m	13.09	8.15	8.15	8.15	0.67	0.66	0.66	0.66	14.32	12.67	12.67	12.67	1.02	0.91	0.91	0.91
T4Wa_70m	70m	12.78	8.11	8.12	8.12	0.67	0.66	0.66	0.66	14.27	12.65	12.65	12.65	1.02	0.90	0.90	0.90
T4Wa_80m	80m	12.55	8.09	8.09	8.09	0.67	0.66	0.66	0.66	14.24	12.64	12.64	12.64	1.02	0.90	0.90	0.90
T4Wa_90m	90m	12.37	8.07	8.08	8.08	0.66	0.65	0.65	0.65	14.21	12.63	12.63	12.63	1.01	0.90	0.90	0.90

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T4Wa_100m	100m	12.22	8.05	8.06	8.06	0.66	0.65	0.65	0.65	14.18	12.62	12.62	12.62	1.01	0.90	0.90	0.90
T4Wa_110m	110m	12.10	8.04	8.05	8.05	0.66	0.65	0.65	0.65	14.16	12.61	12.61	12.61	1.01	0.90	0.90	0.90
T4Wa_120m	120m	12.00	8.03	8.04	8.04	0.66	0.65	0.65	0.65	14.15	12.60	12.61	12.61	1.01	0.90	0.90	0.90
T4Wa_130m	130m	11.91	8.02	8.03	8.03	0.66	0.65	0.65	0.65	14.13	12.60	12.60	12.60	1.01	0.90	0.90	0.90
T4Wa_140m	140m	11.84	8.01	8.02	8.02	0.65	0.65	0.65	0.65	14.12	12.59	12.60	12.60	1.01	0.90	0.90	0.90
T4Wa_150m	150m	11.78	8.00	8.01	8.01	0.65	0.65	0.65	0.65	14.11	12.59	12.59	12.59	1.01	0.90	0.90	0.90
T4Wa_160m	160m	11.72	8.00	8.01	8.01	0.65	0.65	0.65	0.65	14.10	12.59	12.59	12.59	1.01	0.90	0.90	0.90
T4Wa_170m	170m	11.67	7.99	8.00	8.00	0.65	0.65	0.65	0.65	14.10	12.58	12.59	12.59	1.01	0.90	0.90	0.90
T4Wa_180m	180m	11.63	7.99	8.00	8.00	0.65	0.65	0.65	0.65	14.09	12.58	12.58	12.58	1.01	0.90	0.90	0.90
T4Wa_190m	190m	11.60	7.99	7.99	7.99	0.65	0.65	0.65	0.65	14.08	12.58	12.58	12.58	1.01	0.90	0.90	0.90
T4Wa_200m	200m	11.56	7.98	7.99	7.99	0.65	0.65	0.65	0.65	14.08	12.58	12.58	12.58	1.01	0.90	0.90	0.90
T5Ea_1m	1m	43.87	11.44	12.14	12.15	1.28	1.06	1.14	1.14	19.11	14.41	14.89	14.89	1.37	1.03	1.06	1.06
T5Ea_10m	10m	23.49	9.24	9.52	9.52	0.87	0.79	0.82	0.82	15.54	12.85	13.02	13.02	1.11	0.92	0.93	0.93
T5Ea_20m	20m	18.54	8.71	8.88	8.88	0.77	0.73	0.74	0.74	14.67	12.47	12.58	12.58	1.05	0.89	0.90	0.90
T5Ea_30m	30m	16.45	8.49	8.61	8.61	0.73	0.70	0.71	0.71	14.31	12.32	12.40	12.40	1.02	0.88	0.89	0.89
T5Ea_40m	40m	15.30	8.36	8.46	8.46	0.71	0.69	0.70	0.70	14.11	12.24	12.30	12.30	1.01	0.87	0.88	0.88
T5Ea_50m	50m	14.56	8.28	8.37	8.37	0.70	0.68	0.69	0.69	13.99	12.19	12.24	12.24	1.00	0.87	0.87	0.87
T5Ea_60m	60m	14.06	8.23	8.30	8.30	0.69	0.67	0.68	0.68	13.91	12.16	12.20	12.20	0.99	0.87	0.87	0.87
T5Ea_70m	70m	13.68	8.19	8.25	8.25	0.68	0.67	0.67	0.67	13.84	12.13	12.17	12.17	0.99	0.87	0.87	0.87
T5Ea_80m	80m	13.40	8.16	8.22	8.22	0.68	0.66	0.67	0.67	13.80	12.11	12.14	12.14	0.99	0.87	0.87	0.87
T5Ea_90m	90m	13.17	8.13	8.19	8.19	0.68	0.66	0.67	0.67	13.76	12.10	12.12	12.13	0.98	0.86	0.87	0.87
T5Ea_100m	100m	12.99	8.11	8.16	8.16	0.67	0.66	0.66	0.66	13.73	12.09	12.11	12.11	0.98	0.86	0.87	0.87
T5Ea_110m	110m	12.83	8.10	8.14	8.14	0.67	0.66	0.66	0.66	13.70	12.08	12.10	12.10	0.98	0.86	0.86	0.86
T5Ea_120m	120m	12.71	8.08	8.13	8.13	0.67	0.66	0.66	0.66	13.68	12.07	12.09	12.09	0.98	0.86	0.86	0.86
T5Ea_130m	130m	12.60	8.07	8.11	8.11	0.67	0.66	0.66	0.66	13.66	12.06	12.08	12.08	0.98	0.86	0.86	0.86
T5Ea_140m	140m	12.50	8.06	8.10	8.10	0.66	0.66	0.66	0.66	13.65	12.05	12.07	12.07	0.97	0.86	0.86	0.86
T5Ea_150m	150m	12.41	8.05	8.09	8.09	0.66	0.65	0.66	0.66	13.64	12.05	12.07	12.07	0.97	0.86	0.86	0.86
T5Ea_160m	160m	12.34	8.04	8.08	8.08	0.66	0.65	0.66	0.66	13.62	12.04	12.06	12.06	0.97	0.86	0.86	0.86
T5Ea_170m	170m	12.27	8.04	8.07	8.07	0.66	0.65	0.66	0.66	13.61	12.04	12.06	12.06	0.97	0.86	0.86	0.86
T5Ea_180m	180m	12.21	8.03	8.06	8.06	0.66	0.65	0.65	0.65	13.60	12.04	12.05	12.05	0.97	0.86	0.86	0.86
T5Ea_190m	190m	12.16	8.02	8.05	8.05	0.66	0.65	0.65	0.65	13.60	12.03	12.05	12.05	0.97	0.86	0.86	0.86
T5Ea_200m	200m	12.11	8.02	8.05	8.05	0.66	0.65	0.65	0.65	13.59	12.03	12.04	12.04	0.97	0.86	0.86	0.86
T5Wa_1m	1m	33.44	10.32	10.79	10.80	1.07	0.92	0.98	0.98	17.32	13.62	13.94	13.95	1.24	0.97	1.00	1.00
T5Wa_10m	10m	19.15	8.78	8.96	8.96	0.79	0.74	0.75	0.75	14.79	12.53	12.64	12.64	1.06	0.89	0.90	0.90
T5Wa_20m	20m	15.95	8.43	8.54	8.55	0.73	0.70	0.71	0.71	14.23	12.29	12.36	12.36	1.02	0.88	0.88	0.88
T5Wa_30m	30m	14.60	8.29	8.37	8.37	0.70	0.68	0.69	0.69	14.00	12.20	12.24	12.24	1.00	0.87	0.87	0.87
T5Wa_40m	40m	13.85	8.21	8.27	8.27	0.69	0.67	0.68	0.68	13.87	12.14	12.18	12.18	0.99	0.87	0.87	0.87
T5Wa_50m	50m	13.38	8.16	8.21	8.21	0.68	0.66	0.67	0.67	13.79	12.11	12.14	12.14	0.99	0.87	0.87	0.87
T5Wa_60m	60m	13.05	8.12	8.17	8.17	0.67	0.66	0.67	0.67	13.74	12.09	12.12	12.12	0.98	0.86	0.87	0.87
T5Wa_70m	70m	12.80	8.09	8.14	8.14	0.67	0.66	0.66	0.66	13.70	12.07	12.10	12.10	0.98	0.86	0.86	0.86

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T5Wa_80m	80m	12.61	8.07	8.11	8.11	0.67	0.66	0.66	0.66	13.67	12.06	12.08	12.08	0.98	0.86	0.86	0.86
T5Wa_90m	90m	12.46	8.06	8.09	8.10	0.66	0.65	0.66	0.66	13.64	12.05	12.07	12.07	0.97	0.86	0.86	0.86
T5Wa_100m	100m	12.34	8.04	8.08	8.08	0.66	0.65	0.66	0.66	13.62	12.05	12.06	12.06	0.97	0.86	0.86	0.86
T5Wa_110m	110m	12.24	8.03	8.07	8.07	0.66	0.65	0.66	0.66	13.61	12.04	12.05	12.05	0.97	0.86	0.86	0.86
T5Wa_120m	120m	12.16	8.02	8.05	8.06	0.66	0.65	0.65	0.65	13.60	12.03	12.05	12.05	0.97	0.86	0.86	0.86
T5Wa_130m	130m	12.08	8.02	8.04	8.05	0.66	0.65	0.65	0.65	13.58	12.03	12.04	12.04	0.97	0.86	0.86	0.86
T5Wa_140m	140m	12.02	8.01	8.04	8.04	0.66	0.65	0.65	0.65	13.57	12.03	12.04	12.04	0.97	0.86	0.86	0.86
T5Wa_150m	150m	11.96	8.00	8.03	8.03	0.66	0.65	0.65	0.65	13.56	12.02	12.03	12.03	0.97	0.86	0.86	0.86
T5Wa_160m	160m	11.91	8.00	8.02	8.02	0.66	0.65	0.65	0.65	13.56	12.02	12.03	12.03	0.97	0.86	0.86	0.86
T5Wa_170m	170m	11.87	7.99	8.02	8.02	0.66	0.65	0.65	0.65	13.55	12.02	12.03	12.03	0.97	0.86	0.86	0.86
T5Wa_180m	180m	11.83	7.99	8.01	8.01	0.65	0.65	0.65	0.65	13.54	12.01	12.02	12.02	0.97	0.86	0.86	0.86
T5Wa_190m	190m	11.79	7.98	8.01	8.01	0.65	0.65	0.65	0.65	13.54	12.01	12.02	12.02	0.97	0.86	0.86	0.86
T5Wa_200m	200m	11.76	7.98	8.00	8.00	0.65	0.65	0.65	0.65	13.53	12.01	12.02	12.02	0.97	0.86	0.86	0.86
T6Ea_1m	1m	31.83	10.12	10.63	10.65	1.05	0.91	0.97	0.97	17.22	13.66	14.02	14.03	1.23	0.98	1.00	1.00
T6Ea_10m	10m	19.02	8.73	8.94	8.94	0.79	0.74	0.76	0.76	14.93	12.67	12.80	12.81	1.07	0.90	0.91	0.91
T6Ea_20m	20m	15.82	8.39	8.51	8.52	0.73	0.70	0.71	0.71	14.36	12.43	12.50	12.51	1.03	0.89	0.89	0.89
T6Ea_30m	30m	14.46	8.24	8.33	8.34	0.70	0.68	0.69	0.69	14.12	12.33	12.38	12.38	1.01	0.88	0.88	0.88
T6Ea_40m	40m	13.70	8.16	8.23	8.24	0.69	0.67	0.68	0.68	13.99	12.27	12.32	12.32	1.00	0.88	0.88	0.88
T6Ea_50m	50m	13.22	8.11	8.17	8.17	0.68	0.66	0.67	0.67	13.91	12.24	12.27	12.27	0.99	0.87	0.88	0.88
T6Ea_60m	60m	12.89	8.07	8.13	8.13	0.67	0.66	0.67	0.67	13.85	12.21	12.25	12.25	0.99	0.87	0.87	0.87
T6Ea_70m	70m	12.65	8.04	8.09	8.09	0.67	0.66	0.66	0.66	13.81	12.20	12.22	12.22	0.99	0.87	0.87	0.87
T6Ea_80m	80m	12.46	8.02	8.07	8.07	0.67	0.66	0.66	0.66	13.78	12.18	12.21	12.21	0.98	0.87	0.87	0.87
T6Ea_90m	90m	12.31	8.01	8.05	8.05	0.66	0.65	0.66	0.66	13.76	12.17	12.20	12.20	0.98	0.87	0.87	0.87
T6Ea_100m	100m	12.19	8.00	8.03	8.03	0.66	0.65	0.66	0.66	13.74	12.17	12.19	12.19	0.98	0.87	0.87	0.87
T6Ea_110m	110m	12.10	7.99	8.02	8.02	0.66	0.65	0.65	0.66	13.72	12.16	12.18	12.18	0.98	0.87	0.87	0.87
T6Ea_120m	120m	12.01	7.98	8.01	8.01	0.66	0.65	0.65	0.65	13.71	12.16	12.17	12.17	0.98	0.87	0.87	0.87
T6Ea_130m	130m	11.94	7.97	8.00	8.00	0.66	0.65	0.65	0.65	13.69	12.15	12.17	12.17	0.98	0.87	0.87	0.87
T6Ea_140m	140m	11.88	7.96	7.99	7.99	0.66	0.65	0.65	0.65	13.68	12.15	12.16	12.16	0.98	0.87	0.87	0.87
T6Ea_150m	150m	11.83	7.96	7.98	7.99	0.66	0.65	0.65	0.65	13.68	12.14	12.16	12.16	0.98	0.87	0.87	0.87
T6Ea_160m	160m	11.78	7.95	7.98	7.98	0.65	0.65	0.65	0.65	13.67	12.14	12.15	12.15	0.98	0.87	0.87	0.87
T6Ea_170m	170m	11.74	7.95	7.97	7.97	0.65	0.65	0.65	0.65	13.66	12.14	12.15	12.15	0.98	0.87	0.87	0.87
T6Ea_180m	180m	11.70	7.94	7.97	7.97	0.65	0.65	0.65	0.65	13.66	12.14	12.15	12.15	0.98	0.87	0.87	0.87
T6Ea_190m	190m	11.67	7.94	7.96	7.96	0.65	0.65	0.65	0.65	13.65	12.13	12.15	12.15	0.98	0.87	0.87	0.87
T6Ea_200m	200m	11.64	7.94	7.96	7.96	0.65	0.65	0.65	0.65	13.64	12.13	12.14	12.14	0.97	0.87	0.87	0.87
T6Wa_1m	1m	26.12	9.50	9.88	9.89	0.93	0.83	0.87	0.88	16.19	13.21	13.46	13.47	1.16	0.94	0.96	0.96
T6Wa_10m	10m	16.21	8.43	8.57	8.57	0.74	0.70	0.72	0.72	14.44	12.46	12.54	12.55	1.03	0.89	0.90	0.90
T6Wa_20m	20m	14.12	8.20	8.29	8.29	0.70	0.68	0.68	0.68	14.07	12.30	12.35	12.35	1.00	0.88	0.88	0.88
T6Wa_30m	30m	13.26	8.11	8.17	8.18	0.68	0.67	0.67	0.67	13.92	12.24	12.28	12.28	0.99	0.87	0.88	0.88
T6Wa_40m	40m	12.78	8.06	8.11	8.11	0.67	0.66	0.66	0.66	13.83	12.21	12.24	12.24	0.99	0.87	0.87	0.87
T6Wa_50m	50m	12.49	8.03	8.07	8.07	0.67	0.66	0.66	0.66	13.78	12.19	12.21	12.21	0.98	0.87	0.87	0.87

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T6Wa_60m	60m	12.28	8.01	8.04	8.05	0.66	0.65	0.66	0.66	13.75	12.17	12.19	12.19	0.98	0.87	0.87	0.87
T6Wa_70m	70m	12.13	7.99	8.02	8.03	0.66	0.65	0.66	0.66	13.72	12.16	12.18	12.18	0.98	0.87	0.87	0.87
T6Wa_80m	80m	12.01	7.98	8.01	8.01	0.66	0.65	0.65	0.65	13.70	12.16	12.17	12.17	0.98	0.87	0.87	0.87
T6Wa_90m	90m	11.92	7.97	8.00	8.00	0.66	0.65	0.65	0.65	13.69	12.15	12.16	12.16	0.98	0.87	0.87	0.87
T6Wa_100m	100m	11.84	7.96	7.99	7.99	0.66	0.65	0.65	0.65	13.68	12.14	12.16	12.16	0.98	0.87	0.87	0.87
T6Wa_110m	110m	11.77	7.95	7.98	7.98	0.65	0.65	0.65	0.65	13.67	12.14	12.15	12.15	0.98	0.87	0.87	0.87
T6Wa_120m	120m	11.72	7.94	7.97	7.97	0.65	0.65	0.65	0.65	13.66	12.14	12.15	12.15	0.98	0.87	0.87	0.87
T6Wa_130m	130m	11.67	7.94	7.96	7.96	0.65	0.65	0.65	0.65	13.65	12.13	12.14	12.15	0.97	0.87	0.87	0.87
T6Wa_140m	140m	11.63	7.94	7.96	7.96	0.65	0.65	0.65	0.65	13.64	12.13	12.14	12.14	0.97	0.87	0.87	0.87
T6Wa_150m	150m	11.59	7.93	7.95	7.95	0.65	0.65	0.65	0.65	13.64	12.13	12.14	12.14	0.97	0.87	0.87	0.87
T6Wa_160m	160m	11.56	7.93	7.95	7.95	0.65	0.65	0.65	0.65	13.63	12.13	12.14	12.14	0.97	0.87	0.87	0.87
T6Wa_170m	170m	11.53	7.92	7.95	7.95	0.65	0.65	0.65	0.65	13.63	12.12	12.13	12.13	0.97	0.87	0.87	0.87
T6Wa_180m	180m	11.50	7.92	7.94	7.94	0.65	0.65	0.65	0.65	13.62	12.12	12.13	12.13	0.97	0.87	0.87	0.87
T6Wa_190m	190m	11.48	7.92	7.94	7.94	0.65	0.65	0.65	0.65	13.62	12.12	12.13	12.13	0.97	0.87	0.87	0.87
T6Wa_200m	200m	11.45	7.92	7.94	7.94	0.65	0.65	0.65	0.65	13.62	12.12	12.13	12.13	0.97	0.87	0.87	0.87
T7Ea_1m	1m	67.71	14.41	15.11	15.11	1.87	1.45	1.53	1.53	24.25	17.17	17.68	17.68	1.73	1.23	1.26	1.26
T7Ea_10m	10m	34.73	10.71	11.02	11.02	1.13	0.96	1.00	1.00	18.24	14.36	14.57	14.57	1.30	1.03	1.04	1.04
T7Ea_20m	20m	25.57	9.68	9.88	9.88	0.93	0.83	0.85	0.85	16.53	13.60	13.73	13.73	1.18	0.97	0.98	0.98
T7Ea_30m	30m	21.54	9.23	9.37	9.38	0.84	0.77	0.79	0.79	15.80	13.27	13.37	13.37	1.13	0.95	0.95	0.95
T7Ea_40m	40m	19.26	8.97	9.09	9.09	0.80	0.74	0.75	0.75	15.38	13.09	13.17	13.17	1.10	0.94	0.94	0.94
T7Ea_50m	50m	17.79	8.81	8.91	8.91	0.77	0.72	0.73	0.73	15.12	12.98	13.04	13.04	1.08	0.93	0.93	0.93
T7Ea_60m	60m	16.76	8.69	8.78	8.78	0.75	0.71	0.72	0.72	14.93	12.90	12.95	12.95	1.07	0.92	0.93	0.93
T7Ea_70m	70m	16.00	8.60	8.68	8.68	0.73	0.70	0.71	0.71	14.80	12.84	12.89	12.89	1.06	0.92	0.92	0.92
T7Ea_80m	80m	15.41	8.54	8.61	8.61	0.72	0.69	0.70	0.70	14.69	12.80	12.84	12.84	1.05	0.91	0.92	0.92
T7Ea_90m	90m	14.95	8.49	8.55	8.55	0.71	0.69	0.69	0.69	14.61	12.77	12.80	12.80	1.04	0.91	0.91	0.91
T7Ea_100m	100m	14.57	8.44	8.50	8.50	0.70	0.68	0.69	0.69	14.55	12.74	12.77	12.77	1.04	0.91	0.91	0.91
T7Ea_110m	110m	14.25	8.41	8.46	8.46	0.70	0.68	0.68	0.68	14.49	12.72	12.75	12.75	1.04	0.91	0.91	0.91
T7Ea_120m	120m	13.99	8.38	8.43	8.43	0.69	0.67	0.68	0.68	14.44	12.70	12.72	12.73	1.03	0.91	0.91	0.91
T7Ea_130m	130m	13.76	8.35	8.40	8.40	0.69	0.67	0.68	0.68	14.41	12.68	12.71	12.71	1.03	0.91	0.91	0.91
T7Ea_140m	140m	13.56	8.33	8.38	8.38	0.69	0.67	0.67	0.67	14.37	12.67	12.69	12.69	1.03	0.90	0.91	0.91
T7Ea_150m	150m	13.39	8.31	8.36	8.36	0.68	0.67	0.67	0.67	14.34	12.65	12.68	12.68	1.02	0.90	0.91	0.91
T7Ea_160m	160m	13.23	8.29	8.34	8.34	0.68	0.67	0.67	0.67	14.32	12.64	12.67	12.67	1.02	0.90	0.90	0.90
T7Ea_170m	170m	13.10	8.28	8.32	8.32	0.68	0.66	0.67	0.67	14.29	12.63	12.66	12.66	1.02	0.90	0.90	0.90
T7Ea_180m	180m	12.98	8.27	8.30	8.30	0.68	0.66	0.67	0.67	14.27	12.63	12.65	12.65	1.02	0.90	0.90	0.90
T7Ea_190m	190m	12.87	8.25	8.29	8.29	0.67	0.66	0.66	0.66	14.25	12.62	12.64	12.64	1.02	0.90	0.90	0.90
T7Ea_200m	200m	12.77	8.24	8.28	8.28	0.67	0.66	0.66	0.66	14.24	12.61	12.63	12.63	1.02	0.90	0.90	0.90
T7Wa_1m	1m	53.72	12.84	13.40	13.40	1.55	1.24	1.31	1.31	21.74	15.98	16.38	16.38	1.55	1.14	1.17	1.17
T7Wa_10m	10m	27.24	9.87	10.09	10.09	0.97	0.85	0.88	0.88	16.87	13.75	13.90	13.90	1.20	0.98	0.99	0.99
T7Wa_20m	20m	20.61	9.12	9.26	9.26	0.83	0.76	0.78	0.78	15.64	13.21	13.30	13.30	1.12	0.94	0.95	0.95
T7Wa_30m	30m	17.79	8.81	8.91	8.91	0.77	0.72	0.73	0.73	15.13	12.99	13.05	13.05	1.08	0.93	0.93	0.93

