

**Horsham District Council**

# **Sustainability Appraisal of the Horsham District Local Plan Regulation 19 Consultation**

**Final report**

Prepared by LUC

July 2021



## Horsham District Council

### Sustainability Appraisal of the Horsham District Local Plan Regulation 19 Consultation

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# Chapter 1

## Introduction

**1.1** This report has been prepared by LUC on behalf of Horsham District Council to document the current stage of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Horsham District Local Plan 2021-2038 (the 'Local Plan').

**1.2** This report relates to the Regulation 19 version of the Local Plan (September 2021) and should be read in conjunction with that document.

### The Local Plan area

**1.3** Horsham District covers 53,000 hectares and is of predominantly rural character with 85% of its landmass falling within the rural classification<sup>1</sup>. Population density in the District is 2.48 persons per hectare which is significantly lower than that of West Sussex as a whole, which has a population density of 4.05 persons per hectare<sup>2</sup>.

**1.4** The District is home to a total of 23 rural market towns and villages together with a number of other smaller hamlets. In addition to this, the historic market town of Horsham is located in the northern part of the District, acting as an important centre for many local residents. It accommodates 21,000 households, representing 36% of the population. The next largest settlements of Billingshurst, Storrington and Sullington, and Southwater contain 4,100 households, 4,400 households and 3,900 households respectively.

**1.5** Many of the settlements in Horsham have experienced population increases in recent years. This is particularly the case at Horsham town, Southwater and Billingshurst, which have seen a number of housing developments in past years<sup>3</sup>.

**1.6** The majority of the small villages and towns within the District are located along the main road network or provide a good level of access to the network. The A24, A264, A272, A279, A281 and A283 all run through the District. The location of Horsham town within 20 minutes of Gatwick International Airport further strengthens the transport offer in the plan area. The District is located midway between London and the South Coast and its proximity to London greatly influences growth and activity in the plan area.

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<sup>1</sup> Horsham District Council (2014) Infrastructure Delivery Plan [Online] Available at: [https://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf](https://www.horsham.gov.uk/__data/assets/pdf_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf)

<sup>2</sup> Horsham District Council (2014) Green Infrastructure Strategy [Online] Available at:

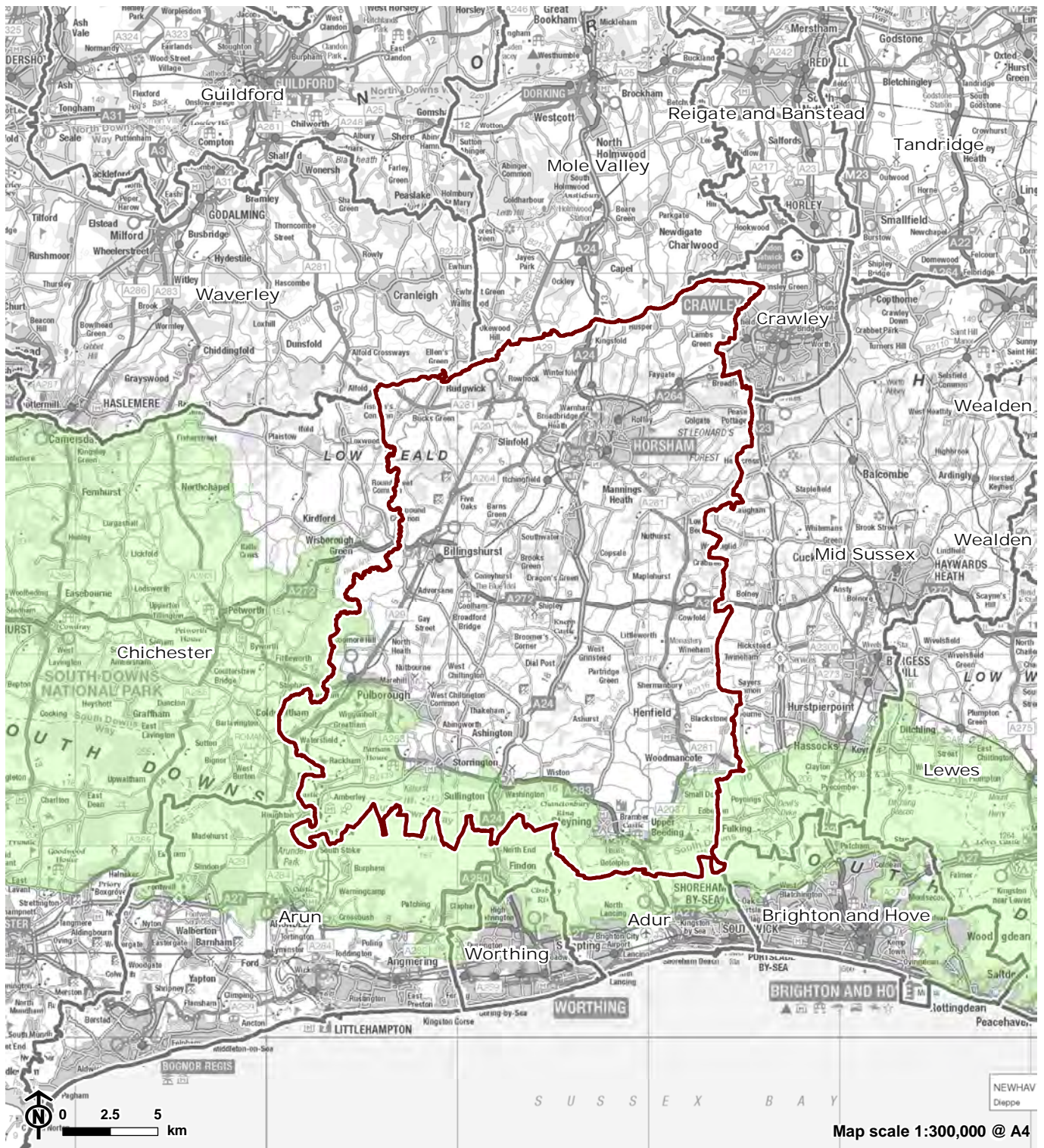
[https://www.horsham.gov.uk/\\_\\_data/assets/pdf\\_file/0007/50956/CD\\_EN\\_03\\_Green-Infrastructure-Study.pdf](https://www.horsham.gov.uk/__data/assets/pdf_file/0007/50956/CD_EN_03_Green-Infrastructure-Study.pdf)

<sup>3</sup> Horsham District Council (2019) The Horsham District Economic Profile [Online] Available at: <http://thinkhorsham.co.uk/wp-content/uploads/Drafting-Horsham-Economic-Profile-December-2019.pdf>

**1.7** Horsham sits at the heart of the Gatwick Diamond, an economic partnership consisting of the local authorities surrounding Gatwick. The Gatwick Diamond forms part of the Coast to Capital Local Enterprise Partnership (LEP) area, which is committed to growing the economy of the area and creating job opportunities.

**1.8** The location of Horsham District is shown in **Figure 1.1** overleaf.





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Source: OS

**Figure 1.1: Location of Horsham District**

- Horsham
- Neighbouring authority
- South Downs National Park

## Horsham District Local Plan

**1.9** Horsham District Council adopted its current Local Plan, the Horsham District Planning Framework (HDPF), in November 2015, which set out the planning strategy for the District up to 2031. It should be noted that the policies in this document and those which are to be contained in the new Local Plan do not apply to land in the South Downs National Park. The planning framework for the National Park area is set out in the South Downs Local Plan<sup>4</sup> as adopted in July 2019.

**1.10** In line with Government guidance, which states that local authorities should review their Local Plans every five years, the Council is reviewing the adopted Local Plan. The Inspector who undertook the independent examination of the adopted Local Plan concluded that further work would be needed by the Council to identify future accommodation needs, including for Gypsies and Travellers, and to ensure that sufficient land is made available to meet the needs of businesses and to support economic growth. He also indicated that a review of the plan should commence within three years of the current Local Plan's adoption to ensure that wider long-term needs in the District could be met.

**1.11** The new Local Plan will run from 2021 to 2038<sup>5</sup> and will set the planning strategy for this period to meet the social, economic and environmental needs of the District. The Local Plan Review process commenced ahead of publication in April 2018 of an Issues and Options document on Employment, Tourism and Sustainable Rural Development which was subject to public consultation between April and May 2018. Consultation on the Regulation 18 Local Plan was undertaken between February and March 2020.

### The Regulation 19 Local Plan

**1.12** The Regulation 19 Local Plan sets out the spatial vision, spatial objectives and strategy for the District over the coming years and contains a number of draft policies for guiding development. The plan identifies development locations for employment, housing, retail and other needs in the District and sets out an approach to securing the protection and enhancement of the natural and built environment.

**1.13** Chapter 3 of the Local Plan document provides an aspirational vision of the District, supported by spatial objectives to allow for a more tangible way of taking forward the plan's approach.

**1.14** The Local Plan includes the overarching approach by which development proposals are to be considered at Chapter 4. This chapter also sets out the Development Hierarchy for

the District, which remains the same as that included in the adopted HDPF.

**1.15** The Local Plan also contains chapters relating to the following topics and associated approaches:

- Economic development – to ensure a strong, resilient and diverse economy and retail offer in the District. This chapter includes those sites allocated to meet local employment needs and protection for existing employment sites.
- Housing development – to help ensure that the Government's step change in housing growth is achieved and local needs are met. This chapter sets out the quanta of housing growth for the plan period. It also includes the approach to affordable housing provision and accommodation to meet the needs of Gypsies and Travellers, setting out allocated sites for this purpose.
- Natural environment – to help ensure that development is delivered in a manner which is considerate of the need for a high quality of life in the District, including maintaining air and water quality as well as protecting local biodiversity and landscape character. This includes an approach to development which will achieve a 10% biodiversity net gain to be demonstrated making use of the Defra Metric, or subsequent updates.
- Development quality, design and heritage – to ensure that development is of a quality and design which is considerate of local character and designated and local heritage assets. Development is also required by policies in this chapter to help to secure a functional, accessible, safe and adaptable environment.
- Climate change and flooding – to ensure that development proposals contribute to achieving net zero carbon emissions across the district by 2050 and do not increase flood risk in the plan area.
- Infrastructure, transport and healthy communities – to ensure that development is delivered in a manner which does not result in deficiency of infrastructure including healthcare, education and community facilities and other service provisions which will contribute to healthy and inclusive communities over the plan period.
- Housing allocations – to allocate sites so that the level of growth to be provided over the plan period can be realistically achieved. This includes the allocation of four large-scale strategic sites and 35 small sites. The site-specific policies which are set out for each of these sites

<sup>4</sup> South Downs National Park Authority (July 2019) South Downs Local Plan

<sup>5</sup> The plan period for the Regulation 18 version of the Local Plan ran from 2019 to 2036. The plan period has now been updated in the Regulation 19 version of the Local Plan, however, both versions of the plan cover a 17 year period.



seek to mitigate the particular constraints of the sites and draw on their strengths.

**1.16** The Council is seeking views from stakeholders and the public on the Regulation 19 Local Plan and this accompanying SA Report.

## Sustainability Appraisal and Strategic Environmental Assessment

**1.17** The Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to SA. SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.

**1.18** SEA is also a statutory assessment process, required under the SEA Directive<sup>6</sup>, transposed in the UK by the SEA Regulations<sup>7</sup>. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)<sup>8</sup>. The purpose of SEA, as defined in Article 1 of the SEA Directive, is:

“to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development”.

**1.19** The SEA Regulations remain applicable despite the UK exiting the European Union in January 2020. Therefore, it is a legal requirement for the Local Plan to be subject to SA and SEA throughout its preparation.

**1.20** SEA and SA are separate processes but have similar aims and objectives. Simply put, SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. The Government's planning practice guidance<sup>9</sup> shows how it is possible to satisfy both requirements by undertaking a joint SA and SEA process, and to present an SA Report that incorporates the requirements of the SEA Regulations. The SA and SEA of the Horsham Local Plan is being undertaken using this integrated approach and throughout this report the abbreviation ‘SA’ should therefore

be taken to refer to ‘SA incorporating the requirements of SEA’.

## Meeting the requirements of the SEA Regulations

**1.21 Table 1.1** overleaf signposts how the requirements of the SEA Regulations have been met within this report.

<sup>6</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment.

<sup>7</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633) as amended by The Environmental Assessments and

Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232) and The Environmental Assessment of Plans and Programmes (Amendment) Regulations 2020 (SI 2020/1531).

<sup>8</sup> Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

<sup>9</sup> See <https://www.gov.uk/government/collections/planning-practice-guidance>

**Table 1.1: Requirements of the SEA Regulations and where these have been met**

SEA Regulations requirement	Covered in this report?
<b>Environmental Report</b>	
Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible Authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation. The report shall identify, describe and evaluate the likely significant effects on the environment of:  implementing the plan or programme; and  reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.  (Regulation 12(1) and (2) and Schedule 2).	This report constitutes the 'environmental report'.
An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	<b>Chapter 1, Chapter 3 and Appendix B</b> of this SA Report.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	
The environmental characteristics of areas likely to be significantly affected.	
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 on the conservation of wild birds and the Habitats Directive.	
The environmental protection, objectives, established at international, Community or national 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.	
The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive effects, and secondary, cumulative and synergistic effects, on issues such as: (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors;	<b>Chapter 4 to Chapter 9</b> of this SA Report.

SEA Regulations requirement	Covered in this report?
(j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the interrelationship between the issues referred to in sub-paragraphs (a) to (l).	
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	<b>Chapter 4 to Chapter 9</b> of this SA Report.
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.	<b>Chapter 2</b> and <b>Appendix F</b> of this SA Report.
A description of the measures envisaged concerning monitoring in accordance with regulation 17.	<b>Chapter 10</b> of this SA Report.
A non-technical summary of the information provided under paragraphs 1 to 9.	A separate Non-Technical Summary has been prepared to accompany this report.
The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of:  current knowledge and methods of assessment;  the contents and level of detail in the plan or programme;  the stage of the plan or programme in the decision-making process; and  the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.  (Regulation 12 (3))	The Environmental Report at each stage of the SA adheres to this requirement.
<b>Consultation</b>	
When deciding on the scope and level of detail of the information that must be included in the environmental report, the responsible Authority shall consult the consultation bodies.  (Regulation 12(5))	Focussed consultation on the scope and level of detail of the SA was carried out with the Environment Agency, Historic England, and Natural England for five weeks commencing 3rd September 2019.
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Reg. 13).	Regulation 18 consultation on the Horsham District Local Plan Review document was undertaken between February and March 2020. Consultation comments received on the Regulation 18 Local Plan and accompanying SA Report have been taken into consideration as part of the preparation of the Regulation 19 Local Plan and this SA Report.



SEA Regulations requirement	Covered in this report?
	A period of representation on the Regulation 19 Local Plan document is taking place between September and October 2021. The consultation document is accompanied by this SA Report which forms the Environmental Report at this stage of the plan-making process.
Other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Reg. 14).	The Local Plan is not expected to have significant effects on EU Member States.
Taking the environmental report and the results of the consultations into account in decision-making (relevant extracts of Regulation 16)	
<b>Provision of information on the decision:</b>  When the plan or programme is adopted, the public and any countries consulted under Reg. 14 must be informed and the following made available to those so informed: <ul style="list-style-type: none"> <li>■ the plan or programme as adopted;</li> <li>■ a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report, the opinions expressed, and the results of consultations entered into have been taken into account, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and</li> <li>■ the measures decided concerning monitoring.</li> </ul>	To be addressed after the Local Plan is adopted.
Monitoring	
The responsible Authority shall monitor the significant effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action.  (Regulation 17(1))	<b>Chapter 10</b> describes the measures that should be taken towards monitoring the likely significant effects of Local Plan.

## Health Impact Assessment

**1.22** Health Impact Assessment (HIA) aims to ensure that health-related issues are integrated into the plan-making process. Health issues are addressed through relevant SA objectives (as described in more detail in **Chapter 2**) and therefore the HIA process has been incorporated into the SA. Throughout this report the abbreviation 'SA' should therefore be taken to refer to 'SA incorporating the requirements of HIA'.

## Equalities Impact Assessment

**1.23** The requirement to undertake formal Equalities Impact Assessment (EqIA) of plans was introduced in the Equality Act 2010 but was abolished in 2012 as part of a Government bid to reduce bureaucracy. Despite this, authorities are still required to have regard to the provisions of the Equality Act, namely the Public Sector Duty which requires public authorities to have due regard for equalities considerations when exercising their functions.

**1.24** In fulfilling this duty, many authorities still find it useful to produce a written record of equalities issues having been specifically considered. Therefore, an EqlA note has been prepared, setting out how the Local Plan is likely to be compatible or incompatible with the duties that Horsham District Council must perform under the Equalities Act 2010. The EqlA is presented in **Appendix G** to this SA Report, separate from the SA/SEA and HIA findings.

## Structure of this report

**1.25** This chapter has introduced Horsham District, the Local Plan, and the SA process. The remainder of the report is structured into the following chapters:

- **Chapter 2** describes the method used to carry out the SA and the difficulties encountered in applying that method.
- **Chapter 3** draws on detailed information in **Appendix B** about the sustainability objectives set by other policies, plans and programmes and the environmental, social and economic baseline to identify the key sustainability issues facing Horsham District and their likely evolution without the Local Plan. Based on this information, it sets out the sustainability objectives against which the SA appraises the likely effects of the Local Plan.
- **Chapter 4 to Chapter 7** describe the findings of the SA for the options considered for the Local Plan in relation to the spatial strategy, quantum of growth, large sites, small sites and growth scenario options.
- **Chapter 9** describes the findings of the SA of each of the separate components of the Local Plan - the vision and objectives and policies, as well as the cumulative effects of the plan.
- **Chapter 10** sets out suggested indicators for monitoring the potential sustainability effects of the Local Plan.
- **Chapter 11** summarises the SA conclusions and describes the next steps in the Local Plan and SA processes.

## Chapter 2

### Methodology

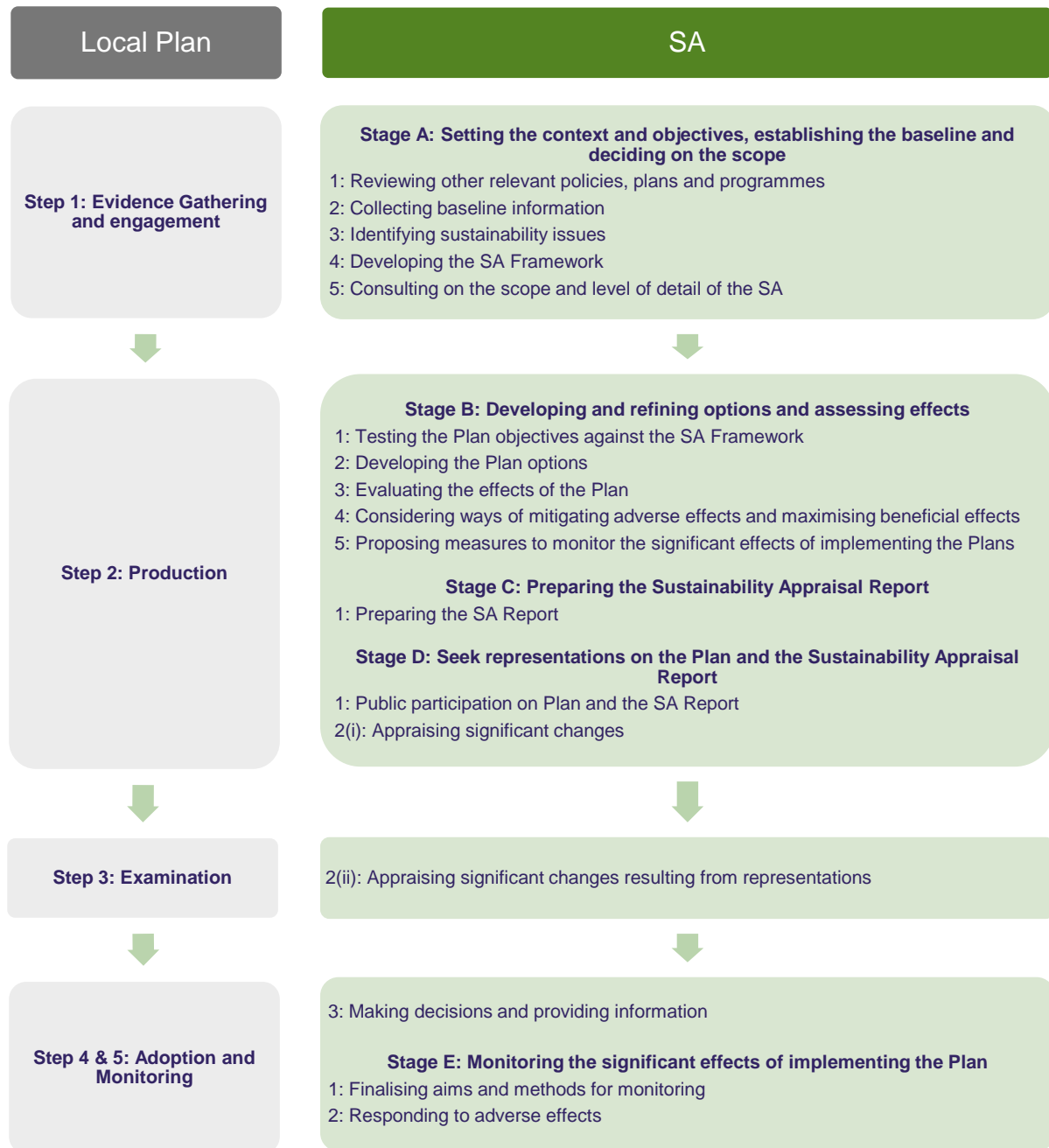
#### Introduction

**2.1** In addition to complying with legal requirements, the approach being taken to the SA of the Horsham Local Plan is based on current best practice and the guidance on SA/SEA set out in the Government's online Planning Practice Guidance.

**2.2** This advises that SA should be carried out as an integral part of the plan-making process. **Figure 2.1** overleaf sets out the main stages of the plan-making process and shows how these correspond to the SA process.



Figure 2.1: Corresponding stages in plan-making and SA



**2.3** The sections below describe the approach that has been taken to the SA of the Horsham Local Plan to date.

### SA Stage A: Scoping

**2.4** The Scoping stage of SA involves understanding the social, economic and environmental baseline for the plan area as well as the sustainability policy context and key

sustainability issues, and using these to inform the creation of an appraisal framework as follows.

### Review other relevant policies, plans and programmes to establish policy context

**2.5** The Local Plan is not prepared in isolation; rather it is prepared within the context of other policies, plans and programmes. The SEA Regulations require the Environmental

Report to describe the relationship of the plan with other relevant plans and programmes. It should also be consistent with environmental protection legislation and support the attainment of sustainability objectives that have been established at the international, national, and regional/sub-regional levels.

**2.6** A review was therefore undertaken of other policies, plans, and programmes at the international, national, regional and sub-regional levels that were considered to be relevant to the scope of the Local Plan. This review is presented in **Appendix B**.

### Collect baseline information to establish sustainability context

**2.7** Information on existing environmental, social and economic conditions in the plan area provides the baseline against which the plan's effects can be assessed in the SA and monitored during the plan's implementation.

**2.8** Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the Local Plan, in order to understand the likely future sustainability conditions in the absence of the Local Plan.

**2.9** The SEA Regulations require the Environmental Report to describe relevant aspects of the current state of the environment and how they are likely to evolve without the plan. An understanding of this likely future evolution, together with the assessed effects of the plan itself, allows the SA to report on cumulative effects, which is another requirement of the SEA Regulations.

**2.10** The SEA Regulations require an assessment of likely effects in relation to the following 'SEA topics': biodiversity, population, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage (including architectural and archaeological heritage), landscape, and the inter-relationship between these. Baseline information was therefore collected in relation to these SEA topics. Additional sustainability topics were also addressed, covering broader socio-economic issues such as housing, access to services, crime and safety, education and employment. This reflects the integrated approach that is being taken to the SA and SEA processes. Baseline information for the District is presented in **Appendix B**.

### Identify sustainability issues

**2.11** The collation of baseline information also allows existing sustainability issues to be identified, including problems as required by the SEA Regulations.

**2.12** Key sustainability issues facing Horsham District and their likely evolution without the Local Plan Review are described in **Appendix B** and summarised in **Chapter 3**.

### Develop the SA framework

**2.13** The relevant sustainability objectives identified by the review of other policies, plans, and programmes together with the key sustainability issues facing the District, identified by the collection and review of baseline information, helped to inform the development of a set of sustainability objectives (the 'SA framework') against which the effects of the plan would be assessed. These objectives reflect the types of issues that are capable of being affected by the land use planning system.

**2.14** Development of the SA framework is not a requirement of the SEA Regulations but is a recognised way in which the likely sustainability effects of a plan can be transparently and consistently described, analysed and compared. The SA framework comprises a series of sustainability objectives and supporting criteria that are used to guide the appraisal of the policies and proposals within a plan. The SA framework that has been used in this way throughout the plan-making process is presented in **Chapter 3**.