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T7Wa_40m	40m	16.22	8.63	8.71	8.71	0.74	0.70	0.71	0.71	14.85	12.87	12.91	12.92	1.06	0.92	0.92	0.92
T7Wa_50m	50m	15.22	8.52	8.59	8.59	0.72	0.69	0.70	0.70	14.67	12.79	12.83	12.83	1.05	0.91	0.92	0.92
T7Wa_60m	60m	14.52	8.44	8.50	8.50	0.70	0.68	0.69	0.69	14.55	12.74	12.77	12.77	1.04	0.91	0.91	0.91
T7Wa_70m	70m	14.02	8.38	8.44	8.44	0.70	0.68	0.68	0.68	14.46	12.70	12.73	12.73	1.03	0.91	0.91	0.91
T7Wa_80m	80m	13.63	8.34	8.39	8.39	0.69	0.67	0.68	0.68	14.39	12.68	12.70	12.70	1.03	0.91	0.91	0.91
T7Wa_90m	90m	13.33	8.31	8.35	8.35	0.68	0.67	0.67	0.67	14.34	12.65	12.68	12.68	1.02	0.90	0.91	0.91
T7Wa_100m	100m	13.09	8.28	8.32	8.32	0.68	0.66	0.67	0.67	14.30	12.64	12.66	12.66	1.02	0.90	0.90	0.90
T7Wa_110m	110m	12.89	8.26	8.30	8.30	0.67	0.66	0.67	0.67	14.26	12.62	12.64	12.64	1.02	0.90	0.90	0.90
T7Wa_120m	120m	12.72	8.24	8.27	8.27	0.67	0.66	0.66	0.66	14.23	12.61	12.63	12.63	1.02	0.90	0.90	0.90
T7Wa_130m	130m	12.58	8.22	8.26	8.26	0.67	0.66	0.66	0.66	14.21	12.60	12.62	12.62	1.01	0.90	0.90	0.90
T7Wa_140m	140m	12.45	8.21	8.24	8.24	0.67	0.66	0.66	0.66	14.19	12.59	12.61	12.61	1.01	0.90	0.90	0.90
T7Wa_150m	150m	12.34	8.19	8.23	8.23	0.66	0.66	0.66	0.66	14.17	12.59	12.60	12.60	1.01	0.90	0.90	0.90
T7Wa_160m	160m	12.25	8.18	8.22	8.22	0.66	0.65	0.66	0.66	14.15	12.58	12.59	12.59	1.01	0.90	0.90	0.90
T7Wa_170m	170m	12.16	8.17	8.20	8.21	0.66	0.65	0.66	0.66	14.14	12.57	12.59	12.59	1.01	0.90	0.90	0.90
T7Wa_180m	180m	12.09	8.17	8.20	8.20	0.66	0.65	0.65	0.65	14.13	12.57	12.58	12.58	1.01	0.90	0.90	0.90
T7Wa_190m	190m	12.02	8.16	8.19	8.19	0.66	0.65	0.65	0.65	14.12	12.56	12.58	12.58	1.01	0.90	0.90	0.90
T7Wa_200m	200m	11.96	8.15	8.18	8.18	0.66	0.65	0.65	0.65	14.11	12.56	12.57	12.57	1.01	0.90	0.90	0.90
T8Ea_1m	1m	38.50	11.11	11.82	11.85	1.18	1.00	1.08	1.08	19.32	15.11	15.60	15.62	1.38	1.08	1.11	1.12
T8Ea_10m	10m	21.13	9.22	9.49	9.50	0.83	0.76	0.79	0.79	16.22	13.75	13.93	13.94	1.16	0.98	0.99	1.00
T8Ea_20m	20m	17.17	8.78	8.96	8.97	0.75	0.71	0.73	0.73	15.52	13.45	13.56	13.56	1.11	0.96	0.97	0.97
T8Ea_30m	30m	15.47	8.60	8.73	8.73	0.72	0.69	0.70	0.70	15.22	13.33	13.40	13.41	1.09	0.95	0.96	0.96
T8Ea_40m	40m	14.52	8.49	8.60	8.60	0.70	0.68	0.69	0.69	15.05	13.26	13.32	13.32	1.08	0.95	0.95	0.95
T8Ea_50m	50m	13.92	8.43	8.52	8.52	0.69	0.67	0.68	0.68	14.95	13.22	13.27	13.27	1.07	0.94	0.95	0.95
T8Ea_60m	60m	13.50	8.38	8.46	8.46	0.68	0.67	0.67	0.67	14.88	13.19	13.23	13.23	1.06	0.94	0.95	0.95
T8Ea_70m	70m	13.19	8.35	8.42	8.42	0.68	0.66	0.67	0.67	14.83	13.17	13.20	13.21	1.06	0.94	0.94	0.94
T8Ea_80m	80m	12.95	8.32	8.39	8.39	0.67	0.66	0.67	0.67	14.79	13.15	13.18	13.19	1.06	0.94	0.94	0.94
T8Ea_90m	90m	12.77	8.30	8.36	8.36	0.67	0.66	0.66	0.66	14.76	13.14	13.17	13.17	1.05	0.94	0.94	0.94
T8Ea_100m	100m	12.61	8.29	8.34	8.34	0.67	0.66	0.66	0.66	14.73	13.13	13.16	13.16	1.05	0.94	0.94	0.94
T8Ea_110m	110m	12.49	8.27	8.32	8.33	0.66	0.66	0.66	0.66	14.71	13.12	13.15	13.15	1.05	0.94	0.94	0.94
T8Ea_120m	120m	12.38	8.26	8.31	8.31	0.66	0.65	0.66	0.66	14.69	13.11	13.14	13.14	1.05	0.94	0.94	0.94
T8Ea_130m	130m	12.29	8.25	8.30	8.30	0.66	0.65	0.66	0.66	14.68	13.11	13.13	13.13	1.05	0.94	0.94	0.94
T8Ea_140m	140m	12.22	8.24	8.29	8.29	0.66	0.65	0.66	0.66	14.67	13.10	13.12	13.13	1.05	0.94	0.94	0.94
T8Ea_150m	150m	12.15	8.24	8.28	8.28	0.66	0.65	0.65	0.66	14.66	13.10	13.12	13.12	1.05	0.94	0.94	0.94
T8Ea_160m	160m	12.09	8.23	8.27	8.27	0.66	0.65	0.65	0.65	14.65	13.10	13.11	13.12	1.05	0.94	0.94	0.94
T8Ea_170m	170m	12.04	8.22	8.26	8.26	0.66	0.65	0.65	0.65	14.64	13.09	13.11	13.11	1.05	0.94	0.94	0.94
T8Ea_180m	180m	11.99	8.22	8.26	8.26	0.66	0.65	0.65	0.65	14.63	13.09	13.11	13.11	1.05	0.93	0.94	0.94
T8Ea_190m	190m	11.95	8.21	8.25	8.25	0.66	0.65	0.65	0.65	14.62	13.09	13.10	13.10	1.04	0.93	0.94	0.94
T8Ea_200m	200m	11.91	8.21	8.24	8.25	0.66	0.65	0.65	0.65	14.62	13.08	13.10	13.10	1.04	0.93	0.94	0.94
T9Ea_1m	1m	38.83	11.15	11.86	11.90	1.18	1.00	1.08	1.08	19.35	15.11	15.60	15.63	1.38	1.08	1.11	1.12
T9Ea_10m	10m	20.88	9.19	9.46	9.47	0.82	0.76	0.79	0.79	16.16	13.72	13.89	13.90	1.15	0.98	0.99	0.99

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T9Ea_20m	20m	16.91	8.76	8.92	8.93	0.74	0.71	0.72	0.72	15.46	13.43	13.53	13.53	1.10	0.96	0.97	0.97
T9Ea_30m	30m	15.24	8.57	8.70	8.70	0.71	0.69	0.70	0.70	15.17	13.31	13.38	13.38	1.08	0.95	0.96	0.96
T9Ea_40m	40m	14.32	8.47	8.57	8.58	0.70	0.68	0.68	0.69	15.01	13.24	13.30	13.30	1.07	0.95	0.95	0.95
T9Ea_50m	50m	13.74	8.41	8.49	8.50	0.69	0.67	0.68	0.68	14.91	13.20	13.25	13.25	1.07	0.94	0.95	0.95
T9Ea_60m	60m	13.33	8.37	8.44	8.44	0.68	0.66	0.67	0.67	14.85	13.17	13.21	13.22	1.06	0.94	0.94	0.94
T9Ea_70m	70m	13.04	8.33	8.40	8.40	0.67	0.66	0.67	0.67	14.80	13.16	13.19	13.19	1.06	0.94	0.94	0.94
T9Ea_80m	80m	12.82	8.31	8.37	8.37	0.67	0.66	0.66	0.66	14.76	13.14	13.17	13.17	1.05	0.94	0.94	0.94
T9Ea_90m	90m	12.64	8.29	8.34	8.35	0.67	0.66	0.66	0.66	14.73	13.13	13.16	13.16	1.05	0.94	0.94	0.94
T9Ea_100m	100m	12.50	8.27	8.33	8.33	0.66	0.65	0.66	0.66	14.71	13.12	13.15	13.15	1.05	0.94	0.94	0.94
T9Ea_110m	110m	12.38	8.26	8.31	8.31	0.66	0.65	0.66	0.66	14.69	13.11	13.14	13.14	1.05	0.94	0.94	0.94
T9Ea_120m	120m	12.28	8.25	8.30	8.30	0.66	0.65	0.66	0.66	14.67	13.11	13.13	13.13	1.05	0.94	0.94	0.94
T9Ea_130m	130m	12.19	8.24	8.28	8.29	0.66	0.65	0.66	0.66	14.66	13.10	13.12	13.12	1.05	0.94	0.94	0.94
T9Ea_140m	140m	12.12	8.23	8.28	8.28	0.66	0.65	0.65	0.65	14.65	13.10	13.12	13.12	1.05	0.94	0.94	0.94
T9Ea_150m	150m	12.06	8.23	8.27	8.27	0.66	0.65	0.65	0.65	14.64	13.09	13.11	13.11	1.05	0.94	0.94	0.94
T9Ea_160m	160m	12.00	8.22	8.26	8.26	0.66	0.65	0.65	0.65	14.63	13.09	13.11	13.11	1.04	0.93	0.94	0.94
T9Ea_170m	170m	11.95	8.21	8.25	8.25	0.66	0.65	0.65	0.65	14.62	13.09	13.10	13.10	1.04	0.93	0.94	0.94
T9Ea_180m	180m	11.91	8.21	8.25	8.25	0.65	0.65	0.65	0.65	14.62	13.08	13.10	13.10	1.04	0.93	0.94	0.94
T9Ea_190m	190m	11.87	8.20	8.24	8.24	0.65	0.65	0.65	0.65	14.61	13.08	13.10	13.10	1.04	0.93	0.94	0.94
T9Ea_200m	200m	11.83	8.20	8.24	8.24	0.65	0.65	0.65	0.65	14.60	13.08	13.09	13.10	1.04	0.93	0.94	0.94
T9Wa_1m	1m	58.86	13.44	14.15	14.23	1.56	1.24	1.32	1.33	22.75	16.70	17.14	17.19	1.63	1.19	1.22	1.23
T9Wa_10m	10m	28.97	10.24	10.52	10.55	0.97	0.85	0.88	0.88	17.66	14.43	14.59	14.61	1.26	1.03	1.04	1.04
T9Wa_20m	20m	21.62	9.46	9.62	9.64	0.82	0.76	0.78	0.78	16.38	13.89	13.98	13.99	1.17	0.99	1.00	1.00
T9Wa_30m	30m	18.54	9.13	9.25	9.26	0.77	0.72	0.73	0.74	15.85	13.67	13.73	13.74	1.13	0.98	0.98	0.98
T9Wa_40m	40m	16.84	8.94	9.04	9.05	0.74	0.70	0.71	0.71	15.57	13.55	13.60	13.60	1.11	0.97	0.97	0.97
T9Wa_50m	50m	15.77	8.83	8.91	8.92	0.72	0.69	0.70	0.70	15.39	13.47	13.52	13.52	1.10	0.96	0.97	0.97
T9Wa_60m	60m	15.03	8.75	8.82	8.83	0.71	0.68	0.69	0.69	15.26	13.42	13.46	13.46	1.09	0.96	0.96	0.96
T9Wa_70m	70m	14.49	8.69	8.76	8.76	0.70	0.68	0.68	0.68	15.17	13.39	13.42	13.42	1.08	0.96	0.96	0.96
T9Wa_80m	80m	14.08	8.65	8.71	8.71	0.69	0.67	0.68	0.68	15.11	13.36	13.39	13.39	1.08	0.95	0.96	0.96
T9Wa_90m	90m	13.75	8.61	8.67	8.67	0.68	0.67	0.67	0.67	15.05	13.34	13.36	13.37	1.08	0.95	0.95	0.95
T9Wa_100m	100m	13.49	8.59	8.63	8.64	0.68	0.67	0.67	0.67	15.01	13.32	13.35	13.35	1.07	0.95	0.95	0.95
T9Wa_110m	110m	13.27	8.56	8.61	8.61	0.68	0.66	0.67	0.67	14.97	13.31	13.33	13.33	1.07	0.95	0.95	0.95
T9Wa_120m	120m	13.09	8.54	8.59	8.59	0.67	0.66	0.66	0.66	14.94	13.30	13.32	13.32	1.07	0.95	0.95	0.95
T9Wa_130m	130m	12.93	8.53	8.57	8.57	0.67	0.66	0.66	0.66	14.92	13.29	13.31	13.31	1.07	0.95	0.95	0.95
T9Wa_140m	140m	12.80	8.51	8.55	8.55	0.67	0.66	0.66	0.66	14.90	13.28	13.30	13.30	1.06	0.95	0.95	0.95
T9Wa_150m	150m	12.68	8.50	8.54	8.54	0.67	0.66	0.66	0.66	14.88	13.27	13.29	13.29	1.06	0.95	0.95	0.95
T9Wa_160m	160m	12.58	8.49	8.52	8.53	0.67	0.66	0.66	0.66	14.86	13.27	13.28	13.28	1.06	0.95	0.95	0.95
T9Wa_170m	170m	12.49	8.48	8.51	8.52	0.66	0.65	0.66	0.66	14.85	13.26	13.27	13.28	1.06	0.95	0.95	0.95
T9Wa_180m	180m	12.41	8.47	8.50	8.51	0.66	0.65	0.66	0.66	14.84	13.26	13.27	13.27	1.06	0.95	0.95	0.95
T9Wa_190m	190m	12.34	8.46	8.49	8.50	0.66	0.65	0.66	0.66	14.82	13.25	13.26	13.27	1.06	0.95	0.95	0.95
T9Wa_200m	200m	12.27	8.46	8.49	8.49	0.66	0.65	0.65	0.65	14.81	13.25	13.26	13.26	1.06	0.95	0.95	0.95

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T10Ea_1m	1m	43.77	11.82	12.31	12.36	1.26	1.05	1.10	1.10	20.22	15.56	15.85	15.89	1.44	1.11	1.13	1.13
T10Ea_10m	10m	22.63	9.56	9.74	9.76	0.85	0.78	0.79	0.79	16.57	13.97	14.07	14.09	1.18	1.00	1.01	1.01
T10Ea_20m	20m	17.92	9.06	9.17	9.19	0.76	0.72	0.73	0.73	15.75	13.63	13.69	13.70	1.13	0.97	0.98	0.98
T10Ea_30m	30m	15.95	8.85	8.93	8.94	0.72	0.69	0.70	0.70	15.42	13.49	13.53	13.54	1.10	0.96	0.97	0.97
T10Ea_40m	40m	14.85	8.73	8.80	8.81	0.70	0.68	0.69	0.69	15.23	13.41	13.45	13.45	1.09	0.96	0.96	0.96
T10Ea_50m	50m	14.16	8.66	8.72	8.72	0.69	0.67	0.68	0.68	15.12	13.37	13.39	13.40	1.08	0.95	0.96	0.96
T10Ea_60m	60m	13.67	8.61	8.66	8.66	0.68	0.67	0.67	0.67	15.04	13.33	13.36	13.36	1.07	0.95	0.95	0.95
T10Ea_70m	70m	13.32	8.57	8.61	8.62	0.68	0.66	0.67	0.67	14.98	13.31	13.33	13.34	1.07	0.95	0.95	0.95
T10Ea_80m	80m	13.05	8.54	8.58	8.58	0.67	0.66	0.66	0.66	14.94	13.29	13.31	13.32	1.07	0.95	0.95	0.95
T10Ea_90m	90m	12.83	8.52	8.55	8.56	0.67	0.66	0.66	0.66	14.90	13.28	13.30	13.30	1.06	0.95	0.95	0.95
T10Ea_100m	100m	12.65	8.50	8.53	8.54	0.67	0.66	0.66	0.66	14.87	13.27	13.29	13.29	1.06	0.95	0.95	0.95
T10Ea_110m	110m	12.51	8.48	8.51	8.52	0.66	0.65	0.66	0.66	14.85	13.26	13.27	13.28	1.06	0.95	0.95	0.95
T10Ea_120m	120m	12.38	8.47	8.50	8.50	0.66	0.65	0.66	0.66	14.83	13.25	13.27	13.27	1.06	0.95	0.95	0.95
T10Ea_130m	130m	12.28	8.46	8.49	8.49	0.66	0.65	0.65	0.65	14.81	13.25	13.26	13.26	1.06	0.95	0.95	0.95
T10Ea_140m	140m	12.19	8.45	8.48	8.48	0.66	0.65	0.65	0.65	14.80	13.24	13.25	13.25	1.06	0.95	0.95	0.95
T10Ea_150m	150m	12.11	8.44	8.47	8.47	0.66	0.65	0.65	0.65	14.79	13.24	13.25	13.25	1.06	0.95	0.95	0.95
T10Ea_160m	160m	12.03	8.43	8.46	8.46	0.66	0.65	0.65	0.65	14.78	13.23	13.24	13.24	1.06	0.95	0.95	0.95
T10Ea_170m	170m	11.97	8.42	8.45	8.45	0.66	0.65	0.65	0.65	14.76	13.23	13.24	13.24	1.05	0.94	0.95	0.95
T10Ea_180m	180m	11.92	8.42	8.44	8.45	0.65	0.65	0.65	0.65	14.76	13.22	13.23	13.24	1.05	0.94	0.95	0.95
T10Ea_190m	190m	11.86	8.41	8.44	8.44	0.65	0.65	0.65	0.65	14.75	13.22	13.23	13.23	1.05	0.94	0.95	0.95
T10Ea_200m	200m	11.82	8.41	8.43	8.43	0.65	0.65	0.65	0.65	14.74	13.22	13.23	13.23	1.05	0.94	0.94	0.94
T10Wa_1m	1m	50.59	12.73	13.30	13.34	1.52	1.22	1.29	1.29	21.89	16.36	16.77	16.79	1.56	1.17	1.20	1.20
T10Wa_10m	10m	25.67	9.93	10.16	10.17	0.95	0.84	0.87	0.87	17.16	14.18	14.33	14.34	1.23	1.01	1.02	1.02
T10Wa_20m	20m	20.01	9.29	9.44	9.45	0.82	0.76	0.77	0.77	16.08	13.70	13.79	13.80	1.15	0.98	0.99	0.99
T10Wa_30m	30m	17.62	9.03	9.13	9.14	0.77	0.72	0.73	0.74	15.63	13.51	13.57	13.58	1.12	0.96	0.97	0.97
T10Wa_40m	40m	16.29	8.88	8.97	8.97	0.74	0.71	0.71	0.71	15.39	13.40	13.45	13.46	1.10	0.96	0.96	0.96
T10Wa_50m	50m	15.45	8.78	8.86	8.86	0.72	0.69	0.70	0.70	15.23	13.34	13.38	13.38	1.09	0.95	0.96	0.96
T10Wa_60m	60m	14.87	8.72	8.78	8.79	0.71	0.69	0.69	0.69	15.13	13.29	13.33	13.33	1.08	0.95	0.95	0.95
T10Wa_70m	70m	14.45	8.67	8.73	8.73	0.70	0.68	0.69	0.69	15.05	13.26	13.29	13.29	1.08	0.95	0.95	0.95
T10Wa_80m	80m	14.13	8.63	8.69	8.69	0.70	0.68	0.68	0.68	14.99	13.23	13.26	13.27	1.07	0.95	0.95	0.95
T10Wa_90m	90m	13.88	8.61	8.66	8.66	0.69	0.67	0.68	0.68	14.95	13.21	13.24	13.24	1.07	0.94	0.95	0.95
T10Wa_100m	100m	13.68	8.58	8.63	8.64	0.69	0.67	0.68	0.68	14.91	13.20	13.23	13.23	1.07	0.94	0.94	0.94
T10Wa_110m	110m	13.52	8.57	8.61	8.61	0.69	0.67	0.67	0.67	14.88	13.19	13.21	13.21	1.06	0.94	0.94	0.94
T10Wa_120m	120m	13.39	8.55	8.60	8.60	0.68	0.67	0.67	0.67	14.86	13.18	13.20	13.20	1.06	0.94	0.94	0.94
T10Wa_130m	130m	13.27	8.54	8.58	8.58	0.68	0.67	0.67	0.67	14.84	13.17	13.19	13.19	1.06	0.94	0.94	0.94
T10Wa_140m	140m	13.18	8.53	8.57	8.57	0.68	0.66	0.67	0.67	14.82	13.16	13.18	13.18	1.06	0.94	0.94	0.94
T10Wa_150m	150m	13.10	8.52	8.56	8.56	0.68	0.66	0.67	0.67	14.81	13.16	13.18	13.18	1.06	0.94	0.94	0.94
T10Wa_160m	160m	13.03	8.51	8.55	8.55	0.68	0.66	0.67	0.67	14.80	13.15	13.17	13.17	1.06	0.94	0.94	0.94
T10Wa_170m	170m	12.96	8.50	8.54	8.54	0.67	0.66	0.66	0.67	14.78	13.15	13.16	13.17	1.06	0.94	0.94	0.94
T10Wa_180m	180m	12.91	8.50	8.53	8.54	0.67	0.66	0.66	0.66	14.77	13.14	13.16	13.16	1.06	0.94	0.94	0.94

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T10Wa_190m	190m	12.86	8.49	8.53	8.53	0.67	0.66	0.66	0.66	14.77	13.14	13.16	13.16	1.05	0.94	0.94	0.94
T10Wa_200m	200m	12.81	8.49	8.52	8.52	0.67	0.66	0.66	0.66	14.76	13.13	13.15	13.15	1.05	0.94	0.94	0.94
T11Ea_1m	1m	56.31	13.37	14.00	14.03	1.64	1.30	1.37	1.38	22.88	16.81	17.26	17.28	1.63	1.20	1.23	1.23
T11Ea_10m	10m	27.98	10.19	10.44	10.45	0.99	0.87	0.90	0.90	17.55	14.35	14.52	14.52	1.25	1.02	1.04	1.04
T11Ea_20m	20m	20.92	9.40	9.55	9.56	0.83	0.77	0.78	0.78	16.22	13.76	13.86	13.86	1.16	0.98	0.99	0.99
T11Ea_30m	30m	17.82	9.05	9.16	9.16	0.77	0.72	0.73	0.74	15.65	13.51	13.58	13.58	1.12	0.97	0.97	0.97
T11Ea_40m	40m	16.10	8.85	8.94	8.94	0.73	0.70	0.71	0.71	15.34	13.38	13.43	13.43	1.10	0.96	0.96	0.96
T11Ea_50m	50m	15.02	8.73	8.80	8.81	0.71	0.69	0.69	0.69	15.14	13.29	13.33	13.33	1.08	0.95	0.95	0.95
T11Ea_60m	60m	14.28	8.65	8.71	8.71	0.70	0.68	0.68	0.68	15.01	13.24	13.27	13.27	1.07	0.95	0.95	0.95
T11Ea_70m	70m	13.76	8.59	8.64	8.65	0.69	0.67	0.68	0.68	14.92	13.20	13.23	13.23	1.07	0.94	0.94	0.94
T11Ea_80m	80m	13.36	8.55	8.59	8.60	0.68	0.67	0.67	0.67	14.85	13.17	13.20	13.20	1.06	0.94	0.94	0.94
T11Ea_90m	90m	13.06	8.51	8.55	8.56	0.68	0.66	0.67	0.67	14.80	13.15	13.17	13.17	1.06	0.94	0.94	0.94
T11Ea_100m	100m	12.82	8.49	8.52	8.53	0.67	0.66	0.66	0.66	14.76	13.13	13.15	13.15	1.05	0.94	0.94	0.94
T11Ea_110m	110m	12.63	8.47	8.50	8.50	0.67	0.66	0.66	0.66	14.73	13.12	13.14	13.14	1.05	0.94	0.94	0.94
T11Ea_120m	120m	12.47	8.45	8.48	8.48	0.67	0.66	0.66	0.66	14.70	13.11	13.12	13.13	1.05	0.94	0.94	0.94
T11Ea_130m	130m	12.34	8.43	8.46	8.46	0.66	0.65	0.66	0.66	14.67	13.10	13.11	13.11	1.05	0.94	0.94	0.94
T11Ea_140m	140m	12.22	8.42	8.45	8.45	0.66	0.65	0.65	0.65	14.66	13.09	13.11	13.11	1.05	0.94	0.94	0.94
T11Ea_150m	150m	12.13	8.41	8.44	8.44	0.66	0.65	0.65	0.65	14.64	13.09	13.10	13.10	1.05	0.93	0.94	0.94
T11Ea_160m	160m	12.04	8.40	8.42	8.43	0.66	0.65	0.65	0.65	14.63	13.08	13.09	13.09	1.04	0.93	0.94	0.94
T11Ea_170m	170m	11.97	8.39	8.42	8.42	0.66	0.65	0.65	0.65	14.61	13.08	13.09	13.09	1.04	0.93	0.93	0.93
T11Ea_180m	180m	11.90	8.38	8.41	8.41	0.66	0.65	0.65	0.65	14.60	13.07	13.08	13.08	1.04	0.93	0.93	0.93
T11Ea_190m	190m	11.85	8.38	8.40	8.40	0.65	0.65	0.65	0.65	14.59	13.07	13.08	13.08	1.04	0.93	0.93	0.93
T11Ea_200m	200m	11.80	8.37	8.39	8.39	0.65	0.65	0.65	0.65	14.59	13.06	13.07	13.07	1.04	0.93	0.93	0.93
T11Wa_1m	1m	87.44	16.82	18.07	18.10	2.24	1.69	1.84	1.85	26.83	18.07	18.96	18.97	1.92	1.29	1.35	1.36
T11Wa_10m	10m	40.70	11.56	12.08	12.09	1.22	1.02	1.08	1.08	18.60	14.19	14.53	14.54	1.33	1.01	1.04	1.04
T11Wa_20m	20m	29.16	10.26	10.59	10.59	0.98	0.86	0.89	0.90	16.52	13.26	13.47	13.47	1.18	0.95	0.96	0.96
T11Wa_30m	30m	24.02	9.69	9.92	9.93	0.87	0.79	0.82	0.82	15.61	12.87	13.01	13.02	1.12	0.92	0.93	0.93
T11Wa_40m	40m	21.06	9.35	9.54	9.55	0.82	0.75	0.77	0.77	15.09	12.65	12.76	12.76	1.08	0.90	0.91	0.91
T11Wa_50m	50m	19.14	9.14	9.29	9.30	0.78	0.73	0.75	0.75	14.76	12.51	12.60	12.60	1.05	0.89	0.90	0.90
T11Wa_60m	60m	17.78	8.98	9.12	9.12	0.75	0.71	0.73	0.73	14.52	12.41	12.48	12.48	1.04	0.89	0.89	0.89
T11Wa_70m	70m	16.77	8.87	8.98	8.99	0.74	0.70	0.71	0.71	14.35	12.34	12.40	12.40	1.03	0.88	0.89	0.89
T11Wa_80m	80m	15.99	8.78	8.88	8.89	0.72	0.69	0.70	0.70	14.22	12.28	12.34	12.34	1.02	0.88	0.88	0.88
T11Wa_90m	90m	15.37	8.71	8.80	8.80	0.71	0.69	0.69	0.69	14.12	12.24	12.29	12.29	1.01	0.87	0.88	0.88
T11Wa_100m	100m	14.87	8.66	8.74	8.74	0.70	0.68	0.69	0.69	14.03	12.21	12.25	12.25	1.00	0.87	0.88	0.88
T11Wa_110m	110m	14.45	8.61	8.68	8.68	0.70	0.68	0.68	0.68	13.97	12.18	12.22	12.22	1.00	0.87	0.87	0.87
T11Wa_120m	120m	14.11	8.57	8.64	8.64	0.69	0.67	0.68	0.68	13.91	12.16	12.19	12.19	0.99	0.87	0.87	0.87
T11Wa_130m	130m	13.82	8.54	8.60	8.60	0.69	0.67	0.67	0.67	13.86	12.14	12.17	12.17	0.99	0.87	0.87	0.87
T11Wa_140m	140m	13.57	8.51	8.57	8.57	0.68	0.67	0.67	0.67	13.82	12.12	12.15	12.15	0.99	0.87	0.87	0.87
T11Wa_150m	150m	13.35	8.49	8.54	8.54	0.68	0.66	0.67	0.67	13.79	12.11	12.13	12.13	0.98	0.86	0.87	0.87
T11Wa_160m	160m	13.16	8.46	8.51	8.51	0.68	0.66	0.67	0.67	13.76	12.10	12.12	12.12	0.98	0.86	0.87	0.87

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T11Wa_170m	170m	13.00	8.45	8.49	8.49	0.67	0.66	0.66	0.66	13.73	12.09	12.11	12.11	0.98	0.86	0.86	0.86
T11Wa_180m	180m	12.85	8.43	8.47	8.47	0.67	0.66	0.66	0.66	13.71	12.08	12.10	12.10	0.98	0.86	0.86	0.86
T11Wa_190m	190m	12.72	8.42	8.46	8.46	0.67	0.66	0.66	0.66	13.69	12.07	12.09	12.09	0.98	0.86	0.86	0.86
T11Wa_200m	200m	12.61	8.40	8.44	8.44	0.67	0.66	0.66	0.66	13.67	12.06	12.08	12.08	0.98	0.86	0.86	0.86
T12Wa_1m	1m	17.53	8.63	8.73	8.75	0.77	0.73	0.74	0.74	15.17	13.04	13.11	13.12	1.08	0.93	0.94	0.94
T12Wa_10m	10m	13.85	8.23	8.28	8.29	0.69	0.68	0.68	0.68	14.49	12.75	12.78	12.78	1.03	0.91	0.91	0.91
T12Wa_20m	20m	12.79	8.12	8.15	8.15	0.67	0.66	0.66	0.66	14.30	12.67	12.69	12.69	1.02	0.90	0.91	0.91
T12Wa_30m	30m	12.33	8.07	8.09	8.09	0.66	0.66	0.66	0.66	14.22	12.63	12.65	12.65	1.02	0.90	0.90	0.90
T12Wa_40m	40m	12.07	8.04	8.06	8.06	0.66	0.65	0.65	0.65	14.17	12.61	12.62	12.63	1.01	0.90	0.90	0.90
T12Wa_50m	50m	11.91	8.02	8.04	8.04	0.66	0.65	0.65	0.65	14.14	12.60	12.61	12.61	1.01	0.90	0.90	0.90
T12Wa_60m	60m	11.80	8.01	8.02	8.03	0.65	0.65	0.65	0.65	14.12	12.59	12.60	12.60	1.01	0.90	0.90	0.90
T12Wa_70m	70m	11.71	8.00	8.01	8.02	0.65	0.65	0.65	0.65	14.11	12.59	12.60	12.60	1.01	0.90	0.90	0.90
T12Wa_80m	80m	11.65	7.99	8.01	8.01	0.65	0.65	0.65	0.65	14.10	12.58	12.59	12.59	1.01	0.90	0.90	0.90
T12Wa_90m	90m	11.60	7.99	8.00	8.00	0.65	0.65	0.65	0.65	14.09	12.58	12.59	12.59	1.01	0.90	0.90	0.90
T12Wa_100m	100m	11.56	7.98	8.00	8.00	0.65	0.65	0.65	0.65	14.08	12.58	12.58	12.59	1.01	0.90	0.90	0.90
T12Wa_110m	110m	11.53	7.98	7.99	7.99	0.65	0.65	0.65	0.65	14.08	12.58	12.58	12.58	1.01	0.90	0.90	0.90
T12Wa_120m	120m	11.50	7.98	7.99	7.99	0.65	0.65	0.65	0.65	14.07	12.57	12.58	12.58	1.01	0.90	0.90	0.90
T12Wa_130m	130m	11.48	7.97	7.98	7.99	0.65	0.65	0.65	0.65	14.07	12.57	12.58	12.58	1.00	0.90	0.90	0.90
T12Wa_140m	140m	11.46	7.97	7.98	7.98	0.65	0.64	0.65	0.65	14.07	12.57	12.58	12.58	1.00	0.90	0.90	0.90
T12Wa_150m	150m	11.44	7.97	7.98	7.98	0.65	0.64	0.65	0.65	14.06	12.57	12.58	12.58	1.00	0.90	0.90	0.90
T12Wa_160m	160m	11.43	7.97	7.98	7.98	0.65	0.64	0.65	0.65	14.06	12.57	12.57	12.57	1.00	0.90	0.90	0.90
T12Wa_170m	170m	11.41	7.97	7.98	7.98	0.65	0.64	0.65	0.65	14.06	12.57	12.57	12.57	1.00	0.90	0.90	0.90
T12Wa_180m	180m	11.40	7.96	7.98	7.98	0.65	0.64	0.64	0.65	14.06	12.57	12.57	12.57	1.00	0.90	0.90	0.90
T12Wa_190m	190m	11.39	7.96	7.97	7.97	0.65	0.64	0.64	0.64	14.05	12.57	12.57	12.57	1.00	0.90	0.90	0.90
T12Wa_200m	200m	11.38	7.96	7.97	7.97	0.65	0.64	0.64	0.64	14.05	12.57	12.57	12.57	1.00	0.90	0.90	0.90
T13Wa_1m	1m	16.90	8.58	8.71	8.70	0.76	0.72	0.73	0.73	14.92	12.86	12.95	12.95	1.07	0.92	0.92	0.92
T13Wa_10m	10m	13.11	8.17	8.22	8.22	0.68	0.67	0.67	0.67	14.23	12.57	12.60	12.60	1.02	0.90	0.90	0.90
T13Wa_20m	20m	12.23	8.08	8.11	8.11	0.66	0.65	0.66	0.66	14.08	12.50	12.52	12.52	1.01	0.89	0.89	0.89
T13Wa_30m	30m	11.86	8.04	8.06	8.06	0.66	0.65	0.65	0.65	14.01	12.48	12.49	12.49	1.00	0.89	0.89	0.89
T13Wa_40m	40m	11.65	8.02	8.04	8.04	0.65	0.65	0.65	0.65	13.98	12.46	12.47	12.47	1.00	0.89	0.89	0.89
T13Wa_50m	50m	11.53	8.00	8.02	8.02	0.65	0.65	0.65	0.65	13.96	12.45	12.46	12.46	1.00	0.89	0.89	0.89
T13Wa_60m	60m	11.44	7.99	8.01	8.01	0.65	0.65	0.65	0.65	13.94	12.45	12.45	12.45	1.00	0.89	0.89	0.89
T13Wa_70m	70m	11.38	7.99	8.00	8.00	0.65	0.64	0.65	0.65	13.93	12.44	12.45	12.45	1.00	0.89	0.89	0.89
T13Wa_80m	80m	11.33	7.98	8.00	8.00	0.65	0.64	0.64	0.64	13.92	12.44	12.45	12.45	0.99	0.89	0.89	0.89
T13Wa_90m	90m	11.29	7.98	7.99	7.99	0.65	0.64	0.64	0.64	13.92	12.44	12.44	12.44	0.99	0.89	0.89	0.89
T13Wa_100m	100m	11.26	7.97	7.99	7.99	0.65	0.64	0.64	0.64	13.91	12.44	12.44	12.44	0.99	0.89	0.89	0.89
T13Wa_110m	110m	11.24	7.97	7.98	7.98	0.65	0.64	0.64	0.64	13.91	12.43	12.44	12.44	0.99	0.89	0.89	0.89
T13Wa_120m	120m	11.22	7.97	7.98	7.98	0.65	0.64	0.64	0.64	13.91	12.43	12.44	12.44	0.99	0.89	0.89	0.89
T13Wa_130m	130m	11.20	7.97	7.98	7.98	0.65	0.64	0.64	0.64	13.90	12.43	12.44	12.44	0.99	0.89	0.89	0.89
T13Wa_140m	140m	11.18	7.97	7.98	7.98	0.65	0.64	0.64	0.64	13.90	12.43	12.43	12.43	0.99	0.89	0.89	0.89

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			
		2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Do Min	2039 Do Something	2019	2019 Future Base	2039 Ref	2039 Do Something
T13Wa_150m	150m	11.17	7.96	7.98	7.98	0.65	0.64	0.64	0.64	13.90	12.43	12.43	12.43	0.99	0.89	0.89	0.89
T13Wa_160m	160m	11.16	7.96	7.97	7.97	0.64	0.64	0.64	0.64	13.90	12.43	12.43	12.43	0.99	0.89	0.89	0.89
T13Wa_170m	170m	11.15	7.96	7.97	7.97	0.64	0.64	0.64	0.64	13.90	12.43	12.43	12.43	0.99	0.89	0.89	0.89
T13Wa_180m	180m	11.14	7.96	7.97	7.97	0.64	0.64	0.64	0.64	13.89	12.43	12.43	12.43	0.99	0.89	0.89	0.89
T13Wa_190m	190m	11.14	7.96	7.97	7.97	0.64	0.64	0.64	0.64	13.89	12.43	12.43	12.43	0.99	0.89	0.89	0.89
T13Wa_200m	200m	11.13	7.96	7.97	7.97	0.64	0.64	0.64	0.64	13.89	12.43	12.43	12.43	0.99	0.89	0.89	0.89

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MID SUSSEX DISTRICT COUNCIL**Equality Impacts Assessment (EqIA) – 2023**

Title of Policy/Service/Contract: Mid Sussex District Plan Review (2021 –2039) (Regulation 19)

Division: Planning Policy and Housing Enabling

Lead Officer: Andrew Marsh

Date Assessment completed: 09/11/2023

What is Equalities Impact Assessment?
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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. Following the Examination in Public of the Mid Sussex District Plan 2014-2031 (Adopted March 2018) the Council committed to an early review of the District Plan commencing in 2021. A draft District Plan, supported by EqIA, was published in November 2022 – this was the first formal consultation stage known as Regulation 18. The

Council is currently at Regulation 19 stage of the District Plan (2021 –2039) preparation, which is the second formal consultation stage.

The District 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 District 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.

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 policies within the District Local Plan 2021-2039 (Regulation 19) 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 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out specific bodies or persons that a local planning authority must notify and invite representations from in developing its Local Plan. The submission draft District Plan will be published for a minimum 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 in accordance with an agreed Community Involvement Plan.

The policies contained within the submission draft District Plan 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 submission draft District Plan 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 / infrastructure 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 submission draft District Plan. This work assists in the formulation of policies and informs and updates the evidence base.

Engagement with stakeholders is vital and is ongoing. A formal consultation at Regulation 18 took place in November/December 2022. Engagement will continue throughout each stage of producing the submission draft District Plan, 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 Housing Enabling, and Development Management;
- Urban Designer;
- Sustainability Officer;
- Heritage Officer;
- Tree Officer;
- Housing;
- 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
- **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. The full evidence base is available online at <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/district-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 submission draft District Plan 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. At Regulation 19 stage of plan-making, comments must relate to Legal and Soundness matters as set out in the Community Involvement Plan.

More information on the consultation will be available in the Community Involvement Plan which accompanies the submission draft District Plan. 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 submission draft District Plan and the upcoming consultation. Opportunities have been identified where it is anticipated that the submission draft District Plan 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 submission draft District Plan 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 submission draft District Plan PD.

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 the submission draft District Plan 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 District Plan 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 submission draft District Plan 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>DPH5: 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 submission draft District Plan 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>DPH12: 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 	Engagement with Access Groups.	Implement submission draft District Plan policies on housing site allocations within the identified	Andrew Marsh	Monitor in line with the submission draft

<p>Infrastructure; - 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>Implementation of submission draft District Plan policy DPH11: <i>Dwelling Space Standards</i> seeks 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.</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>indicative phasing period to ensure development is responsive to the needs of disabled people, including in regards to design, accessibility, transport, community facilities and local services, infrastructure and housing mix.</p>		<p>District Plan Monitoring Schedule.</p>
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The needs of people with a religion or belief				
None identified at this time.	Existing District Plan policies on community facilities and local services and infrastructure.	None identified at this time.	-	-
The needs of gay men, lesbians, bisexuals and heterosexual people				
None identified at this time.	None identified at this time.	None identified at this time.	-	-
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:</p> <ul style="list-style-type: none"> • DPSC1: Land at west of Burgess Hill • DPSC2: Land at Crabbet Park • DPSC3: Land south of Reeds Lane, Sayers Common • DPA9: 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"> • DPH18: Land at Byanda, Hassocks • DPH19: 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>	Implement submission draft District Plan 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.	Andrew Marsh	Monitor in line with the submission draft District Plan Monitoring Schedule.

	<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 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 	<p>Engagement with voluntary services, registered social landlords and the business community.</p> <p>Draft policy <i>DPH8: 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</p>	<p>Implement submission draft District Plan 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 submission draft District Plan Monitoring Schedule.</p>

<p>open spaces, the public realm and transport infrastructure.</p> <ul style="list-style-type: none"> - 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 ensure that they can positively input into plan-making process.</p>	<p>local services and infrastructure, accessibility and transport.</p>			
<p>The needs of people who live in a rural area</p>				
<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>DPH10: Rural Exception Sites</i> allows for the provision of rural exception sites, and <i>DPE7: Sustainable Rural Development</i> and the Rural Economy allows for new small scale economic development in the countryside.</p>	<p>Implement submission draft District Plan 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 submission draft District Plan 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 submission draft District Plan 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 submission draft District Plan 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 Plan is adopted, which respond to the needs of protected groups.</p> <p>Implement submission draft District Plan 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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District Plan

Community Involvement Plan (CIP) – November 2023

For the:

- **Mid Sussex District Plan (Regulation 19)**
- **Sustainability Appraisal**
- **Habitats Regulations Assessment**
- **Equality Impacts Assessment**

1. Background

The District Council is revising the 2018 District Plan to guide development and the provision of infrastructure over the period to 2039. The submission draft 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)

Consultation was held on a Regulation 18 draft District Plan in November/December 2022. This Community Involvement Plan relates to the Regulation 19 consultation. At this stage of the plan-making process, the Council will have published a version of the Plan that it believes meets legal and soundness requirements and is capable of Submission to the Secretary of State for examination. It is a requirement by the Planning Inspectorate that responses are focussed on legal and soundness matters. An example form for use at Regulation 19 stage prepared by the Planning Inspectorate can be found in Appendix 1. The responses are collated by the District Council and submitted in full to the independent Inspector appointed by the Secretary of State to examine the District Plan.

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 submission draft District Plan;
- Why people are being involved in the process;
- When and how people will be able to get involved and influence the submission draft District Plan; and
- How the results of community involvement will be used.