### Development of the site appraisal framework

**2.15** To ensure consistency and transparency when assessing the likely sustainability effects of development site options considered for allocation in the Local Plan Review, the SA framework is supported by a set of site assessment criteria and assumptions. More detail on the criteria and assumptions used in the SA is provided in **Appendix C** of this SA Report.

### Consult on the scope and level of detail of the SA

**2.16** Public and stakeholder participation is an important element of the SA and wider plan-making processes. It helps to ensure that the SA Report is robust and has due regard for all appropriate information that will support the plan in making a contribution to sustainable development.

**2.17** The SEA Regulations require the statutory consultation bodies (the Environment Agency, Historic England and Natural England) are consulted "*when deciding on the scope and level of detail of the information that must be included*" in the SA Report. The scope and level of detail of the SA is governed by the SA framework and the statutory consultees (and the local authority areas which surround Horsham District) have therefore been consulted on this when it was

developed as part of the scoping process for the SA<sup>10</sup>. This consultation on the SA Scoping Report was undertaken for a five week period starting in September 2019.

**2.18 Appendix A** lists the comments that were received on the SA Scoping Report during this period of consultation and describes how each one has been addressed. In light of the comments received, a number of amendments were made to the review of policies, plans, and programmes, the baseline information, key sustainability issues, the SA framework and the SA assumptions. Those amendments are reflected in the relevant parts of this current SA Report.

## SA Stage B: Developing and refining options and assessing effects

**2.19** Developing options for a plan is an iterative process, usually involving a number of consultations with the public and stakeholders. Consultation responses and the SA can help to identify where there may be other 'reasonable alternatives' to the options being considered for a plan.

**2.20** In relation to the SA Report, Regulation 12 (2) of the SEA Regulations requires that:

"The report must identify, describe and evaluate the likely significant effects on the environment of—  
(a) implementing the plan or programme; and  
(b) reasonable alternatives, taking into account the objectives and the geographical scope of the plan or programme."

**2.21** The SEA Regulations require that the alternative policies and site allocations 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) or site allocation options that are unavailable or undeliverable.

**2.22** The SA findings are not the only factors taken into account when determining a preferred option to take forward in a plan. Indeed, there will often be an equal or similar number of positive or negative effects identified by the SA for each option, such that it is not possible to rank them based on sustainability performance in order to select a preferred option. Factors such as public opinion, deliverability and conformity with national policy will also be taken into account by plan-makers when selecting preferred options for their plan.

**2.23** The following sections describe the process that was followed in identifying and appraising options for the Horsham District Local Plan. The alternative options were identified by the Council based on the most up-to-date evidence and taking into account information received during Local Plan consultation exercises. The stages of option development and the accompanying SA work carried out are described below.

### Identifying and appraising the elements of the growth options work

**2.24** The Council identified potentially available and suitable reasonable alternative site options from various sources. To understand the sites that may be available for housing development, the Council held a 'call for sites' in 2018, with an update to the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA) published in January 2019. The residential sites promoted ranged in scale from sites for five homes up to large scale developments of several thousand homes. Sites were then assessed by the Council against a set of Site Assessment Criteria devised to ensure a consistent approach.

**2.25** The vast majority of sites that have been proposed to the Council can be considered 'available' for development during the plan period. There are, however, a number of sites that are held on the Council's SHELAA database that have not been actively promoted for a number of years and for which the Council has not been able to obtain up to date information. These sites were considered not to be available over the plan period and were excluded from further assessment. Where sites were assessed to be available and suitable for development, the deliverability of the development was also considered.

**2.26** The Council provided LUC with high level quantas of growth options as well as overall spatial strategy options for appraisal in Autumn 2019. Alongside this work a number of large and small site options were also provided for appraisal. In effect these sites comprised the sites that were not 'screened out' at an earlier stage of the site assessment process.

**2.27** LUC undertook appraisal of these various options (i.e. quantum of growth options, overall spatial strategy options, and large sites options) in Autumn 2019 and presented the initial findings to the Council in September 2019 in the form of a summary note to inform the plan-making process. This was followed by further SA work relating to small site options and growth scenario options.

**2.28** The detailed findings of the SA for these various options are presented in the Interim Sustainability Appraisal of Growth

<sup>10</sup> This original scoping process is described in the SA Scoping Report prepared by LUC in August 2019.



Options Report<sup>11</sup>, which was published for consultation alongside a Regulation 18 version of the Local Plan in February 2020. A summary of the findings is presented in **Chapter 4** (spatial strategy and quantum of growth options), **Chapter 5** (large site options), **Chapter 6** (small site options) and **Chapter 7** (growth scenario options) of this SA Report.

### Appraising Regulation 18 draft Local Plan policies

**2.29** As highlighted above, the Council identified various options (reasonable alternatives) for its approach to the quantum of growth to be provided over the plan period and the overall spatial strategy. Various site options and growth scenarios (which consider combinations of the overall spatial strategies across different quanta of growth) were also considered and appraised. Given their overarching nature and implications for housing supply and economic growth as well as where this growth is to be located over the plan period, these elements of the Local Plan comprise its most important elements, and the focus of the SA work on reasonable alternatives.

**2.30** At the Regulation 18 stage, the Council had yet to decide which quantum of housing growth to take forward in the Local Plan, and which combination of large and small scale sites to allocate to meet this growth. Instead, the Council decided that it was appropriate to keep an open mind and take into account not only the Interim Sustainability Appraisal of Growth Options Report, but also the responses of the consultation on the Regulation 18 Local Plan, and the evidence base that was continuing to be gathered, before coming to a final decision.

**2.31** The Council nonetheless produced a Regulation 18 draft Local Plan<sup>12</sup> for consultation in February 2020. The plan-making process for this draft comprised a review of the adopted Local Plan (HDPF). In effect, the policies of HDPF formed the starting point of this review. Many of these policies are development management-style policies, which seek to guide development to avoid any adverse effects. For many of the policies the alternative would be to include no policy or to include a policy which would be contrary to national planning policy. With this in mind, the Council considered that there were not genuinely reasonable alternatives for many of the policies in the Local Plan and the SA work focussed on the likely effects of the draft policies included as part of the Local Plan Review.

**2.32** The Regulation 18 draft Local Plan was comprehensive in its policy coverage, and the draft policies within it were subject to SA. The Interim SA Report<sup>13</sup> at this stage of the

plan preparation process was published alongside the Regulation 18 Draft Local Plan in February 2020.

### Consultation on the Regulation 18 SA Reports

**2.33** Both the Interim SA Reports (the SA of Growth Options and the Interim SA Report) were subject to consultation alongside the Regulation 18 draft Horsham District Local Plan 2019-2036. Consultation comments received on these reports and responses to them are presented in **Appendix A** of this SA Report.

## SA Stage C: Preparing the Sustainability Appraisal report

**2.34** Following consultation on the Regulation 18 draft Local Plan, the Council has continued its evidence gathering and reviewed the consultation responses. It has now produced the Regulation 19 version of the Local Plan, which it considers to be sound. The Regulation 19 version of the Local Plan sets out an overall strategy for growth including the amount of housing growth, and the strategic and small sites that should be allocated to deliver this growth. It should be noted that since the Regulation 18 draft Local Plan, the plan period has been updated from 2019-36 to 2021-38.

**2.35** This SA Report summarises the SA work carried out during earlier stages of Local Plan preparation, including the consideration of reasonable alternatives, and sets out the findings of the appraisal of the preferred site, overall spatial strategy and growth scenario options as well as the appraisal of policies. Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects. This report includes an update to the appraisal work undertaken at Regulation 18 stage in relation to options for the quantum of growth (i.e. how much growth can be accommodated in the plan area), large site options and growth scenario options (which consider different reasonable alternative combinations of how growth might be distributed in the plan area).

**2.36** For the quantum of growth options, the appraisal of two additional higher quantum options (involving delivering 1,600 dwellings per annum (dpa) and 1,800 dpa) is presented. This work was undertaken to consider the potential for the District to accommodate an additional amount of housing from neighbouring districts under the Duty to Cooperate. An update to the appraisal of large site options is also presented. This has been included to ensure that the most recent information regarding the expected capacity and development provisions

<sup>11</sup> LUC (February 2020) Interim Sustainability Appraisal of Growth Options for Horsham District Local Plan Regulation 18 Consultation

<sup>12</sup> Draft Horsham District Local Plan 2019-2036

<sup>13</sup> LUC (February 2020) Interim Sustainability Appraisal of Horsham District Local Plan Regulation 18 Consultation

(including any new services and facilities) for each site is reflected. This information is also reflected in the updated growth scenario options appraisal work. The update to the growth scenario options appraisal also considers a number of new growth scenarios, in order to ensure that all reasonable alternatives for the distribution of development in Horsham are tested. It also presents the appraisal of the Preferred Strategy alongside other options considered by the Council.

**2.37** The SA findings are set out in **Chapter 4** to **Chapter 7** of this SA Report. The Interim SA Report at the Regulation 18 stage made recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the policies. These are presented in **Chapter 9** alongside the actions the Council has taken in response to them.

## SA Stage D: Consultation on the Local Plan and the SA Report

**2.38** Information about consultation on the SA that has already taken place at earlier stages of plan-making has been provided above.

**2.39** Horsham District Council is now inviting comments on this SA Report alongside the Regulation 19 version of the Horsham District Local Plan 2021-2038. These documents are being published on the Council's website for a period of representation between September and October 2021. Comments relating to the SA will be taken into account during the Examination of the Local Plan by a Planning Inspector to be appointed by the Secretary of State, and in the remaining stages of Local Plan preparation and the SA process.

## SA Stage E: Monitoring implementation of the Local Plan

**2.40** Recommendations for monitoring the likely significant social, environmental and economic effects of implementing the Horsham District Local Plan are presented in **Chapter 10**.

## Appraisal methodology

**2.41** Reasonable alternative spatial options and policies for the Local Plan, as well as those included in the Regulation 19 version of the Local Plan, have been appraised against the SA objectives in the SA framework (see **Table 3.2** in **Chapter 3**). Scores have been attributed to each option or policy to indicate its likely effects on each SA objective as shown in **Figure 2.2**.

**2.42** Where a potential positive or negative effect is uncertain, a question mark was added to the relevant score (e.g. +? or -?) and the score has been colour coded as per the potential

positive, negligible or negative effect (e.g. green, yellow, orange, etc.).

**2.43** The likely effects of options and policies need to be determined and their significance assessed, which inevitably requires a series of judgments to be made. The appraisal has attempted to differentiate between the most significant effects and other more minor effects through the use of the symbols shown above. The dividing line in making a decision about the significance of an effect is often quite small. Where either (++) or (--) has been used to distinguish significant effects from more minor effects (+ or -) this is because the effect of an option or policy on the SA objective in question is considered to be of such magnitude that it will have a noticeable and measurable effect taking into account other factors that may influence the achievement of that objective.

**Figure 2.2 Key to symbols and colour coding used in the SA of the Horsham Local Plan Review**

++	Significant positive effect likely
++/-	Mixed significant positive and minor negative effects likely
+	Minor positive effect likely
+/- or ++/--	Mixed minor or significant effects likely
-	Minor negative effect likely
--/+	Mixed significant negative and minor positive effects likely
--	Significant negative effect likely
0	Negligible effect likely
?	Likely effect uncertain

## Assumptions and uncertainty

### Assumptions applied during the SA

**2.44** SA inevitably relies on an element of subjective judgement. However, in order to ensure consistency in the appraisal of the site options, detailed sets of assumptions were developed and applied, with a separate set of assumptions relating to each type of site option. These assumptions set out clear parameters within which certain SA scores would be given, based on factors such as the distance of site options from features such as biodiversity designations, public transport links and areas of high landscape sensitivity. The assumptions are presented in **Appendix C** of this SA

Report. They were applied through the use of Geographical Information Systems (GIS) data.

**2.45** The assumptions were updated after they were consulted on as part of the SA Scoping Report. Changes were also made to reflect additional evidence which has emerged as the plan-making process for the Local Plan Review has been undertaken, as detailed below.

**2.46** The SA assumptions for SA objective 2 now reflect the proximity of sites to the built-up area of settlements in the District instead of defined town centres in recognition that services and facilities (including essential provisions such as healthcare and education) are often not limited to the town centre locations only. The assumptions also acknowledge that the appraisal of sites will reflect the most up to date order of settlements in the Development Hierarchy. There has been a change in the position of Thakeham and Partridge Green in the Development Hierarchy between the Regulation 18 and Regulation 19 versions of the Local Plan. Furthermore, Kilnwood Vale has been added as new settlement in the 'Small Towns and Larger Villages' tier of the hierarchy in the Regulation 19 Local Plan.

**2.47** The SA assumptions for SA objective 6 were updated to reflect the bat sustenance zone associated with the Mens SAC. This information was made available following the SA Scoping stage and the assumptions for this SA objective were subsequently updated to reflect the potential for new development to impact upon flight paths of Barbastelle associated with this designated site.

**2.48** The revisions to SA objective 2 and SA objective 6 were detailed in Appendix A of the Interim Sustainability Appraisal of Growth Options Report. The changes to these SA assumptions were denoted by underlined and ~~strikethrough~~ text. A 'clean' version of the final assumptions used in the SA is provided in **Appendix C** of this SA Report. All sites appraised at the Regulation 18 and Regulation 19 stages of the Local Plan have been appraised in line with these assumptions, which reflect the revisions to SA objectives 2 and 6.

## Difficulties Encountered

**2.49** The SEA Regulations, Schedule 2(8) require the Environmental Report to include:

"...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."

**2.50** A number of difficulties and limitations arose in the course of the SA work carried out to date and these are outlined below.

- There was a need to appraise a large number of site options consistently. In order to address this issue, detailed assumptions relating to each of the SA objectives were developed and applied during the appraisal of site options (as described above).
- Not all baseline data were available or were possible to collect. In collating the baseline data, problems encountered included the difficulty of obtaining ward or district level data consistently and the difficulty of identifying trends in some data sets. SEA guidance recognises that data gaps will exist but suggests that where baseline information is unavailable or unsatisfactory, authorities should consider how it will affect their assessments and determine how to improve it for use in the assessment of future plans. The collection and analysis of baseline data is regarded as a continual and evolving process, given that information can change or be updated on a regular basis. Not all the relevant information was available at the local level and as a result there are some gaps within the datasets. Nevertheless, the available information provides a sufficiently comprehensive view of the sustainability issues within the plan area.
- Some of the data which is available at the national and district level is based on the reporting of 2011 census. This data allows for comparisons to be made between the district and national performance in relation to number of indicators; however it recognised that data is now relatively old considering the timings of the national census.
- The assumptions presented in **Appendix C** of this SA Report include a number of distance-based criteria used to estimate likely effects of site options. Reference is made to 'easy walking distance' in the appraisal assumptions. Research by the Institute of Highways and Transportation was used to identify these distances to various services and facilities. Distances in the appraisal were measured as a straight-line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances could be greater. To recognise the potential for walking distances to be greater, when applying the Institute of Highways and Transportation distances for the appraisal of site options to each of the relevant distances a 10% buffer was applied to account for the potential difference between the straight line distance and the actual distance involved in a journey. Similarly, straight line distances were used to define zones of influence within which



varying levels of harm to environmental receptors were assumed to exist. In reality, the risk of harmful effects will sometimes depend on non-linear pathways (such as watercourses for water pollution effects) and will depend on the particular vulnerabilities of specific receptors. Nevertheless, the assumptions used were judged proportionate to the level of detail of a Local Plan and were considered to provide a consistent basis for assessing all of the site options.

- Spatial analysis was based on straight line walking distances. Examination of actual distances via the rights of way network was not possible since digital data were not available to indicate the access points of services and facilities or the likely entry and exit points from the site options.
- Where site allocations are close to the District boundary, the spatial analysis was potentially affected by the fact that some spatial data required for proximity-based assessments were not available for neighbouring districts, or for part of them.
- The level of detail of the site options appraisal work was commensurate with the level of detail of the Local Plan document. As such, not every local characteristic could be investigated for each site option. For example, in relation to potential effects of the site options on biodiversity assets, it was necessary to base the score on proximity to designated biodiversity sites only. While it is recognised that in some cases sites might be close to high value non-designated assets, the strategic nature of the SA meant that it was not possible to investigate this potential for each site option and the score was based on designated sites only. This approach was considered to be the best way of ensuring consistency and a comparable level of detail in each site appraisal.
- The rate at which emissions from private vehicles will change over the course of the plan period as a result of technological improvements cannot be predicted or realistically factored into judgements about air quality and carbon emissions.
- The available GIS data for agricultural land classification did not distinguish between Grade 3a (considered to be best and most versatile agricultural land) and 3b (not considered to be best and most versatile agricultural land). This resulted in some uncertainty in the scores, as set out in the assumptions.
- The effects of site options relating to the historic environment and landscape character have been

informed by heritage impact assessment work and the Landscape Capacity Study<sup>14</sup> undertaken by the Council. These pieces of work covered most of, but not all of, the site options tested through the SA.

- The options appraised for different quanta of housing and employment growth in the early stages of the Interim Sustainability Appraisal of Growth Options Report were not associated with any particular spatial pattern or location of development. It was therefore difficult to assess these figures against the baseline, as the spatial implications of each were unknown. As such, whilst the SA generally assesses each option individually against the baseline, the assessments of these options are necessarily high level and focused on drawing out comparisons between the options. The appraisal of growth scenario options sought to address this issue.

<sup>14</sup> Horsham District Council (2020) Horsham District Landscape Capacity Assessment

## Chapter 3

# Sustainability context for development in Horsham and the SA framework

### Introduction

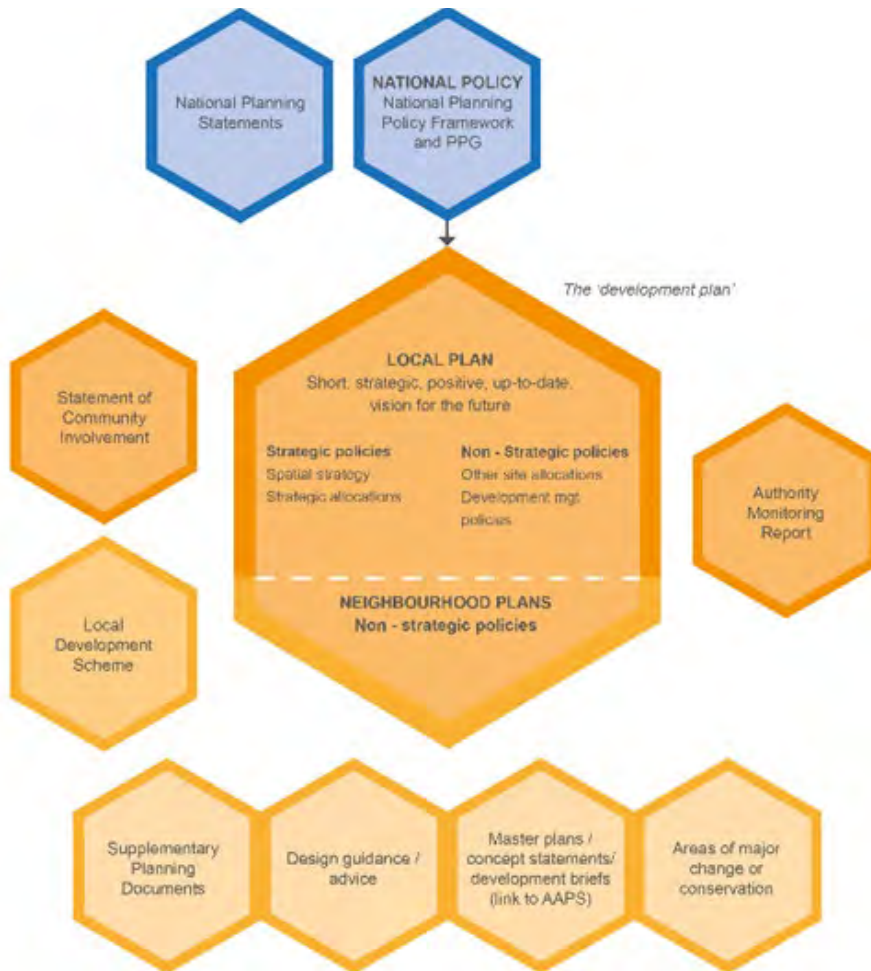
**3.1** Schedule 2 of the SEA Regulations requires:

- (a) “an outline of the...relationship with other relevant plans or programmes”; and
- (e) “the environmental protection objectives established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”

**3.2** In order to establish a clear scope for the SA it is necessary to review and develop an understanding of the environmental, social and economic objectives contained within international and national policies, plans and strategies that are of relevance to the Horsham District Local Plan Review. Given the SEA Regulations’ requirements above, it is also necessary to consider the relationship between the Horsham District Local Plan Review and other relevant plans, policies and programmes.

**3.3** The Local Plan is not prepared in isolation and must be in conformity with a range of international and national plans and programmes as show in **Figure 3.1** overleaf. In addition, the Local Plan comprises any ‘made’ Neighbourhood Plans within the District and is supported by other documents such as Supplementary Planning Documents (SPDs).

Figure 3.1 Local Plan relationship with other relevant plans or programmes



## Policy context

**3.4** This section sets out the policy context within which the Local Plan must operate in relation to the various sustainability themes covered by the SA. This context informs consideration of what constitute reasonable alternative policy options for the Plan as well as the framework of sustainability objectives against which the plan has been appraised. A more detailed review of the relevant documents is provided by topic heading in **Appendix C**.

**3.5** It should be noted that the policy context is inherently uncertain as the current framework outlined here is likely to change in response to a number of key factors:

- **Brexit** - Following the United Kingdom's (UK) departure from the European Union (EU) on 31 January 2020, it entered a transition period which ended on 31 December 2020. Directly applicable EU law now no longer applies to the UK and the UK is free to repeal EU law that has been transposed into UK law. As set out in the Explanatory Memorandum accompanying the Brexit amendments<sup>15</sup>, the purpose of the Brexit amendments to the SEA Regulations is to ensure that the law functions correctly after the UK has left the EU. No substantive changes are being made by this instrument to the way the SEA regime operates.
- **COVID-19** – The COVID-19 pandemic has led to far-reaching changes to society in the UK and around the world. Which of these changes will continue in the long term is unknown and will depend on a variety of factors. Potential implications for planning and development include Government measures to re-start the economy via support for housebuilding and infrastructure development; changes to permitted development rights; increased remote working and reduced commuting and related congestion and air pollution; increased prioritisation of walking and cycling over public transport; and increasing pressure to ensure satisfactory living standards are set and enforced. Within the local context, COVID-19 has had a particular impact upon passenger travel at Gatwick Airport, which is an important economic hub to the north of the District. It is unclear if and when passenger numbers will recover to their pre-pandemic levels.
- **Planning for the Future White Paper** – The August 2020 consultation sets out proposals for the reform of the

planning system in England, covering plan-making, development management, development contributions, and other related policy proposals. Potential implications include reducing the period of a Local Plan to 10 years; a move towards a zonal planning system with areas of England allocated as either Growth Areas; Renewal Areas or Protected Area; and the abolition of Community Infrastructure Levy (CIL) and Section 106.

**3.6** It is also possible that UK and sub-national climate change policy may change as public awareness and prioritisation of the threat of climate change grows, as illustrated by Horsham District Council's commitment to take steps to move to a low-carbon future through its Corporate Plan.

## International

**3.7** Former EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the 'SEA Directive') and Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive') were transposed into the Strategic Environmental Assessment (SEA) Regulations<sup>16</sup> and Habitats Regulations<sup>17</sup>. Following the UK's departure from the EU, these Regulations still apply and require environmental assessment processes to be undertaken in relation to the Horsham Local Plan. These processes should be undertaken iteratively and integrated into the production of the plan in order to ensure that any potential negative environmental effects (including on European-level nature conservation designations) are identified and can be mitigated.

**3.8** There were also a wide range of other EU Directives relating to issues such as water quality, waste and air quality, most of which are transposed into UK law through Acts, Regulations and national-level policy. The UK has now fully left the EU and therefore EU Directives no longer apply to the UK. The main sustainability objectives of international plans and programmes which are of most relevance for the Local Plan and SA are provided in **Appendix B**.

## National Planning Policy Framework

**3.9** The most significant national policy context for the Local Plan Review is the National Planning Policy Framework (NPPF) which was originally published in 2012 and revised in 2019<sup>18</sup>. It should be noted that between January and March 2021 the Government consulted on draft revisions to the

<sup>16</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232).

<sup>17</sup> The Conservation of Habitats and Species Regulations 2017 (2017) SI No. 2017/1012, as amended by The Conservation of Habitats and Species

(Amendment) (EU Exit) Regulations 2019 (SI 2019/579), TSO (The Stationery Office), London.

<sup>18</sup> Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework [online] Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)



NPPF<sup>19</sup> in response to the Building Better Building Beautiful Commission “Living with Beauty” report. The consultation also sought views on the draft National Model Design Code<sup>20</sup>, which provides detailed guidance on the production of design codes, guides and policies to promote successful design. The consultation on these documents has been completed but the outcomes of the consultation have yet to be published by the Government.