The submission draft 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 19 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 start of the process of producing the submission draft District Plan, including:

- District Councillors and Town and Parish Councils have been briefed on the need for a 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 and has been kept informed of the progress in plan making.
- Neighbouring Local Authorities and County Authorities, on a group and individual basis. Input was sought to the methodology for the site selection, the outcome of the Site Selection process, the content of the draft District Plan at Regulation 18 stage, representations received during the Regulation 18 consultation and strategic cross-boundary matters emerging as a result of the Regulation 19 plan;
- Infrastructure providers such as water companies, utility suppliers, the highways authority, education authority.
- External organisations, such as the High Weald AONB Unit and the National Park.
- 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

¹ As defined by the *Equality Act 2010*

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 submission draft 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 submission draft District Plan. These include members of the public, the Mid Sussex Partnership, voluntary services’ associations, residents’ associations, housing associations, business groups and associations, 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 service which includes members of the public as well as organisations⁴;
- Those that made representations at Regulation 18 stage; and
- Internal consultees at the District Council.

Elected District Councillors have a key role to play in forming the submission draft District Plan and will be fully involved in the process through:

- The Scrutiny Committee for Place and Environment (any District Councillor can attend and request to speak);
- Full Council (consists of all District Councillors);
- Briefings;
- Meetings with Ward Councillor directly impacted and
- Councillors will be directly informed and can respond during the public consultation period.

The Council has committed to ongoing engagement with Town and Parish Councils and this too involves group and individual briefings and workshops. In addition Town and Parish Councils are a ‘Specific Consultation Body’ and are therefore invited to respond to formal consultations.

4. Why are people being involved?

We are asking for comments on the submission draft 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

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)*

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>

allocate sites for development in the district. It also includes planning policies that will have an impact on both the existing and future communities of Mid Sussex.

The Regulation 18 draft District Plan was published in November 2022. At that stage stakeholders had the opportunity to comment on what the plan ought to contain. All comments made at that stage were considered by the Council and informed the content of the next version of the Plan, which is the Regulation 19 submission draft District Plan. At this stage there is limited scope to influence the content of the Plan, and responses at this stage must focus on whether the Plan meets legal and soundness tests set out in National Planning Policy.

To meet the legal and soundness tests the plan needs to be positively prepared, justified, effective, consistent with national policy as well as meeting specific legal requirements. It will be for an independent Planning Inspector to determine if the legal and soundness tests have been met.

The Regulation 19 submission draft District Plan is the version of the Plan that the Council believes meets legal requirements and is ‘sound’ in accordance with the Tests of Soundness set out in National Planning Policy Framework. A model response form has been prepared by the Planning Inspectorate to assist – an example is provided at Appendix 1. All responses received at this stage will be submitted to the independent Inspector who will examine the Plan.

To ensure the consultation is meaningful, it is important to understand the context within which the submission draft District Plan has been drafted. The Plan has been informed by Government policy and guidance along with an extensive evidence base. The draft District Plan has been written in line with Government planning policy and guidance, set out in the National Planning Policy Framework (2023) and Planning Practice Guidance.

- The submission draft District Plan has been written in accordance with legislation and regulations.⁵
- The submission draft 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 submission draft District Plan has been informed by background evidence. The background evidence will be made available to view on the Council’s website.⁶

5. When will people be involved?

Proposed Submission draft (Regulation 19)	Following agreement by Council, the Council will publish the Proposed Submission District Plan for a six-week period in January 2024. During this time the public can make further representations on the submission draft District Plan and these will be considered by an independent Planning Inspector appointed by the Secretary of State to carry out the Examination in Public. The Council may make minor changes to the District Plan following publication.
Main Modifications	Should the independent Planning Inspector conclude that Main Modifications are required in order for the Plan to be found ‘sound’, these will be subject to a further consultation. If this is the case, a

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/>

	Community Involvement Plan will be published at that stage identifying how people can be involved.
Adoption	Assuming the Inspector concludes that it is sound (or can be made so if Main Modifications are accepted) the new District Plan is due to be adopted in 2024. No consultation is 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:

- Issue a press release, and utilise social media;
- Put all the details and documentation on the Council's website including an on-line response form.
- 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;
- Send letters or emails to all those who made a representation at Regulation 18 stage;
- Organise a briefing for District, Town and Parish Councils to disseminate information – individual briefings will be held where requested;
- Organise public exhibitions in accessible locations on request.
- All on-line material will be compatible with 'BrowseAloud' for people who find it difficult to read on-line;
- Provide an interactive version of the submission draft District Plan with accompanying interactive Policies Map to improve accessibility;
- 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;

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 (Oaklands, Oaklands Road, Haywards Heath, RH16 1SS) during normal office hours.

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 within the district and provide instructions for accessing the documentation on the Council website (which could be accessed using library PCs for example). Hard copies will also be sent to Town and Parish Councils to make available for the public to view.

The submission draft 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 interactive consultation portal, by email or by post. Electronic submissions are encouraged to facilitate ease of processing. A response form, following the Planning Inspectorate’s defined template for Regulation 19 stage, will be made available. 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

7. What happens to the results?

The Council is required to summarise the main issues raised and publish a consultation statement that sets out:

- Who was invited to make representations to the District Plan Consultation Draft, how this was done, a summary of the main issues raised and how they were taken into account
- Who was invited to make representations to the submission draft District Plan, how this was done, how many representations were received and a summary of the main issues raised.

All comments will be considered by the Planning Inspector appointed to carry out the examination. The Inspector may decide that some matters are of sufficient importance that they will be considered at the Examination hearing sessions. It will be for the Inspector to decide which matters are dealt with in the way and which parties will be invited to attend.

Notification that the submission draft District Plan has been submitted 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 concerns with your experience of a Council-led community involvement exercise, you should in the first instance contact the team using the details above.

⁷Such as the *Data Protection Act (2018)*

Model Representation Form for Local Plans (from [Model representation form for Local Plans - GOV.UK \(www.gov.uk\)](http://www.gov.uk))

LPA Logo	Local Plan Publication Stage Representation Form	Ref: (For official use only)
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Name of the Local Plan to which this representation relates:

Please return to [name of LPA] BY [time/ date/year]
NB - LPA to include data protection / privacy notice, see para 4 of Explanatory Note

This form has two parts –
Part A – Personal Details: need only be completed once.
Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*	2. Agent's Details (if applicable)
<i>*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.</i>	
Title	<input style="width: 250px; height: 25px;" type="text"/>
First Name	<input style="width: 250px; height: 25px;" type="text"/>
Last Name	<input style="width: 250px; height: 25px;" type="text"/>
Job Title (where relevant)	<input style="width: 250px; height: 25px;" type="text"/>
Organisation (where relevant)	<input style="width: 250px; height: 25px;" type="text"/>
Address Line 1	<input style="width: 250px; height: 25px;" type="text"/>
Line 2	<input style="width: 250px; height: 25px;" type="text"/>
Line 3	<input style="width: 250px; height: 25px;" type="text"/>
Line 4	<input style="width: 250px; height: 25px;" type="text"/>
Post Code	<input style="width: 250px; height: 25px;" type="text"/>
Telephone Number	<input style="width: 250px; height: 25px;" type="text"/>
E-mail Address (where relevant)	<input style="width: 250px; height: 25px;" type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

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TREASURY MANAGEMENT STRATEGY STATEMENT AND ANNUAL INVESTMENT STRATEGY 2024/25 TO 2026/27

REPORT OF: DIRECTOR OF RESOURCES AND ORGANISATIONAL DEVELOPMENT
Contact Officer: Rachel Jarvis, Assistant Director Corporate Resources (S151)
Email: rachel.jarvis@midsussex.gov.uk
Wards Affected: All
Key Decision: No
Report to: Council
13 December 2023

Purpose of Report

1. The report sets out the Council's rolling investment and borrowing strategy for the forthcoming three years and reports the counterparty list with which investments may be made. It also sets out the Prudential Limits that provide the parameters for approved future lending and borrowing, including the incidental cost of so doing. The strategy at Appendix A was approved by Audit Committee at its meeting of 28 November 2023 for recommendation to Council. Appendix 2 then sets out the Mid Year report (including Quarter 1) confirming practice has aligned to policy.
2. Following a discussion at Audit Committee it is proposed to formally document strengthening the commitment to investing with counterparties that meet our ESG (Environmental, Social and Governmental) ambitions, as per our Sustainable Economic Strategy. Thus clearer wording is proposed at paragraph 9 below.

Summary

3. The lending is restricted to the same counterparties and within the same limits as in the previous strategy approved in February 2023 except for the following amendments:
 - (i) Add Lloyds Bank Corporate Markets to the list of approved counterparties.
 - (ii) Increase the counterparty limit for Lloyds Group Entities from £7m to £9m.

Recommendations

4. Council is recommended to agree:
 - (i) the proposed Treasury Management Strategy Statement (TMSS) for 2024/25 and the following two years, including the additional clarity suggested at paragraph 9 below.
 - (ii) the Annual Investment Strategy (AIS) and the Minimum Revenue Provision Statement (MRP) as contained in Sections 4 and 2.3 respectively of the report;
 - (iii) the proposed amendments to the specified and non-specified investment appendices;
 - (iv) the Prudential Indicators contained within this report.
 5. Council is recommended to endorse the Treasury Management activity for the half year to 30 September 2023 as attached in Appendix 2
-

Background

6. The Council's approach to investments is to pursue a low-risk strategy which favours security over yield. There are some proposals in this report intended to increase yield with marginally more risk, however, these proposals diversify the portfolio and extend the spread of risk.
7. Other options are available, which may return higher yields such as not using the lowest common denominator method of selecting counterparties or extending the range of foreign banks, but these could potentially expose the Council to further risk.
8. The service provider endeavours to undertake due care when reviewing counterparties ESG credentials. This is an on-going process of monitoring existing counterparties. As an example, the service provider reviews the money market fund's investments and divests where considered appropriate. The market for the environmental aspect of ESG is in its early stages, however, the service provider will investigate authorities investing in sustainability projects and where appropriate recommend those as ESG investments, as well as continuing to actively talk to the market recommending investments deemed to have an appropriate balance of risk and yield.
9. Following a discussion at Audit Committee the Council is asked to approve clearer wording to be added to the strategy. This has been provisionally discussed and agreed with Adur Worthing. This will underline that the Council will actively seek to invest in organisations that minimise their impact on the environment in consideration of Environmental, Social and Governance factors when placing any investment with current or new counterparties. This includes, where possible, divesting of current counterparties which do not meet these goals, as has been undertaken with a review of foreign counterparties and transparency requirements. The Council, through the SLA agreement with Adur Worthing, will continue to actively monitor these emerging ESG markets for new investments. However, the Council will remain committed to ensuring any actions do not jeopardise the Council's capital invested, cause any other undue financial risk or adversely affect yields.
10. Aligned to the annual budget plan, the treasury management operation is to ensure that this cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in high-quality counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity initially, before considering investment return. This is consistent with national guidance which promotes security and liquidity above yield.
11. The second main function of the treasury management service is consideration of the funding of the Council's capital plans. These capital plans provide a guide to the borrowing needs of the Council, essentially the longer-term cash flow planning, to ensure that the Council can meet its capital spending obligations.
12. The contribution the treasury management function makes to the authority is critical to ensure liquidity or the ability to meet spending commitments as they fall due, either on day-to-day revenue or for larger capital projects. Since cash balances generally result from reserves and balances, it is paramount to ensure adequate security of the sums invested, as a loss of principal will in effect result in a loss to the General Fund Balance.
13. CIPFA defines treasury management as: *"The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."*

14. Whilst any commercial initiatives or loans to third parties will impact on the treasury function, these activities are generally classed as non-treasury, (arising usually from capital expenditure), and are separate from the day to day treasury management activities.

Policy Context

15. Providing transparency and approval of the strategies contained in this report is an important part of the Council's statutory role. Treasury Management has become increasingly topical given the nature of the world's financial markets in recent years, and Members are expected to have a basic understanding of how the Council uses its reserves and cash flows which are in the stewardship of the Assistant Director Corporate Resources.

Other Options Considered

16. This report is statutorily required.

Financial Implications

17. This report has no quantifiable financial implications. Interest payable and interest receivable arising from treasury management operations, and annual revenue provisions for repayment of debt, form part of the revenue budget but are not required to support the provision of services.

Risk Management Implications

18. This report has no specific implications for the risk profile of the Authority.

Equality and Customer Service Implications

19. None.

Other Material Implications

20. None.

Appendices

- Appendix 1 - Treasury Management Strategy Statement & Annual Investment 2024/25 to 2026/27
- Appendix 2 – Review of Treasury Management Activity 1 April – 30 September 2023

Background Papers

- Treasury Management Strategy Statement & Annual Investment Strategy 2023/24 to 2025/26 (February 2023)
- Annual Review of Treasury Management 2022-23 (September 2023)
- Review of Treasury Management Activity 1 April – 30 September 2023 (on this agenda)
- Treasury Management in the Public Services: Code of Practice and Cross Sectoral Guidance Notes (CIPFA, December 2021) and CIPFA Treasury Management Guidance Notes 2021
- The Prudential Code for Capital Finance in Local Authorities (CIPFA, December 2021)
- Draft Corporate Plan 2024/25
- Link Asset Services report template 2023/24

Treasury Management Strategy Statement & Annual Investment 2024/25 to 2026/27

INTRODUCTION

1.1 Reporting requirements

1.1.1 Capital Strategy

The CIPFA revised 2021 Prudential and Treasury Management Codes require all local authorities to prepare a capital strategy report which will provide the following:

- a high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
- an overview of how the associated risk is managed
- the implications for future financial sustainability

The aim of this capital strategy is to ensure that all elected members on the Full Council fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite.

1.1.2 Treasury Management Reporting

The Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals:

a. Prudential and treasury indicators and treasury strategy (this report) - the first, and most important report covers:

- the capital plans (including prudential indicators);
- a minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
- the treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
- an investment strategy (the parameters on how investments are to be managed).

The approval of the Treasury Management Strategy and Annual Investment Strategy is the function of the Council, however,, the Assistant Director Corporate Resources (S151) shall also report to the Audit Committee on treasury management activity performance as follows:

b. A mid year Treasury Management report – This will update Members on the progress of the capital position, amending prudential indicators as necessary, and whether any policies require revision. The report will be submitted as soon after 30 September as practically possible.

c. An annual treasury report – This provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy. The report will be submitted no later than 30 September after the financial year end.

d. Quarterly reports – In addition to the three major reports detailed above, from 2023/24 quarterly reporting is also required. However, these additional reports do not have to be reported to Full Council but do require to be adequately scrutinised. It is intended to include this reporting as part of one of our existing reports.

1.2 Scrutiny

The above reports are required to be adequately scrutinised before being recommended to the Council. This role is undertaken by the Audit Committee, which may make recommendations regarding any aspects of treasury management policy and practices it considers appropriate in fulfilment of its scrutiny role. Such recommendations, as may be made shall be incorporated within the above named reports and submitted to meetings of the Council for consideration at the next available opportunity. The Council's Scheme of Delegations is set out in Appendix E.

1.3 **Treasury Management Strategy for 2024/25**

The strategy for 2024/25 covers two main areas:

Capital issues

- the capital expenditure plans and the associated prudential indicators;
- the minimum revenue provision (MRP) policy.

Treasury Management issues

- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- prospects for interest rates;
- the borrowing strategy;
- policy on borrowing in advance of need;
- debt rescheduling;
- the investment strategy;
- creditworthiness policy; and
- policy on use of external service providers.

These elements cover the requirements of the Local Government Act 2003, DLUHC Investment Guidance, DLUHC MRP Guidance, the CIPFA Prudential Code and the CIPFA Treasury Management Code.

1.4 **Training**

The CIPFA Code requires the responsible officer to ensure that Members with responsibility for treasury management receive adequate training. This especially applies to Members responsible for scrutiny. Training was supplied to Members by Link Asset Services on the 13th December 2022. Similar training is being arranged for January 2024. The training needs of the treasury management officers at Adur District Council, who provide the shared treasury service to Mid Sussex District Council, are periodically reviewed. Officers attend courses provided by appropriate trainers such as CIPFA and Link Asset Services. As of 1st April 2023, a log of training undertaken will be maintained by the Group Accountant responsible for the treasury function in compliance with the revised 2021 CIPFA Treasury Management Code.

1.5 **External Service Providers**

The Council obtains Treasury Management services under a Shared Services Arrangement (SSA) from the in-house treasury management team formed out of the partnership working between Adur District and Worthing Borough Councils. The operation for all three Councils' treasury management is based at Worthing Town Hall, utilising similar banking arrangements.

The SSA is provided under a Service Level Agreement (SLA) that commenced in October 2022 and which defines the respective roles of the client and provider authorities for a period of three years.

The SSA uses Link Group, Treasury Solutions as its external treasury management advisors. The Council recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources.

In making this arrangement the Council recognises that responsibility for Treasury Management decisions remains with the organisation at all times and will ensure that reliance beyond the terms and arrangements specified in the SLA is not placed upon the shared service providers. The Council will ensure that the terms of the appointment of the shared services providers, and the methods by which their value will be assessed, are properly agreed and documented and subjected to regular review.

2. THE CAPITAL PRUDENTIAL INDICATORS 2024/25 – 2026/27

The Council's capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the Prudential Indicators, which are designed to assist Members' overview and confirm capital expenditure plans.

2.1 Capital expenditure

This Prudential Indicator is a summary of the Council's capital expenditure plans, both those agreed previously and those forming part of this budget cycle. The figures exclude other long-term liabilities, such as leasing arrangements which already include borrowing instruments. These forecasts are based on the information which was available at the time and are intended to be indicative but changes to the Capital Strategy may have been approved by other committees.

Capital expenditure £m	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
General Fund	4.633	12.377	10.310	2.256	1.054

The table below summarises the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

Financing of capital expenditure £m	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Capital receipts	0.746	2.981	0.413	0.299	0.079
Capital grants, Contributions & S106 receipts	2.837	5.701	8.664	1.882	0.900
General Reserves, Specific Reserves & Revenue Contributions	1.050	3.695	1.064	0.075	0.075
Net financing need for the year	0.000	0.000	0.000	0.000	0.000

2.2 The Council's borrowing need (the Capital Financing Requirement)

The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's indebtedness and so it's underlying borrowing need. Any capital expenditure above, which has not immediately been paid for through a revenue or capital resource, will increase the CFR.

The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the indebtedness in line with each asset's life and so charges the economic consumption of capital assets as they are used.

The CFR includes any other long-term liabilities (e.g. finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility, so the Council is not required to separately borrow for these schemes. The Council currently has one finance lease taken out in 2018 and ending in 2028.

The Council is asked to approve the CFR projections below:

Capital Financing Requirement £m	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Total CFR at 31/03	6.114	5.714	5.307	4.894	4.481
Movement in CFR	(0.547)	(0.401)	(0.407)	(0.413)	(0.419)
Movement in CFR represented by:					
Net financing need for the year (above)	(0.000)	0.000	0.000	0.000	0.000
Less MRP and other financing movements	(0.547)	(0.401)	(0.407)	(0.413)	(0.419)
Movement in CFR	(0.547)	(0.401)	(0.407)	(0.413)	(0.419)

2.3 Liability Benchmark

A third and new prudential indicator for 2023/24 is the Liability Benchmark (LB). this is shown in the Mid-Year review elsewhere on the agenda.

2.4 Minimum revenue provision (MRP) policy statement

The Council is required to pay off an element of the accumulated General Fund capital spend each year (the CFR) through a revenue charge (the minimum revenue provision - MRP), although it is also allowed to undertake additional voluntary payments if required (voluntary revenue provision - VRP). Repayments included in finance leases are applied as MRP.

DLUHC regulations have been issued which require the full Council to approve an MRP Statement in advance of each year. A variety of options is provided to councils, so long as there is a prudent provision. The Council is recommended to approve the following MRP Statement:

The Council's policy for MRP relating to unfunded capital expenditure is to provide for MRP on an annuity basis over the life of the loans (except as detailed below for the Orchard Shopping Centre). As an annuity is a fixed annual sum comprising interest and principal, the MRP for repayment of debt will increase each year over the asset life as the proportion of interest calculated on the principal outstanding reduces as the debt is repaid.

The purchase of the Orchard Shopping Centre head lease in November 2016 increased the Capital Financing Requirement. However, due to capital receipts on Hurst Farm, MRP will only be provided on £5m. This will be done on a level basis of £100,000 per year.

3.0 BORROWING

The capital expenditure plans set out in Section 2 provide details of the service activity of the Council. The treasury management function ensures that the Council's cash is organised in

accordance with the relevant professional codes so that sufficient cash is available to meet the service activity and the Council's capital strategy. This will involve both the organisation of the cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

3.1 Current portfolio position

The overall treasury management portfolio as at 31 March 2023 and for the position as at 30 September 2023 are shown below for both borrowing and investments.

Note: the investment balances are at a point in time indicated in the table but there can be considerable variations throughout the year, with peaks and troughs on the cash flow.

	Principal at 31.03.2023 £m	Actual 31.03.2023 %	Principal at 30.09.2023 £m	Actual 30.09.2023 %
External Borrowing				
PWLB	(0.000)	0%	(0.000)	0%
Finance lease	(1.676)	100%	(1.526)	100%
TOTAL BORROWING	(1.676)	100%	(1.526)	100%
Treasury Investments:				
Local Authority Property Fund	5.584	8%	5.512	6%
In-house:				
Banks	21.041	37%	27.360	31%
Building societies - unrated	27.500	15%	24.000	26%
Building societies - rated	11.000	24%	19.000	21%
Debt Management Office	18.000	7%	8.000	9%
Local authorities	8.000	11%	4.000	4%
Money market funds	4.230	6%	3.170	3%
TOTAL INVESTMENTS	74.315	100%	91.042	100%
NET INVESTMENTS	72.639		89.516	

The Council's forward projections for borrowing are summarised below. The table shows the actual external debt, against the underlying capital borrowing need (the Capital Financing Requirement - CFR), highlighting any over or under borrowing.