**3.10** The Local Plan Review must be consistent with the requirements of the NPPF, which states:

“Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

**3.11** The NPPF sets out information about the purposes of local plan-making, stating that plans should:

- *“Be prepared with the objective of contributing to the achievement of sustainable development;*
- *Be prepared positively, in a way that is aspirational but deliverable;*
- *Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- *Be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area”.*

**3.12** The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

- *“Housing (including affordable housing), employment, retail, leisure and other commercial development;*
- *Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*

- *Community facilities (such as health, education and cultural infrastructure); and.*
- *Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”*

**3.13** The NPPF also promotes well-designed places and development, and plans should “*at the most appropriate level, set out a clear design vision and expectations.*”

**3.14** Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development, including qualitative aspects such as design of places, landscapes, and development.

**3.15** The NPPF also states that:

“Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”

## Neighbourhood plans

**3.16** The Localism Act (2011) sought to move decision-making away from central government and towards local communities. Part of this included the introduction of Neighbourhood Planning.

**3.17** Neighbourhood Plans must be consistent with the requirements of the NPPF and be in ‘general conformity’ with the Local Plan for the area. Once ‘made’, Neighbourhood Plans form part of the statutory development plan for the district or borough within which they are located. The NPPF sets out information about the purposes of Neighbourhood Plan-making, stating that:

“Neighbourhood planning gives communities the power to develop a shared vision for their area.”

<sup>19</sup> Ministry of Housing, Communities and Local Government (2021) National Planning Policy Framework (Draft text for consultation)

<sup>20</sup> Building Better, Building Beautiful Commission (2021) Building Better Building Beautiful Commission “Living with Beauty”

**3.18** The NPPF also states that Neighbourhood Plans “can shape, direct and help to deliver sustainable development”, but they should not promote less development than set out in the strategic policies in a Local Plan covering the neighbourhood area or undermine those strategic policies. Within this context, Neighbourhood Plans typically include policies to deliver:

- Site allocations for small and medium-sized housing.
- The provision of infrastructure and community facilities at a local level.
- Establishing design principles.
- Conservation and enhancement of the natural and historic environment.

**3.19** At the time of writing there are currently 26 designated neighbourhood plan areas within Horsham District (including one designated neighbourhood forum for the Unparished Area of Horsham town; i.e. the Horsham Blueprint Business Neighbourhood Forum).

**3.20** Neighbourhood Plans have been ‘made’ for Nuthurst (October 2015), Thakeham (April 2017), Shermanbury (June 2017), Woodmancote (June 2017), Slinfold (June 2018), Warnham (June 2019) and Storrington, Sullington and Washington (September 2019). In June 2021 Horsham District Council took the decision to ‘make’ a further 10 neighbourhood plans for Ashington, Billingshurst, Bramber, Henfield, Rudgwick, Rusper, Shipley Parish, Southwater, Upper Beeding Parish and West Grinstead Parish. Neighbourhood Plans for the remaining designated neighbourhood plan areas are in various stages of preparation.

## Sustainability context

**3.21 Appendix B** of this report sets out the detailed policy context, baseline, and key sustainability issues (including their likely evolution without the Local Plan) for each SA subject area, including the topics required to be covered by the SEA Regulations. Separate sections of **Appendix B** cover the following subject areas:

- Population Growth, Health and Wellbeing.
- Economy.
- Transport Connections and Travel Habits.
- Air, Land and Water Quality.
- Climate Change Adaptation and Mitigation.
- Biodiversity.
- Historic Environment.
- Landscape.

**3.22** The description of the likely future evolution of the baseline and key issues without the Local Plan considers past trends and current pressures.

## Key sustainability issues

**3.23** The key issues identified through the analysis of the baseline and the policy context are summarised in **Table 3.1**.

**3.24** The likely evolution of these issues without implementation of the Local Plan Review is set out in **Appendix B**.

**Table 3.1 Key sustainability issues for Horsham**

<b>A. Population, health and wellbeing</b>
A1. The population structure of the District reflects an ageing population and there is potential for increases in the number of families in the area. This has the potential to result in pressures on capacities at local services and facilities including schools and healthcare.
A2. House prices in Horsham are high in comparison to the regional and national averages. The level of socially rented housing which is currently provided in the District is also significantly lower than the regional and national levels. As a whole, the delivery of affordable housing is considerably lower than the need identified and there are a high number of residents currently on the waiting list for this type of provision. There is also continued need in the District for housing suitable for the elderly, families and the Gypsy and Traveller community.
A3. Horsham is one of the least deprived local authorities in the UK. However, there are disparities between the least and the most deprived areas in Horsham. A number of wards are within the 40% most deprived in the UK.
A4. Health in Horsham is generally recorded as being at reasonably good level or higher. However, levels of obesity and excess weight in the District are slightly above the national average. Furthermore there are inequalities displayed between the most and least deprived areas of the District in terms of health.
A5. Horsham provides access to a number of important areas of open space and green infrastructure. This includes South Down National Park to the south and High Weald AONB to the north east. A deficiency in recreational or open space provision has been identified in a

number of specific areas including provision for play and allotments. There is also potential for new development to result in loss of access to open spaces and elements of green infrastructure as well as impacts upon their quality.
A6. In general Horsham is a relatively safe district in which to live. In recent years, however, certain types of crime such as violent crime, weapon use and illegal drug use have increased in the District.
<b>B. Economy</b>
B1. Horsham is generally seen to be an economically affluent area and the area has a higher average wage than the regional and national averages. It forms part of the Gatwick Diamond and Coast to Capital LEP, which allows for links to important economies in the surrounding area. The rural character of the District and close proximity of employment centres such as Crawley, London and Brighton and Hove further afield mean that the area sees a significant net outflow of commuters. Horsham needs to ensure a future supply of jobs and continued investment to ensure identified employment development opportunities are taken forward and issues of deprivation are tackled. This is of particular relevance considering the negative net commuting flow which the District experiences.
B2. While Horsham town centre is currently noted to be performing strongly, the town centre and small town and larger village centres of the District face evolving pressures in terms of outside retail offers of the surrounding areas and the continued importance of e-retailing and provision of services online.
<b>C. Transport connections and travel hubs</b>
C1. Parts of the highway network in the District experience high levels of congestion and delays. Rail capacity is also currently stretched, and capacity pressures on London services are expected to increase. Population growth has the potential to exacerbate these problems.
C2. Given the rural character of much of the District, a large proportion of the District's residents drive to work and some have access to only limited bus services and other public transport links.
<b>D. Air, land and water quality</b>
D1. Horsham District Council has two identified AQMAs at Cowfold and Storrington. There are also two AQMAs in close proximity to the north eastern edge of the District at Horley and Crawley and a further AQMA in Hassocks to the East. In addition to potential for exacerbated air quality issues at AQMAs within the District, development within Horsham could have impacts on AQMAs in neighbouring authorities. Similarly, there is potential for a cumulative impact of development in neighbouring authorities alongside development in Horsham in terms of air quality at AQMAs in Horsham.
D2. The District contains a mix of classified agricultural land, the majority being Grade 3, with small areas of Grade 2 and Grade 4. New development should, where possible, be delivered as to avoid the loss of higher grades of agricultural land.
D3. The District contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.
D4. Some of the water bodies which flow through the District have been identified by the Environment Agency as having 'bad' or 'poor' ecological status. There are also areas in the District which are covered by a Source Protection Zone.
<b>E. Climate change adaptation and mitigation</b>
E1. Climate change is likely to affect biodiversity, increase hazards from fluvial flooding and also affect the social and economic aspects of life. The rural character of the District means that there are likely to be difficulties with regards the delivery of measures to help reduce greenhouse gas emissions. While average energy consumption among residents in Horsham has fallen in recent years, the District still has the second highest carbon dioxide emissions in the County (and the second highest in the County per capita). The Council has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings.
E2. The effects of climate change in the District are likely to result in extreme weather events (e.g. intense rainfall, prolonged high temperatures and drought) becoming more common and more intense.
E3. Flood risk in Horsham is dominated by fluvial flooding. The expected magnitude and probability of significant fluvial, tidal, ground and surface water flooding could increase in the District as a result of climate change.
<b>F. Biodiversity</b>
F1. The District contains and is in close proximity to a wide variety of both designated and non-designated natural habitats and biodiversity features. This includes those designated for their national and international importance.
F2. Although designated sites represent the most valued habitats in the District, the overall ecological network is important for biodiversity as a whole, helps to support the health designated sites, and allows species to migrate in response to climate change. Fragmentation and erosion of habitats and the wider ecological network is an ongoing threat to biodiversity.

<b>G. Historic Environment</b>
G1. There are many sites, features and areas of historical and cultural interest in the District, some of which are at risk and identified on the Heritage at Risk Register. These assets may be particularly vulnerable to development which is poorly located or designed.
<b>H. Landscape</b>
H1. The District contains a number of nationally distinct landscape character areas that could be harmed by inappropriate development. In some locations, including in close proximity to existing settlements, landscape sensitivity is high. The High Weald AONB and the South Downs National Park are both of national importance for their landscape value and are also heavily used as a recreational resource. The setting of the AONB (looking both out of the AONB and towards the AONB) can also be affected by inappropriate development.

## The SA framework

**3.25** As described in **Chapter 2**, the SA appraises the likely significant effects of the Local Plan in relation to whether they will help to meet a set of sustainability objectives – the ‘SA framework’. The sustainability objectives and supporting appraisal questions were defined with reference to the key sustainability issues facing the District and the international, national, and sub-regional policy objectives that provide the context for the Local Plan (see **Appendix B**).

**3.26** The SA framework is set out in **Table 3.2**. The penultimate column indicates the relationship between the key sustainability issues for the District and the SA objectives and confirms that an assessment against these objectives and appraisal questions will address all of these issues. Updates

that have been made to the SA framework since the Regulation 18 stage, to account for updates in the evidence available to inform the appraisal process as well as consultation comments received on the SA, are shown with underlined text.

**3.27** The topics required to be covered by the SEA Regulations are biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; and the inter-relationships between these. The final column of Table 3.2 shows the relationship between these and the SA objectives and confirms that an assessment against the objectives and appraisal questions will address all of these topics.

**Table 3.2 SA framework**

SA Objective	Appraisal questions: Does the Local Plan option/policy...	Relevant key issues (see Table 3.1)	Relevant SEA Topics
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	SA 1.1: Does the Plan provide for the local housing need of the District? SA 1.2: Does the Plan deliver the range of types, tenures and affordable homes the District needs over the Plan Period? SA 1.3: Does the Plan increase the supply of affordable homes in both urban and rural areas? SA 1.4: Does the Plan provide for the housing needs of an ageing population? SA 1.5: Does the plan meet Gypsy and Traveller accommodation needs?	A2	Population, Human Health and Material Assets
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.	SA 2.1: Does the Plan support the existing town and village centres? SA 2.2: Does the Plan provide for additional services and facilities centres that are sufficient to support new and growing communities? SA 2.3: Does the Plan provide for development within proximity to existing or new education facilities that are accessible for all?	A1 A3 B1 C1 C2	Population, Human Health and Material Assets
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.	SA 3.1: Does the Plan facilitate the integration of new neighbourhoods with existing neighbourhoods? SA 3.2: Does the Plan promote developments that benefit and are used by existing and new residents in the District, particularly for the District’s most deprived areas?	A1 A2 A3 A4	Population, Human Health and Material Assets

SA Objective	Appraisal questions: Does the Local Plan option/policy...	Relevant key issues (see Table 3.1)	Relevant SEA Topics
	SA 3.3: Does the Plan meet the needs of specific groups in the District, including the needs of a growing and ageing population?  SA 3.4: Does the Plan promote the vitality and viability of the District's town and village centres through social and cultural initiatives?	A5 B1 B2 C1	
SA 4: To support the creation of safe communities in which levels of crime, anti-social behaviour and disorder and the fear of crime are reduced.	SA 4.1: Does the Plan promote principles of good urban design to limit the potential for crime in the District?  SA 4.2: Does the Plan contribute to a reduction in the fear of crime?  SA 4.3: Does the Plan help to promote road safety in the District?	A6	Population and Human Health
SA 5: To improve public health and wellbeing and reduce health inequalities.	SA 5.1: Does the Plan promote health and wellbeing and encourage healthy lifestyles by maintaining, connecting, creating and enhancing multifunctional open spaces, green infrastructure, and recreation and sports facilities?  SA 5.2 Does the Plan promote healthy lifestyle choices by encouraging and facilitating walking and cycling?  SA 5.3 Does the Plan provide access to recreational opportunities in the countryside?  SA 5.4 Does the Plan improve access to health care facilities?	A1 A3 A4 A5 C2 D1 F2	Population and Human Health
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.	SA 6.1: Does the Plan avoid adverse effects on <u>and seek to enhance</u> internationally and nationally designated biodiversity and geodiversity assets within and outside the District?  SA 6.2: Does the Plan avoid adverse effects on <u>and seek to enhance</u> locally designated biodiversity and geodiversity assets within and outside the District, including ancient woodland?  SA 6.3: Does the Plan seek to protect and enhance ecological networks, promoting the achievement of net gain where possible (being considerate of how the plan will achieve net gain), whilst taking into account the impacts of climate change?  SA 6.4: Does the Plan provide and manage opportunities for people to come into contact with wildlife whilst encouraging respect for and raising awareness of the sensitivity of biodiversity?	A5 F1 F2	Biodiversity, Flora, Fauna and Human Health
SA 7: To conserve and enhance the character and distinctiveness of the District's landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place.	SA 7.1: Does the Plan protect and enhance the District's sensitive and special landscapes, including the setting of the High Weald AONB and the South Downs National Park?  SA 7.2: Does the Plan conserve and enhance the character and distinctiveness of the District's non-designated landscapes and settlements?  SA 7.3: Does the Plan protect and enhance the District's natural environment assets (including parks and green spaces, common land, woodland and forest reserves) and public realm?	A5 F1 F2 H1	Landscape, Biodiversity, Flora, Fauna and Cultural Heritage
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.	SA 8.1: Does the Plan conserve and enhance the District's designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?  SA 8.2: Does the Plan conserve and enhance the District's non-designated heritage assets, including their setting and their contribution to wider local character and distinctiveness?	G1 H1	Cultural Heritage, Architectural and Archaeological Heritage



SA Objective	Appraisal questions: Does the Local Plan option/policy...	Relevant key issues (see Table 3.1)	Relevant SEA Topics
	<p>SA 8.3: Does the Plan provide opportunities for improvements to the conservation, management and enhancement of the District's heritage assets, particularly heritage at risk?</p> <p>SA 8.4: Does the Plan promote access to, as well as enjoyment and understanding of, the local historic environment for the District's residents and visitors?</p>		
SA 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils.	<p>SA 9.1: Does the Plan maximise the provision of housing and employment development on previously developed land?</p> <p>SA 9.2: Does the Plan seek to deliver an appropriate density of housing development as to make efficient use of land?</p> <p>SA 9.3: Does the Plan ensure contaminated land is remediated where appropriate?</p> <p>SA 9.4: Does the Plan minimise the loss of high grade agricultural land to development?</p>	D2	Soil and Material Assets
SA 10: To conserve natural resources, including mineral resources in the District.	<p>SA 10.1 Does the plan ensure that unnecessary or unjustified sterilisation of mineral resources is prevented?</p> <p>SA 10.2 Does the plan promote achievement of the waste hierarchy?</p>	D3	Material Assets
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.	<p>SA 11.1: Does the Plan seek to improve the quality of groundwater and surface water in the District's as well as water quality within its rivers and inland waters?</p> <p>SA 11.2: Does the Plan seek to prevent and where unreasonable minimise inappropriate development in Source Protection Zones?</p> <p>SA 11.3: Does the Plan ensure there is sufficient waste water treatment capacity to accommodate the new development?</p> <p>SA 11.4: Does the Plan promote development which would avoid water pollution due to contaminated runoff from development?</p> <p>SA 11.5: Does the Plan ensure that there is sufficient water resource available to support new development?</p> <p>SA 11.6: Does the Plan support efficient use of water in new developments, including the recycling of water resources where appropriate?</p>	D4	Water, Biodiversity, Fauna and Flora
SA 12: To manage and reduce the risk of flooding.	<p>SA 12.1: Does the Plan seek to prevent and where unreasonable 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?</p> <p>SA12.2: Does the Plan promote the use of Natural Flood Management schemes, Sustainable Drainage Systems (SuDS) and flood resilient design?</p>	D4 E2 E3	Water, Material Assets, Climatic Factors and Human Health
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	<p>SA 13.1: Does the Plan support access to public transport provision?</p> <p>SA 13.2: Does the Plan maintain and enhance networks for active travel, including walking and cycling?</p> <p>SA 13.3: Does the Plan support development which is in close proximity to local centres, services and facilities, key employment areas and/or public transport nodes.</p>	A4 B1 C1 C2 D1	Air, Human health and Climatic factors
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.	<p>SA 14.1: Does the Plan avoid, minimise and mitigate the effects of poor air quality?</p> <p>SA 14.2: Does the Plan promote more sustainable transport and reduce the need to travel?</p>	C1 D1 E1	Air and Human Health

SA Objective	Appraisal questions: Does the Local Plan option/policy...	Relevant key issues (see Table 3.1)	Relevant SEA Topics
	SA 14.3: Does the Plan contain measures which will help to reduce congestion? SA 14.4: Does the Plan minimise increases in traffic in Air Quality Management Areas? SA 14.5: Does the Plan facilitate the take up of low / zero emission vehicles?		
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.	SA 15.1: Does the Plan promote energy efficient design? SA 15.2: Does the Plan encourage the provision of energy from renewable sources where possible? SA 15.3: Does the Plan minimise greenhouse gas emissions from transport? SA 15.4: Does the Plan promote the use of locally and sustainably sourced, and recycling of materials in construction and renovation?	D1 E1	Climatic Factors and Air
SA 16: To facilitate a sustainable and growing economy.	SA 16.1: Does the Plan allow for an adequate supply of land and the delivery of infrastructure to meet the District's economic and employment needs? SA 16.2: Does the Plan seek to promote business development and enhance productivity? SA 16.3: Does the Plan promote the image as an area for investment and support opportunities for the expansion and diversification of businesses? SA 16.4: Does the Plan provide for start-up businesses and flexible working practices? SA 16.5: Does the Plan support the prosperity and diversification of the District's rural economy? SA 16.6: Does the Plan support stronger links to the wider economy of the Gatwick Diamond and the aim of the Coast to Capital LEP?	A3 B1 B2	Population and Material Assets
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.	SA 17.1: Does the Plan provide for accessible employment opportunities? SA 17.2: Does the Plan support equality of opportunity for young people and job seekers and opportunity for the expansion and diversification of business?	B1 C2	Population and Material Assets

## Chapter 4

# Appraisal of quantum of growth and spatial strategy options

### Introduction

**4.1** The Council commenced the Local Plan Review by considering a series of high-level quantum of growth and spatial strategy options. This enabled some early SA findings to be generated, which helped to inform the creation of more detailed growth scenarios, taking into account individual site options.

### Quantum of growth options

**4.2** As part of the work for the Regulation 18 draft Local Plan, the Council considered three different quantum of growth options. Each of the three quantum options (lower growth, medium growth and higher growth) considered the level of housing and employment growth which would be provided in the District over the plan period. The SA has now considered two additional quantum of growth options. These new near maximum (1,600 dpa) and maximum (1,800 dpa) quantum options have been tested through the SA to consider the potential for the District to accommodate additional growth from neighbouring authorities under the Duty to Cooperate.

**4.3** The updated appraisal work reflects the new plan period of 2021 to 2038. As part of the updates to the appraisal work undertaken between the Regulation 18 and Regulation 19 stages, the work initially undertaken at the Regulation 18 stage has been updated to reflect the new plan period. It should be noted that over the plan period some 8,063 homes already have planning permission or are otherwise identified for development and the Council also has evidence that 1,875 windfall units will be delivered during that period of time. The appraisal work in this chapter relates to the effects which would be over and above those associated with the already-committed development, windfall housing or homes already completed.

**4.4** For the three initial quantum options tested through the SA work for the Regulation 18 draft Local Plan, a level of employment land was set out alongside the level of housing to be delivered. This was based on the findings of the Employment Growth Assessment for the lower growth option and was scaled proportionately from this figure for the medium and higher options. Given that the level of employment growth tested through the initial lower, medium and higher growth options would all meet the expected requirements for employment land over the plan period, a further increased

level of employment land has not been tested for the new quantum options and the SA findings reflect an assumption that employment land requirements would be met.

4.5 The five quantum of growth options (including the three options tested at the Regulation 18 stage and the two new options) are:

- **Quantum option 1:** Lower growth - 1,000 dpa (16,405 total) and 35.3 hectares employment land

*Level of housing development set out at a level to meet the standard methodology calculation for Local Housing Need for the District (965 dpa)<sup>21</sup> with consideration for a slight uplift in provision to ensure flexibility in housing supply.*

*Level of employment growth set out to meet the gross need for the District based on Economic Growth Assessment.*

- **Quantum option 2:** Medium growth - 1,200 dpa (20,400 total) and 43.4 hectares employment land

*An intermediate level of housing development which meets the standard methodology calculation for Local Housing Need for the District and some but not all of the Duty to Cooperate cross-boundary need from a number of neighbouring districts.*

*Level of employment growth proportionately scaled from the Economic Growth Assessment total to reflect the medium housing growth option.*

- **Quantum option 3:** Higher growth - 1,400 dpa (23,800 total) and 50.7 hectares employment land

*A higher level of housing growth with the District accepting additional growth to meet the unmet needs of a number of neighbouring districts under the Duty to Cooperate.*

*Level of employment growth proportionately scaled from the Economic Growth Assessment total to reflect the higher housing growth option.*

- **Quantum option 4:** Near maximum growth - 1,600 dpa (27,200 total)

*Near maximum level of growth with the District accepting significant additional growth to help meet the unmet needs of a number of neighbouring districts under the Duty to Cooperate.*

- **Quantum option 5:** Maximum growth – 1,800 dwellings per annum (30,600)

*Maximum level of growth with the District making an even greater contribution to the unmet needs of a*

*number of neighbouring districts under the Duty to Cooperate.*

4.6 The quantum options considered did not incorporate any information about the spatial distribution of growth across the plan area. As such, they were considered at a high level and the appraisal findings reflect the potential effects of delivering varying levels of growth in principle at undecided locations within the District.

<sup>21</sup> It should be noted that the standard method calculation for the District's housing need has subsequently been recalculated. The new figure (as at April 2021) is 897dpa. Quantum option 1 still allows for testing of a level of

development which includes a slight uplift in provision to ensure flexibility in housing supply.

4.7 **Table 4.1** presents a summary of the likely SA effects of the five quantum options considered. In general, providing a higher level of growth (i.e. those options providing 1,400 dpa and higher) over the plan period would require a higher amount of greenfield land take, which could have a range of environmental effects. The delivery of a higher amount of growth could also place more development in closer proximity to sensitive environmental receptors, higher value landscapes and heritage assets.

4.8 It is also expected that an approach which involves a higher amount of development would significantly increase the number of private vehicle journeys being made regularly, which is likely to be to the detriment of air quality and the District's contribution to climate change. In contrast, delivering higher levels of growth could support new service provision as well as the viability of sustainable transport links in Horsham District. A higher level of growth would also be likely to deliver benefits in relation to addressing housing affordability in the plan area as well as contributing to the housing need of neighbouring local authority areas.



**Table 4.1 Summary of likely sustainability effects of the growth quantum options for the Horsham District Local Plan**

SA Objective	Quantum Option 1: Lower growth	Quantum Option 2: Medium growth	Quantum Option 3: Higher growth	Quantum Option 4: Near maximum growth	Quantum Option 5: Maximum growth
1: Housing	+	++?	++	++	++
2: Access to services/facilities	+	++?	++/-?	++/--?	++/--?
3: Inclusive communities	+	+	+/-?	-/+?	-/+?
4: Crime	0?	0?	0?	0?	0?
5: Health and wellbeing	+	+	+/-?	-/+?	-/+?
6: Biodiversity	-	--	--	--	--
7: Landscape	-	--	--	--	--
8: Historic environment	--	--	--	--	--
9: Soil quality	--?	--?	--?	--?	--?
10: Natural resources	--?	--?	--?	--?	--?
11: Water resources	-?	-?	-?	-?	-?
12: Flooding	-	--	--	--	--
13: Transport	+/-?	+/-?	++/--?	++/--?	++/--?
14: Air pollution	+/-?	+/-?	-/+?	-/+?	-/+?
15: Climate change	+/-?	+/-?	++/--?	++/--?	++/--?
16: Economic growth	+	+/-	++/-	++/-	++/-
17: Access to employment opportunities	+	+	++/-	++/--	++/--

**4.9** All five quantum options considered would provide a level of housing to meet the local housing need for Horsham in line with the standard methodology calculation. As such, all five options are expected to have at least a minor positive effect in relation to **SA objective 1: housing**. Delivering a higher level of housing growth is likely to help address housing affordability in the plan area and deliver a wider range of homes in terms of tenure and type to meet the needs of more residents. The positive effects expected for Option 2 (Medium growth), Option 3 (Higher growth), Option 4 (Near maximum growth) and Option 5 (Maximum growth) are therefore likely to be significant. Uncertainty is attached to the significant positive effect expected for Option 2 (Medium growth). While this

option is expected to perform more favourably than Option 1 (Lower growth) in terms of housing affordability in the plan area, the more moderate level of development to be achieved could have reduced benefits in terms of securing a more affordable housing stock in Horsham compared to the higher growth options.

**4.10** Option 2 (Medium growth) and Option 3 (Higher growth) are expected to contribute to the housing needs of neighbouring districts under the Duty to Cooperate. The potential to meet local housing needs and contribute to the housing needs of the neighbouring authorities of Crawley to the north east and Mid Sussex to the east is further increased under Option 4 (Near maximum growth) and Option 5

(Maximum growth). These local authority areas fall within the Northern West Sussex Housing Market Area (HMA) alongside Horsham and these areas are strongly linked by functional and economic connections. A small part of Horsham District also falls within the Coastal Housing Market Area which is primarily focused on the settlements of Brighton and Hove, Shoreham and Worthing. The District does not directly adjoin the south coast towns and is separated from these areas by the South Downs National Park, meaning there is reduced potential to positively contribute to the unmet need of these areas. The significant positive effects recorded in relation to SA objective 1 for Option 4 and Option 5 in particular are likely to be over and above those recorded for options 2 and 3.

**4.11** While new service provision is not directly linked to housing or employment growth, delivering a high level of growth in the plan area is likely to provide the critical mass to support these types of provisions. Furthermore, there is potential for a higher level of growth to secure increased financial contributions through S106/CIL to support infrastructure enhancements. Both issues will, however, be dependent in part on the distribution of growth, with a more dispersed distribution of growth at a higher number of smaller sites considered less likely to support significant service improvement. As such, the effects for all five quantum options are considered uncertain.

**4.12** All five options are likely to support some level of service provision and are therefore expected to have at least a minor positive effect in relation to **SA objective 2: access to services/facilities**. The higher levels of growth delivered through Option 2 (Medium growth) and Option 3 (Higher growth) and in particular through Option 4 (Near Maximum growth) and Option 5 (Maximum growth) could support a higher level of service provision in the plan area. However, higher growth options could also increase pressure and result in capacity issues for some services and facilities. Any adverse impact identified is particularly likely in the short term prior to new improvements being delivered and might be addressed as new provisions are made and existing services and facilities are expanded. An uncertain minor negative effect is therefore expected in combination with positive effects for Option 3 (Higher growth). This potential issue could be further exacerbated through Option 4 (Near maximum growth) and Option 5 (Maximum growth) where such substantial housing growth may place more considerable strain on existing services and facilities. As such, an uncertain significant negative effect is identified for these options as part of an overall mixed effect.

**4.13** As all five quantum options would be expected to help support some level of service provision in the District, it is likely that minor positive effects would result in relation to **SA objective 3: inclusive communities**. Positive effects are considered most likely to result where improvements are

made within close proximity of existing and new homes and may be most evident in terms of the access that older people and people with disabilities have to essential provisions. The higher levels of growth set out through Option 3 (Higher growth), and in particular through Option 4 (Near maximum growth) and Option 5 (Maximum growth), may present issues in terms of social integration and community cohesion, including placing strain on existing service provision, particularly in the short term. A higher number of locations could come forward where place-making issues would be more evident. This may include where new towns are created or where a high level of development occurs at existing smaller settlements. Therefore, an uncertain negative effect is expected as part of an overall mixed effect in relation to SA objective 3 for Option 3 (Higher growth), Option 4 (Near maximum growth) and Option 5 (Maximum growth). The uncertain negative effect recorded for Option 4 (Near maximum growth) and Option 5 (Maximum growth) is significant given the increased likelihood for the disruption of community networks in the District and overburdening of services and facilities.

**4.14** Delivering varying levels of growth in the District is not expected to impact upon issues relating to the occurrence and fear of crime. These issues will be most affected by other factors including the design and layout of new development. A negligible effect is therefore expected for all five options in relation to **SA objective 4: crime**.

**4.15** The impacts of growth in the District on public health will depend in part on the ability of new developments to support the delivery of new healthcare facilities. Impacts relating to health will also be influenced by the potential for promoting more active lifestyles and active travel habits among residents. It is expected that the level of growth supported through all five options would help to provide the critical mass to support new service provision in Horsham and therefore a minor positive effect is expected for all options in relation to **SA objective 5: health and wellbeing**.

**4.16** The positive effects expected for Option 3 (Higher growth), Option 4 (Near maximum growth) and Option 5 (Maximum growth) are combined with an uncertain negative effect as the substantially higher levels of growth associated with those options may result in capacity issues at existing healthcare facilities. These options may also result in the need to deliver a higher level of growth within the Gatwick Airport noise contour to the north east of the District, meaning that there would be increased potential for adverse impacts in terms of exposure of residents to noise pollution. Furthermore, the particularly high levels of growth to be delivered through Option 4 (Near maximum growth) and Option 5 (Maximum growth) have the potential to require development to be provided in more isolated locations where healthcare facilities are less accessible. Through these options there is also the

greatest potential for residents to be exposed to increased construction-related noise and increased traffic noise as new homes and businesses are occupied. Therefore, the uncertain negative effects expected for Option 4 (Near maximum growth) and Option 5 (Maximum growth) in relation to SA objective 5 are significant.

**4.17** It is expected that the higher levels of growth associated with Option 2 (Medium growth), Option 3 (Higher growth), Option 4 (Near maximum growth) and Option 5 (Maximum growth) would have more potential for adverse impacts in relation to **SA objective 6: biodiversity** and **SA objective 7: landscape**. Effects relating to the natural environment including designated and undesignated biodiversity sites as well as the special designated landscapes in the area (including the High Weald AONB and South Downs National Park) will be dependent in part on the amount of land take that development requires. It will also be influenced by the potential for human activities during the operational phase of development to result in disturbance or fragmentation of habitats and existing local character. Therefore, the increased growth associated with Option 4 (Near maximum growth) and Option 5 (Maximum growth) is likely to have adverse impacts relating to sensitive environmental receptors over and above those identified for the other growth options. The overall level of growth to be provided for through these two options is likely to be particularly difficult to mitigate given the land take that would be required as well as the increased number of residents accommodated in the District.

**4.18** Impacts relating to landscape character are informed by the landscape capacity work undertaken to inform the Local Plan Review. While the specific location of new growth will influence the significance of effects, it is assumed that a higher amount of land take could have significant negative effects in relation to **SA objective 6: biodiversity** as well as **SA objective 7: landscape**. Option 2 (Medium growth), Option 3 (Higher growth), and in particular Option 4 (Near maximum growth) and Option 5 (Maximum growth), could result in not only a substantially higher amount of land take being required, but could also be more likely result in development coming forward at locations which are in close proximity to biodiversity designations and areas which have limited landscape capacity. The negative effects recorded for these options in relation to SA objectives 6 and 7 are therefore significant.

**4.19** It is considered likely that all options would result in some level of growth at the settlements of the District. These locations contain a concentration of the District's designated and undesignated heritage assets, including Listed Buildings and Conservation Areas. Of the larger towns and villages in the plan area, only Southwater and Broadbridge Heath do not contain Conservation Areas, although there are a number of Listed Buildings present at these settlements. Many of the

heritage assets in the District are found towards the centres of the larger settlements. Development at the more rural locations of the District (which most notably might account for any new settlements being delivered over the plan period) also has the potential to adversely affect the setting of heritage assets including the six Registered Parks and Gardens which are distributed across Horsham District. As such, all of the growth quantum options considered are expected to result in significant negative effects in relation to **SA objective 8: historic environment**. The particularly high levels of development associated with Option 4 (Near maximum growth) and Option 5 (Maximum growth) could be most likely to result in development coming forward at locations which form the setting of heritage assets. These options therefore have the greatest potential for significant negative effects to result.

**4.20** The amount of greenfield land required under each option is likely to result in development occurring on some land which is of higher agricultural value. The District only contains small areas of Grade 2 agricultural soils which are towards the south. The loss of Grade 2 agricultural soils, in the context of Horsham District, is considered to be particularly significant, given its currently limited supply. The rural nature of the District means there is also a limited supply of brownfield land. It is expected that all five options would result in a high amount of greenfield land take and a significant negative effect is therefore expected for all options in relation to **SA objective 9: soil quality**. The particularly high levels of growth proposed through Option 4 (Near maximum growth) and Option 5 (Maximum growth) may present the most difficulty in avoiding the District's highest quality agricultural land, given the increased greenfield land take that would be required.

**4.21** The level of land take expected under all options is also considered likely to result in a significant negative effect in relation to **SA objective 10: natural resources**. The majority of the District falls within Minerals Safeguarding Areas (MSAs). As such the delivery of a relatively high amount of growth in the plan area is likely to affect access to finite mineral resources, regardless of its spatial distribution. It may be particularly difficult to avoid the sterilisation of mineral resources under Option 4 (Near maximum growth) and Option 5 (Maximum growth), considering the particularly high level of land take required to deliver these options, meaning that there is increased potential for significant negative effects to occur.

**4.22** Development within Source Protection Zones (SPZs) in the plan area has the potential to adversely affect water quality. There are small areas of the south western part of the District towards Pulborough and West Chiltington which fall within an SPZ and it is expected that the level of growth associated with all five options considered could result in development at these locations. As such, a minor negative

effect is expected in relation to **SA objective 11: water resources** for all five options.

**4.23** The impact of new development on water quality in the plan area will be dependent on the capacity of wastewater treatment works (WwTW) infrastructure and the potential to increase this capacity where required. Therefore, uncertainty is attached to the effects recorded for each option on SA objective 11. The highest levels of development under Option 4 (Near maximum growth) and Option 5 (Maximum growth) are likely to result in increased pressure on wastewater infrastructure. The Water Cycle Study<sup>22</sup> indicates this is likely to be the case for development towards Billingshurst, Henfield and the north east of the District, by Crawley. Therefore, particular uncertainty is associated with the negative effects identified for these higher growth options, given the increased strain on WwTW infrastructure they may result in should they require higher levels of development at any of these locations.

**4.24** It is considered likely that all five options could potentially be constrained by areas of high flood risk from various sources. Parts of the River Arun and River Adur extend into the southern portion of the District and account for the large areas of Flood Zone 2 and Flood Zone 3 there. The River Arun also re-enters the District to the north west of the District, to the south of Rudgwick, and would act as a constraint to development in that area. It is noted that the sequential test will apply to the allocation of new sites in the District.

**4.25** The development of a higher amount of greenfield land is likely to increase the area of impermeable surfaces in Horsham District which may adversely impact levels of flood risk. As such, a significant negative effect is expected for Option 2 (Medium growth), Option 3 (Higher growth), Option 4 (Near maximum growth) and Option 5 (Maximum growth) in relation to **SA objective 12: flooding**. The latter two options are particularly likely to have significant effects on flood risk, given the higher overall land take that would be required. The lower amount of greenfield land which would be required to be developed through Option 1 (Lower growth) means that a minor negative effect is expected for this option in relation to SA objective 12.

**4.26** The impacts of new growth in Horsham District relating to reducing the need to travel, encouraging modal shift and reducing congestion will depend largely on the location of the new development in relation to sustainable transport links, services and facilities and employment land. As such an element of uncertainty is attached to the effects recorded for all five quantum options in relation to **SA objective 13: transport**. It is considered likely that the substantially higher level of growth set out through Option 3 (Higher growth) and in particular the highest levels of growth set out under Option 4

(near maximum growth) and Option 5 (Maximum growth) would result in particularly high numbers of trips being made on a regular basis in Horsham. Conversely, these options are also most likely to help fund new transport infrastructure, including bus services and cycle links through S106/CIL, as well as potentially ensuring their longer-term viability through increased usage. Option 4 and Option 5 are likely to offer the greatest potential in this respect given the increased demand for sustainable transport that they could create.

**4.27** Overall, an uncertain mixed (significant positive and significant negative) effect is therefore expected for these three options in relation to SA objective 13. The lower levels of growth set out through Option 1 (Lower growth) and Option 2 (Medium growth) are assumed likely to result in smaller increases in the number of journeys being undertaken regularly in the District, so would have lesser impacts on congestion. These options are, however, likely to provide more limited opportunities for funding transport improvements and for supporting the delivery of new services and facilities which could also reduce the need to travel longer distances. Therefore, an uncertain mixed (minor positive and minor negative) effect is recorded for Option 1 and Option 2.

**4.28** Similar effects are expected in relation to air pollution and emissions of carbon dioxide. This judgement is made considering the influence that day-to-day travel has in relation to these issues. Development within the District also has the potential to exacerbate existing air quality issues at the Air Quality Management Areas (AQMAs) already declared within or adjacent to Horsham, most notably at Cowfold, Storrington and Hazelwick AQMA in the adjoining district of Crawley. The lack of spatial information attached to the quantum options means that no variation is identified between the options in relation to their potential to intensify existing air quality issues at these locations. However, given that commuting data indicates a high level of commuting between Horsham and Crawley, there is some potential for the highest growth options to increase car traffic through the Hazelwick AQMA.

**4.29** Therefore, the positive effect expected for Option 3 (Higher growth), Option 4 (Near maximum growth) and Option 5 (Maximum growth) in relation to **SA objective 14: air quality** is considered likely to be minor. While these options are likely to help support the viability of sustainable transport provision in the plan area, services which may be provided are likely to include buses which are still likely to have some implications in terms of air quality. It is recognised that Option 3 (Higher growth), and in particular Option 4 (Near maximum growth) and Option 5 (Maximum growth), may present opportunities for the delivery of infrastructure which supports renewable energy generation, particularly where larger sites come forward and funding can be gained via S106/CIL.

<sup>22</sup> Gatwick Sub-Region Water Cycle Study



Current planning policy in the District supports an energy hierarchy where Combined Heat and Power (CHP) sits at the top. While large sites might provide funding for sustainable transport improvements and deliver the scale of development at which renewable energy schemes are viable, development at urban centres with large populations and complementary land uses may make achieving CHP more likely. It is expected that the positive effects of Option 3, Option 4 and Option 5 in relation to **SA objective 15: climate change** could be significant.

**4.30** The Economic Growth Assessment<sup>23</sup> indicates that, based on past take-up and baseline labour supply, the robust and aspirational scenario for employment land growth to plan for lies between 35 ha and 39 ha. It is noted that Gatwick Airport's proposed growth plans are likely to have an impact on the overall type and scale of employment land provision to be planned for within the wider North West Sussex area. Option 1 (Lower growth) would deliver land which meets the lower end of the projected requirement for the District. As such the level of growth set out should meet local need but would not support aspirations to substantially grow the local economy. It is noted that this approach is most likely to respond to the economic realities of the District considering its strong relationship with the Gatwick Diamond area, Crawley and London to which a high number of residents commute regularly. A minor positive effect is therefore expected for Option 1 (Lower growth) in relation to **SA objective 16: economic growth** and **SA objective 17: access to employment opportunities**.

**4.31** The higher amounts of employment land set out through Option 2 (Medium growth) and Option 3 (Higher growth) could allow for a more ambitious level of economic growth to be achieved in Horsham. While no specific level of employment land is proposed through Option 4 (Near maximum growth) and Option 5 (Maximum growth), the level planned for would be similar to Option 3. The highest levels of economic growth are likely to be achieved through Option 3 (Higher growth), Option 4 (Near maximum growth) and Option 5 (Maximum growth) for which significant positive effects are expected in relation to SA objectives 16 and 17. These higher growth options are also likely to help increase expenditure levels within the District and create jobs within the construction industry and associated supply chains, given the higher number of homes to be provided. Increased expenditure in the plan area is likely to help support the viability of the District's town centres.

**4.32** However, through these options it is expected that uptake of all identified employment land is unlikely to be achieved and

overly ambitious economic targets would not be met. In effect, the economy in the District may not be able to meet the needs of growing local population by attracting sufficient inward investment. As such, a minor negative effect is also expected for these options in relation to SA objective 16: economic growth.

**4.33** The higher overall levels of growth set out through Option 3 (Higher growth) Option 4 (Near Maximum growth) and Option 5 (Maximum growth) are also considered likely to result in increased congestion in the area, which may make employment sites difficult to access and economic investment in the District less attractive. This is considered to be particularly likely in the short term as new road infrastructure is delivered to support growth in the District. The increased potential for congestion in Horsham may be mitigated to an extent by increased investment in sustainable transport arising from the high levels of growth proposed in Option 4 and Option 5. However, the particularly high levels of development set out through Option 4 and Option 5 would increase the potential for new homes to come forward at less developed locations from which employment opportunities are less accessible. The negative effect recorded as part of an overall mixed effect for these two options in relation to SA objective 17: access to employment opportunities is therefore significant.

### Conclusion

**4.34** The SA of the quantum of growth options does not provide a definitive conclusion about which of the five options would be the most sustainable. Rather, its purpose is to draw out the comparative advantages and disadvantages of each option across the full suite of SA objectives, to inform the decision as to which quantum of growth should be pursued in the Local Plan.

**4.35** Nonetheless, it is possible to draw out some themes from the appraisal. As a general rule of thumb, the higher the quantum of growth, the more positively the options tend to perform against socio-economic objectives, such as meeting housing need (including affordable housing and the needs of surrounding districts), the provision of services and facilities, economic growth and job creation. In relation to economic growth and job provision there is likely to be a ceiling above which planning for increased levels of employment land will not result in increased inward investment. This is based on the latest evidence presented in the Economic Growth Assessment and the economic realities of the plan area.

**4.36** In contrast, the higher the quantum of growth the more likely it is that there will be significant negative effects on

<sup>23</sup> Lichfields on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council Northern West Sussex (2020) Northern West Sussex EGA



environmental assets, such as biodiversity, landscape and the historic environment, and environmental resources, such as water, soils and minerals, and air quality. Similarly, higher growth is more likely to result in development impinging on areas of flood risk or generating surface water run-off.

4.37 With respect to transport and carbon emissions, lower growth options may result in lower increases in the number of traffic movements and carbon emissions. These options are also less likely to require development to come forward at more isolated locations from which there will be an increased need to travel longer distances. However, higher growth options offer greater potential to improve investment in sustainable transport services and larger scale low carbon developments, in turn addressing overall carbon emissions.

4.38 With respect to services and facilities, such as schools, healthcare, open space and sports facilities, the higher the growth option the greater the pressure on existing provision and the more likely it will be that significant investment in new and improved provision is required, which could potentially be facilitated through contributions from development. By supporting higher levels of growth in the plan area, the resultant support for increased service provision may also help to partially offset the need to travel longer distances day-to-day.

## Spatial strategy options

4.39 Six overall strategy options for the distribution of development were identified by the Council, taking into account the current settlement pattern, the relationship of Horsham District with surrounding areas, and potential larger scale development sites. Each of the following options was subject to SA:

- **Option 1:** Existing settlement hierarchy strategy (bring forward existing development strategy)  
*Focus growth in and around the key settlement of Horsham and allow for growth in the rest of the District in accordance with the identified settlement hierarchy.*
- **Option 2:** Proportionate growth strategy  
*Growth is apportioned to all settlements in a more dispersed distribution in a way that is proportionate to the existing number of households/population.*
- **Option 3:** New garden towns  
*Strategic scale growth (90%) is delivered as new garden towns, with a small remainder (10% of total) delivered at small sites in accordance with localism principles.*
- **Option 4:** New urban extensions

*As per Option 3 but with the majority of growth focussed at new urban extensions.*

### ■ **Option 5:** Employment strategy

*Focus growth in Horsham District at locations expected to see significant employment growth (which could include employment growth close to the District boundary to respond to the areas which are of economic importance outside of Horsham).*

### ■ **Option 6:** Sustainable transport strategy

*Growth focused at settlements in the existing settlement hierarchy (for the District) with existing rail links, access to high frequency bus services (i.e. where services run once every 30 minutes or more often) and to a lesser extent where there is good access onto the primary road network (i.e. the A24, A29, A281, A283 and A264).*

4.40 The appraisal work considered both the principle of focusing growth in line with each option and, where appropriate, the implication of possible locations coming forward under that option. This was of particular relevance in relation to the appraisal of Options 3 and 4 which were informed by the large-scale site options being considered by the Council for garden towns and urban extensions in Horsham. In order to be precautionary, any potential effects that could arise at particular locations where development could come forward under an option influenced the overall likely effect recorded.

4.41 Some overarching key assumptions and themes were considered and used to inform the appraisal of overall strategy options considered. This included the strong economic relationship between Horsham District and Crawley and the surrounding Gatwick Diamond area which, alongside areas such as London, provide employment opportunities for a large number of residents. It is evident that the District (and to a lesser extent the largest settlements in the District) see a higher level of out-commuting to these areas. As such it is considered that failure to provide some level of growth which is well-related to Crawley, may fail to best respond to the economic realities of the area. Moreover, a strategy which is not well-related to Crawley would miss the opportunity to respond positively to any unmet housing need arising from Crawley specifically.

4.42 Notwithstanding the importance of Crawley to the District in terms of access to employment opportunities, options which would deliver a high amount of growth at urban extensions would include new growth at the edge of the town of Horsham. Given the importance of this settlement in terms of employment and service offer at the District level, this option would provide a high proportion of new residents with access to existing provisions of this type in the District.

**4.43** Options 3 and 4 which involve growth at new garden towns or at urban extension locations include a small amount of development to be provided in line with the principles of localism. This element of growth of both options is not expected to have a specific impact in terms of the spatial implications of either strategy. The majority of the development set out through these options would be at new garden towns and urban extensions respectively, and therefore it was considered appropriate for the appraisal to focus on the effects of these elements.

**4.44** The potential hurdles to providing a high level of growth at one location either in the form of new settlements or urban extensions was also considered when appraising Options 3 and 4. The success of large scale new developments will require the delivery of substantial amounts of supporting infrastructure. This is likely to include education and healthcare facilities. The sustainability of new settlements may also require new employment floorspace as well as retail facilities to establish an element of 'self-containment'. Therefore, viability could be an issue with respect to deliverability.

**4.45** The level of new provisions required at new settlements can be more challenging and costly to deliver in new settlements compared to urban extensions. At new settlements there is an increased need for supporting infrastructure compared to urban extension sites<sup>24</sup>. New

residents will often benefit from access to existing provisions within the built up area at existing settlements where urban extensions are provided. Achieving a degree of self-containment within new settlements is also likely to require substantial investments into new transport systems and it has been suggested that building standalone new settlements can exacerbate the dysfunctionality of the existing system for funding large scale developments. Whilst similar challenges exist in delivering urban extensions, it has been found the per-dwelling cost of delivering adequate infrastructure for an urban extension can be half of what is required for a new settlement<sup>25</sup>.

**4.46** The implications of delivering new urban extensions in the District may relate to achieving social cohesion with existing development within the existing built up area. Achieving social integration with existing community networks and challenges relating to ensuring that existing services and facilities do not become overburdened as new homes are provided mean that placemaking issues are more likely to arise for development delivered in this manner.

**4.47** The detailed findings by SA objective for each of the spatial growth options were set out in Chapter 2 of the Interim SA of Growth Options (LUC, February 2020). A summary of the sustainability effects of the six overall strategy options being considered for the Horsham Local Plan is presented in **Table 4.2** below.

<sup>24</sup> Bramley, Glen; Ballantyne Way, Sarah; Cousins, Lin; and Houston, Dominic (2017), The Deliverability and Affordability of Housing in the South West of England. RTPi Research Report no. 16. Available at: <https://three-dragons.co.uk/deliverability-affordability-housing-south-west-england/>

<sup>25</sup> URBED (2014), Uxcester Garden City: Submission for the 2014 Wolfson Economics Prize. Available at: <http://urbed.coop/sites/default/files/URBED%20Wolfson%20Submission.pdf>

**Table 4.2 Summary of likely sustainability effects of the overall strategy options considered for Horsham District Local Plan**

SA Objective	Option 1: Existing settlement hierarchy	Option 2: Proportionate growth	Option 3: New garden towns	Option 4: New urban extensions	Option 5: Employment strategy	Option 6: Sustainable transport strategy
1: Housing	++	++/-?	++?	++?	++	++
2: Access to services and facilities	++/-?	--/+	++/--?	++/-?	++/--	++/-
3: Inclusive communities	++	+/-	++/--?	++/-?	++/-	+/-
4: Crime	0	0	0	0	0	0
5: Health and wellbeing	++/-?	--/+	++/--?	++/-?	+/-	+/-?
6: Biodiversity and geodiversity	--?	--?	--?	--?	--?	--?
7: Landscapes and townscapes	--/+?	--?	--?	--?	--?	--?
8: Historic environment	--?	--?	--?	--?	--?	--?
9: Soil quality	++/-?	--?	--?	--?	+/-?	--/+?
10: Natural resources	-?	--?	--?	--?	--?	--?
11: Water resources	-?	-?	0	-?	--?	-?
12: Flooding	--	--?	--	--	--?	--?
13: Transport	++/--	--/+	--/+	+/-	++/--	++/-
14: Air pollution	+/-	--/+	--/+	--/+	--/+	--/+
15: Climate change	+/-	--/+	--/+	+/-	--/+	+/-
16: Economic growth	++/-?	--/+	+/-?	++/-?	++?	+/-
17: Access to employment opportunities	++/-	--/+	++/--?	++/-?	++	++/-

4.48 The summary of effects indicates that Option 1 (Existing settlement hierarchy) and Option 4 (New urban extensions) perform better overall compared to the other strategy options

in relation to many of the SA objectives. Option 1 (Existing settlement hierarchy) would deliver benefits in terms of providing a high number of residents with access to the largest

settlements in Horsham which support the widest range of services and facilities and employment opportunities in the District. The distribution of development supported through both options would provide new growth by the main settlement of Horsham which acts as the main economic centre and service provider in the District. Option 1 (Existing settlement hierarchy) therefore presents more potential for avoiding adverse impacts in terms of social integration and local landscape and townscapes.