External Debt £m	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
Debt at 1 April	0.152	0.000	0.000	0.000	0.000
Expected change in Debt	(0.152)	(0.000)	(0.000)	(0.000)	0.000
Other long-term liabilities (OLTL)	1.970	1.676	1.375	1.069	0.756
Expected change in OLTL	(0.294)	(0.301)	(0.306)	(0.313)	(0.319)
Actual gross debt at 31 March	1.676	1.375	1.069	0.756	0.436
The Capital Financing Requirement	6.114	5.714	5.307	4.894	4.894
Under borrowed	4.438	4.339	4.238	4.138	4.458

The Council's only debt comprises of a finance lease categorised as "other long term liability".

Within the range of Prudential Indicators, there are a number of key indicators to ensure that the Council operates its activities within well-defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for 2024/25 and the following two financial years. This allows some flexibility for limited early borrowing for future years but ensures that borrowing is not undertaken for revenue or speculative purposes.

The Assistant Director of Corporate Resources reports that the Council complied with this Prudential Indicator in the current year and does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this report.

3.2 Treasury Indicators: limits to borrowing activity.

The operational boundary - This is the limit which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt and the ability to fund under-borrowing by other cash resources.

Operational Boundary	2023/24	2024/25	2025/26	2026/27
	£m	£m	£m	£m
Debt	£28.0m	£28.0m	£28.0m	£28.0m
Other long-term liabilities	£4.0m	£4.0m	£4.0m	£4.0m
Total	£32.0m	£32.0m	£32.0m	£32.0m

The authorised limit for external debt – This is a key Prudential Indicator and represents a control on the maximum level of borrowing. This represents a legal limit beyond which external debt is prohibited, and this limit needs to be set or revised by the full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.

The Council is asked to approve the authorised limit:

Authorised Limit	2023/24	2024/25	2026/27	2027/28
	£m	£m	£m	£m
Debt	£30.0m	£30.0m	£30.0m	£30.0m
Other long-term liabilities	£4.0m	£4.0m	£4.0m	£4.0m
Total	£34.0m	£34.0m	£34.0m	£34.0m

This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all councils' plans or those of a specific council, although this power has not yet been exercised.

The Assistant Director of Corporate Resources has delegated authority, within the total limit for any individual year, to effect movement between the separately agreed limits for borrowing and other long-term liabilities. Decisions will be based on the outcome of financial option appraisals and best value considerations. Any movement between these separate limits will be reported to the next meeting of the Council at the earliest opportunity.

3.3 Prospects for interest rates

The Council has appointed Link Group as its treasury advisor and part of their service is to assist the Council to formulate a view on interest rates. Refer to section 4 of the Mid Year review elsewhere on the agenda.

3.4 Borrowing for capital expenditure

Link's long-term forecast (beyond 10 years) for Bank Rate is 2.50%. If the Council is not able to avoid borrowing to finance new capital expenditure, there will be a cost of carry, (the difference between higher borrowing costs and lower investment returns), to any new borrowing that causes a temporary increase in cash balances as this position will, most likely, incur a revenue cost. However, there is currently no anticipated borrowing requirement.

3.5 Borrowing strategy

The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow has been used as a temporary measure. This strategy is prudent as investment returns are good and counterparty risk is an issue that is kept under review.

Against this background and the risks within the economic forecast, caution will be adopted with the 2023/24 treasury operations. The Assistant Director Corporate Resources will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:

As stated, there are no current plans to borrow, but if this changes, it is most likely that fixed rate funding will be drawn for a short period until they return to lower rates.

Any decisions will be reported to the appropriate decision-making body at the next available opportunity.

3.6 Policy on borrowing in advance of need

The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds. Risks associated with any borrowing in advance activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism

3.7 Debt rescheduling

The Council had one loan from the Public Works Loan Board, repaid by fixed annuities over the life of the loan, which ended in March 2023, therefore no debt rescheduling is anticipated.

3.8 New financial institutions as a source of borrowing and/or types of borrowing

Currently, the PWLB Certainty Rate is set at gilts + 80 basis points for borrowing. However, if borrowing is required, consideration may still need to be given to sourcing funding from the following sources for the following reasons:

- Local authorities (primarily shorter dated maturities out to 3 years or so – still cheaper than the Certainty Rate).
- Financial institutions (primarily insurance companies and pension funds but also some banks, out of forward dates where the objective is to avoid a "cost of carry" or to achieve refinancing certainty over the next few years).
- Municipal Bonds Agency (possibly still a viable alternative depending on market circumstances prevailing at the time).

Our advisors will keep us informed as to the relative merits of each of these alternative funding sources if any borrowing is required.

4.0 ANNUAL INVESTMENT STRATEGY

4.1 Investment policy – management of risk

The Council's investment policy has regard to the following:

- DLUHC's Guidance on Local Government Investments ("the Guidance")
- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2021 ("the Code")
- CIPFA Treasury Management Guidance Notes 2021

The Council's investment priorities will be security first, portfolio liquidity second and then yield, (return).

The Assistant Director Corporate Resources, under delegated powers, will undertake through the Shared Service Arrangement the most appropriate form of investments in keeping with the investment objectives, income and risk management requirements, and Prudential Indicators. Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months). Greater returns are usually obtainable by investing for longer periods. While most cash balances are required in order to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer term investments will be carefully assessed. For cash flow balances, the Councils will seek to use notice accounts, money market funds, call accounts and short-dated deposits to benefit from the compounding of interest.

If it is thought that Bank Rate is likely to rise significantly within the time horizon being considered, then consideration will be given to keeping most investments as being short term or variable.

Conversely, if it is thought that Bank Rate is likely to fall within that time period, consideration will be given to locking in higher rates currently obtainable, for longer periods.

The proposed Specified and Unspecified investments will remain the same as for 2023/24 except for:

- i. Add Lloyds Bank Corporate Markets to the list of approved counterparties.
- ii. Increase the counterparty limit for Lloyds from £7m to £9m.

Investment instruments identified for use in the financial year are listed in Appendices C and D under the 'specified' and 'non-specified' investments categories. Counterparty limits will be as set through the Council's treasury management practices.

The above guidance from the DLUHC and CIPFA places a high priority on the management of risk. This authority has adopted a prudent approach to managing risk and defines its risk appetite by the following means:

Minimum acceptable **credit criteria** are applied in order to generate a list of highly credit-worthy counterparties. This also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the short-term and long-term ratings.

Other information: ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets.

To achieve this consideration the Council will engage with the advisors to maintain a monitor on market pricing such as “credit default swaps” (a financial derivative or contract that allows an investor to “swap” or offset his or her credit risk with that of another investor) and overlay that information on top of the credit ratings.

Other information sources used will include the financial press, share price and other such information pertaining to the financial sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.

This authority has defined the list of **types of investment instruments** that the Treasury Management team are authorised to use. There are two lists in appendices C and D under the categories of ‘specified’ and ‘non-specified’ investments.

- **Specified investments** are those with a high level of credit quality and subject to a maturity limit of one year or have less than a year left to run to maturity if originally they were classified as being non-specified investments solely due to the maturity period exceeding one year.
- **Non-specified investments** are those with less high credit quality, may be for periods in excess of one year, and/or are more complex instruments which require greater consideration by members and officers before being authorised for use.

1. **Lending limits**, (amounts and maturity), for each counterparty are set out in Appendices C and D.
2. This authority will set a limit for the amount of its investments which are invested for **longer than 365 days**, (see paragraph 4.8).
3. Investments will only be placed with counterparties from countries with a specified minimum **sovereign rating**, (see paragraph 4.5). The UK is excluded from this limit because it will be necessary to invest in UK banks and other institutions even if the sovereign rating is cut.
4. Through the shared service, this authority has access to **external consultants**, to provide expert advice on how to optimise an appropriate balance of security, liquidity and yield, given the risk appetite of this authority in the context of the expected level of cash balances and need for liquidity throughout the year.
5. All investments will be denominated in **sterling**.
6. As a result of the change in accounting standards for 2022/23 under IFRS 9, this Authority will consider the implications of investment instruments which could result in an adverse movement in the value of the amount invested and resultant charges at the end of the year to the General Fund. (In November 2018, the MHCLG, concluded a consultation for a temporary override to allow English local authorities time to adjust their portfolio of all pooled investments by announcing a statutory override to delay implementation of IFRS 9 for five years ending 31.3.23, in December 2022 as a result of further consultation the implementation was further delayed until 31st of March 2025.

However, this authority will also pursue **value for money** in treasury management and will monitor the yield from investment income against appropriate benchmarks for investment performance, (see paragraph 4.14). Regular monitoring of investment performance will be carried out during the year.

4.2 **Changes in risk management policy from last year**

The above criteria are unchanged from last year.

4.3 **Creditworthiness policy**

The primary principle governing the Council's investment criteria through the Shared Services Arrangement (SSA) is the security of its investments, although the yield or return on the investment is also a key consideration. After this main principle, the SSA will ensure that:

- It maintains a policy covering both the categories of investment types it will invest in, criteria for choosing investment counterparties with adequate security and monitoring their security. This is set out in the specified and non-specified investment sections in Appendices C and D; and
- It has sufficient liquidity in its investments. For this purpose, it will set out procedures for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the Council's Prudential Indicators covering the maximum principal sums invested.

The SSA will maintain a counterparty list in compliance with the criteria in the Appendices and will revise the criteria and submit them to Council for approval as necessary. These criteria are separate to that which determines which types of investment instrument are either specified or non-specified as it provides an overall pool of counterparties considered high quality which the Council may use, rather than defining what types of investment instruments are to be used.

Credit rating information is supplied to the SSA by the Link Group, their treasury advisors, on all active counterparties that comply with the criteria below. Any counterparty failing to meet the criteria would be omitted from the counterparty (dealing) list. Any rating changes, rating Watches (notification of a likely change), and rating Outlooks (notification of the longer-term bias outside the central rating view) are provided to the SSA almost immediately after they occur, and this information is considered before dealing. For instance, a negative rating Watch applying to a counterparty at the minimum Council criteria will be suspended from use, with all others being reviewed in light of market conditions.

4.4 Use of additional information other than credit ratings

Additional requirements under the Code require the Council to supplement credit rating information. Whilst the above criteria rely primarily on the application of credit ratings to provide a pool of appropriate counterparties for officers to use, additional operational market information will be applied before making any specific investment decision from the agreed pool of counterparties. This additional market information will be applied to compare the relative security of differing investment opportunities.

The officers of the shared service recognise that ratings should not be the sole determinant of the quality of an institution and that it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets, the government support for banks, and the credit ratings of that government support. Accordingly, the shared service will exercise discretion to deviate from Link's suggested durational bands – for example, the Council approves the use of Building Societies as set out in the Appendices.

4.5 Creditworthiness

Following the Government's fiscal event on 23rd September 2022, both S&P and Fitch placed the UK sovereign debt rating on Negative Outlook, reflecting a downside bias to the current ratings in light of expectations of weaker finances and a challenging economic outlook. Nothing further has evolved in the first half of 2023/24.

4.6 CDS prices

Credit Default Swaps (CDS) are credit derivative contracts that enable investors to swap credit risk on a company with another counterparty. They are market indicators of credit risk.

Although CDS prices for UK banks spiked at the outset of the pandemic in 2020, they then subsequently returned to near pre-pandemic levels. However, sentiment can easily shift, so it remains important to undertake continual monitoring of all aspects of risk and return in the current circumstances. Link monitor CDS prices as part of their creditworthiness service to local authorities and the SSA has access to this information via its Link-provided Passport portal.

4.7 **The Council's Minimum Investment Creditworthiness Criteria**

The minimum credit ratings criteria used by the Council generally will be a short term rating (Fitch or equivalents) of F1, and long term rating A-. There may be occasions when the counterparty ratings from one or more of the three Ratings Agencies are marginally lower than the minimum requirements of F1 Short term, A- Long term (or equivalent). Where this arises, the counterparties to which the ratings apply may still be used with discretion, but in these instances consideration will be given to the whole range of topical market information available, not just ratings.

The Council includes **Building Societies** with asset size in excess of £1 billion in its approved counterparty list. It is recognised that they may carry a lower credit rating than the Council's other counterparties or no rating, therefore the lending limits for the building societies shall be £4m each for the top 5 and £3m for the others.

4.8 **Other limits**

Due care will be taken to consider the exposure of the Council's total investment portfolio to non-specified investments, countries, groups, and sectors. The shared service has determined that it will only use approved counterparties from countries (other than the UK) with a minimum sovereign credit rating of AA- from Fitch Ratings (or equivalent from other agencies if Fitch does not provide one). The list of countries that qualify using these credit criteria as at the date of this report is reflected in the counterparty approved lending list at Appendix C. This list will be added to, or deducted from, by officers should ratings change, in accordance with this policy. No more than 25% of investments shall be placed in non-UK financial institutions for more than 7 days.

4.9 **Investment strategy**

In-house funds - Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e., rates for investments up to 12 months). Greater returns are usually obtainable by investing for longer periods. While most cash balances are required in order to manage the ups and downs of cash flow, where cash sums can be identified that could be invested for longer periods, the value to be obtained from longer term investments will be carefully assessed. For cash flow balances, the shared service will seek to use notice accounts, money market funds and short-dated deposits to benefit from the compounding of interest.

- If it is thought that Bank Rate is likely to rise significantly within the time horizon being considered, then consideration will be given to keeping most investments as being short term or variable.
- Conversely, if it is thought that Bank Rate is likely to fall within that time period, consideration will be given to locking in higher rates currently obtainable, for longer periods.

The Assistant Head Corporate Resources, through the shared service, will undertake the most appropriate form of investments in keeping with the investment objectives, income and risk management requirements and Prudential Indicators. Decisions taken on the core investment portfolio will be reported to the meetings of the Audit Committee and the Council in accordance with the reporting arrangements. The shared service will take into account the ethical, social or climate change policies of counterparties.

4.10 Investment Returns Expectations

The suggested budgeted investment earnings rates for returns on investments placed for periods up to about three months during each financial year are as follows.:

Average earnings in each year	
2023/24	4.30%
2024/25	5.00%
2025/26	3.00%
2026/27	2.30%
Long term later years	2.20%

4.11 Investment treasury indicator and limit - principal funds invested for greater than 365 days

These limits are set with regard to the Council's liquidity requirements and to reduce the need for early sale of an investment, and are based on the availability of funds after each year-end. There are currently 3 fixed-term deposit investments with a remaining duration of more than 365 days, totalling £6m and the Local Authorities' Property Fund investment of £6m is expected to be held for more than 365 days.

The Council is asked to approve the following treasury indicator limit: -

Maximum proportion of principal sums invested > 365 days	2024/25	2025/26	2026/27
Principal sums invested > 365 days	50%	50%	50%

In any sustained period of significant stress in the financial markets, the default position is for investments to be placed with The Debt Management Account Deposit Facility of the Debt Management Office (DMO) of the UK central government. The rates of interest are usually below equivalent money market rates, however, the returns are an acceptable trade-off for the guarantee that the Council's capital is secure.

The Council's proposed investment activity for placing cash deposits in 2024/25 will be to use:

- AAA rated Money Market Funds with a Constant Net Asset Value (CNAV) or a Low Volatility Net Asset Value (LVNAV) under the new money market fund regulations
- other local authorities, parish councils etc.
- bank business reserve accounts and term deposits. These are primarily restricted to UK institutions that are rated at least A- long term.
- Building Societies with asset size in excess of £1 billion

4.12 Other Options for Longer Term Investments

To provide the Council with options to enhance returns above those available for short term durations, it is proposed to retain the option to use the following for longer-term investments, as an alternative to cash deposits:

- a) **Supranational bonds** greater than 1 year to maturity
- b) **Gilt edged securities** with a maturity of greater than one year. These are Government bonds and so provide the highest security of interest and the repayment of principal on maturity. Similar to category (a) above, the value of the bond may rise or fall before maturity and losses may accrue if the bond is sold before maturity.
- c) **Building Societies** not meeting the basic security requirements under the specified investments, but on the list in Appendix C (b). The operation of some building societies does not require a credit rating, although in every other respect the security of the society would match similarly sized societies with ratings.
- d) Any **bank** that has a minimum long term credit rating of A- for deposits with a maturity of greater than one year (including forward deals in excess of one year from inception to repayment).
- e) Any **non-rated subsidiary** of a credit rated institution included in the specified investment category. These institutions will be included as an investment category subject to a guarantee from the parent company, and exposure up to the limit applicable to the parent.
- g) **Property Investment Funds** for example the Local Authorities' Property Fund. The Councils will consult the Treasury Management Advisors and undertake appropriate due diligence before investment of this type is undertaken. Some of these funds are deemed capital expenditure – the Councils will seek guidance on the status of any fund considered for investment.
- h) Other **local authorities**, parish councils etc.
- i) Other investments listed in Appendices C and D - the Council will seek further advice on the appropriateness and associated risks with investments in these other categories as and when an opportunity presents itself.

The **accounting treatment** may differ from the underlying cash transactions arising from investment decisions made by the Council. To ensure that the Council is protected from any adverse revenue impact, which may arise from these differences, the accounting implications of new transactions will be reviewed before they are undertaken.

The Council will not transact in any investment that may be deemed to constitute capital expenditure (e.g. Share Capital, or pooled investment funds other than Money Market Funds), without the resource implications being approved as part of the consideration of the Capital Programme or other appropriate Committee report.

4.13 **Investment risk benchmarking**

The shared service will subscribe to Link's Investment Benchmarking Club to review the investment performance and risk of the portfolios.

At the end of the financial year, the Council will report on investment activity as part of the **Annual Treasury Report**.

4.14 **External fund managers**

The Council does not use external fund managers, (other than the Local Authorities' Property Fund) but reserves the option to do so in future should this be deemed to be appropriate. Should consideration be given to exercising this option in the future, the relevant Committee will be advised of the reasons for doing so and the Council requested to consider whether it wishes to proceed with the selection and appointment of external fund managers.

4.15 **The monitoring of investment counterparties**

The credit rating of counterparties will be monitored regularly. The shared service receives credit rating information (changes, rating watches and rating outlooks) from Link Group as and when ratings change, and counterparties are checked promptly. On occasion, ratings may be downgraded when an investment has already been made. The criteria used are such that a minor downgrading should not affect the full receipt of the principal and interest. Any counterparty failing to meet the criteria will be removed from the list immediately by the shared service, and if required, new counterparties which meet the criteria will be added to the list.

5. OTHER MATTERS

5.1 **2021 revised CIPFA Treasury Management Code and Prudential Code – changes which will impact on future TMSS/AIS reports and the risk management framework.**

CIPFA published the revised codes on 20th December 2021 and has stated that formal adoption is not required until the 2023/24 financial year. The Councils have to have regard to these codes of practice when they prepare the Treasury Management Strategy Statement and Annual Investment Strategy, and also related reports during the financial year, which are taken to the Full Councils for approval.

5.2 **Treasury Management**

Arising from the organisation's cash flows or treasury risk management activity, this type of investment represents balances which are only held until the cash is required for use. Treasury investments may also arise from other treasury risk management activity which seeks to prudently manage the risks, costs or income relating to existing or forecast debt or treasury investments.

Following the revised codes, the following adaptations have been made in this report:

- Inclusion of the liability benchmark in the strategy as shown in 2.2. · An amendment to the Treasury Management Practices to address Environmental, Social and Governance policy within the treasury management risk framework; as included in Appendix B.
- Maintenance of the knowledge and skills register for individuals involved in the treasury management function as addressed in 1.4.
- The adoption of Quarterly reporting for the year 2023/24 as detailed in 1.1.

5.3 **Balanced budget requirement**

The Council complies with the provisions of S32 of the Local Government Finance Act 1992 to set a balanced budget.

1. THE CAPITAL PRUDENTIAL AND TREASURY INDICATORS 2022/23 – 2026/27

1.1 The Council’s capital expenditure plans are the key driver of treasury management activity. The output of the capital expenditure plans is reflected in the Prudential Indicators, which are designed to assist Members’ overview and confirm capital expenditure plans.

Capital expenditure	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
	£m	£m	£m	£m	£m
General Fund	4.633	12.593	10.115	2.233	1.054

1.2 Affordability Prudential Indicators

The previous sections cover the overall capital and control of borrowing Prudential Indicators, but within this framework, Prudential Indicators are required to assess the affordability of the capital investment plans. These provide an indication of the impact of the capital investment plans on the Council’s overall finances. The Council is asked to approve the following indicators:

1.3 Ratio of financing costs to net revenue stream.

This indicator identifies the trend in the cost of capital (borrowing and other long term obligation costs net of investment income) against the net revenue stream.

	2022/23 Actual	2023/24 Estimate	2024/25 Estimate	2025/26 Estimate	2026/27 Estimate
	%	%	%	%	%
Ratio	-3.45%	-17.58%	-18.69	-6.23%	-5.67%

The estimates of financing costs include current commitments and the proposals in this budget report.

1.4 Maturity structure of borrowing

These gross limits are set to reduce the Council’s exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits. However as the Council currently has no loans.

The Council is asked to approve the following treasury indicators and limits:

Maturity structure of fixed interest rate borrowing 2024/25		
	Lower	Upper
Under 12 months	0%	80%
12 months to 2 years	0%	70%
2 years to 5 years	0%	80%
5 years to 10 years	0%	80%
Over 10 years	0%	60%

TREASURY MANAGEMENT PRACTICE (TMP1) – CREDIT AND COUNTERPARTY RISK MANAGEMENT

The MHCLG (now DLUHC) issued Investment Guidance in 2018, and this forms the structure of the Council's policy below. These guidelines do not apply to either trust funds or pension funds which operate under a different regulatory regime.

The key intention of the Guidance is to maintain the current requirement for councils to invest prudently, and that priority is given to security and liquidity before yield. In order to facilitate this objective the guidance requires this Council to have regard to the CIPFA publication Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes, which will apply to all investment activity. In accordance with the Code, the Council will comply with the treasury management practices (TMPs). This part, TMP 1(1), covering investment counterparty policy requires approval each year.

Annual investment strategy - The key requirements of both the Code and the investment guidance are to set an annual investment strategy, as part of the annual treasury strategy for the following year, covering the identification and approval of the following:

- The strategy guidelines for choosing and placing investments, particularly non-specified investments.
- The principles to be used to determine the maximum periods for which funds can be committed.
- Specified investments that the Council will use. These are high security (i.e. high credit rating, although this is defined by the Council, and no guidelines are given), and high liquidity investments in sterling and with a maturity of no more than a year.
- Non-specified investments, clarifying the greater risk implications, identifying the general types of investment that may be used and a limit to the overall amount of various categories that can be held at any time.