4.49 Option 4 (New urban extensions) would provide a large amount of growth by Crawley which is a significant employment centre in the wider area and provides a substantial service offer. Delivering new growth at large scale new urban extensions would allow new residents to benefit from access to existing services and facilities as well as employment opportunities and sustainable transport links. The scale of growth would also perform more favourably than Option 1 (Existing settlement hierarchy) in terms of supporting substantial new service provision in the District.

4.50 It is expected that Option 4 (New urban extensions) and Option 5 (Employment strategy) could respond strongly to the economic realities of the area, reflecting the importance of Crawley and the surrounding Gatwick Diamond Area. Option 2 (Proportionate growth) consistently scored negatively across the majority of the SA objectives compared to the other strategy options and therefore is likely to be the least sustainable option. Delivering growth in a proportionate manner would fail to make best use of the settlements with the strong service offer and employment opportunities, which in turn could result in increased car use. It may also result in a higher amount of development at smaller settlements and more rural locations than might be the case through other options, meaning that adverse impacts on biodiversity, heritage and the landscape may be more likely to result.

4.51 Option 1 (Existing settlement hierarchy) and Option 4 (New urban extensions) generally perform better than Option 3 (New garden towns) and Option 5 (Employment strategy) in relation to **SA objectives 13: transport, 14: air pollution and 15: climate change**. Option 6 (Sustainable transport strategy) performs quite similarly to Option 1 (Existing settlement hierarchy) and Option 4 (New urban extensions) given the transport focus of this option and the close correlation between the position of settlements in the development hierarchy and the strength of their sustainable transport offer.

4.52 Option 1 (Existing settlement hierarchy) and Option 4 (New urban extensions) also perform better than Option 3 (New garden towns), Option 5 (Employment strategy) and Option 6 (Sustainable transport strategy) in relation to **SA objective 5: health and wellbeing** as the larger settlements also provide the best access to healthcare facilities in Horsham District. Locating most new development at these

settlements (particularly at large sites) may support the delivery of new healthcare facilities. However, there is the potential for existing facilities to become overburdened if this issue is not given appropriate consideration, particularly in terms of the cumulative effects of multiple sites.

4.53 Unsurprisingly, Option 5 (Employment strategy) performs particularly well in relation to **SA objectives 16: economic growth and 17: access to employment opportunities** compared to other options, given its focus on achieving a more employment-focussed strategy.

4.54 Despite having similar effects in relation to the majority of the SA objectives, Option 1 (Existing settlement hierarchy) performs better than Option 4 (New urban extensions) in relation to **SA objectives 7: landscapes and townscapes, 9: soil quality and 10: mineral resources** as it is expected to result in less development on large-scale greenfield sites.

## Conclusion

4.55 The recommendations of the SA at the Regulation 18 stage were that the Council might consider taking forward a hybrid of options which includes development in line with the existing development hierarchy, one or more large growth points (with many of the urban extensions noted to performing more sustainably in relation to a number of objectives) and a sizeable proportion of growth delivered at a location which makes best use of the District's strong relationship with Crawley.

4.56 The SA of the spatial strategy options concluded that it may be that development will need to be accommodated at one of the new settlement site options, given the overall level of growth which is required over the plan period. The inclusion of this type of site could help to provide new services and facilities as well as new high-quality employment land which makes use of the strategic road network to the benefit of the surrounding area. It was noted that an approach of this nature would have to take into account particular environmental sensitivities of the District, including the High Weald AONB, which borders parts of settlement edge of the town of Horsham as well as Crawley and the South Downs National Park which lies to the south.

4.57 The SA noted that the actual effects of the overall strategy options depend heavily upon the precise location and scale of development, the quality of design and the delivery of supporting infrastructure. Therefore, in order to provide the Council with more detailed analysis, further SA work was carried out that considered different combinations of the spatial strategy options and different quanta of development, in the form of growth scenarios. This work is presented in **Chapter 7**.

## Chapter 5

### Appraisal of large site options

#### Introduction

**5.1** The Council initially considered 10 large site options as part of the Local Plan review. These are strategic sites which can make a significant contribution to the future housing needs for the District. These sites have been appraised in more detail than the small site options, with consideration for the specific proposals at each location. The sites comprise a mix of urban extensions and new settlement proposals.

**5.2** In addition to these 10 site options, as part of the SA work for the Regulation 18 Local Plan, the Ashington cluster site was appraised to the same level of detail as the strategic sites due to the high amount of development which it can provide. The sites forming the cluster came forward separately as part of the Council's SHELAA process but are now being promoted as one site by a consortium since November 2020. The appraisal of the Ashington cluster site as one large, combined site reflects the fact that delivery of some parcels which form part of the cluster are dependent on the whole cluster coming forward. This approach does not imply that certain parcels could not come forward independently, should a lower level of development ultimately be deemed appropriate. Parcels that make up the Ashington cluster site which have potential to come forward individually (SA085, SA520 and SA539) have been appraised separately in this SA Report as small site options (see **Chapter 6** and **Appendix E**)

**5.3** The assumptions set out in **Appendix C** have been used to inform the appraisal of the large site options. However, specific details of the proposals for each site have also been taken into account in the appraisal. These proposals have been presented separately in detail in the site assessment proformas published by the Council as part of the evidence base for the Local Plan Review. The detailed SA matrices for each of the large site options are presented in **Appendix D**.

**5.4** The appraisal work that was originally undertaken for these 11 large site options as part of the SA work for the Regulation 18 Local Plan has been updated to take into account new information provided by the Council in relation to expected proposals for each site. The updated appraisal work also reflects any changes to the site boundaries, baseline conditions and the Council's assessment work for these sites since the Regulation 18 stage. This includes, for example, where new information has become available in relation to requirements for sites to be supported by wastewater



treatment work infrastructure. For sites that were appraised in the SA report for the Regulation 18 Local Plan and which have subsequently been updated to reflected new evidence provided as part of the preparation of the Regulation 19 Local Plan, the matrices in **Appendix D** show the likely effects that were identified at both stages.

**5.5** This update of the appraisal work has also considered one additional large site option. The Horsham Golf and Fitness site is not considered suitable for development by the Council as it does not meet the criteria set out in the Council's Site Assessments Report. However, the site has been appraised to the same level of detail as the other large site options given that it is being promoted for a significant number of homes and is therefore recognised as having strategic implications. It should also be noted that the West of Kilnwood Vale site is no longer considered by the Council to have potential to be developed as a strategic site and the reduced expected capacity of the site for housing delivery has been reflected in the appraisal of this site. Given that the site still has capacity for a substantial amount of development (350 homes) the findings for this site are presented alongside the other large site options.

**5.6** The 12 large site options that have been appraised are as follows (details of the expected number of dwellings and key employment uses at each site is provided in italics):

- Site SA101: Land West of Ifield (urban extension)  
*3,250 dwellings and approximately 9,000sqm B2/B8 and former B1 uses (c.2.0ha) within the plan period (and 10,000 dwellings in the longer term when fully built out).*
- Site SA118: Land East of Billingshurst (urban extension)  
*650 dwellings and 2,200sqm B2/B8 and former B1 uses (0.5ha) within the plan period.*
- Site SA119: West of Southwater (urban extension)  
*1,200 dwellings and 18,000sqm B2/B8 and former B1 uses (c.4.0ha) within the plan period.*
- SA291: West of Kilnwood Vale (urban extension)  
*350 dwellings with no substantial employment land provision within the plan period*
- Site SA394: Rookwood (urban extension)  
*725 dwellings and 3,000sqm E uses (start-up or flexible desk space facilities) (c.0.4ha) within the plan period.*
- Site SA414: Land North East of Henfield (Mayfield) (new settlement)  
*2,000 dwellings and the creation of 7,000 new jobs through the provision of new employment floorspace*

*within the plan period (and 7,000 homes in the longer term when fully built out).*

- Site SA459/SA674/SA846: Land East of Kingsfold (urban extension/satellite settlement)  
*1,000 dwellings and 75,000m<sup>2</sup> of employment space within the plan period (and 1,300 dwellings in the longer term).*

- Site SA597: Adversane / Land at Steepwood Farm (new settlement)  
*2,000 dwellings and the creation of 2,450 jobs within the plan period (and a total of 2,850 dwellings in the longer term).*

- Site SA716: Buck Barn / Land at Newhouse Farm, West Grinstead (new settlement)  
*2,100 dwellings, 30,000sqm B2/B8 and former B1 uses (of which 21,200sqm B2/B8) (c.6.5ha) within the plan period (and a total of 3,500 dwelling in the longer term).*

- Site SA744: (includes SA225)/SA668: West of Billingshurst (urban extension)  
*1,000 dwellings and 4,600m<sup>2</sup> of B class use employment space within the plan period*

- Site SA754: Horsham Golf & Fitness Club (urban extension)

*500-550 dwellings and a range of sports facilities.*

- Site SA085/SA520/SA524/SA539/SA790: Ashington cluster (urban extension)

*400 dwellings and a limited amount of flexible employment space within the plan period.*

**5.7** In effect each site would be delivered as a new standalone garden settlement or an urban extension of the higher order settlement (i.e. Crawley, Horsham, Billingshurst or Southwater) which it adjoins or is in close proximity to. Information available from the Council about the type of development and infrastructure which are being promoted and are expected to be provided to support new growth at each site has been used to inform the appraisal work.

**5.8 Table 5.1** below presents a summary of the SA scores for these twelve large site options. The sites that are proposed for allocation in the Regulation 19 Local Plan are detailed in **Chapter 8** in relation to the policies which allocate them.

**5.9** As discussed below, the development of sites which would provide new homes, as well as new services and facilities and space for employment within the District, is generally likely to have positive effects on some of the social and economic objectives (housing and economic growth). More mixed effects are expected in relation to health and wellbeing as well as access to services depending on proximity to existing

settlements, while a range of negative effects are expected for many of the large site options in relation to the environmental objectives. This is because many of the large site options have the potential to result in loss of large areas of greenfield land, high value agricultural soils and permeable surfaces as

well as finite mineral resources. There is also potential for impacts on the landscape, the historic environment and biodiversity/geodiversity assets in the District.

**Table 5.1 Summary of likely sustainability effects of the large site options considered for the Horsham District Local Plan**

SA Objective	Urban extension or 'satellite settlement' sites									Standalone new settlement sites		
	SA101: West of Ifield	SA118: Land East of Billingshurst	SA119: West of Southwater	SA291 West of Kilnwood Vale	SA394: Rookwood	SA459/SA674/SA846: Land East of Kingsfold	SA744 (includes SA225)/SA668: West of Billingshurst	SA754: Horsham Golf & Fitness Club	SA085/SA520/SA524/SA539/SA790: Ashington cluster	SA414: Land North East of Henfield (Mayfield)	SA597: Adversane	SA716: Buck Barn
1: Housing	++	++	++?	+	++	++	++	++	+	++	++	++
2: Access to services / facilities	++?	+/-?	++?	+/-?	++?	--/+?	++/-?	+/-?	+/-?	++/-?	++/-?	++/-?
3: Inclusive Communities	+?	+?	+?	0	+?	0	+/-?	0	+?	0	0	0
4: Crime	0?	0?	0?	0?	0?	0?	0?	0	0?	0?	0?	0?
5: Health and wellbeing	++/-?	++/-?	++/-?	+/-?	++/-?	--/+?	++/-?	--/+?	+/-?	++/-?	++/-?	++/-?
6: Biodiversity	--?	--?	--?	--?	--?	--/+?	--/+?	-?	--?	--?	--?	--/+?
7: Landscape	--?	-?	--?	--?	--?	--?	--?	--?	--?	--?	--?	-?
8: Historic environment	--?	--?	--?	-?	-?	--?	--?	--?	--?	--?	--?	--?
9: Soil quality	-	--?	--?	--?	-	--?	--?	-	--?	--?	--?	--?
10: Mineral resources	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
11: Water resources	-?	-?	0	-?	0	0	-?	0	0	-?	0	0
12: Flooding	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?	-?
13: Transport	++/-?	++/-?	++/-?	++/-?	++/-?	+/-?	++/-?	++/-?	+/-?	--/+?	--/+?	--/+?
14: Air pollution	++/-?	++/-?	++/-?	++/-?	++/-?	+/-?	++/-?	++/-?	--/+?	--/+?	+/-?	--/+?
15: Climate change	+/-	+/-?	+/-?	+/-?	+/-?	++/-?	+/-?	+/-?	+/-?	++/-?	++/-?	++/-?
16: Economic growth	++	++	++	+	+	++?	++	+	+	++?	++?	++?
17: Access to employment	++	+/-?	+/-?	+	++	+/-	+/-?	+/-?	+/-	--/+	+/-	+/-

## Summary of the likely sustainability effects of the large site options

**5.10** All 12 large sites are expected to have positive effects in relation to **SA objective 1: housing**. Each site would make a sizeable contribution to the District's identified housing need, including the provision of affordable housing.

**5.11** While the Ashington cluster of sites (SA085/SA520/SA524/SA539/SA790) and the West of Kilnwood Vale site (SA291) are expected to deliver around 400 and 350 new homes respectively over the plan period, the amount of housing that would be provided at these sites is substantially lower than the other large site options. For these two sites, the positive effect expected in relation to SA objective 1 is therefore likely to be minor. Information from the Council regarding the proportion of affordable housing to be delivered at the West of Southwater site (SA119), indicates that this may be influenced by the effects of the Covid-19 pandemic. The developer for this site has stated that there is a commitment to providing the highest level of affordable housing that the scheme can support. However, it is also stated there is a need to be cautious about the level of affordable homes supported, given the potential impacts of the recession associated with the pandemic. Therefore, the significant positive effect expected in relation to **SA objective 1** for that site is uncertain.

**5.12** The sites at Ifield (SA101) and West of Kilnwood Vale (SA291) are in close proximity to the boundary with Crawley and could potentially contribute to the unmet housing need within that District as part of the wider North West Sussex Housing Market Area (HMA). Similarly, the Land North East of Henfield (Mayfield) site (SA414) could make a positive contribution towards the unmet housing need in Mid Sussex which it lies in close proximity to and is also within that HMA. The Ifield (SA101), Land North East of Henfield (Mayfield) (SA414), Adversane (SA597) and Buck Barn (SA716) sites could also potentially deliver a high number of new homes in the longer term beyond the plan period, given their capacity and developers' proposals.

**5.13** A positive effect is expected for all large sites in relation to **SA objective 2: access to services and facilities**. Many of the large site options (most notably the urban extensions) would provide access to existing services and facilities within the larger settlements. Proposals for many of the large site options also include the delivery of new services and facilities. A significant positive effect alone has been identified for the sites at Ifield (SA101), West of Southwater (SA119) and Rookwood (SA394). These sites are located within walking distance of an existing settlement (Crawley, Southwater and Horsham town, respectively) and existing services and

facilities, and would also deliver new services and facilities of a more substantial scale.

**5.14** The positive effect for the East of Billingshurst site is only expected to be minor. Although this site is in close proximity to the built-up area boundary of Billingshurst and the services and facilities there, the proposals for new services at the site are less substantial than those expected at new settlement sites and many of the other urban extensions. Essential service provision here would be more limited, with contributions secured towards a primary school but no new healthcare facilities to be provided. Given that issues relating to the capacity of the secondary school within Billingshurst have been identified and that this issue may need to be addressed before any housing is delivered, the minor positive effect expected is combined with a potential but uncertain minor negative effect.

**5.15** For eight further sites (West of Kilnwood Vale (SA291), Land North East of Henfield (Mayfield) (SA414), Kingsfold (SA459/SA674/SA846), Adversane (SA597), Buck Barn (SA716), West of Billingshurst (SA744 (includes SA225)/SA668, Ashington cluster (SA085/SA520/SA524/SA539/SA790) and Horsham Golf and Fitness Club (SA754)) a mixed effect has been identified in relation to SA objective 2, given that these sites are not in close proximity to certain specific types of services and facilities. The negative effect expected as part of an overall mixed effect for site SA459/SA674/SA846 at Kingsfold is expected to be significant. Although the proposals for this site includes the provision of new services and facilities, the level of service provision is more limited than for many of the other site options (for example this site is not expected to provide new healthcare or schools onsite). Furthermore, the nearest town centre and existing healthcare and education facilities are not within close proximity and are unlikely to be easily accessible to residents. The new settlement options at Mayfield, (SA414), Adversane (SA597) and Buck Barn (SA716) are not within close proximity of an existing town centre or a wide range of existing services and facilities. However, the Mayfield, (SA414) and Buck Barn (SA716) sites are relatively well related to the developed areas of Henfield and Southwater, meaning that residents might have access to some services and facilities. It is noted that essential services such as healthcare and education are less well related to these sites. The Adversane site would provide nearby access to an existing college facility; however it is not expected that this facility would serve a large proportion of new residents at the site. The negative effect recorded for these three sites is minor. Uncertainty is attached to the effects recorded as they will be dependent in part on the delivery of new services and facilities, the phasing of development and existing pressures on service provision.

**5.16** None of the sites are located within an area that is within the 40% most deprived and therefore the potential for development to achieve local regeneration in areas affected by social deprivation is limited. However, where sites are located within close proximity of an existing town or neighbourhood centre (sites at Ifield (SA101), East of Billingshurst (SA118), West of Southwater (SA119), Rookwood (SA394), West of Billingshurst (SA744 (includes SA225)/SA668) and Ashington cluster (SA085/SA520/SA524/SA539/SA790)), a minor positive effect has been identified in relation to **SA objective 3: inclusive communities**. It is expected that the new uses at these sites could potentially complement and contribute to the vitality of the existing uses at the town and neighbourhood centres in question.

**5.17** In the case of the West of Billingshurst site (SA744 (includes SA225)/SA668), a minor negative effect has been identified in combination with the positive effect because there is potential for the A29 to act as a barrier between the site and the existing urban edge of Billingshurst. The severance created by this road may limit the potential for cohesion between the existing settlement and the new development.

**5.18** All of the site options are expected to result in an uncertain negligible effect in relation to **SA objective 4: crime**. The potential for development to minimise the occurrence and fear of crime is likely to be influenced mostly by the detailed design of development, which is unknown at this stage.

**5.19** A mixed effect is expected for all sites in relation to **SA objective 5: health and wellbeing**. All but four sites (West of Kilnwood Vale (SA291), Kingsfold (SA459/SA674/SA846), Horsham Golf and Fitness Club (SA754) and Ashington (SA085/SA520/SA524/SA539/SA790)) are expected to have a significant positive effect as they are in close proximity to at least one existing health centre and an area of open space/sports facility or because the site proposals include the delivery of substantial new healthcare facilities and open space/active travel routes. However, uncertainty is attached to the effects identified as there is the potential for existing healthcare facilities to be overburdened given the high amount of new development that would be delivered at each location.

**5.20** The West of Kilnwood Vale site (SA291) and the Horsham Golf and Fitness Club (SA754) would not provide any healthcare facilities, while the Kingsfold site (SA459/SA674/SA846) and the Ashington cluster of sites (SA085/SA520/SA524/SA539/SA790) are only expected to provide contributions towards these type of facilities and a GP outreach service, respectively. These sites are also not in close proximity of an existing healthcare facility. The negative effect expected for the Kingsfold site is significant given that it is also not in close proximity to any existing recreation

facilities. The negative effect recorded for this site also reflects the potential for residents to be affected by noise pollution. The negative effects at all other sites except for the sites at Land North East of Henfield (Mayfield) (SA414) and Ashington cluster (SA085/SA520/SA524/SA539/SA790) reflect the potential for noise pollution associated with aircraft at Gatwick, railway lines or A-roads to affect new residents.

**5.21** A significant negative effect on SA objective 5 has also been identified for the sites at Ifield (SA101), Horsham Golf and Fitness Club (SA754) and Rookwood (SA394), as the development of those sites could result in the loss of areas of outdoor sports provision.

**5.22** An uncertain significant negative effect is expected for all but one of the sites (Horsham Golf & Fitness Club (SA754)) in relation to **SA objective 6: biodiversity**. Eleven sites contain or are within close proximity of a biodiversity designation and/or fall within an Impact Risk Zone (IRZ) which identifies residential or employment development as a potential risk. In the case of five of the sites within the west of District (East of Billingshurst, West of Southwater, Adversane, West of Billingshurst and Ashington (SA118, SA119, SA597, SA744 (includes SA225)/SA668 and SA085/SA520/SA524/SA539/SA790)), the negative effect is because of their location within the Bat Sustenance Zone associated with the Mens SAC. Development at Buck Barn could impact upon the rewilding objectives of the Knepp Estate.

**5.23** Development at all of these site options would result in the development of previously undeveloped land and there may be pressures associated with habitat loss, fragmentation or disturbance. Furthermore, as new development is constructed and occupied there is likely to be potential for increased air/noise/light pollution as well as recreational pressures. At the Horsham Golf and Fitness Club site (SA754) there is more limited potential for impacts on biodiversity designations and the negative effect recorded in relation to SA objective 6: biodiversity is minor. While areas of ancient woodland are found within close proximity, the site and surrounding land are not designated as important for nature conservation. The details design of the development at each site may allow for some degree of mitigation meaning there is some degree of uncertainty.

**5.24** The majority of the sites would include the provision of new and enhanced open space and green infrastructure. The negative effects recorded for all sites in relation to SA objective 6 are therefore uncertain given that these measures may help to mitigate adverse effects in relation to the natural environment. A minor positive effect is identified in combination with the negative effect for the sites at Kingsfold (SA459/SA674/SA846), Buck Barn (SA716) and West of Billingshurst (SA744 (includes SA225)/SA668) as a significant



area of these sites is expected to be preserved as new country parks.

**5.25** All of the large site options would involve the development of mostly greenfield land as substantial urban extensions or new growth points at currently undeveloped locations. Therefore, there is potential for development to impact upon the existing character of the landscape. A significant negative effect has been identified for 10 sites in relation to **SA objective 7: landscape** (Ifield (SA101), West of Southwater (SA119), West of Kilnwood Vale (SA291), Rookwood (SA394), Land North East of Henfield (Mayfield) (SA414), Kingsfold (SA459/SA674/SA846, SA597), Adversane (SA597), West of Billingshurst (SA744 (includes SA225)/SA668), Horsham Golf and Fitness Club (SA754) and Ashington cluster (SA085/SA520/SA524/SA539/SA790)). These sites contain substantial areas of land that was assessed in the Horsham District Landscape Capacity Assessment<sup>26</sup> as having no/low or low-moderate landscape capacity to accommodate large-scale residential and/or employment development. The West of Kilnwood Vale site also lies almost immediately to the north of the High Weald AONB and therefore development at this location has the potential to impact upon the setting of this designated landscape. Development of this site may also contribute to coalescence between Crawley and Horsham town.

**5.26** Only two sites (East of Billingshurst (SA118) and Buck Barn (SA716)) lie on land which is mostly assessed as having moderate capacity for large scale residential development as part of the Landscape Capacity Assessment. A minor rather than significant negative effect has therefore been identified in relation to SA objective 7 for these sites. All effects identified in relation to this SA objective are uncertain as the design of new development may provide opportunities to mitigate adverse effects and achieve enhancements. This may particularly be the case where the delivery of new urban extensions provides opportunities to soften existing settlements edges and improve the transition to the open countryside.

**5.27** There is potential for the large sites to impact negatively upon the historic environment within the District. It is likely that there will be opportunities to support the mitigation of adverse impacts through the design of new development and therefore all effects recorded are uncertain. A significant negative effect has been identified for the majority of the sites in relation to **SA objective 8: historic environment**. These sites contain or are in close proximity to designated and/or local heritage assets, whose settings may be impacted upon as result of new development.