Strategy guidelines – The main strategy guidelines are contained in the body of the treasury strategy statement.

ESG – The Council will consider Environmental, Social and Governance factors when placing any investment with current or new counterparties. Where matters for concern are identified for any specific counterparty the Councils will consider placing future investments with other counterparties. A process of ongoing monitoring is underway for existing counterparties using ESG tracking services and available indices of bribery and corruption for the countries of domicile for the proposed counterparties. This is maintained by the SSA's Group Accountant (Strategic Finance).

Whilst there are no concerns regarding our banker, for operational reasons the Councils' own banker Lloyds bank is required to be exempt from this approach as we are contractually bound to them for the duration of our banking contract. These factors will always be considered when the contract is renewed.

In line with the approved strategy, the service provider endeavours to undertake due care when reviewing counterparties ESG credentials. This is an on-going process of monitoring existing counterparties. As an example, the service provider reviews the money market fund's investments by geographical location, and it is in this regard the review highlighted that HSBC and Invesco had lent to The People's Republic of China. In consultation with the section 151 officer the decision was taken to disinvest from those funds. They still remain on the list of approved counterparties but will not be used until such a time as they meet the authority's requirements.

From time to time the authority invests in other local authorities as there is an active market for inter authority lending. The service provider will investigate authorities investing in sustainability projects and where appropriate recommend those as ESG investments.

The market for the environmental aspect of ESG is in its early stages; the service provider is actively talking to the market and will recommend investments deemed to have an appropriate balance of risk and yield.

The investment strategy keeps scope for investments with foreign counterparties very limited. Therefore, there is no likelihood for the Authority directly investing in countries with corrupt regimes or human right violations.

SPECIFIED AND NON SPECIFIED INVESTMENTS

A variety of investment instruments will be used , subject to the credit quality of the institution and, depending on the type of investment made, it will fall into one of the categories below.

Specified Investments will be those that meet the criteria in the MHCLG Guidance, i.e. the investment

- is sterling denominated
- has a maximum maturity of 1 year or where the Council has the right to be repaid within 12 months or where the investment would have been classified as specified apart from originally being for a period longer than 12 months, once the remaining period to maturity falls to under 12 months
- meets the “high” credit criteria as determined by the Council or is made with the UK government or is made with a local authority in England, Wales and Scotland
- the making of which is not defined as capital expenditure under section 25(1)(d) in SI 2003 No 3146 (i.e. the investment is not loan capital or share capital in a body corporate).

These are considered low risk assets where the possibility of loss of principal or investment income is small.

“Specified” Investments identified for the Council’s use are:

- The UK Government such as the Debt Management Account Deposit Facility – there is no limit for these investments.
 - Deposits with UK local authorities
 - Deposits with banks and building societies
 - *Certificates of deposit with banks and building societies
 - *Gilts : (bonds issued by the UK government)
 - *Bonds issued by multilateral development banks
 - Pooled investment vehicles such as AAA Money Market Funds with a Constant Net Asset Value (Constant NAV) or appropriate Low Volatility Net Asset Value (LVNAV) that have been awarded an AAA rating by Standard and Poor’s, Moody’s and/or Fitch rating agencies.
 - Other Money Market Funds and Collective Investment Schemes– i.e. credit rated funds which meet the definition of a collective investment scheme as defined in SI 2004 No 534 and SI 2007 No 573.
- * Investments in these instruments will be on advice from the Shared Service’s treasury advisor.

Non Specified Investments

These are any investments which do not meet the specified investment criteria. Where appropriate, the Council will seek further advice on the associated risks with non-specified investments.

All Investments

For credit rated counterparties, the minimum criteria, excepting for the Council's own banker and the specified building societies, (see below) will be the short-term / long-term ratings assigned by various agencies which may include Moody's Investors Services, Standard and Poor's, Fitch Ratings, being:

Long-term investments (over 365 days): minimum: A- (Fitch) or equivalent

Or

Short-term investments (365 days or less): minimum: F1 (Fitch) or equivalent

For all investments the Shared Service will also take into account information on corporate developments of, and market sentiment towards, investment counterparties.

If the Council's own banker (currently Lloyds Bank) falls beneath the specified criteria, it will still be used for transactional purposes.

Where appropriate the Ring Fenced entities of banks will be used.

Within these bodies, and in accordance with the Code, the Council has set additional criteria to set the time and amount of monies which will be invested in these bodies, as detailed below.

APPENDIX C

APPROVED INVESTMENT INSTITUTIONS

Specified Investments identified for use by the Council.

New specified investments will be made within the following limits:

(a) Banks

Major U.K. and Foreign Banks and their wholly owned subsidiaries meeting the Council's approved investment criteria. RFB refers to Ring Fenced Bank – the separate core retail banking service.

Counterparty	Group	Maximum Sum	Maximum Period *
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	DMADF, DMO (Government)	N/A	No limit	
1	HSBC UK Bank PLC (RFB)	N/A	£5m	5 years
2	NatWest/ Royal Bank of Scotland Group (RFB)	£5m	£5m	5 years
3	Lloyds/ Bank of Scotland Group	£9m	£9m	5 years
4	Barclays Bank UK PLC (RFB)	N/A	£5m	5 years
5	Santander UK PLC	N/A	£5m	5 years
6	Clydesdale Bank PLC	N/A	£4m	5 years
7	Handelsbanken PLC	N/A	£5m	1 year
8	Goldman Sachs International Bank	N/A	£5m	5 years
9	Close Brothers Ltd	N/A	£5m	5 years
10	Standard Chartered Bank	N/A	£5m	5 years
11	The Australia and New Zealand Banking Group	N/A	£3m	1 year

*Specified investments are for a maximum period of 1 year, the maximum limits shown in this column are for non-specified investments with these institutions.

- (b) Building Societies
Building Societies (Assets in excess of £1 billion):

Rank	Name of Counterparty	Individual	
		Sum	Period*
1	Nationwide	£4m	3 years
2	Coventry	£4m	3 years
3	Yorkshire	£4m	3 years
4	Skipton	£4m	3 years
5	Leeds	£4m	3 years
6	Principality	£3m	3 years
7	West Bromwich	£3m	3 years
8	Newcastle	£3m	3 years
9	Nottingham	£3m	3 years
10	Cumberland	£3m	3 years
11	National Counties (Family)	£3m	3 years
12	Progressive	£3m	3 years
13	Cambridge	£3m	3 years
14	Monmouthshire	£3m	3 years
15	Newbury	£3m	3 years
16	Saffron	£3m	3 years
17	Leek United	£3m	3 years
18	Furness	£3m	3 years

- (c) Money Market Funds

Counterparty	Sum	For Short Term Operational Cash Flow Purposes
Invesco Aim – Sterling	£3m	
Blackrock Institutional Sterling Liquidity Fund	£3m	
Goldman Sachs Sterling Liquidity Reserve Fund	£3m	
HSBC Global Liquidity Fund	£3m	
Fidelity Institutional Cash Fund plc – Sterling	£3m	
CCLA Public Sector Deposit Fund	£3m	
JP Morgan GBP Liquidity LVNAV Fund	£3m	
Federated Short-Term Sterling Prime Liquidity Fund	£3m	

The limit for investing in any one Money Market Fund is £3 million. Total investments in Money Market Funds shall not exceed the higher of £9m or 25% of the total investment portfolio, for more than one week at any one time.

- (d) Local Authorities

Details	Individual	
	Sum	Period*
All Local Authorities	£5m	1 year

*Specified investments are for a maximum period of 1 year, the maximum period limits shown in (b) and (d) are for non-specified investments with these institutions. Local Authorities where there is Government intervention are excluded.

NON-SPECIFIED INVESTMENTS DETERMINED FOR USE BY THE COUNCIL

Having considered the rationale and risk associated with Non-Specified Investments, the following have been determined for the Council's use.

	In-house use	Use by Fund Managers	Maximum Maturity	Maximum % of portfolio or £m	Capital Expenditure?
<ul style="list-style-type: none"> • Deposits with banks and building societies • Certificates of deposit with banks and building societies 	√	√	5 years	The higher of £10m or 50% of funds	No
<ul style="list-style-type: none"> • Deposits with Local Authorities 	√		5 years	The higher of £10m or 50% of funds	No
Gilts and Bonds: <ul style="list-style-type: none"> • Gilts • Bonds issued by multilateral development banks • Bonds issued by financial institutions guaranteed by the UK government • Sterling denominated bonds by non-UK sovereign governments 	√ √ √ √ (on advice from treasury advisor)	√ √ √ √	5 years	The higher of £3m or 25% of funds	No
Money Market Funds and Collective Investment Schemes (pooled funds which meet the definition of a collective investment scheme as defined in SI 2004 No. 534 and SI 2007, No. 573), but which are not credit rated.	√ (on advice from treasury advisor)	√	These funds do not have a defined maturity date.	The higher of £9m or 25% of funds	No
Government guaranteed bonds and debt instruments (e.g. floating rate notes) issued by corporate bodies	√ (on advice from treasury advisor)	√	5 years	The higher of £2m or 10% of funds	Subject to test
Property Funds approved by HM Treasury and operated by managers regulated by the Financial Conduct Authority – specifically the Local Authorities' Property Fund	√	√	These funds do not have a defined maturity date.	The higher of £6m or 25% of funds	No
Non-guaranteed bonds and debt instruments (e.g. floating rate notes) issued by corporate bodies	√ (on advice from treasury advisor)	√	5 years	The higher of £2m or 10% of funds	Subject to test

Collective Investment Schemes (pooled funds) which do not meet the definition of collective investment schemes in SI 2004 No. 534 or SI 2007, No. 573.	√ (on advice from treasury advisor)	√	These funds do not have a defined maturity date	The higher of £2m or 20% of funds	Subject to test
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APPENDIX D- ANNEX 1

APPROVED COUNTRIES FOR INVESTMENTS

This list is based on those countries which have sovereign ratings of AA- or higher, (we show the lowest rating from Fitch, Moody's and S&P) and also, (except - at the time of writing - for Hong Kong and Luxembourg), have banks operating in sterling markets which have credit ratings of green or above in the Link creditworthiness service.

Based on lowest available rating as at

AAA

- Australia
- Denmark
- Germany
- Netherlands
- Norway
- Singapore
- Sweden
- Switzerland

AA+

- Canada
- Finland
- U.S.A.

AA

- Abu Dhabi (UAE)
- France
- New Zealand

AA-

- Belgium
- U.K.

NB Consideration will be given to other factors, including Environmental, Social and Governance standards when considering the destination country of Non-UK investments. As such countries with an appropriate sovereign rating will not be used where matters identified do not align with the respective Council's values.

NB As detailed in it has been determined that the UK will remain an approved country for investment regardless of its sovereign rating. This is due to the avoidance of such investments being operationally prohibitive.

In determining the period to maturity of an investment, the investment is regarded as commencing on the date of the commitment of the investment rather than the date on which funds are paid over to the counterparty.

The Council will seek further advice on the appropriateness and associated risks with investments in these Non-Specified investment categories, other than those which would be Specified other than for the duration of over 12 months (for example a 2-year fixed term deposits with a bank on the counterparty list).

Accounting treatment of investments

The accounting treatment may differ from the underlying cash transactions arising from investment decisions made by this Council. To ensure that the Council is protected from any adverse revenue impact, which may arise from these differences, we will review the accounting implications of new transactions before they are undertaken.

The monitoring of investment counterparties - The credit rating of counterparties will be monitored regularly. The Council's Shared Service receives credit rating information (changes, rating watches and rating outlooks) from Link as and when ratings change, and counterparties are checked promptly. On occasion ratings may be downgraded when an investment has already been made. The criteria used are such that a minor downgrading should not affect the full receipt of the principal and interest. Any counterparty failing to meet the criteria will be removed from the list immediately by the Shared Service, and if required new counterparties which meet the criteria will be added to the list.

TREASURY MANAGEMENT SCHEME OF DELEGATION

(i) **Full Council**

- approval of annual Treasury Management strategy and Annual Investment Strategy
- approval of MRP Statement

(ii) **Executive Committee (e.g., Cabinet)**

- approval of/amendments to the organisation's adopted clauses, treasury management policy statement and treasury management practices
- budget consideration and approval
- approval of the division of responsibilities
- receiving and reviewing regular monitoring reports and acting on recommendations
- approving the selection of external service providers and agreeing terms of appointment.

(iii) **Audit Committee**

Receiving and reviewing the following, and making recommendations to the Cabinet

- regular monitoring reports on compliance with the Treasury Management Strategy, practices, and procedures.

(iv) **The S151 (responsible) officer**

- recommending clauses, treasury management policy/practices for approval, reviewing the same regularly, and monitoring compliance
- submitting regular treasury management policy reports
- submitting budgets and budget variations
- receiving and reviewing management information reports
- reviewing the performance of the treasury management function
- ensuring the adequacy of treasury management resources and skills, and the effective division of responsibilities within the treasury management function
- ensuring the adequacy of internal audit, and liaising with external audit
- recommending the appointment of external service providers.

REVIEW OF TREASURY MANAGEMENT ACTIVITY 1 APRIL – 30 SEPTEMBER 2023

1. SUMMARY

This report summarises the Council's treasury management for the half year to 30 September 2023. The presentation of this report fulfils the requirements under the Council's treasury management policy.

2. BACKGROUND

2.1 Capital Strategy

The CIPFA revised 2021 Prudential and Treasury Management Codes require all local authorities to prepare a capital strategy report which will provide the following:

- a high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services
- an overview of how the associated risk is managed
- the implications for future financial sustainability

The aim of this capital strategy is to ensure that all elected members on the full Council fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite.

2.2 Treasury Management

The treasury management operations ensure this cash flow is adequately planned, with surplus monies being invested in low risk counterparties, providing adequate liquidity initially before considering optimising investment return.

The second main function of the treasury management service is the funding of the Council's capital plans, longer term cash flow planning to ensure the Council can meet its capital spending operations.

Accordingly, treasury management is defined as:

“The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”

3. INTRODUCTION

This report has been written in accordance with the requirements of the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management (revised 2021).

The primary requirements of the Code are as follows:

1. Creation and maintenance of a Treasury Management Policy Statement which sets out the policies and objectives of the Council's treasury management activities.
2. Creation and maintenance of Treasury Management Practices which set out the manner in which the Council will seek to achieve those policies and objectives.
3. Receipt by the full Council of an annual Treasury Management Strategy Statement including the Annual Investment Strategy and Minimum Revenue Provision Policy for

the year ahead, a Mid-Year Review Report and an Annual Report (stewardship report) covering activities during the previous year.

4. Delegation by the Council of responsibilities for implementing and monitoring treasury management policies and practices and for the execution and administration of treasury management decisions.
5. Delegation by the Council of the role of scrutiny of treasury management strategy and policies to a specific named body. For this Council the delegated body is the Audit Committee.

This mid-year report has been prepared in compliance with CIPFA's Code of Practice on Treasury Management, and covers the following:

- An economic update for the first part of the 2023/24 financial year;
- A review of the Treasury Management Strategy Statement and Annual Investment Strategy;
- The Council's capital expenditure and prudential indicators;
- A review of the Council's investment portfolio for 2023/24;
- A review of the Council's borrowing strategy for 2023/24;
- A review of any debt rescheduling undertaken during 2023/24;
- A review of compliance with Treasury and Prudential Limits for 2023/24.

4. ECONOMICS AND INTEREST RATES

*The following commentary has been supplied by **Link Group**, the professional consultants for the Council's shared treasury management services provider. The context is significant as it describes the backdrop against which treasury management activity has been undertaken for the first half year.*

4.1 Economics update

4.1.1 The first half of 2023/24 saw:

- Interest rates rise by a further 100bps, taking Bank Rate from 4.25% to 5.25% and, possibly, the peak in the tightening cycle.
- Short, medium, and long-dated gilts remain elevated as inflation continually surprised to the upside.
- A 0.5% m/m decline in real GDP in July, mainly due to more strikes.
- CPI inflation falling from 8.7% in April to 6.7% in August, its lowest rate since February 2022, but still the highest in the G7.
- Core CPI inflation declining to 6.2% in August from 7.1% in April and May, a then 31 years high.
- A cooling in labour market conditions, but no evidence yet that it has led to an easing in wage growth (as the 3myy growth of average earnings rose to 7.8% in August, excluding bonuses).
 - The 0.5% m/m fall in GDP in July suggests that underlying growth has lost momentum since earlier in the year. Some of the weakness in July was due to there being almost twice as many working days lost to strikes in July (281,000) than in June (160,000). But with output falling in 10 out of the 17 sectors, there is an air of underlying weakness.
 - The fall in the composite Purchasing Managers Index from 48.6 in August to 46.8 in September left it at its lowest level since COVID-19 lockdowns reduced activity in January 2021. At face value, it is consistent with the 0.2% q/q rise in real GDP in the period April to June, being followed by a contraction of up to 1% in the second half of 2023.
 - The 0.4% m/m rebound in retail sales volumes in August is not as good as it looks as

- it partly reflected a pickup in sales after the unusually wet weather in July. Sales volumes in August were 0.2% below their level in May, suggesting much of the resilience in retail activity in the first half of the year has faded.
- As the growing drag from higher interest rates intensifies over the next six months, we think the economy will continue to lose momentum and soon fall into a mild recession. Strong labour demand, fast wage growth and government handouts have all supported household incomes over the past year. And with CPI inflation past its peak and expected to decline further, the economy has got through the cost-of-living crisis without recession. But even though the worst of the falls in real household disposable incomes are behind us, the phasing out of financial support packages provided by the government during the energy crisis means real incomes are unlikely to grow strongly. Higher interest rates will soon bite harder too. We expect the Bank of England to keep interest rates at the probable peak of 5.25% until the second half of 2024. Mortgage rates are likely to stay above 5.0% for around a year.
 - The tightness of the labour market continued to ease, with employment in the three months to July falling by 207,000. The further decline in the number of job vacancies from 1.017m in July to 0.989m in August suggests that the labour market has loosened a bit further since July. That is the first time it has fallen below 1m since July 2021. At 3.0% in July, and likely to have fallen to 2.9% in August, the job vacancy rate is getting closer to 2.5%, which would be consistent with slower wage growth. Meanwhile, the 48,000 decline in the supply of workers in the three months to July offset some of the loosening in the tightness of the labour market. That was due to a 63,000 increase in inactivity in the three months to July as more people left the labour market due to long term sickness or to enter education. The supply of labour is still 0.3% below its pre-pandemic February 2020 level.
 - But the cooling in labour market conditions still has not fed through to an easing in wage growth. While the monthly rate of earnings growth eased sharply from an upwardly revised +2.2% in June to -0.9% in July, a lot of that was due to the one-off bonus payments for NHS staff in June not being repeated in July. The headline 3myy rate rose from 8.4% (revised up from 8.2%) to 8.5%, which meant UK wage growth remains much faster than in the US and in the Euro-zone. Moreover, while the Bank of England's closely watched measure of regular private sector wage growth eased a touch in July, from 8.2% 3myy in June to 8.1% 3myy, it is still well above the Bank of England's prediction for it to fall to 6.9% in September.
 - CPI inflation declined from 6.8% in July to 6.7% in August, the lowest rate since February 2022. The biggest positive surprise was the drop in core CPI inflation, which declined from 6.9% to 6.2%. That reverses all the rise since March and means the gap between the UK and elsewhere has shrunk (US core inflation is 4.4% and in the Euro-zone it is 5.3%). Core goods inflation fell from 5.9% to 5.2% and the further easing in core goods producer price inflation, from 2.2% in July to a 29-month low of 1.5% in August, suggests it will eventually fall close to zero. But the really positive development was the fall in services inflation from 7.4% to 6.8%. That also reverses most of the rise since March and takes it below the forecast of 7.2% the Bank of England published in early August.
 - In its latest monetary policy meeting on 20 September, the Bank of England left interest rates unchanged at 5.25%. The weak August CPI inflation release, the recent loosening in the labour market and the downbeat activity surveys appear to have convinced the Bank of England that it has already raised rates far enough. The minutes show the decision was "finely balanced". Five MPC members (Bailey, Broadbent, Dhingra, Pill and Ramsden) voted for no change and the other four (Cunliffe, Greene, Haskel and Mann) voted for a 25bps hike.
 - Like the US Fed, the Bank of England wants the markets to believe in the higher for longer narrative. The statement did not say that rates have peaked and once again said if there was evidence of more persistent inflation pressures "further tightening in policy would be required". Governor Bailey stated, "we'll be watching closely to see if further increases are needed". The Bank also retained the hawkish guidance that rates will stay "sufficiently restrictive for sufficiently long".
 - This narrative makes sense as the Bank of England does not want the markets to

decide that a peak in rates will be soon followed by rate cuts, which would loosen financial conditions and undermine its attempts to quash inflation. The language also gives the Bank of England the flexibility to respond to new developments. A rebound in services inflation, another surge in wage growth and/or a further leap in oil prices could conceivably force it to raise rates at the next meeting on 2nd November, or even pause in November and raise rates in December.

- The yield on 10-year Gilts fell from a peak of 4.74% on 17th August to 4.44% on 29th September, mainly on the back of investors revising down their interest rate expectations. But even after their recent pullback, the rise in Gilt yields has exceeded the rise in most other Developed Market government yields since the start of the year. Looking forward, once inflation falls back, Gilt yields are set to reduce further. A (mild) recession over the next couple of quarters will support this outlook if it helps to loosen the labour market (higher unemployment/lower wage increases).
- The pound weakened from its cycle high of \$1.30 in the middle of July to \$1.21 in late September. In the first half of the year, the pound bounced back strongly from the Truss debacle last autumn. That rebound was in large part driven by the substantial shift up in UK interest rate expectations. However, over the past couple of months, interest rate expectations have dropped sharply as inflation started to come down, growth faltered, and the Bank of England called an end to its hiking cycle.
- The FTSE 100 has gained more than 2% since the end of August, from around 7,440 on 31st August to 7,608 on 29th September. The rebound has been primarily driven by higher energy prices which boosted the valuations of energy companies. The FTSE 100's relatively high concentration of energy companies helps to explain why UK equities outperformed both US and Euro-zone equities in September. Nonetheless, as recently as 21st April the FTSE 100 stood at 7,914.

4.2 Interest rate forecasts

- 4.2.1 The Council's shared treasury management services provider has appointed Link Group as its treasury advisors and part of their service is to assist them to formulate a view on interest rates. The PWLB rate forecasts below are based on the Certainty Rate (the standard rate minus 20 bps) which has been accessible to most authorities since 1st November 2012.

The latest forecast on 25th September sets out a view that short, medium and long-dated interest rates will be elevated for some little while, as the Bank of England seeks to squeeze inflation out of the economy.

Our PWLB rate forecasts below are based on the Certainty Rate (the standard rate minus 20 bps, calculated as gilts plus 80bps) which has been accessible to most authorities since 1st November 2012.

Link Group Interest Rate View		25.09.23											
	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26	Sep-26	Dec-26
BANK RATE	5.25	5.25	5.25	5.00	4.50	4.00	3.50	3.00	2.75	2.75	2.75	2.75	2.75
3 month ave earnings	5.30	5.30	5.30	5.00	4.50	4.00	3.50	3.00	2.80	2.80	2.80	2.80	2.80
6 month ave earnings	5.60	5.50	5.40	5.10	4.60	4.10	3.60	3.10	2.90	2.90	2.90	2.90	2.90
12 month ave earnings	5.80	5.70	5.50	5.20	4.70	4.20	3.70	3.20	3.00	3.00	3.00	3.00	3.00
5 yr PWLB	5.10	5.00	4.90	4.70	4.40	4.20	4.00	3.90	3.70	3.70	3.60	3.60	3.50
10 yr PWLB	5.00	4.90	4.80	4.60	4.40	4.20	4.00	3.80	3.70	3.60	3.60	3.50	3.50
25 yr PWLB	5.40	5.20	5.10	4.90	4.70	4.40	4.30	4.10	4.00	3.90	3.80	3.80	3.80
50 yr PWLB	5.20	5.00	4.90	4.70	4.50	4.20	4.10	3.90	3.80	3.70	3.60	3.60	3.60

5. TREASURY MANAGEMENT STRATEGY STATEMENT and ANNUAL INVESTMENT STRATEGY UPDATE

The Treasury Management Strategy Statement (TMSS) for 2023/24 was approved by this Council on 1st March 2023. The details in this report update the actual and forecast expenditure in light of the updated economic position and budgetary changes already approved.

There are no policy changes to the TMSS; the details in this report update the position in the

light of the updated economic position and budgetary changes already approved.

6. THE COUNCIL'S CAPITAL POSITION (PRUDENTIAL INDICATORS)

This part of the report is structured to update:

- The Council's capital expenditure plans
- How these plans are being financed
- The impact of the changes in the capital expenditure plans on the prudential indicators and the underlying need to borrow
- Compliance with the limits in place for borrowing activity

b Prudential Indicator for Capital Expenditure

This table shows the revised estimates for capital expenditure and the changes since the capital programme was agreed at the Budget. The increase is made up of a number of capital variations which are detailed in the Budget Management Reports to Cabinet on 13 November 2023. The Capital Programme for 2023/24, as approved at Council on the 1st March 2023, amounted to £5.735m. This was increased to £12.337m following additions to the programme and rescheduling of the 2022/23 programme as detailed in the Capital Programme Update reports on 13 November 2023.

	2023/24 Original Estimate	Actual at 30 Sept 2023	2023/24 Revised Estimate
	£m	£m	£m
Total capital expenditure	5.735	2.728	12.377

6.2 Changes to the Financing of the Capital Programme

The table below draws together the main strategy elements of the capital expenditure plans (above), highlighting the original supported and unsupported elements of the capital programme, and the expected financing arrangements of this capital expenditure. The borrowing element of the table increases the underlying indebtedness of the Council by way of the Capital Financing Requirement (CFR), although this will be reduced in part by revenue charges for the repayment of debt (the Minimum Revenue Provision). This direct borrowing need may also be supplemented by maturing debt and other treasury requirements.

	2023/24 Original Estimate	2023/24 Revised Estimate
	£m	£m
Total Capital Expenditure	5.735	12.377
Financed by:		
Capital receipts	2.386	4.308
Capital grants, S106 etc.	2.032	4.737
Reserves and revenue contributions	1.317	3.332
Total financing	5.735	12.377
Borrowing requirement	0.000	0.000

6.3 Changes to the Prudential Indicators for the Capital Financing Requirement (CFR), External Debt and the Operational Boundary

The table below shows the CFR, which is the underlying external need to incur borrowing for a capital purpose. The table also shows the expected debt position over the period, which is termed the Operational Boundary.

Prudential Indicator – Capital Financing Requirement

There is no movement in the Capital Financing Requirement from the original.

Prudential Indicator – the Operational Boundary for external debt

	2023/24 Original Estimate	Actual at 30 Sept 2023	2023/24 Revised Estimate
	£m	£m	£m
Prudential Indicator: Capital Financing Requirement			
CFR – non housing	5.714	5.510	5.714
Net movement in CFR	(0.400)	(0.200)	(0.400)
Prudential Indicator: The Operational Boundary for External Debt			
	Op Boundary	Actual	Op Boundary
Borrowing	28.000	0.000	28.000
Other long term liabilities*	4.000	1.526	4.000
Total debt	32.000	1.526	32.000

*finance leases

6.4 Limits to Borrowing Activity: Debt Compared with the Capital Financing Requirement

The first key control over the treasury activity is a prudential indicator to ensure that over the medium term, net borrowing (borrowings less investments) will only be for a capital purpose. Gross external borrowing should not, except in the short term, exceed the total of CFR in the preceding year plus the estimates of any additional CFR for 2023/24 and the next two financial years. This allows some flexibility for limited early borrowing for future years. The PWLB borrowing was fully repaid in 2022/23. The Council has approved a policy for borrowing in advance of need which will be adhered to if this proves prudent. The Head of Corporate Resources reports that no difficulties are envisaged for the current or future years in complying with this prudential indicator.

	2023/24 Original Estimate	Actual at 30 Sept 2023	2023/24 Revised Estimate
	£m	£m	£m
Borrowing	0.00	0.000	0.00
Other long term liabilities*	1.375	1.526	1.375
Total debt	1.375	1.526	1.375
CFR	5.714	5.510	5.714

*finance leases

6.5 Limits to Borrowing Activity: Debt Compared with the Authorised Limit

A further prudential indicator controls the overall level of borrowing. This is the Authorised

Limit which represents the limit beyond which borrowing is prohibited, and needs to be set and revised by Members. It reflects the level of borrowing which, while not desired, could be afforded in the short term, but is not sustainable in the longer term. It is the expected maximum borrowing need with some headroom for unexpected movements. This is the statutory limit determined under section 3 (1) of the Local Government Act 2003.

Authorised Limit for external debt	2023/24 Original Indicator	Actual at 30 Sept 23	2023/24 Revised Indicator
	£m	£m	£m
Borrowing	30.000	0.000	30.000
Other long term liabilities	4.000	1.526	4.000
Total	34.000	1.526	34.000

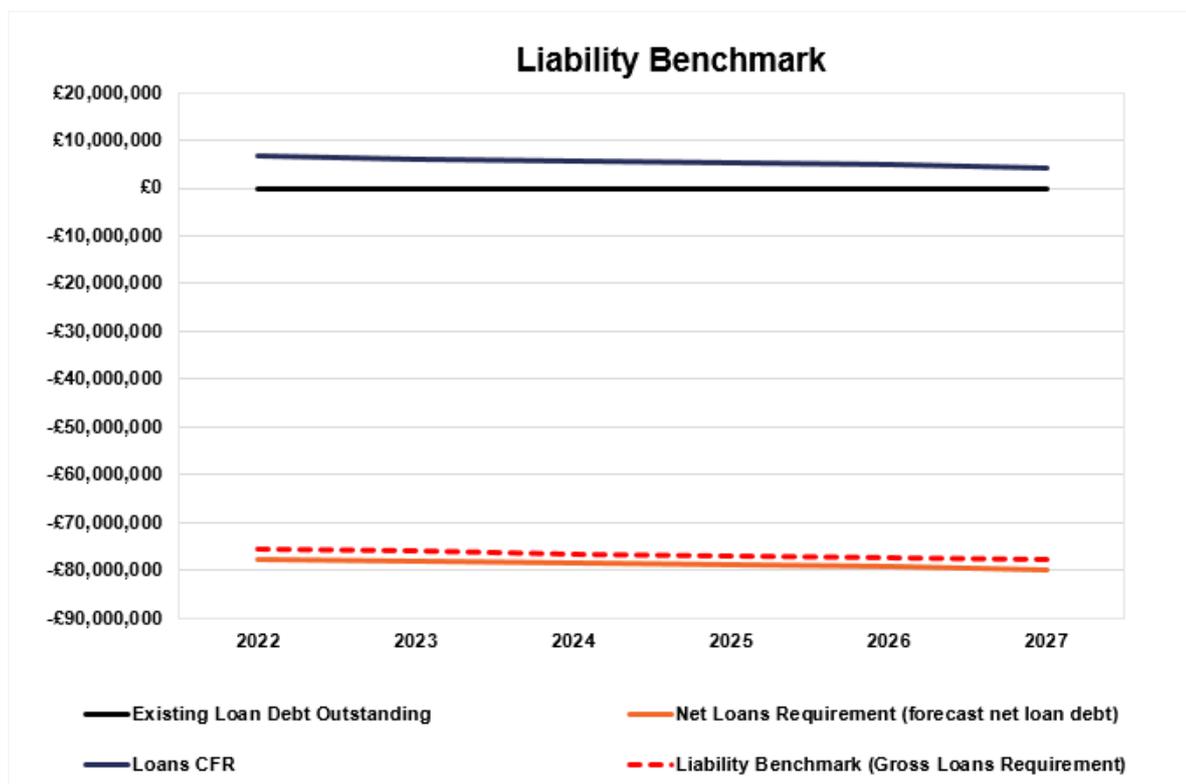
6.6 Liability Benchmark

A third and new prudential indicator for 2023/24 is the Liability Benchmark (LB). The Authority is required to estimate and measure the LB for the forthcoming financial year and the following two financial years, as a minimum.

There are four components to the LB: -

- Existing loan debt outstanding: the Authority's existing loans that are still outstanding in future years.
- Loans CFR: this is calculated in accordance with the loans CFR definition in the Prudential Code and projected into the future based on approved prudential borrowing and planned MRP.
- Net loans requirement: this will show the Authority's gross loan debt less treasury management investments at the last financial year-end, projected into the future and based on its approved prudential borrowing, planned MRP and any other major cash flows forecast.
- Liability benchmark (or gross loans requirement): this equals net loans requirement plus short-term liquidity allowance.

As the authority is effectively debt free, with the exception of the finance lease from 2023/24, the benchmark lacks relevance but is nevertheless a requirement.



7 BORROWING

7.1 The Council's capital financing requirement (CFR) for 2023/24 is £5.714m. The CFR denotes the Council's underlying need to borrow for capital purposes. If the CFR is positive the Council may borrow from the PWLB or the market (external borrowing) or from internal balances on a temporary basis (internal borrowing). The balance of external and internal borrowing is generally driven by market conditions. Table 6.4 shows the Council currently has borrowings of £1.375m. This will be below the CFR, with the balance of the CFR funded from cash flow funds in lieu of borrowing. This is a prudent and cost-effective approach in the current economic climate but will require ongoing monitoring in the event that any upside risk to gilt yields prevails.

The Council has not taken out any new borrowing in 2023/24. There was some temporary borrowing from 10 days for cash flow reasons as a result of a minor dealing error on the TM side, this was at no detriment to the Council. Occasionally, where commitments have been made to fixed-term investment deals, there are points where the cash flow reaches a trough. The service provider endeavours to keep a safe buffer of liquidity. On this occasion, the buffer was exceeded due to some large rate refunds. Worthing Borough Council provided the borrowing at a rate commensurate with the market rates at the time.

7.2 PWLB maturity certainty rates (gilts plus 80bps) year to date to 30th September 2023

Gilt yields and PWLB certainty rates were on a generally rising trend throughout the first half of 2023/24. At the beginning of April, the 5-year rate was the cheapest part of the curve and touched 4.14% whilst the 25-year rate was relatively expensive at 4.58%.

July saw short-dated rates peak at their most expensive. The 1-year rate spiked to 6.36% and the 5-year rate to 5.93%. Although, in due course, short-dated rate expectations fell, the medium dates shifted higher through August and the 10-year rate pushed higher to 5.51% and the 25-year rate to 5.73%. The 50-year rate was 4.27% on 5th April but rose to 5.45% on 28th September.

We forecast rates to fall back over the next two to three years as inflation dampens. The CPI measure of inflation is expected to fall below 2% in the second half of 2024, and we forecast 50-year rates to stand at 3.90% by the end of September 2025. However, there is considerable

gilt issuance to be digested by the market over the next couple of years, as a minimum, so there is a high degree of uncertainty as to whether rates will fall that far.

- The current PWLB rates are set as margins over gilt yields as follows: -.
 - **PWLB Standard Rate** is gilt plus 100 basis points (G+100bps)
 - **PWLB Certainty Rate** is gilt plus 80 basis points (G+80bps)
 - **Local Infrastructure Rate** is gilt plus 60bps (G+60bps)

8 DEBT RESCHEDULING

Debt rescheduling opportunities have been very limited in the current economic climate and following the various increases in the margins added to gilt yields which have impacted PWLB new borrowing rates since October 2010. No debt rescheduling has therefore been undertaken to date in the current financial year.

9 COMPLIANCE WITH TREASURY AND PRUDENTIAL LIMITS

It is a statutory duty for the Council to determine and keep under review the affordable borrowing limits. During the half year ended 30 September 2023, the Council has operated within the treasury and prudential indicators set out in the Council's Treasury Management Strategy Statement for 2023/24. The Director of Resources and Organisational Development reports that no difficulties are envisaged for the current or future years in complying with these indicators.

All treasury management operations have also been conducted in full compliance with the Council's Treasury Management Practices.

10 ANNUAL INVESTMENT STRATEGY

- 10.1 The Council will aim to achieve the optimum return (yield) on investments commensurate with proper levels of security and liquidity and with the Council's risk appetite. In the current economic climate, it is considered appropriate to keep investments short-term to cover cash flow needs, but also to seek out value available in periods up to 12 months with high credit-rated financial institutions. The shared Treasury Service uses information supplied by the Treasury advisers, Link Asset Services, including a minimum sovereign credit rating and Credit Default Swap (CDS) overlay information.

As shown by the interest rate forecasts in section 10.3, investment rates have continued to rise. There have been 4 meetings of the MPC in the 6 months to 30th September 2023, at each meeting the decision has been made to increase the base rate until the September meeting when the rate was held at 5.25%, its highest since 2008's Global Financial Crisis. It is anticipated that a first rate cut to 5.00% will be in Q3 2024, to be followed by further rate cuts through the remainder of 2024 and into 2025.

Our investments continue to follow a low risk and largely short term strategy, with emphasis placed on laddering investments to even out maturity dates. This increases our ability to respond to changes in market conditions and to changes in risk; which we continue to monitor closely.

10.2 Creditworthiness

Following the Government's fiscal event on 23rd September 2022, both S&P and Fitch placed the UK sovereign debt rating on Negative Outlook, reflecting a downside bias to the current ratings in light of expectations of weaker finances and a challenging economic outlook. Nothing further has evolved in the first half of 2023/24.

10.3 Investment Counterparty Criteria

The current investment counterparty criteria selection approved in the TMSS meets the requirement of the treasury management function.

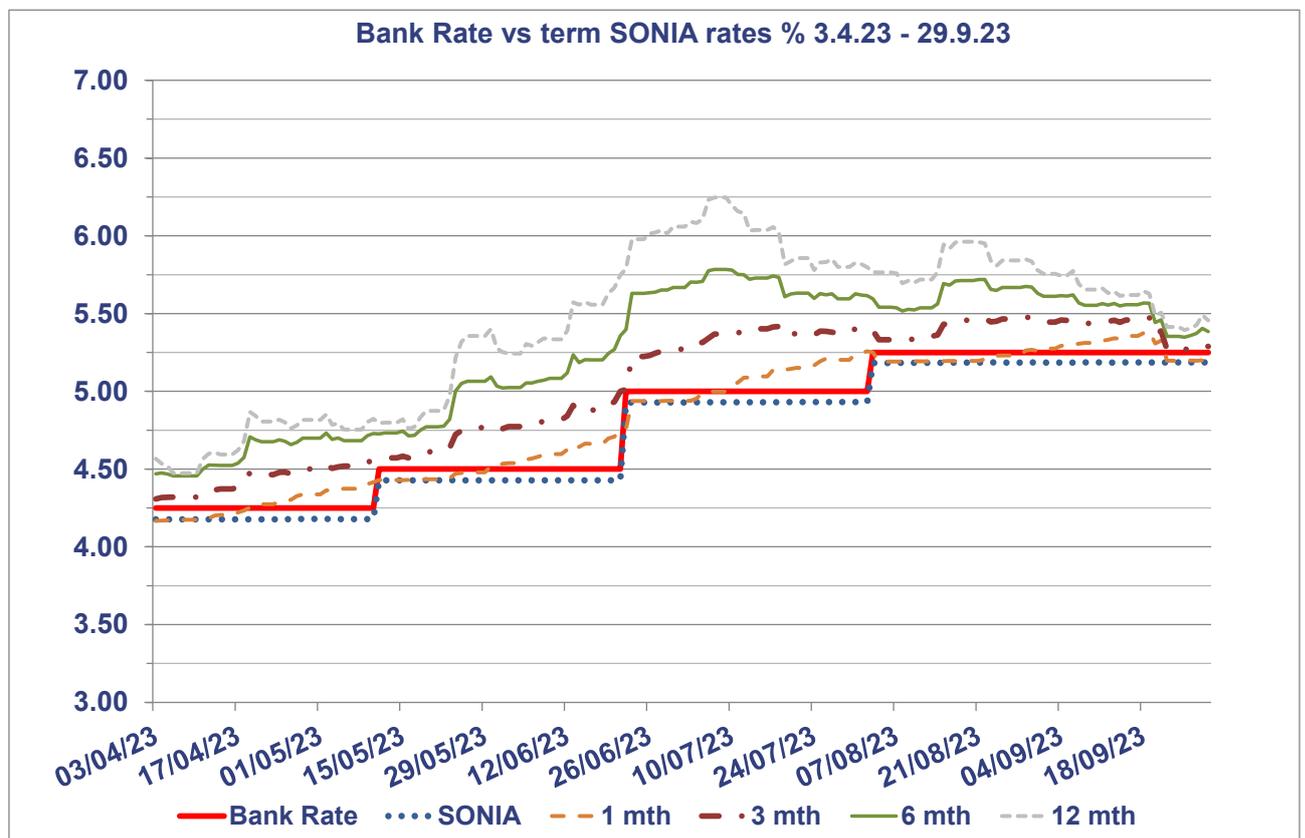
10.4 Credit Default Swap Prices

Credit Default Swaps (CDS) are credit derivative contracts that enable investors to swap credit risk on a company with another counterparty. They are market indicators of credit risk. Although CDS prices for UK banks spiked at the outset of the pandemic in 2020, they then subsequently returned to near pre-pandemic levels. **However, sentiment can easily shift, so it remains important to undertake continual monitoring of all aspects of risk and return in the current circumstances.**

Investment balances

The average level of funds available for investment purposes during the 6 months, excluding the Council's £6m investment in the Local Authorities' Property Fund, was **£85.5m**. These funds were available on a temporary basis, and the level of funds available was mainly dependent on the timing of precept payments, receipt of grants and progress on the capital programme.

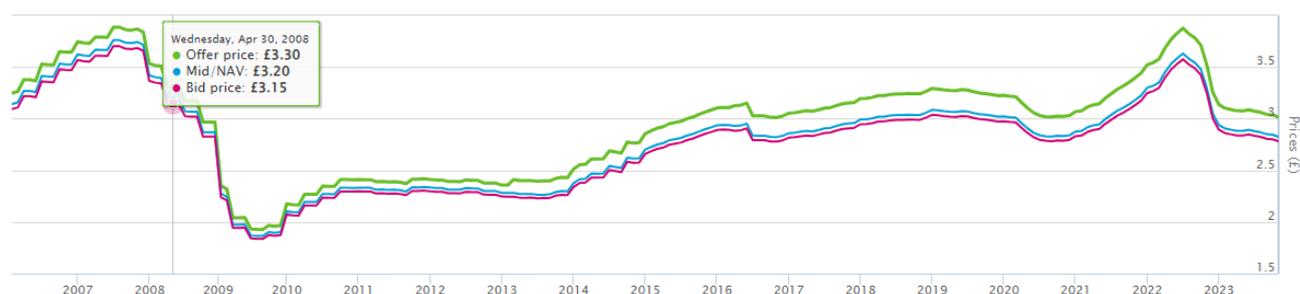
Investment rates during period ended 30th September 2023



10.4 Investment performance year to date as at 30 September 2023

The Council earned £1,591,426 in investment income of which £123,534 was from market funds, call accounts and notice accounts. This total excludes interest from the Council's £6m investment in the Local Authorities' Property Fund.

Local Authorities' Property Fund – the Council has invested £6m with the Local Authorities' Property Fund. Since 31st March the Property Fund has declined in value by £73k. This reflects the general decline in property prices in the UK. The fund should be viewed as long term. Losses occurred in 2008 from which the fund recovered. The fund has consistently provided good dividends and earned £140k in dividend income in for the first half of 2023/24.



10.5 Approved limits and Counterparties

Officers can confirm that the approved limits within the Annual Investment Strategy were not breached during the period to 30 September 2023.

10.6 The current difficult economic situation has had a severe impact on the majority of Councils, but some are less well placed to manage the additional pressures caused by rising interest rates and general inflationary increases in wages, utilities and other costs. The service provider continues to monitor and take due care when recommending investments with other Local Authorities.