**5.28** The findings for each site have been informed by the heritage impact work undertaken by the Council. For 10 of the site options it was concluded that development would result in significant change to the setting of at least one designated heritage asset. The exceptions are site SA291 which would form an extension to Kilnwood Vale to the west of Crawley and site SA394 at Rookwood. The closest designated heritage asset to the West of Kilnwood Vale site is located approximately 500m to the west and the heritage impact work for this site concluded that, while the assets nearby are sensitive to change, the new development would not result in a magnitude of effects that could cause significant change to the settings of these heritage assets. The site also includes a number of Archaeological Notification Areas, although there is potential for relevant investigations of archaeology to be supported before development begins. A number of designated heritage assets and Archaeological Notification Areas also lie in close proximity to the Rookwood site. The magnitude of change was recorded as low for the heritage assets in question relating to development at this site. The negative effects expected for these sites in relation to SA objective 8 are therefore expected to be minor.

**5.29** The District contains large swathes of Grade 3 agricultural land as well as substantial areas of land which fall within Mineral Safeguarding Areas (MSAs). Most of the large sites take up substantial areas of undeveloped land which comprise higher value soils and land within MSAs. As such an uncertain significant negative effect is expected for the majority of the sites in relation to **SA objectives 9: soil quality** and **10: natural resources**.

**5.30** The sites at Ifield (SA101), Horsham Golf and Fitness Club (SA754) and Rookwood (SA394) have been identified as having the potential to result in a minor negative effect in relation to soil quality, because a high proportion of these sites is located on Grade 4 agricultural land.

**5.31** Uncertainty is attached to the majority of the effects identified for these sites in relation to SA objective 9 as there are no data available to distinguish whether the Grade 3 land for most of the sites is Grade 3a (good quality) or the Grade 3b (moderate quality). Uncertainty is also attached to the significant negative effects expected for all sites in relation to **SA objective 10**, as there may be opportunities to deliver development in a manner which would allow continued access to mineral resources in the future. The large amount of land required for each site option means that some adverse impacts relating to soil quality and mineral resources in Horsham may result regardless of measures to achieve mitigation.

<sup>26</sup> Horsham District Council (2020) Landscape Capacity Assessment



**5.32** The Gatwick Sub-Region Water Cycle Study<sup>27</sup> has identified areas of the District as having potential for impacts relating to Wastewater Treatment Works (WwTW) capacity if development occurs. The findings of this study also reflect discussions that the Council has had with water suppliers for the District. WwTW infrastructure in the plan area may need to be upgraded to accommodate substantial additional development towards Billingshurst, Henfield and the north east of the District, by Crawley. Given that the level of development proposed may support the delivery of new WwTW infrastructure to help mitigate adverse impacts, the overall effect is uncertain.

**5.33** The sites which are located at East of Billingshurst (SA118), West of Billingshurst SA744 (includes SA225)/SA668), North East of Henfield (Mayfield) (SA414), towards the boundary with Crawley (Ifield (SA101) and West of Kilnwood Vale (SA291)) are expected to have uncertain minor negative effects in relation to **SA objective 11: water resources**. For the West of Billingshurst site the effect also reflects the potential for impacts on water quality at the Upper Arun SSSI. Natural England has identified that development of the site will need to be assessed in terms of the potential effects on this nationally important biodiversity site. Potential adverse effects are identified in relation to surface and wastewater. None of the large site options considered are located within a Source Protection Zone (SPZ) and the remaining sites are not expected to be constrained by the capacity of the wastewater infrastructure in the District or the surrounding area. A negligible effect has therefore been identified for the remaining sites in relation to SA objective 11.

**5.34** All of the sites considered are expected to have minor negative effects in relation to **SA objective 12: flooding**. While all sites fall mostly outside of the higher risk flood areas, they would result in the development of a large amount of greenfield land. Therefore, all sites would contribute to a substantial increase in the overall area of impermeable surfaces in Horsham District. For all sites the effect is uncertain. The proposals for these sites include the incorporation of sustainable drainage systems (SuDS) or other flood mitigation measures which could help to mitigate the potential for increased flood risk associated with an increase in impermeable surfaces.

**5.35** Mixed effects are expected for all the site options in relation to **SA objectives 13: transport, 14: air pollution and 15: climate change**. The achievement of these SA objectives is likely to be influenced to varying degrees by the potential for the new development to promote modal shift in the District. The proximity of sites to existing sustainable transport links

and services and facilities as well as the potential to make new provisions of this type onsite will play an important role in relation to these SA objectives. All of the sites include provisions which could help reduce the need for residents to travel and therefore potentially limit the contribution to congestion, climate change and air pollution in the long term. In addition, the existing commuting patterns in the areas adjacent to the proposed developments have also been considered. All effects are uncertain given that the decisions of residents to choose to travel by car or otherwise will influence any potential for achieving modal shift.

**5.36** All new development is likely to result in carbon emissions, as new homes and businesses require heat and electricity, as well as embodied energy in construction materials. Carbon emissions from the built environment can be reduced through energy efficient design and construction, and the inclusion of low energy (e.g. energy efficient boilers and ground source heat pumps) and renewable energy sources (e.g. solar) to supply heat and power.

**5.37** Providing and connecting to district heating schemes may be more likely to be achieved at larger developments, although there is no accepted threshold above which this is considered to be more viable. However, those strategic sites where the inclusion of low carbon and sustainable energy generation explicitly forms part of the development proposals have been scored more favourably, although other strategic sites may also offer this potential. Otherwise, options that are likely to place greater reliance on private vehicles, as opposed to walking, cycling and public transport, are considered more likely to generate higher carbon emissions.

**5.38** The delivery of a high amount of development at the large sites has the potential to increase the overall traffic in the District and therefore negative effects have been identified for all sites in relation to **SA objective 13: transport**. For the sites Land North East of Henfield (Mayfield) (SA414), Adversane (SA597) and Buck Barn (SA716) the relationship of the sites with the existing strategic road network and/or the lack of accessibility to railway links and existing services and facilities means that the negative effect is likely to be significant. Significant positive effects (as part of mixed effects overall) are expected in relation to SA objective 13 for sites at Ifield (SA101), East of Billingshurst (SA118), Southwater (SA119), West of Kilnwood Vale (SA291), Rookwood (SA394), Horsham Golf and Fitness Club (SA754) and West of Billingshurst (SA744 (includes SA225)/SA668)) as they are well-related to existing sustainable transport links and higher order settlements which provide access to a wide range of services and facilities. It should be noted that while the

<sup>27</sup> JBA Consulting on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Reigate and Banstead District Council (2020) Gatwick Sub-Region Water Cycle Study

proposals for the Kingsfold and Adversane sites include the potential delivery of new railway stations, there is currently no agreement with the statutory bodies for their delivery.

**5.39** It is likely that increased travel in the District will contribute to issues relating to air pollution as well as increasing carbon emissions. The Ifield (SA101), West of Kilnwood Vale (SA291), Land North East of Henfield (Mayfield) (SA414), Buck Barn (SA716) and Ashington cluster (SA085/SA520/SA524/SA539/SA790) sites are expected to have significant negative effects in relation to **SA objective 14: air quality**. The effects reflect the potential for increased traffic within AQMAs which may exacerbate existing air quality issues.

**5.40** A significant positive effect has been identified in relation to **SA objective 15: climate change** for the sites Land North East of Henfield (Mayfield) (SA414), Kingsfold (SA459/SA674/SA846), Adversane (SA597) and Buck Barn (SA716) as the site proposals include infrastructure to support low carbon and sustainable energy generation. This type of provision would directly help limit any increase in carbon emissions as a result of new development at these sites. For the Land North East of Henfield (Mayfield) (SA414) and Buck Barn a significant negative effect is expected in combination with the significant positive effect. The Henfield site is not in close proximity to any existing sustainable transport links or services and facilities and would help deliver a new link road which may help to reduce local congestion but may also limit the potential for achieving modal shift in the area.

**5.41** The Buck Barn site (SA716) is relatively well related to the developed area of Southwater, however, a wide range of services and facilities are not readily accessible from the site. The nearest healthcare and school facilities are approximately 2.0km from the site. There are also no railway links in close proximity and development of the site would result in the upgrading of the strategic road network which could reduce the potential to achieve modal shift at this location. While the large sites in closest proximity to Crawley (Ifield (SA101) and West of Kilnwood Vale (SA291)) could also help facilitate improvements to the strategic road network by facilitating the delivery of the Crawley Western Link Road, these sites are comparatively well-related to existing services and facilities as well as sustainable transport links within Crawley and the surrounding area. As such, the negative effects expected as part of overall mixed effects in relation to SA objective 15 for these two sites are expected to be minor.

**5.42** As well as meeting the area's identified housing need, the delivery of the large sites also has the potential to support the local economy by increasing the available workforce, increasing local expenditure and providing construction job opportunities in the short term. As such, positive effects are expected for all site options in relation to **SA objective 16:**

**economic growth**. Furthermore, the delivery of new high-quality employment floorspace could also help to attract high quality employment opportunities to the District. Sites that are mixed use and would include the delivery of an element of employment land are likely to have a significant positive effect in relation to this SA objective. This includes the Ifield (SA101), East of Billingshurst (SA118), West of Southwater (SA119) Land North East of Henfield (Mayfield) (SA414), Kingsfold (SA459/SA674/SA846), Adversane (SA597), Buck Barn (SA716) and West of Billingshurst (SA744 (includes SA225)/SA668) sites. Uncertainty is attached the positive effects identified in relation to the Henfield (SA414), Kingsfold (SA459/SA674/SA846), Adversane (SA597), Buck Barn (SA716) and Ashington (SA085/SA520/SA524/SA539/SA790) sites. These sites are relatively remote from existing settlements or would provide only small-scale flexible employment space, meaning the potential to support long term substantial economic growth is less certain.

**5.43** The locations of the large sites in relation to existing town centres, key employment sites and sustainable transport links has informed the appraisal of sites against **SA objective 17: access to employment opportunities**. A significant negative effect has been identified for Land North East of Henfield (Mayfield) (SA414) given its relative remoteness from existing key employment areas and town centre locations that may restrict residents' access to employment opportunities during the early stages of development.

**5.44** In addition, a minor negative effect has been identified for seven of the sites (East of Billingshurst (SA118), West of Southwater (SA119), Kingsfold (SA459/SA674/SA846), Adversane (SA597), Buck Barn (SA716) West of Billingshurst (SA744 (includes SA225)/SA668), Horsham Golf and Fitness Club (SA754) and Ashington cluster (SA085/SA520/SA524/SA539/SA790)). These sites are in relatively close proximity to sustainable transport links which might provide access to employment further afield as well as key employment areas, but are not near to the larger town centres of Horsham town or Crawley. The trends highlighted in the North West Sussex Economic Growth Assessment (EGA), indicate that Crawley and the Gatwick Diamond (and to a lesser extent the London Boroughs) continue to provide important employment opportunities for residents. The most recent evidence shows that many of Horsham's residents commute to areas outside of the District to access higher paid jobs. Furthermore, recent trends indicate that commercial occupiers often consider sites within Crawley Borough in the first place and then sites within the wider North West Sussex area (including within Horsham District) if they cannot find

suitable accommodation/sites within Crawley<sup>28</sup>. Uncertainty is attached to the effects recorded for the site at West of Southwater and Horsham Golf and Fitness (which is to the north of Southwater) and the two sites at Billingshurst. The established commuting patterns out of these settlements may be reinforced if new development is provided here.

**5.45** The sites at Adversane (SA597), Buck Barn (SA716) and the Ashington cluster (SA085/SA520/SA524/SA539/SA790) provide some level of access to nearby key employment sites, but access is unlikely to be on foot considering the lack of current pedestrian routes. A positive effect has, however, been identified in relation to this SA objective for all the sites (resulting in mixed effects for the majority of sites) given their good access to existing sustainable transport links, town centres or close proximity to key employment areas. The positive effects also reflect where sites include the provision of new sustainable transport links. In the case of sites at Ifield SA101 and Rookwood (SA394), a significant positive effect has been identified in relation to this SA objective as these sites are located adjacent to the higher order towns of Crawley and Horsham. The significant positive effects reflect the importance of these towns for employment opportunities in the surrounding area.

## Conclusions

**5.46** The SA of the large sites has demonstrated that a range of effects, both positive and negative, could arise as a result of development at the locations considered. The distribution of environmental constraints and assets throughout the plan area means that clear cut judgements about the best performing site options in relation to effects on the natural and built environment and biodiversity in the plan area are difficult to make.

**5.47** The urban extension sites generally perform better than the new settlement sites given their level of access to existing jobs, services and facilities. Delivering new large-scale development at these locations could also provide new jobs, services and facilities where existing residents could easily access them, which would further help to limit the need for residents to travel longer distances.

**5.48** The best performing urban extension sites are Rookwood, West of Ifield and West of Southwater because of their close proximity to the main centres of population which are also of most importance for economic growth for the area at Crawley and Horsham town. The West of Southwater site is relatively close to Horsham town, but does not provide as substantial benefits in this regard. While residents at this settlement benefit from nearby access to a number of existing

key employment areas and local services and facilities, existing commuting patterns show many have to travel further afield for work. The West of Ifield site could provide substantial levels of growth in the long term, potentially including new healthcare facilities. This site and the West of Southwater site would also provide a sizeable amount of new employment land. The Rookwood site is less sensitive in terms of the historic environment than the majority of the other large sites appraised. This latter site and the West of Southwater site are also less likely to lead to intensification of air pollution within an AQMA than the Ifield site given that site's relatively close proximity to Hazelwick AQMA.

**5.49** The urban extension sites at East of Billingshurst and West of Billingshurst, followed by Horsham Golf and Fitness Club perform slightly less favourably than Rookwood, West Ifield and West of Southwater. Billingshurst is an important local centre which meets the daily needs of residents but residents here will have to travel to meet some of their needs. The East of Billingshurst and Horsham Golf and Fitness Club sites would deliver more limited service provision as part of their development compared to the West of Billingshurst site, with no healthcare facilities to be provided at either of these sites. The Horsham Golf and Fitness Club site is expected to perform less favourably than both the East of Billingshurst and West of Billingshurst sites in relation to economic growth. The sites at Billingshurst include new employment uses while economic development at the Horsham Golf and Fitness Club site is limited to job provision supported through the development of new homes and at new leisure facilities. As the West of Billingshurst site would include a new country park it performs better than East of Billingshurst site in relation to biodiversity. The Horsham Golf and Fitness Club is less constrained than many of the other large sites in terms of nearby biodiversity designations; however this site and the West of Billingshurst site perform less favourably than the East of Billingshurst site in terms of their landscape sensitivity.

**5.50** The West of Kilnwood Vale site and the Ashington cluster site perform least well of all urban extension options considered. These are the only large sites with a capacity for fewer than 500 homes. The Ashington cluster site is also located at a relatively small settlement in comparison to the other urban extensions considered. Residents at the village of Ashington are required to travel to larger settlements to meet many of their requirements. The settlement lacks access to a healthcare centre and a secondary school. The cluster of development that would be delivered at the settlement is of a scale to support new primary school but new healthcare services would be limited to a GP outreach service. The West of Kilnwood Vale site would be dependent upon the committed

<sup>28</sup> Lichfields on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council Northern West Sussex (2020) Northern West Sussex EGA

development at the existing strategic allocation at Kilnwood Vale for access to services and facilities. While Kilnwood Vale sits at the Small Towns and Larger Villages tier of the settlement hierarchy, development of this new neighbourhood is ongoing. Not all of the planned services and facilities have been fully delivered but are expected to come forward during the plan period. The West of Kilnwood Vale site itself would not include the delivery of new healthcare facilities, community facilities or school provision. It is also relatively close to the AONB.

**5.51** Of the new settlement options appraised, Adversane and Buck Barn perform comparably with only marginal differences between them. These two sites perform more strongly than the Mayfield site. It is notable that, of these three sites, the Buck Barn site performs best in relation to impacts on landscape character. This site also performs most favourably in relation to biodiversity, given that its delivery would support substantial green infrastructure and a country park.

**5.52** However, the Adversane site outperforms Buck Barn as well as Mayfield in terms of air quality and climate change. Development at the Adversane site is less likely to result in increased traffic within an AQMA. The Adversane site may also perform more favourably than the Buck Barn and Mayfield sites in terms of climate change mitigation given the provisions to be incorporated onsite to achieve net zero emissions by 2025. While the Buck Barn site also includes provisions which could help to reduce the need to travel from the site by private vehicle, its development would also support substantial improvements to the strategic road network. These improvements would help to limit congestion in the area but would do little to discourage travel by private vehicle given the proximity of the site to A24 and A272. It is acknowledged that the implementing a travel strategy for the site could encourage more positive transport habits for new residents at the site. Both the Buck Barn and Adversane sites perform more favourably than the Mayfield site in terms of access to employment and water quality. The Mayfield site is relatively isolated from existing key employment areas and larger town

centres as well as transport links which might otherwise be used to access employment opportunities. Furthermore, the close proximity of the Mayfield site to Henfield means that improvements to the WwTW infrastructure at this location may be required to support the substantial level of growth to be accommodated.

**5.53** The Kingsfold site would act as an extension to the settlement of Kingsfold. However, the small size of that settlement means that, in effect, the development could act as a standalone new settlement. The settlement would likely function as a satellite to Horsham town, with residents dependent upon access to that settlement for many services and facilities. Given that the Kingsfold site is well related to an existing train station, it outperforms the Adversane, Buck Barn and Mayfield sites in relation to sustainable transport. It also performs as well as Adversane and Buck Barn in terms of access to employment given the close proximity of existing key employment areas. However, the level of services to be provided at this site is more limited than at the three other new settlement sites, given its smaller scale. While the site is located along the A24 which provides access to Horsham town, it is still some distance from the existing built up area of the settlement. It would perform relatively strongly in relation to biodiversity as it would incorporate a new country park.

**5.54** Across the SA objectives as a whole, from a locational perspective, the Kingsfold site performs slightly better than the Mayfield site and similarly to Buck Barn but less favourably than Adversane. However, it is of a much smaller scale than the other three new settlement alternatives, and therefore would both make a lesser contribution to housing need in both the plan period and beyond, and would also be more limited in its ability to achieve a degree of self-containment.

**5.55** The Council's reasons for selecting sites for allocation or discounting them are explained in **Chapter 9** as part of the reasons for choosing the preferred approach for the spatial strategy.

## Chapter 6

### Appraisal of small site options

#### Introduction

**6.1** In addition to the new, large site allocations that will be necessary to help meet the housing requirements for the District, the Council has identified a number of small site options which could potentially be allocated for housing or other uses in and around the towns and villages.

**6.2** The majority of these sites have potential to contribute to the local housing need (i.e. those considered for residential use or residential led mixed use development). The remaining sites have been considered for employment use only or for use for Gypsy and Traveller accommodation. It should be noted that the residential led sites include some sites in Ashington, which have also been assessed as part of the 'Ashington cluster' strategic site, as reported in the previous chapter. These are sites that were reasonably considered to have potential to come forward in their own right if they are not delivered as part of the larger 'cluster' site.

**6.3** Each of the small site options has been appraised in line with the methodology set out in **Chapter 2** of this report. The assumptions which have been used to inform the appraisal of these site options are presented in **Appendix C** and the detailed matrices for each of the site options are presented in **Appendix D**. A summary of the SA findings for the small site options is presented in **Table 6.2** further ahead in this section.

**6.4** The small site options are grouped in Table 6.2 in relation to the settlements which they are in closest proximity to in the development hierarchy for the District. This allows for a consideration of effects in relation to the individual settlements of the plan area. The number of expected homes to be provided at residential site options has been included for reference. In general, the amount of employment land at relevant site options is proportionate to the site size and therefore this information has not been included in the table.

**6.5** The appraisal of all sites has been undertaken using a 'policy off' approach. That is to say, mitigation which might be delivered through the policies in the Regulation 19 Local Plan that allocate some of the sites has not influenced the findings presented here. Consideration for the mitigation which might be achieved through the requirements of these policies is reflected in the appraisal of the individual policies in question in **Chapter 8** of this report.



**6.6** Since completion of the SA work undertaken for the Regulation 18 Local Plan, a number of changes have been made to the reasonable alternative small-scale site options for allocation in the Local Plan. Sites SA070, SA191, SA565 and SA819 which were appraised through the SA for the Regulation 18 Local Plan are no longer considered to be reasonable alternatives for allocation. The appraisals of each of these small site options have, however, been presented in this SA report for completeness. The reasons for the rejection of these sites as reasonable alternatives are presented in **Table 6.1**.

**Table 6.1 Details of sites rejected by Council as reasonable alternatives**

Site reference	Considered at Regulation 18 for	Reason for no longer considering site a reasonable alternative
SA070	Residential use - 25 dwellings	Updated heritage assessment work indicates that the site is no longer suitable for allocation.
SA191	Employment use	The site has recently been granted planning permission for 10,000 sqm office floorspace and there is no longer a need for its allocation.
SA565	Residential use - 12 dwellings	The site contains pylons and is not well related to the existing settlement at Billingshurst and is therefore not suitable for allocation.
SA819	Employment use	The site is no longer proposed as a standalone allocation because it has now been subsumed into the East of Billingshurst strategic site, SA118. Site SA819 will in effect become the employment provision for that strategic site.

**6.7** The audit trail for all site options considered as part of the Council's site selection process at the Regulation 18 and Regulation 19 stages is presented in **Appendix F**. This includes the Council's reasons for decision making in relation to those sites which have been proposed for allocation or not.

**6.8** The reasonable alternative site list has also been updated to include site SA689. This site was omitted in error from the SA work for the Regulation 18 Local Plan but is now appraised in this SA report.

Table 6.2 Summary of the likely sustainability effects of the small site options considered for the Horsham District Local Plan

SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
Ashington																	
SA085 (residential - 20 dwellings)	++	+/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	0
SA122/SA131/SA548/SA735 (residential – 225 dwellings)	++	++	0	0?	+	-?	--?	--?	-	--?	0	-	+	0	+	0	+
SA520 (residential – 95 dwellings)	++	+/-?	0	0?	+	-?	--?	--?	--?	--?	0	-	+	0	+	0	+
SA539 (residential – 80 dwellings)	++	+/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	+
SA866 (residential - 75 dwellings)	++	++	0	0?	+	-?	--?	0?	-	--?	0	-	+	0	+	0	+
Barns Green																	
SA006 (residential – 50 dwellings)	++	++	0	0?	+	-?	--?	--?	-	--?	0	-	+	0	+	0	--
SA344 (residential – 30 dwellings)	++	++	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
SA510 (residential – 25 dwellings)	++	++	0	0?	+	-?	--?	--?	--?	--?	0	-	+	0	+	0	--
SA613 (residential – 30 dwellings)	++	++	+	0?	--/+	-?	-?	--?	+	--?	0	0	+	0	+	0	--
Billingshurst																	
SA565 (residential – 12 dwellings)	++	++/-?	0	0?	++	-?	--?	?	--?	--?	0	-	++	0	++	0	+

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SA656 (residential – 10 dwellings)	+	++?	0	0?	+	--?	?	--?	--?	--?	0	-	++	0	++	0	+
SA698 (residential - 40 dwellings)	++	++/-?	0	0?	++	-?	--?	-?	--?	--?	0	-	++	0	++	0	+
SA560 (residential – 80 dwellings)	++	++?	0	0?	+	-?	--?	-?	--?	--?	0	-	++	0	++	0	+
SA607 (residential – 30 dwellings)	++	++/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	++	0	++	0	+
SA678 (residential – 80 dwellings)	++	++?	0	0?	+	-?	--?	-?	--?	--?	0	-	++	0	++	0	+
SA770 (residential – 105 dwellings)	++	++/-?	0	0?	++	-?	--?	-?	--?	--?	0	-	++	0	++	0	+
SA573 employment use)	0	++	0	0?	++	--?	--?	-?	--?	--?	0	-	++	0	++	+	++
GA016 (Gypsy and Traveller use)	++	-?	0	0?	+	--?	?	0?	--?	--?	0	-	+	0	+	0	-
SA819 (employment)	0	++	+	0?	+	--?	--?	?	+	--?	0	0	++	0	++	++	++
Bramber and Upper Beeding																	
SA483/SA055/SA488 (residential – 70 dwellings)	++	++?	0	0?	++	--?	?	--?	-	0	0	-	-	0	-	0	-
Broadbridge Heath and Slinfold																	
SA102 (employment)	0	++?	+	0?	+	--?	--?	--?	-	--?	0	-	+	0	+	+	+
SA386 (- residential – 150 dwellings)	++	++/-?	+	0?	+	-?	-?	--?	--?	--?	0	-	+	0	+	0	+

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SA622 (residential – potential for retirement housing and specialist care accommodation-140 dwellings)	++	++	+	0?	+	-?	--?	-?	-	--?	0	-	+	0	+	+	+
SA833 (employment)	0	+	+	0?	+	-?	?	0?	--?	--?	0	-	+	0	+	++	+
GA002 (Gypsy and Traveller use)	++	-?	+	0?	-	-?	?	0?	+	--?	0	0	+	0	+	0	+
Christ's Hospital																	
SA129 (residential – 20 dwellings)	++	++?	0	0?	+	-?	--?	0?	-	--?	0	-	++	0	++	0	++
Cowfold																	
SA076/SA083 (residential – 35 dwellings)	++	++?	0	0?	++	0?	--?	-?	--?	--?	0	-	+	--	+	0	+
SA366 (residential – 100 dwellings)	++	+	0	0?	++	-?	--?	--?	--?	--?	0	-	+	--	+	0	+
SA609 (residential – 35 dwellings)	++	++?	0	0?	++	0?	--?	--?	--?	--?	0	-	+	--	+	0	+
SA610/SA611 (residential – 35 dwellings)	++	++?	0	0?	++	0?	-?	--?	--?	--?	0	-	+	--	+	0	+
GA017 (Gypsy and Traveller use)	++	-?	0	0?	-	-?	--?	0?	--?	--?	0	-	+	--	+	0	--
Henfield																	

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SA005 (residential – 100 dwellings)	++	++/-?	0	0?	++	0?	--?	-?	--	--?	0	-	+	0	+	0	+
SA011 (residential – 30 dwellings)	++	++/-?	0	0?	++	-?	--?	--?	--?	--?	0	-	+	0	+	0	+
SA065 (residential – 25 dwellings)	++	++/-?	0	0?	++	0?	0?	0?	--?	--?	0	-	+	0	+	0	-
SA317 (residential – 55 dwellings)	++	++/-?	0	0?	+	--?	--?	--?	--	--?	0	-	+	0	+	0	-
SA504 (residential – 10 dwellings)	++	++/-?	0	0?	+	-?	--?	--?	--?	--?	0	-	+	0	+	0	+
SA686 (residential – 205 dwellings)	++	++?	0	0?	++	-?	--?	0?	--?	--?	0	-	+	0	+	0	-
GA011 (Gypsy and Traveller use)	++	-?	+	0?	-	-?	?	0?	+	--?	0	0	+	0	+	0	-
Horsham																	
SA074 (residential – 100 dwellings)	++	++?	0	0?	+	--?	--?	-?	-	0	0	-	++	0	++	0	++
SA191 (employment )	0	-?	0	0?	-	-?	?	0?	-	--?	0	-	++	0	++	+	++
SA363 (employment)	0	-?	0	0?	-	-?	--?	0?	-	--?	0	-	++	0	++	+	++
SA568b (residential – 300 dwellings)	++	++/-?	0	0?	+	-?	-?	0?	--?	--?	0	-	++	--	++	0	++
SA568a (employment)	0	++	0	0?	+	-?	-?	0?	--?	--?	0	-	++	--	++	+	++
SA568 (residential– 300 dwellings)	++	++/-	0	0?	+	-?	-?	0?	--?	--?	0	-	++	--	++	0	++
SA570 (employment)	0	++	0	0?	+	-?	--?	0?	-	-?	0	-	++	0	++	+	++
SA325 (employment)	0	++	0	0?	+	-?	--?	?	--?	--?	0	-	++	0	++	++	++



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Lower Beeding																	
SA567 (residential – 30 dwellings)	++	+	0	0?	+	-?	--?	-?	--?	-?	0	-	+	0	+	0	--
SA575 (residential – 20 dwellings)	++	+	0	0?	+	-?	--?	-?	--?	0	0	-	+	0	+	0	--
SA584 (residential – 7 dwellings)	+	+	0	0?	+	-?	--?	--?	--?	0	0	-	+	0	+	0	--
SA657 (residential – 20 dwellings)	++	+	0	0?	+	-?	--?	0?	--?	0	0	-	+	0	+	0	--
SA729 (residential – 10 dwellings)	++	+	0	0?	+	-?	--?	0?	--?	0	0	-	+	0	+	0	--
Partridge Green																	
SA063 (employment)	0	+	0	0?	++	--?	?	0?	--?	--?	0	-	+	0	+	+	+
SA274 (residential – 55 dwellings)	++	+	0	0?	++	0?	-?	--?	--?	--?	0	-	+	0	+	0	+
SA320 (residential – 70 dwellings)	++	+/-?	0	0?	++	--?	--?	0?	--?	--?	0	-	+	0	+	0	+
SA433 (residential – 80 dwellings)	++	+	0	0?	++	--?	-?	--?	--?	--?	0	-	+	0	+	0	+
SA634 (residential – 20 dwellings)	++	+/-?	0	0?	++	--?	-?	--?	--?	--?	0	-	+	0	+	0	+
Pulborough and Codmore Hill																	
SA112 (residential – 60 dwellings)	++	++/-?	0	0?	+	--?	--?	-?	-	--?	0	-	++	0	++	0	+
SA385 (employment)	0	++	0	0?	+	--?	--?	-?	--?	--?	0	-	+	0	+	+	+

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SA445 (residential use – 170 dwellings)	++	++?	0	0?	++	--?	--?	--?	--?	--?	0	-	++	0	++	0	+/-
SA556 (residential – 25 dwellings)	++	++?	0	0?	++	--?	--?	-?	--?	--?	0	-	++	0	++	0	+
SA588 (residential – 20 dwellings)	++	++?	0	0?	+	--?	--?	?	--?	--?	0	-	++	0	++	0	+
SA830 (employment)	0	++	0	0?	+	--?	--?	?	--?	--?	0	-	+	0	+	+	+
GA007 (Gypsy and Traveller use)	++	++/-?	+	0?	+	-?	--?	-?	+	--?	0	0	+	0	+	0	-
GA015 (Gypsy and Traveller use)	++	-?	+	0?	-	0?	--?	0?	+	--?	0	0	+	0	+	0	--
Rudgwick and Bucks Green																	
SA442 (residential – 15 dwellings)	++	+/-?	0	0?	++	-?	--?	-?	-	--?	0	-	+	0	+	0	--
SA574 (residential – 60 dwellings)	++	+	0	0?	++	-?	--?	0?	--?	--?	0	-	+	0	+	0	--
SA683 (residential – 6 dwellings)	+	+/-?	0	0?	++	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
SA794 (residential - 6 dwellings)	+	+	0	0?	-	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
GA009 (Gypsy and Traveller use)	++	-?	+	0?	-	-?	?	0?	+	--?	0	0	-	0	-	0	-
Rusper																	
SA080 (residential – 12 dwellings)	++	+	0	0?	+	-?	--?	--?	-	--?	0	-	+	0	+	0	--

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SA465 (residential – 6 dwellings)	+	+	0	0?	+	-?	--?	--?	-	--?	0	-	+	0	+	0	--
SA737 (residential – 5 dwellings)	+	+	0	0?	+	-?	--?	-?	-	--?	0	-	+	0	+	0	--
SA872 (residential - 20 dwelling)	++	+	0	0?	+	-?	--?	--?	-	--?	0	-	+	0	+	0	--
GA008 (Gypsy and Traveller use)	++	-?	+	0?	-	0?	?	0?	+	--?	0	0	+	0	+	0	--
Small Dole																	
SA505 (residential – 10 dwellings)	++	-?	0	0?	+	-?	-?	0?	--?	--?	0	-	+	0	+	0	+
SA538 (residential – 40 dwellings)	++	-?	0	0?	+	-?	-?	-?	--	--?	0	-	+	0	+	0	+
SA689 (residential - 20 dwellings)	++	-?	0	0?	+	--?	-?	0?	--?	--?	0	-	+	0	+	0	+
Southwater																	
SA324 (residential – 15 dwellings)	++	++	0	0?	+	-?	-?	-?	--?	--?	0	-	++	0	++	0	+
SA644/SA645 (employment)	0	-?	0	0?	-	-?	?	-?	--?	--?	0	-	+	--	+	++	+
SA703 (employment)	0	++	0	0?	+	-?	--?	0?	--?	--?	0	-	++	0	++	+	++
SA701 (residential – 60 dwellings)	++	++/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	+
SA725 (residential – 60 dwellings)	++	++/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	+

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SA743 (residential – 60 dwellings)	++	++/-?	0	0?	+	-?	--?	-?	--?	--?	0	-	+	0	+	0	+
Steyping																	
SA742 (residential – 240 dwellings)	++	++	0	0?	++	--?	-?	--?	--?	0	0	-	+	0	+	0	--
Storrington																	
SA361/SA732 (residential – 70 dwellings)	++	++?	0	0?	++	--?	--?	--?	--?	--?	0	-	+	--	+	0	+
SA639 (residential – 50 dwellings)	++	++?	0	0?	++	--?	--?	-?	--?	--?	0	-	+	--	+	0	+
SA384 (residential - 75 dwellings)	++	++?	0	0?	++	--?	--?	-?	-	--?	0	-	+	--	+	0	+
Thakeham																	
SA039 (residential – 25 dwellings)	++	+/-?	0	0?	+	--?	?	0?	--	-?	-	-	+	0	+	0	+
SA513 (residential – 25 dwellings)	++	+/-?	0	0?	+	-?	--?	0?	--	--?	-	-	+	0	+	0	+
SA873 (residential – 40 dwellings)	++	+/-?	0	0?	+	-?	?	0?	--	-?	-	-	+	0	+	0	+
GA010 (Gypsy and Traveller use)	++	+	+	0?	+	-?	--?	0?	+	--?	-	0	+	0	+	0	-
GA014 (Gypsy and Traveller use)	++	-?	+	0?	-	-?	?	0?	--?	--?	0	-	+	0	+	0	--
Warnham																	

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SA objectives	1: Housing	2: Access to services and facilities	3: Inclusive communities	4: Crime	5: Health	6: Biodiversity and geodiversity	7: Landscapes and townscapes	8: Historic environment	9: Efficient land use	10: Natural resources	11: Water resources	12: Flooding	13: Transport	14: Air Quality	15: Climate change	16: Economic growth	17: Access to employment opportunities
SA070 (residential – 25 dwellings)	++	+	0	0?	+	-?	--?	?	--?	--?	0	-	++	0	++	0	+
SA071 (residential – 20 dwellings)	++	+	0	0?	+	0?	--?	0?	--?	--?	0	-	++	0	++	0	+
West Chiltington Village and Common																	
SA066 (residential – 15 dwellings)	++	+	0	0?	+	0?	-?	--?	--?	--?	0	-	+	0	+	0	--
SA429 (residential – 15 dwellings)	++	+/-?	0	0?	-	0?	--?	-?	--?	-?	-	-	-	0	-	0	+
SA500 (residential – 6 dwellings)	+	+	0	0?	+	0?	-?	-?	--?	--?	-	-	+	0	+	0	-
GA004 (gypsy and traveller use)	++	+/-?	0	0?	-	0?	--?	0?	--?	--?	0	-	+	0	+	0	--



## Summary of the likely sustainability effects of the small site options

**6.9** The majority of the small site options appraised are expected to have positive effects in relation to **SA objective 1: housing**. These are sites that would support the delivery of new homes, including sites for Gypsies and Travellers, in the District. The remaining sites have been considered for uses which would not include the delivery of new homes. Of the sites for which positive effects are expected most are likely to have significant positive effects. These sites have the capacity for more than 10 dwellings or would provide land to meet the identified requirements for Gypsy and Traveller accommodation in the plan area.

**6.10** The sites which are expected to have only minor positive effects in relation to SA objective 1 are those at Lower Beeding (SA584), Billingshurst (SA656), Rusper (SA465 and SA737), Rudgwick and Bucks Green (SA683 and SA794) and West Chiltington Village and Common (SA500). These sites have capacity for fewer than 10 dwellings.

**6.11** The majority of the small site are expected to have positive effects in relation to **SA objective 2: access to services and facilities**, due to their close proximity to the boundaries of a built-up area as well as specific services and facilities within the District. For many of these sites the positive effect is likely to be significant as these sites are located within close proximity to Horsham (the Main Town) or a Small Town or Larger Village in the District. However, a relatively small number of the sites which are being considered for residential or Gypsy and Traveller use are not located within close proximity of a primary school or a secondary school and therefore the significant positive effects for those sites are combined with uncertain minor negative effects.

**6.12** For a relatively large number of the small sites a minor positive or uncertain minor positive effect is expected on SA objective 2 as these sites are located within close proximity of the built-up area boundary of a Medium Village and/or a primary school or secondary school (but not both). A small number of these sites are located within close proximity of one type of education facility but not a higher order settlement, or are located within close proximity of a Medium Village but no education facilities. Therefore, a mixed (minor positive and minor negative) effect is expected in relation to SA objective 2 for these sites.

**6.13** An uncertain minor negative effect alone is expected for a relatively small number of sites. Sites SA505, SA538 and SA689 which were considered for residential use are located at the Smaller Village of Small Dole and would not provide residents with easy access to an education facility; therefore uncertain minor negative effects are identified for those sites in relation to SA objective 2. Sites GA002, GA008, GA009,

GA011, GA014, GA015, GA016 and GA017 are Gypsy and Traveller site options for which negative effects have been identified due to their poor location in relation to services and facilities. A minor negative effect is also expected for the employment site options SA191, SA363 and SA644/SA645 as they are not located within close proximity to the built-up area of any of the settlements in the development hierarchy in the District.

**6.14** Negligible effects are expected for the majority of the small site options in relation to **SA objective 3: inclusive communities**. These sites are not located within an area that is within the 40% most deprived according to the IMD 2019. They are also not located on brownfield land, the development of which might otherwise promote regeneration in Horsham District, and would not provide new retail or community uses to complement existing uses within the town or village centre locations of the District.

**6.15** A minor positive effect is expected for the remaining sites. Small sites at the settlements of Barns Green (SA613) and Billingshurst (SA819) are not located within a 40% most deprived area but are located on brownfield land. The Gypsy and Traveller sites GA007, GA008, GA009, GA010, GA011 and GA015 are also expected to result in minor positive effects in relation to SA objective 3 given that they contain brownfield land. Two sites at Broadbridge Heath (SA102 and SA386) are located within a 40% most deprived area where development may help to achieve benefits relating to regeneration. Sites SA833 and GA002 also fall within this 40% most deprived area. A third site at Broadbridge Heath (SA622) is not located within a 40% most deprived area, but as it would support the delivery of specialist housing for older people, it could help to promote social integration in the area.

**6.16** All of the small site options are expected to have uncertain negligible effects in relation to **SA objective 4: crime**. It is expected that the potential for new development to minimise incidences of crime and the fear of crime will depend mostly on design considerations. Measures such as ensuring open spaces are designed to be overlooked and the incorporation of appropriate lighting schemes will help to ensure that residents at new development in Horsham District feel secure, but these factors will not be determined by the location of sites.

**6.17** The majority of the small site options are expected to have positive effects in relation to **SA objective 5: health**, due to their proximity to healthcare facilities and areas such as open spaces or sports facilities which may help to encourage more active lifestyle choices. Of the small sites that are expected to have positive effects, for a relatively small number of sites this is expected to be significant. These sites are located within close proximity of both a healthcare facility and an area of open space or sports facility. Many of the small

sites are located within close proximity of either a healthcare facility or an area of open space or sports facility but not both. Minor positive effects are therefore expected for these sites in relation to SA objective 5. However, development at one site at Barns Green (SA613), may result in the loss of an area of open space or sports facility at Sumners Pond Fishery and Campsite. Therefore, a significant negative effect is expected in combination with the minor positive effect for this site.

**6.18** For a small number of remaining site options, which are at or in close proximity to the settlements of Broadbridge Heath (GA002), Cowfold (GA017), Henfield (GA011), Horsham (SA191 and SA363), Pulborough and Codmore Hill (GA015), Rudgwick and Bucks Green (SA794 and GA009), Rusper (GA008), Southwater (SA644/SA645), Thakeham (GA014) and West Chiltington Village and Common (SA429 and GA004) minor negative effects alone are expected on SA objective 5. These sites are not located within close proximity of facilities which would support health and wellbeing in the District.

**6.19** The majority of the small site options are expected to have negative effects in relation to **SA objective 6: biodiversity and geodiversity**. It is likely that the land take required for new development, as well as resultant human activities once the development is occupied, would result in habitat loss, fragmentation and/or disturbance. There is also potential for air/light/noise pollution as a result of construction and as the new development is occupied.

**6.20** A significant negative effect is expected for a relatively small number of the sites due to their location within one of Natural England's designated SSSI Impact Risk Zones (IRZs) which have been identified in relation to the potential risk that residential or employment related uses may pose. Minor negative effects are expected for many of the sites due to their proximity to locally designated biodiversity or geodiversity sites or areas of ancient woodland. Furthermore, it should be noted that many of the small site options for which a negative effect has been identified lie within the bat sustenance zone which has been designated in the west of the District in relation to the Mens SAC.

**6.1** The remaining small number of sites would have negligible effects on SA objective 6. These sites are at West Chiltington Village and Common (SA066, SA429, SA500 and GA004) Warnham (SA071), Rusper (GA008), Pulborough and Codmore Hill (GA015) Henfield (SA005 and SA065), Partridge Green (SA274) and Cowfold (SA076/SA083, SA609 and SA610/SA611). These sites are not located within an IRZ which lists planning applications relating to the use proposed for the site as a potential risk and are not within close proximity of any locally designated biodiversity or geodiversity sites or areas of ancient woodland.

**6.2** In all cases, the effects identified on SA objective 6 are uncertain. Appropriate mitigation may avoid or reduce negative effects and the incorporation of measures such as green infrastructure may result in benefits such as improved habitat connectivity. The uncertainty also reflects the potential for adverse impacts in relation to undesignated biodiversity and geodiversity features in the District as development occurs.

**6.3** In relation to **SA objective 7: landscapes and townscapes**, development within the District has the potential to disrupt existing character as well as the setting of designated landscapes such as the High Weald AONB and the South Downs National Park. The potential for impacts relating to landscape character in the District has been informed by the findings of the Landscape Capacity Assessment which assessed the capacity of the landscape to accommodate change relating to different types of use.

**6.4** A relatively high number of the small site options are located within a Local Landscape Area identified as having 'No/Low' landscape capacity or 'Low-Moderate' landscape capacity for new housing development or employment development. Significant negative effects are therefore expected for these options. Only a relatively small number of site options are located within Local Landscape Areas identified as having 'Moderate' or 'Moderate-High' landscape capacity for new housing development or employment development. These options are expected to have uncertain minor negative effects in relation to this SA objective.

**6.5** A negligible effect on SA objective 7 is expected for only one of the small sites at the settlement of Henfield (SA065). This site is located within an existing built-up area and so is not expected to have adverse effects on the landscape. The areas in which a small number of the sites are located are not covered by the Landscape Capacity Assessment, and therefore, uncertain effects are identified for these sites.

**6.6** The Council has undertaken heritage impact assessment work for the small site options to inform the potential effects on **SA objective 8: historic environment**. This has identified where development is expected to have impacts in relation to surrounding designated and non-designated heritage assets as well as archaeology. The sensitivity of heritage assets in close proximity to sites, as well as the magnitude of the potential effects, has been recorded through this assessment work to give an overall significance assessment for each heritage asset. The heritage impact work also recorded where Archaeological Notification Areas or Archaeology Sites fall within the sites' boundaries.

**6.7** A number of the site options have been recorded through this assessment work as having significant overall effects on nearby heritage assets. Therefore, a significant negative effect is expected in relation to SA objective 8. For a sizeable

number of the site options a minor negative effect was recorded in relation to SA objective 8. For some of these sites the significant effects recorded through the assessment work in relation to nearby heritage assets were only potential and the expected magnitude of change as a result of development was recorded as low. The remainder of these sites were not identified as having the potential to impact upon nearby heritage assets but contained an Archaeological Notification Area or Archaeological Site. Only a small number of site options were not covered by the heritage impact assessment work and therefore uncertain effects were recorded in relation to this SA objective. The remaining relatively large number of sites were assessed as unlikely to have adverse effects in relation to heritage assets or archaeology. These sites have been recorded as having negligible effects in relation to SA objective 8.

**6.8** All effects identified in relation to SA objective 8 are uncertain at this stage as they will depend on the detailed design of the development. The design process may allow for the incorporation of appropriate mitigation in relation to impacts on the setting of heritage assets and potential improvements to the character of a given area.

**6.9** The majority of the small sites are expected to have negative effects in relation to **SA objective 9: efficient land use**, given that they are located on greenfield land. The negative effect is likely to be significant for many of these sites due to their location on land which is classed as Grade 1, Grade 2, or Grade 3 agricultural quality. Information is not currently available to establish whether the Grade 3 agricultural soils within the District are of Grade 3a or 3b quality and therefore the significant negative effect is uncertain for the small sites which lie within Grade 3 land. A relatively small number of sites are expected to have minor negative effects due to their location on greenfield land which is classed as Grade 4 or Grade 5 agricultural, non-agricultural, or urban land.

**6.10** The small sites at Barns Green (SA613), and Billingshurst (SA819), Broadbridge Heath and Slinfold (GA002), Henfield (GA011), Pulborough and Codmore Hill (GA007 and GA015), Rudgwick and Bucks Green (GA009), Rusper (GA008) and Thakeham (GA010) are located on brownfield land. Development at these sites could therefore promote the more efficient use of land in the District. As such, minor positive effects are expected in relation to this SA objective. None of the small site options contain land which is identified as being contaminated and therefore there is likely to be limited potential/need to promote the remediation of land as new development occurs.

**6.11** The majority of the small site options are expected to have negative effects in relation to **SA objective 10: natural resources** as they lie within or are within close proximity to a

Minerals Safeguarding Area (MSA). It is expected that development at these locations could result in loss of access to, or sterilisation of, the finite mineral resources in the District.

**6.12** Most of the small site options are located within an MSA where development is expected to result in a significant negative effect. The negative effects identified in relation to this SA objective are uncertain, as there may be potential for mineral extraction to be undertaken prior to the development of the sites or for development to be designed to maintain access to mineral resources at these locations. Only a small number of sites are located outside of but within 250m of an MSA and therefore minor negative effects are expected for those sites. The remaining sites are located within the settlements of Horsham (SA074), Lower Beeding (SA575, SA584, SA657 and SA729), Bramber and Upper Beeding (SA055/SA483/SA488) and Steyning (SA742), and are more than 250m from an MSA. Negligible effects are therefore expected in relation to SA objective 10 for these sites.

**6.13** Only a small number of small site options are expected to have minor negative effects in relation to **SA objective 11: water resources**. These are sites which are located at Thakeham (SA039, SA513, SA873, GA010) and West Chilmington Village and Common (SA429 and SA500) and lie within a Source Protection Zone (SPZ). Development of these sites may result in adverse impacts in relation to the contamination of the District's drinking water. The remaining site options are not located within an SPZ and therefore are expected to have negligible effects.

**6.14** All of the small site options are located on land that is mostly within flood zone 1. However, the majority of these sites are also located on greenfield land. As development there may result in an increase in impermeable surfaces in the District, a minor negative effect is expected in relation to **SA objective 12: flooding** for the majority of small sites. It is recognised that development of these sites would be required by planning policy to incorporate mitigation, including SuDS.

**6.15** Only a small number of sites which are located at or in close proximity to the settlements of Barns Green (SA613), Billingshurst (SA819), Broadbridge Heath and Slinfold (GA002) Henfield (GA011), Pulborough and Codmore Hill (GA007 and GA015), Rudgwick and Bucks Green (GA009), Rusper (GA008), Thakeham (GA010) contain a substantial area of brownfield land. As such, development of these sites is unlikely to result in a significant increase in impermeable surfaces and a negligible effect is expected in relation to SA objective 12.

**6.16** It is expected that the vast majority of the small site options would have positive effects in relation to **SA objective 13: transport**. These are sites which are in close proximity to public transport links and/or cycle paths. It is expected that development at these locations offers the greatest potential to

limit increases in congestion levels related to travel by private vehicles in the District. A significant positive effect is expected for a relatively small number of these sites as they are within 1.8km of a railway station. These sites are located within or in close proximity to the settlements of Pulborough and Codmore Hill, Billingshurst, Christ's Hospital, Horsham town or Warnham where the District's railway stations are located.

**6.17** Minor positive effects are expected for many of the sites as they are within 450m of a bus stop or cycle route but not a railway station. Minor negative effects are expected in relation to SA objective 13 for only a small number of sites, located in West Chiltington Village and Common (SA429), Bramber and Upper Beeding (SA483/SA055/SA488) and Rudgwick and Bucks Green (GA009) as they are not within close proximity to any sustainable transport links.

**6.18** In relation to **SA objective 14: air quality**, the potential for increased travel by private vehicle is likely to impact air quality in the District as development is provided over the plan period. This is particularly likely to be the case where existing air pollution issues have been identified.

**6.19** Of the small site options, a relatively small number are either within or directly connected via a road to an Air Quality Management Area (AQMA). These sites are located at or in close proximity to Horsham town (SA568, SA568a and SA568b), Storrington (SA384, SA361/SA732 and SA639), Southwater (SA644/SA645) and Cowfold (SA076/SA083, SA366, SA609, SA610/SA611 and GA017).

**6.20** Development at these sites has the potential to intensify existing air quality issues within the AQMAs at Hazelwick in Crawley, as well as those at Storrington and Cowfold. Therefore, a significant negative effect is expected for these sites in relation to SA objective 14. The majority of sites are not located within, or directly connected to an AQMA. A negligible effect is therefore expected for these sites in relation to this SA objective.