10.7 Investments at 30 September 2023

Counterparty	Issue Date	Maturity Date	Principal	Current Interest Rate	Long Term Rating
Close Brothers Limited	11/09/2023	04/03/2024	£1,000,000	5.75%	A-
Close Brothers Limited	26/09/2023	04/03/2024	£1,000,000	5.75%	A-
Close Brothers Limited	26/09/2023	04/03/2024	£1,000,000	5.75%	A-
Close Brothers Limited	30/03/2023	30/09/2024	£2,000,000	4.75%	A-
Clydesdale Bank Plc	11/08/2023	09/08/2024	£2,000,000	5.65%	A-
Goldman Sachs International Bank	02/03/2023	01/03/2024	£1,500,000	4.65%	A+
Goldman Sachs International Bank	06/03/2023	05/03/2024	£1,000,000	4.69%	A+
Goldman Sachs International Bank	31/03/2023	28/03/2024	£1,500,000	4.96%	A+
Handlesbanken Fixed Term Deposit	06/04/2023	05/04/2024	£1,000,000	4.82%	AA
Handlesbanken Fixed Term Deposit	08/08/2023	08/08/2024	£3,000,000	5.54%	AA
Lloyds Bank Plc (Rfb)	31/03/2023	/ /	£360,000	5.14%	A+
National Westminster Bank Plc (Rfb)	05/04/2023	05/04/2024	£1,000,000	4.65%	A+
National Westminster Bank Plc (Rfb)	29/06/2023	28/06/2024	£2,000,000	6.11%	A+
National Westminster Bank Plc (Rfb)	30/06/2023	30/11/2023	£1,000,000	5.64%	A+
National Westminster Bank Plc (Rfb)	04/07/2023	02/07/2024	£1,000,000	6.20%	A+
Standard Chartered Bank	31/03/2023	29/12/2023	£1,000,000	4.82%	A+
Standard Chartered Bank	31/03/2023	28/03/2024	£2,000,000	4.90%	A+
Standard Chartered Bank	05/04/2023	04/04/2024	£1,000,000	4.77%	A+
Standard Chartered Bank	28/07/2023	26/07/2024	£1,000,000	6.24%	A+
Cambridge Building Society	05/07/2023	05/12/2023	£1,000,000	5.50%	Unrated
Cambridge Building Society	05/07/2023	04/07/2024	£1,000,000	5.90%	Unrated
Cambridge Building Society	05/07/2023	28/02/2024	£1,000,000	5.70%	Unrated
Coventry Building Society	31/05/2023	30/05/2024	£1,000,000	5.01%	A-
Coventry Building Society	14/06/2023	13/06/2025	£1,000,000	5.26%	A-
Coventry Building Society	09/08/2023	09/08/2024	£1,000,000	5.49%	A-
Coventry Building Society	18/08/2023	16/01/2024	£1,000,000	5.46%	A-

Furness Building Society	27/04/2023	26/04/2024	£1,000,000	5.00%	Unrated
Furness Building Society	15/05/2023	15/05/2024	£1,000,000	5.00%	Unrated
Leeds Building Society	16/06/2023	16/10/2023	£1,000,000	4.77%	A-
Leeds Building Society	16/06/2023	20/11/2023	£1,000,000	4.89%	A-
Leeds Building Society	11/08/2023	09/08/2024	£2,000,000	5.69%	A-
Monmouthshire Building Society	07/08/2023	07/08/2024	£3,000,000	5.75%	Unrated
National Counties Building Society	06/04/2023	05/04/2024	£1,000,000	4.34%	Unrated
National Counties Building Society	26/05/2023	27/05/2025	£1,000,000	5.10%	Unrated
National Counties Building Society	29/06/2023	28/06/2024	£1,000,000	5.80%	Unrated
Newcastle Building Soc.	19/07/2023	19/07/2024	£2,000,000	5.85%	Unrated
Newcastle Building Soc.	01/08/2023	01/08/2024	£1,000,000	5.85%	Unrated
Nottingham Building Soc.	26/07/2023	25/07/2024	£2,000,000	6.05%	Unrated
Nottingham Building Soc.	08/08/2023	20/05/2024	£1,000,000	5.87%	Unrated
Nationwide Building Society	30/06/2023	29/02/2024	£1,000,000	5.58%	A
Nationwide Building Society	08/08/2023	08/08/2024	£3,000,000	5.55%	A
Principality Building Soc	09/06/2023	07/06/2024	£3,000,000	5.09%	BBB+
Progressive Building Society	06/04/2023	05/04/2024	£2,000,000	4.50%	Unrated
Progressive Building Society	05/07/2023	05/07/2024	£1,000,000	6.00%	Unrated
Saffron Building Society	26/05/2023	24/05/2024	£1,000,000	5.15%	Unrated
Saffron Building Society	04/07/2023	03/07/2024	£2,000,000	5.91%	Unrated
West Bromwich Building So	05/07/2023	03/01/2024	£1,000,000	5.40%	BB-
Yorkshire Building Society	22/06/2023	22/01/2024	£1,000,000	5.30%	A-
Yorkshire Building Society	26/07/2023	26/07/2024	£2,000,000	5.63%	A-
Debt Management Office	06/07/2023	12/10/2023	£2,000,000	5.20%	N/A
Debt Management Office	03/08/2023	02/02/2024	£2,000,000	5.43%	N/A
Cheshire East Council	26/09/2023	05/01/2024	£2,000,000	5.38%	AA-
Lancashire County Council	25/04/2023	24/04/2024	£1,000,000	4.70%	AA-
North Lanarkshire Council	22/08/2023	19/08/2024	£5,000,000	5.75%	AA-
Blackrock	03/04/2023	/ /	£10,000	5.23%	AAA mmf
Ccla Investment Management Limited	06/02/2020	/ /	£10,000	5.20%	AAA mmf
Federated Investors (Uk) Llp	15/02/2023	/ /	£3,000,000	5.35%	AAA mmf
Invesco Liquidity Funds Plc	01/09/2023	/ /	£150,000	5.33%	AAA mmf
Lloyds Bank Plc (Rfb)	05/04/2023	07/04/2025	£2,000,000	4.10%	A+
Furness Building Society	27/04/2023	25/04/2025	£1,000,000	5.10%	Unrated
TOTAL			£85,530,000		

11 OTHER

11.1 Changes in risk appetite

The 2021 CIPFA Codes and guidance notes place importance on risk management. Where an authority changes its risk appetite e.g., for moving surplus cash into or out of certain types of investment funds or other types of investment instruments, this change in risk appetite and policy should be brought to members' attention in treasury management update reports.

11.2 Sustainability and Ethical Policies of Counterparties

Following the concerns expressed by Members, the Shared Treasury Service in consultation with the Assistant Director Corporate Resources gives due consideration to environmental, social, and corporate governance issues. Some of the policies of the banks and building societies that the Council is currently using are linked below.

<https://www.cambridgebs.co.uk/more/about-us/community-detail>

<https://www.ccla.co.uk/our-policies/climate-change-and-investment-policy>

<https://www.closebrothers.com/sustainability-and-environment>

<https://www.coventrybuildingsociety.co.uk/member/sustainability/environment-policy.html>

<https://www.cumberland.co.uk/about/corporate-governance>

<https://www.federatedinvestors.com/resources/resource-centers/responsible-investing-center.do?hint=class>

<https://www.goldmansachs.com/investor-relations/corporate-governance/sustainability-reporting/>

<https://www.handelsbanken.com/en/sustainability/climate-impact>

<https://www.invesco.com/corporate/about-us/esg/environmental-sustainability>

<https://www.leedsbuildingsociety.co.uk/knowledge-base/members/continuing-to-reduce-our-carbon-footprint/>

<https://www.lloydsbankinggroup.com/our-group/responsible-business/financing-a-green-future-together/reducing-our-own-environmental-footprint/>

<https://www.monbs.com/blog/valuer-project/>

<https://www.ncbs.co.uk/about-us/corporate-information>

<https://investors.natwestgroup.com/esg-disclosures>

<https://www.newcastle.co.uk/about-us/governance/corporate-governance/>

<https://www.nationwide.co.uk/about-us/responsible-business/>

<https://www.principality.co.uk/about-us/our-community/csr>

<https://theprogressive.com/your-society/our-responsibilities/progressive-and-the-environment>

<https://www.saffronbs.co.uk/about/community/green-hub/going-green-saffron>

<https://www.santandercb.co.uk/why-santander/sustainability>

https://www.sc.com/en/sustainability/?gclid=Cj0KCQjw18WKBhCUARIsAFiW7Jw9h9XtzcULNMBFfdOMiAEC0Lkjinwv5QBGzPyHH7ftV08AuVuZm3hYaAmJmEALw_wcB&gclsrc=aw.ds

<https://www.westbrom.co.uk/suppliers/supplier-code-of-conduct>

<https://www.ybs.co.uk/your-society/environment/index.html>

1st Quarter Treasury Management Update Report **Quarter ended 30th June 2023**

The CIPFA (Chartered Institute of Public Finance and Accountancy) Code of Practice for Treasury Management 2021 recommends that members be updated on treasury management activities at least quarterly. This report, therefore, ensures this Council is implementing best practice in accordance with the Code.

1. Economic Backdrop

1.1 The following are relevant economic events disclosed here since they occurred during Quarter one of the 2023/24 year:

- CPI inflation fell from 10.1% to 8.7% in April, but remained at 8.7% in May, this was the highest of the G7 nations;
- Core CPI inflation rose in both April and May reaching a 31-year high of 7.1%;
- The labour market remained tight with 3 month-year average earnings growth rising from 6.1% to 6.5% in April data;
- The Bank of England Base rate has risen a further 75 bps over the quarter from 4.25% to 5.00%;
- Gilt yields, an instrument which underpins PWLB borrowing costs for councils, are nearing the peaks of the “mini budget”. Caused by higher than anticipated core inflation figures.

1.2 The UK economy has continued to weather the pressures of rising inflation and the drag of increased interest rates, showing surprising resilience. The 0.2% month on month GDP rise in April will further raise hopes that the UK economy may avoid recession this year.

1.3 MPC Meetings During Quarter 1

11th of May 2023 - 0.25% rise.

At the 11th May, the Bank of England’s Monetary Policy Committee (MPC) increased the Bank Rate by 25 basis points to 4.50%.

22nd of June 2023 - 0.50% rise.

At the 22nd June meeting, the MPC moved rates up a further 50 basis points to 5.00%.

Both increases reflected a split vote – seven members voting for an increase and two for none.

2. Interest Rate Forecast

2.1 The latest forecast, made on the 26th of June, sets the view that both short and long-dated interest rates will be elevated for some while. In part due to the Bank of England's efforts to bring inflation within the economy under control, against a backdrop of a stubbornly robust economy and strong labour market.

2.2 Below are the current Bank Rate and PWLB rate forecasts. There have been a number of upward revisions between each PWLB forecast. This is representative of the continued surprise upsides in data releases and increased domestic inflationary pressures which have driven markets to demand higher returns on fixed income instruments such as Gilts which have a direct impact on the cost of PWLB borrowing for local authorities.

Link Group Interest Rate View		26.06.23											
	Jun-23	Sep-23	Dec-23	Mar-24	Jun-24	Sep-24	Dec-24	Mar-25	Jun-25	Sep-25	Dec-25	Mar-26	Jun-26
BANK RATE	5.00	5.50	5.50	5.50	5.25	4.75	4.25	3.75	3.25	2.75	2.75	2.50	2.50
3 month ave earnings	5.30	5.60	5.50	5.30	5.00	4.50	4.00	3.50	3.00	2.70	2.60	2.50	2.50
6 month ave earnings	5.80	5.90	5.70	5.50	5.10	4.60	4.00	3.50	3.00	2.70	2.60	2.60	2.60
12 month ave earnings	6.30	6.20	6.00	5.70	5.30	4.80	4.10	3.60	3.10	2.80	2.70	2.70	2.70
5 yr PWLB	5.50	5.60	5.30	5.10	4.80	4.50	4.20	3.90	3.60	3.40	3.30	3.30	3.20
10 yr PWLB	5.10	5.20	5.00	4.90	4.70	4.40	4.20	3.90	3.70	3.50	3.50	3.50	3.40
25 yr PWLB	5.30	5.40	5.20	5.10	4.90	4.70	4.50	4.20	4.00	3.90	3.80	3.80	3.70
50 yr PWLB	5.00	5.10	5.00	4.90	4.70	4.50	4.30	4.00	3.80	3.60	3.60	3.50	3.50

3. Annual Investment Strategy

3.1 The Treasury Management Strategy Statement (TMSS) for 2023/24, which includes the Annual Investment Strategy, was approved by Full Council on 1st of March 2023. In accordance with the CIPFA Treasury Management Code of Practice, it sets the Council's investment priorities as being security of capital, liquidity, and yield in that order.

3.2 Creditworthiness

There have been no changes in credit ratings for institutions which are considered significant during quarter 1. However, the shared service officers continue to monitor rating agency releases and other subjective measures of creditworthiness to ensure that only appropriate counterparties are considered for investment purposes.

3.2 Investment Counterparty Criteria

The current investment counterparty criteria selection approved in the Treasury Management Strategy Statement (TMSS) is meeting the operational requirements of the treasury management function.

3.3 Investment Balances

Below is a summary of the portfolio as at 30th June 2023. The portfolio balances have decreased during the quarter, this is a strategic decision, intended to extend gaps between when borrowing is needed, shielding the Council from elevated borrowing rates. Capital expenditure in the quarter has been financed by internal borrowing where possible meaning the cash balances of the council have been utilised in lieu of borrowing.

Portfolio position as at 30th June 2023:

Counterparty	Issue Date	Maturity Date	Principal	Current Interest Rate	Long Term Rating
BLACKROCK	03/04/2023	/ /	£120,000.00	4.751	AAA mmf
Cambridge Building Society	09/07/2021	05/07/2023	£1,000,000.00	0.400	*
Cambridge Building Society	05/07/2021	05/07/2023	£2,000,000.00	0.400	*
CCLA Investment Management Limited	06/02/2020	/ /	£1,800,000.00	4.782	AAA mmf
Cheshire East Council	23/03/2023	26/09/2023	£2,000,000.00	4.300	AA-
Close Brothers Limited	05/09/2022	05/09/2023	£2,000,000.00	2.800	A-
Close Brothers Limited	08/09/2022	11/09/2023	£1,000,000.00	3.900	A-

Close Brothers Limited	30/03/2023	30/09/2024	£2,000,000.00	4.750	A-
Clydesdale Bank PLC	10/08/2022	11/08/2023	£4,000,000.00	2.820	A-
Coventry Building Society	10/08/2022	09/08/2023	£1,000,000.00	2.320	A-
Coventry Building Society	18/08/2022	18/08/2023	£1,000,000.00	2.700	A-
Coventry Building Society	31/05/2023	30/05/2024	£1,000,000.00	5.010	A-
Coventry Building Society	14/06/2023	13/06/2025	£1,000,000.00	5.260	A-
Federated Investors (UK) LLP	15/02/2023	/ /	£280,000.00	4.728	AAA mmf
Furness Building Society	27/04/2023	26/04/2024	£1,000,000.00	5.000	*
Furness Building Society	15/05/2023	15/05/2024	£1,000,000.00	5.000	*
Furness Building Society	27/04/2023	25/04/2025	£1,000,000.00	5.100	*
Goldman Sachs International Bank	02/03/2023	01/03/2024	£1,500,000.00	4.650	A+
Goldman Sachs International Bank	06/03/2023	05/03/2024	£1,000,000.00	4.685	A+
Goldman Sachs International Bank	31/03/2023	28/03/2024	£1,500,000.00	4.955	A+
Goldman Sachs International Bank	06/04/2023	05/04/2024	£1,000,000.00	4.820	A+
Handelsbanken plc	08/08/2022	08/08/2023	£3,000,000.00	2.480	AA
HSBC ESG MMF	14/04/2022	/ /	£2,460,000.00	4.703	AAA mmf
Invesco Liquidity Funds Plc	04/05/2023	/ /	£10,000.00	4.704	AAA mmf
Lancashire County Council	25/04/2023	24/04/2024	£1,000,000.00	4.700	AA-
Leeds Building Society	16/06/2023	16/10/2023	£1,000,000.00	4.770	A-
Leeds Building Society	16/06/2023	20/11/2023	£1,000,000.00	4.890	A-
Lloyds Bank Plc (RFB)	31/03/2023	/ /	£3,030,000.00	4.900	AA
Lloyds Bank Plc (RFB)	05/04/2023	07/04/2025	£2,000,000.00	4.100	AA
Monmouthshire Building Society	02/08/2021	07/08/2023	£3,000,000.00	0.350	*
National Counties Building Society	06/04/2023	05/04/2024	£1,000,000.00	4.340	*
National Counties Building Society	26/05/2023	27/05/2025	£1,000,000.00	5.100	*
National Counties Building Society	29/06/2023	28/06/2024	£1,000,000.00	5.800	*
National Westminster Bank PLC (RFB)	05/04/2023	05/04/2024	£1,000,000.00	4.650	A+
National Westminster Bank PLC (RFB)	29/06/2023	28/06/2024	£2,000,000.00	6.110	A+

National Westminster Bank PLC (RFB)	30/06/2023	30/11/2023	£1,000,000.00	5.640	A+
Nationwide Building Society	08/08/2022	08/08/2023	£3,000,000.00	2.430	*
Nationwide Building Society	30/06/2023	29/02/2024	£1,000,000.00	5.580	*
Principality Building Soc	09/06/2023	07/06/2024	£3,000,000.00	5.090	BBB+
Progressive Building Society	05/07/2022	05/07/2023	£1,000,000.00	2.400	*
Progressive Building Society	06/04/2023	05/04/2024	£2,000,000.00	4.500	*
Saffron Building Society	26/05/2023	24/05/2024	£1,000,000.00	5.150	*
Standard Chartered Bank	29/07/2022	28/07/2023	£1,000,000.00	2.790	A+
Standard Chartered Bank	31/03/2023	29/12/2023	£1,000,000.00	4.820	A+
Standard Chartered Bank	31/03/2023	28/03/2024	£2,000,000.00	4.900	A+
Standard Chartered Bank	05/04/2023	04/04/2024	£1,000,000.00	4.770	A+
Surrey Heath Borough Council	26/09/2022	26/09/2023	£3,000,000.00	2.700	AA-
West Bromwich Building So	05/07/2022	05/07/2023	£2,000,000.00	2.100	BB-
West Bromwich Building So	05/07/2022	05/07/2023	£1,000,000.00	2.100	BB-
Yorkshire Building Society	26/07/2022	26/07/2023	£3,000,000.00	2.520	A-
Yorkshire Building Society	22/06/2023	22/01/2024	£1,000,000.00	5.300	A-
TOTAL			£77,700,000.00		

3.4 Approved Limits

The chief financial officer can confirm that the approved limits within the Annual Investment Strategy were not breached during the quarter ended 30th June 2023.

3.5 Prudential Indicators

During the quarter ended 30th June 2023, there has been no material changes or re-profiling of the capital programme which give rise to a review of prudential indicators. Members will be updated in subsequent quarterly reports if material changes occur. In the meantime, members are encouraged to review the current and projected indicators given in the above end of year treasury management review.

RECOMMENDATIONS FROM CABINET – 13 NOVEMBER 2023

REPORT OF: Director of Resources and Organisational Development
Contact Officer: Rachel Jarvis, Assistant Director Corporate Resources (and S151 Officer)
Email: Rachel.jarvis@midsussex.gov.uk Tel: 01444 477064
Wards Affected: All
Key Decision: Yes
Report to: Council
13 December 2023

BUDGET MANAGEMENT 2023/24 – PROGRESS REPORT APRIL TO JUNE 2023

Purpose of Report

1. The Cabinet report provided an update on the forecast financial position at quarter one (Q1) against the approved Revenue Budget for 2023/24 and the current Capital Programme.

Summary

2. The forecast revenue outturn position for 2023/24 at the end of June is a net overspend of £442,000 against the current budget. It should, however, be noted that quarter one projections are prepared early in the year and thus external trends are still emerging.
3. As was the case in 2022/23, the continued impact of rising interest rates and effective investment decision-making is also achieving a positive movement on the Council's Treasury Management income. This continues to be used to offset service pressures.
4. A number of fully funded Capital variations have come forward in the first quarter of the year totalling £635,000 which are detailed in table 3 of the Cabinet report. The Capital Programme remains on target at this stage in the year.

Recommendations

5. **That Council:**
 - (i) **Note the current forecast outturn;**
 - (ii) **Endorse the variations to the Capital Programme contained in Table 3 of the Cabinet report in accordance with the Council's Financial Procedure rule B3 and the Capital Strategy**
 - (iii) **Approve the formal creation of the Specific Reserves as identified in Table 2, funded from external grant funding as detailed in paragraphs 19-21 of the Cabinet report.**
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BUDGET MANAGEMENT 2023/24 – PROGRESS REPORT JULY TO SEPTEMBER 2023

Purpose of Report

1. The Cabinet report provided an update on the forecast financial position at quarter two (Q2) against the approved Revenue Budget for 2023/24 and the current Capital Programme.

Summary

2. The forecast revenue outturn position for 2023/24 at the end of September is an overspend of £654,000.
3. As was the case in 2022/23, the continued impact of rising interest rates and effective investment decision making is also achieving a windfall income on the Council's Treasury Management income. This has continued to be used to offset pressures on services that continue to be impacted by excess inflation.
4. A number of fully funded Capital variations have also come forward in the second quarter of the year totalling £5,385,000 which are detailed at Table 3 of the Cabinet report. These pertain to the investment in Temporary accommodation allowing the authority to access the Local Authority Housing Funding, as agreed at Cabinet on 11th September, and now proposed for formal recommendation to Council.

Recommendations

5. That Council:

- (i) **Note the current forecast outturn;**
 - (ii) **Endorse the variations to the Capital Programme contained at Table 3 in the Cabinet report in accordance with the Council's Financial Procedure rule B3 and the Capital Strategy;**
 - (iii) **Approve the use of £2,080m for LAHF Tranche 1 and £1,252m for LAHF Tranche 2, as detailed in paragraphs 23 and 24 of the Cabinet report.**
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Financial Implications

6. The financial implications are detailed within the body of the Cabinet reports.

Risk Management Implications

7. There are no risk management implications.

Equality and Customer Service Implications

8. There are no Equality and Customer Service implications.

Other Material Implications

9. There are no legal implications as a direct consequence of the Cabinet reports.

Sustainability Implications

10. There are no sustainability implications as a direct consequence of the reports.