**6.21** It is expected that that all new development is likely to result in some level of carbon emissions, for example, as new homes and businesses require heat and electricity. Providing and connecting to district heating schemes may be more likely to be achieved at larger developments. However, there is no accepted threshold above which this is considered to be more viable and there may be some scope to connect smaller sites to these types of schemes at large strategic sites in the District. Given this context, the appraisal of sites against **SA objective 15: climate change** has focussed on potential transport patterns in the District and the likely effect of this in relation to climate change.

**6.22** Most of the sites are expected to have a positive effect in relation to SA objective 15 given their proximity to sustainable transport links. Providing residents with opportunities to make

use of more sustainable modes of transport is expected to help encourage modal shift, thereby limiting the potential for substantial increases in carbon emissions as new development is delivered.

**6.23** A relatively small number of sites are within 1.8km of a railway station, and therefore are expected to have significant positive effects. A minor positive effect is expected for many of the small sites given that they are located within 450m of a bus stop or cycle route. The remaining sites, located at West Chiltington Village and Common (SA429), Bramber and Upper Beeding (SA483/SA055/SA488) and Rudgwick and Bucks Green (GA009) are not within close proximity to sustainable transport links. Development of these sites is therefore likely to require residents to undertake journeys by car on a more regular basis which could have detrimental impacts on the District's contribution to climate change. Therefore, minor negative effects are expected for these sites in relation to SA objective 15.

**6.24** The majority of the small sites considered would deliver residential development only. This type of development could provide some short term employment opportunities associated with the construction of new homes. However, the delivery of a wider range of employment opportunities and sustainable economic growth in the District will be most supported through the allocation of viable employment sites and sites which support the creation of long term employment opportunities. Therefore, negligible effects are expected for all sites which would provide mostly open market housing in relation to **SA objective 16: economic growth**.

**6.25** A relatively small number of the small sites would provide new employment development or development that would provide employment opportunities onsite. Some of these sites (SA325, SA644/SA645, SA819 and SA833) have the potential to provide more than 5ha of employment land and so are expected to have significant positive effects in relation to **SA objective 16: economic growth**. For the remaining sites which would provide some employment uses, the amount of land would be less than 5 ha and therefore the positive effects expected are minor.

**6.26** All sites considered at Horsham and Christ's Hospital (SA074, SA129 and SA568, SA568b for residential uses and SA191, SA325, SA363, SA568a and SA570 for employment uses) are expected to have significant positive effects in relation to **SA objective 17: access to employment opportunities**. This reflects the close proximity of Key Employment Areas (within 1.8km) and Horsham town centre (within 720m) to these sites, which are likely to provide some employment opportunities for new residents. The positive effects are also reflective of the potential for employment sites SA191, SA325, SA363, SA568a, SA570 and SA703 to provide new employment uses in the plan area, where they



are accessible to a high number of people via rail links. A significant positive effect is also expected for employment sites SA573 and SA819 (Billingshurst) as well as employment site SA703 (Southwater) due to those sites being located within 1.8km of a railway station.

**6.27** Many of the small site options being considered for either residential use or for Gypsy and Traveller accommodation are located within 1.8km of a Key Employment Area but are not within 720m of Horsham town. Therefore, these sites are likely to provide some nearby employment opportunities for new residents and minor positive effects are expected in relation to SA objective 17.

**6.28** A relatively small number of small sites being considered for either residential use or for Gypsy and Traveller accommodation are not located within 2.7km of a key employment area or within 720m of Horsham town centre. A significant negative effect is therefore expected in relation to SA objective 17 for these sites. These sites include those located across Barns Green, Cowfold, Lower Beeding, Rusper, Rudgwick, Steyning, Thakeham, Pulborough and Codmore Hill, Bucks Green and West Chiltington Village and Common. A small number of small site options are expected to have minor negative effects given that they are located between 1.8km and 2.7km of a key employment area but are not within 720m of Horsham town centre.

## Conclusions

**6.29** The SA of the small sites has indicated that a range of both positive and negative effects could arise as a result of their development. It is possible to draw out some conclusions in relation to effects which are most apparent when considered at a settlement level.

**6.30** It is notable that many of the sites at the Main Town (Horsham) or a Small Town or Larger Village in the District perform favourably in relation to both access to services and facilities (SA objective 2) and health and wellbeing (SA objective 5). This is particularly the case for sites at Billingshurst, Henfield, Pulborough and Codmore Hill, Steyning and Storrington. These larger settlements provide access to a range of services and facilities including healthcare. The smaller settlements of Rudgwick and Bucks Green, Cowfold and Partridge Green benefit from healthcare facilities but their smaller size means the range of services and facilities accessible at these locations is more limited. Therefore, for some of the sites at these settlements, while there is a relatively positive effect expected in relation to access to services and facilities, the effect in relation to health and wellbeing is stronger than might be expected for a smaller settlement.

**6.31** Particular benefits in relation to transport (SA objective 13) and climate change (SA objective 15) were noted where

sites are close to settlements which provide access to a railway station i.e. at Billingshurst, Christ's Hospital, Horsham town, Pulborough and Codmore Hill and Warnham. Conversely, where sites are at a settlement which contains or is functionally linked to an AQMA, particularly adverse impacts are expected in relation to air quality (SA objective 14). This is the case for the sites at Cowfold and Storrington.

**6.32** Many of the existing development edges of settlements in the District including Ashington, Barns Green, Billingshurst, Christ's Hospital, Cowfold, Henfield, Lower Beeding, Pulborough and Codmore Hill, Rudgwick and Bucks Green, Rusper, Southwater, Storrington, Thakeham and Warham have been identified as having no/low or low-moderate landscape capacity for new development. Sites at these settlements perform particularly poorly in relation to landscape (SA objective 7). It is not possible to make similarly definitive conclusions in relation to potential impacts relating to heritage assets (SA objective 8) as the impacts of development in relation to this issue are more site-specific and dependent upon the intricacies of interrelationships between existing elements of the built environment.

**6.33** The sites proposed for allocation are shown in **Chapter 8**, as part of the appraisal of policies included in the Regulation 19 Local Plan. Considering the summary of effects for the small site options, it is not possible to state definitively that the sites proposed for allocation perform more positively across the SA objectives than the reasonable alternatives that have not been allocated. This is because the sites are of different scales and different uses, and the sites not only need to be compared as a whole but on a settlement by settlement basis. It also depends upon the SA objectives being considered.

**6.34** It is fair to say that no clear patterns emerge and that, in some instances the sites proposed for allocation perform better than the reasonable alternatives and in other instances this may not be the case. In most instances, the differences between them are not particularly marked or there are particular issues relating to a site, whether linked to an individual SA objective or other planning consideration, that results in the site being allocated or not, as the case may be. The Council's reasons for allocating or discounting sites are explained in full in **Appendix F** to this SA Report.



## Chapter 7

# Appraisal of growth scenario options

### Introduction

**7.1** Drawing on the appraisals of the five quanta of growth options, the six overall spatial strategy options, and the large and small-scale site options, the Council identified nine spatially specific growth scenarios at the Regulation 18 stage that could be taken forward in the Local Plan Review. These were subject to SA.

**7.2** The growth scenario options relate to either lower, medium or higher growth scenarios. They include different combinations of large and small site options to ensure that all reasonable alternative options relating to the approach to the distribution of growth in the District have been appraised. Following consultation on the Regulation 18 Local Plan, further testing has been undertaken through the SA to ensure that all additional reasonable alternative growth scenarios have been considered. In total 14 growth scenario options have now been subject to appraisal.

**7.3** While it is recognised that a very high number of different scenarios might be derived from alternative combinations of the various site options considered, the 14 scenarios tested represent what is considered reasonable. The different combinations of site options that comprise each scenario are shown in **Table 7.1** further ahead in this section. The explanation for the combination of different sites included within each scenario is provided in the text preceding that table. The Preferred Strategy for the Local Plan has also been appraised alongside the 14 alternative growth scenario options.

**7.4** For each growth scenario, a level of growth to be achieved from smaller non-strategic sites was assumed. With the exception of Scenarios 3b and 3c, this can be met from the residential-led sites tested in **Chapter 6**. Under Scenarios 3b and 3c, the number of homes to be delivered at small sites is well beyond the capacity of the sites assessed as potentially suitable for allocation by officers, but could theoretically be achieved by bringing back in sites submitted to the SHELAA that are currently considered not suitable (i.e. those assessed as 'Not Currently Developable').

**7.5** This SA work was originally presented to the Council at the Regulation 18 stage and was included as part of the SA for the Local Plan consultation at that stage. In addition to the appraisal of the new growth scenario options considered following the Regulation 18 consultation, the SA work

presented at the Regulation 18 stage has also been updated to reflect any changes in baseline conditions.

## The growth scenario options

**7.6** The rationale underpinning each growth scenario is set out in the text box below. Each growth scenario has been linked to the quantum of growth options and spatial strategy options which were considered as part of the early stages of the SA. For each strategic site the level of housing considered is approximate. While the number of homes tested at each site provides a means of testing the likely effects of development, it is recognised that some variation may occur in the number of homes which might be provided at these sites as development proposals are worked up. It is expected that any change in the level of development to be accommodated would not be substantially higher or lower so as to result in materially different effects than those identified through the appraisal work undertaken for the growth scenario options.

**7.7** Note that the total new homes figure for each option relates to the whole plan period and refers to housing delivery on sites that are not already committed. Some 8,063 homes already have planning permission or are otherwise identified for development and the Council also has evidence that 1,875 windfall units will be delivered during the plan period. The appraisal work in this chapter relates to the effects which would be over and above those of the already-committed development, windfall housing or homes already completed. The appraisal undertaken for all scenarios has been updated to reflect the updated plan period of 2021 to 2038.

**7.8 Table 7.1** below the text box provides more detail on the distribution of development which would be achieved through each scenario. Growth scenario options that have first been considered at the Regulation 19 stage are shown as 'new scenarios' in the text box with darker green shading and are highlighted in red in the table below. The text box also details the link between the scenarios and the quantum of growth options and spatial strategy options appraised in **Chapter 4**.

### **Lower growth scenarios (Quantum of Growth Option 1)**

#### ■ **Scenario 1a: lower growth settlement hierarchy - urban extensions (*Total new homes: approximately 7,645*)**

*This scenario accommodates a lower level of growth. It includes all settlement extensions that are immediately adjacent to settlements with good prospect of integration with the host settlement. There is a small amount of small settlement growth allowed for. This option, whilst low growth, would broadly follow the settlement hierarchy approach. It comprises a hybrid of Spatial Strategy Options 1 and 4 (existing settlement hierarchy strategy and new urban extensions).*

This scenario reflects an 'ideal' situation (from an objective spatial planning perspective) whereby a lower housing requirement allows sole focus on extensions to the larger settlements in the District, where strategic sites have been promoted (i.e. good prospect of the land being available). These are the sites that would have good potential to integrate into existing large and medium settlements. It would allow modest 'organic scale' growth at the smaller settlements, reflecting what are known to be the smaller village communities' aspiration (i.e. there is little appetite in these communities for accelerated housing growth which is proportionately larger than that seen in the past).

#### ■ **Scenario 1b: lower growth new settlement option (*Total new homes: approximately 8,050*)**

*This scenario accommodates a lower level of growth. It includes all three of the new settlement proposals but does not include any major settlement extensions. It allows for a medium level of growth from smaller sites at settlements within the settlement hierarchy. It stems primarily from Option 3: New garden towns.*

This scenario presents the most distinct possible alternative to Scenario 1a. It embraces the idea of sustainable, self-contained new settlements. New settlements can bring benefits of scale, and in providing new strategic-scale infrastructure, can protect existing infrastructure in existing settlements from new development pressures.

#### ■ **Scenario 1c: lower growth sustainable transport option (*Total new homes: approximately 9,825*)**

*This scenario accommodates a lower level of growth. It includes sites which would best help to promote a strategy which supports sustainable transport viability in the plan area. It links most closely to Spatial Strategy Option 6 (sustainable transport strategy).*

This scenario allocates strategic sites only at settlements that are considered to potentially have good access to an existing rail station. Land west of Southwater is included because Southwater has an existing high frequency and

convenient bus service to Horsham Town centre and Horsham Rail Station. The additional small site allocation total reflects the settlement hierarchy, considering active travel opportunities to local shops and services.

■ **Scenario 1d: lower growth new settlements and small sites only (Total new homes: approximately 9,700)**

*This scenario accommodates a low to medium level of growth. It includes all three of the new settlement proposals but does not include any major settlement extensions. However, it necessitates a high level of growth from smaller sites at settlements within the settlement hierarchy to reflect a more ambitious level of housing growth compared to Scenario 1b. It comprises a hybrid of Spatial Strategy Options 2 and 3 (proportionate growth strategy and new garden towns).*

This scenario represents a progression from Scenario 1b, by way of increasing the total housing number. As with Scenario 1b, it embraces the idea of sustainable, self-contained new settlements. New settlements can bring benefits of scale, and in providing new strategic-scale infrastructure, can protect existing infrastructure in existing settlements from new development pressures. Compared with Scenario 1b, it assumes a much higher quantum of housing growth via smaller sites and at smaller settlements, reflecting more strongly the settlement hierarchy principle.

**Medium growth scenarios (Quantum of Growth Option 2)**

■ **Scenarios 2a, 2b and 2c: medium growth new settlement plus settlement hierarchy (Total new homes: approximately 11,575)**

*These three scenarios accommodate a medium level of growth. They all include all settlement extensions that are immediately adjacent to settlements with good prospect of integration with the host settlement. The respective options include one new settlement - either North East of Henfield (Mayfield), Adversane or Buck Barn. Each respective scenario includes some additional growth from small site allocations in line with the settlement hierarchy. They comprise a hybrid of Spatial Strategy Options 1, 3 and 4 (existing settlement hierarchy strategy, new garden towns and new urban extensions).*

These scenarios represent the greatest degree of balance between Spatial Strategy Options 1, 3 and 4. At the Regulation 18 stage, three stand-alone new settlement proposals (i.e. entirely non-dependent on any existing settlement) were included in the nine strategic sites identified for further testing. These are respectively represented in these three options. In each of these scenarios, all of the strategic urban extensions would also come forward in order to maximise development that would have good potential to integrate into existing large and medium settlements. The additional small site allocation total reflects the settlement hierarchy.

■ **Scenario 2d: medium growth new settlement with east-west spread (Mayfield), Urban Extension West of Billingshurst, without Kilnwood Vale and expand medium settlements (Total new homes: approximately 10,795) (new scenario):**

*This scenario accommodates a medium level of growth. It tests an alternative combination of large new settlement and urban extension sites. Through this scenario the Kilnwood Vale site would not be allocated, hence a more limited level of development 'at' Crawley and the larger urban extension site at Billingshurst would be included to increase the level of development at that settlement. Development would still broadly be in line with the development hierarchy with a substantial number of homes at Horsham town. It comprises a hybrid of Spatial Strategy Options 1, 3 and 4 (existing settlement hierarchy strategy, new garden towns and new urban extensions).*

This represents an alternative medium-growth strategy to Scenarios 2a to 2c, to ensure a range of alternative distributions are tested. It is distinct from other medium-growth alternatives insofar as it focuses more development in the mid-eastern and mid-western parts of the District, and reduces the amount of development in the northern parts. The additional small site allocation total reflects the settlement hierarchy.

■ **Scenario 2e: medium growth A24/A264 corridor focus (including the large scale site at Kingsfold) (Total new homes: approximately 10,975) (new scenario)**

*This scenario accommodates a medium level of growth. It includes large scale sites focussed along the A24/A264 corridor at Kingsfold, Horsham town, Buck Barn and towards Crawley. It also allows for some development at*

*Billingshurst. It comprises a hybrid of Spatial Strategy Options 1, 3, 4 and 5 (existing settlement hierarchy strategy, new garden towns, new urban extensions and employment strategy).*

This scenario provides the strongest focus of the medium-growth scenarios on economic drivers. There is particular focus on sites located in the heart of the Gatwick Diamond, i.e. in the northern part of the District close to north of Horsham business parks, and also along the A24. It also builds on growing employment opportunities at Billingshurst through allocation of the East of Billingshurst strategic site. The additional small site allocation total reflects the settlement hierarchy.

■ **Scenario 2f: medium growth with east central focus - two new settlements, smaller Crawley expansion and all reasonable alternative small sites (including Kilnwood Vale) (Total new homes: approximately 10,800) (new scenario)**

*This scenario accommodates a medium level of growth. It includes two of the three new settlement options, only the Kilnwood Vale site towards Crawley and a relatively high number of homes at small sites. It comprises a hybrid of Spatial Strategy Options 2, 3 and 4 (proportionate growth strategy, new garden towns and new urban extensions).*

This scenario provides a distinct medium-growth alternative to a strategy focused on new settlements on the one hand, and a strategy focused on extensions to existing settlements on the other. The main rationale is that much growth in the District over recent years (and ongoing until the end of the adopted HDPF period) has focused on the northern part of the District, especially Horsham Town. Allocation of two new settlements in the middle and eastern parts of the District respectively can be seen as balancing this via an alternative distribution. It necessitates a high level of growth from smaller sites at settlements within the settlement hierarchy to ensure delivery of a medium level of housing growth overall.

■ **Scenario 2g: medium growth urban extension and small sites option (Total new homes: approximately 11,575)**

*This scenario accommodates a medium level of growth. It includes all settlement extensions that are immediately adjacent to settlements with good prospect of integration with the host settlement. It also includes new settlements or 'satellite' settlements (i.e. are close to but not directly connected to the host settlement). There is a high amount of small settlement growth allowed for which provides growth across a number of other settlements within the settlement hierarchy. It comprises a hybrid of Spatial Strategy Options 1, 3 and 4 (existing settlement hierarchy strategy, new garden towns and new urban extensions).*

This scenario is distinct from the other medium-growth scenarios as it does not allocate any new settlement which is entirely stand-alone from other existing settlements. To achieve medium growth, this necessitates allocating all urban extension strategic sites. It also necessitates allocating the sites that are physically separate from, but close to, existing settlements - namely land east of Kingsfold and land west of Billingshurst. The additional small site allocation total reflects the settlement hierarchy.

**Higher growth scenarios (Quantum of Growth Options 3, 4 and 5)**

■ **Scenario 3a: higher growth urban extension and new settlements (Total new homes: approximately 14,295)**

*This scenario accommodates a high level of growth. It includes all three of the new settlement proposals, and all the major settlement extensions. It does not require any allocations of smaller sites, i.e. 100% of growth is from sites of at least 350 homes. It comprises a hybrid of Spatial Strategy Options 3 and 4 (new garden towns and new urban extensions).*

This scenario delivers a high level of housing growth. It allocates all available strategic sites, including all urban extensions, new settlements and 'satellite settlements', but not including the Ashington cluster which is not a strategic site apart from for purposes of the SA. Given this approach delivers a high level of growth, it is not necessary (or appropriate) to deliver any further small sites in or around the District's settlements.

■ **Scenario 3b: higher growth urban extension and small sites (Total new homes: approximately 14,675)**

*This scenario accommodates a high level of growth. It includes all settlement extensions that are immediately adjacent to settlements with good prospect of integration with the host settlement. It also includes new settlements or 'satellite' settlements (i.e. are close to but not directly connected to the host settlement). It does not include any new standalone settlements. It also relies on very significant delivery from small sites - well beyond the capacity of sites assessed as potentially suitable for allocation by officers but could theoretically be achieved by bringing back in sites submitted to the SHELAA that are currently considered Not Currently Developable. It comprises a hybrid of Spatial Strategy Options 2, 4 and 5 (proportionate growth, new urban extensions and employment strategy).*

This scenario theoretically considers an approach whereby no new standalone settlements are allocated, rather a very high level of development is delivered on a large number of smaller sites across the District. It should be noted that this level of delivery from smaller sites would inevitably mean both significant growth around the edge of a number of settlements (including those with highly sensitive landscape settings) as well as a number of sites located relatively distant from existing settlements that form part of the settlement hierarchy (for example at secondary settlements). This approach may align to an employment-led distribution as it avoids new settlements and may provide opportunity for more smaller sites to be allocated around existing employment hubs.

■ **Scenario 3c: Maximum growth, all available sites (i.e. all reasonable alternatives, strategic and small sites, the rejected Horsham Golf & Fitness site<sup>29</sup> plus 1,500 from other rejected sites (Total new homes: approximately 21,225) (new scenario)**

*This scenario accommodates a maximum level of growth for the District, by taking forward all reasonable alternative sites considered including those rejected through the SHELAA process. It includes all large scale settlement extensions and new standalone settlements. Similar to Scenario 3b, it also includes a very significant level of delivery from small sites - well beyond the capacity of sites assessed as potentially suitable for allocation by officers but could theoretically be achieved by bringing back in sites submitted to the SHELAA that are currently considered Not Currently Developable. It comprises a hybrid of Spatial Strategy Options 2, 3, 4 and 5 (proportionate growth, new garden towns, new urban extensions and employment strategy).*

This scenario theoretically considers a situation in which almost all sites promoted for development in the District are allocated.

**Preferred Strategy taken forward in Regulation 19 Local Plan**

■ **Preferred Strategy (Total new homes: 10,445)**

*The Preferred Strategy has evolved from earlier medium-growth scenarios (most notably Scenarios 2a, 2b, 2c and 2d above, which were appraised as part of the SA work for the Regulation 18 Local Plan), and recognises housing market limitations whereby putting too much development in one part of the district can put rates of delivery at risk. It is a balanced strategy which builds on the settlement hierarchy (including sustainable urban extensions), whilst also planning for a new garden village community.*

<sup>29</sup> Given that the Horsham Golf and Fitness site is not considered suitable for development by the Council as it does not meet the criteria set out in the Council's Site Assessments Report, it is only included in the Maximum Growth Scenario which would require the development of all reasonable alternatives.



Table 7.1 Growth scenario options considered for the Horsham District Local Plan and subject to Sustainability Appraisal

Site names	Lower Growth Scenarios				Medium Growth Scenarios							Higher Growth Scenarios			Preferred Strategy
	Scenario 1a: settlement hierarchy - urban extension	Scenario 1b: new settlement option	Option 1c: relating to access to sustainable transport	Scenario 1d: new settlements and small sites only	Scenario 2a: new settlement plus settlement hierarchy (Mayfield)	Scenario 2b: new settlement plus settlement hierarchy (Adversane)	Scenario 2c: new settlement plus settlement hierarchy (Buck Barn)	Scenario 2d: new settlement with east-west spread (Mayfield), urban extension West of Billingshurst, without Kilnwood Vale & expand medium settlements	Scenario 2e: A24/A264 corridor focus (Kingsfold)	Scenario 2f: east central focus - 2 new settlements, smaller Crawley expansion & all reasonable alternative small sites (Kilnwood Vale)	Scenario 2g: urban extension and small sites option	Scenario 3a urban extension and new settlements	Scenario 3b: urban extension and small sites	Scenario 3c: maximum growth, all available sites (i.e. all reasonable alternatives, strategic and small sites, plus 1,500 from other rejected sites)	
West of Ifield	3,250	0	3,250	0	3,250	3,250	3,250	3,250	3,250	0	3,250	3,250	3,250	3,250	3,250
East of B'hurst	650	0	650	0	650	650	650	0	650	650	650	650	650	650	650
West of S'water	1,200	0	1,200	0	1,200	1,200	1,200	1,200	0	1,200	1,200	1,200	1,200	1,200	1,200
North Horsham densified	500	0	500	0	500	500	500	500	500	500	500	500	500	500	500
West of Kilnwood Vale	350	0	0	0	350	350	350	0	350	350	350	350	350	350	350
Rookwood	725	0	725	0	725	725	725	725	725	0	725	725	725	725	0
Mayfield	0	2,000	0	2,000	2,000	0	0	2,000	0	0	0	2,000	0	2,000	0
Land East of Kingsfold	0	0	0	0	0	0	0	0	1,000	0	1,000	1,000	1,000	1,000	0
Adversane	0	2,000	0	2,000	0	2,000	0	0	0	2,000	0	2,000	0	2,000	0
Land at Buck Barn	0	2,000	0	2,000	0	0	2,000	0	2,000	2,000	0	2,000	0	2,000	2,000
West of B'hurst	0	0	1,000	0	0	0	0	1,000	0	0	1,000	1,000	1,000	1,000	0
Ashington cluster	400	0	0	0	400	400	400	0	0	0	400	0	400	400	0
Small sites	550	2,050	2,500	3,700	2,500	2,500	2,500	2,500	2,500	4,100	2,500	0	5,600	6,150	2,500
<b>Total</b>	<b>7,625</b>	<b>8,050</b>	<b>9,825</b>	<b>9,700</b>	<b>11,575</b>	<b>11,575</b>	<b>11,575</b>	<b>11,175</b>	<b>10,975</b>	<b>10,800</b>	<b>11,575</b>	<b>14,675</b>	<b>14,675</b>	<b>21,225</b>	<b>10,450</b>

### SA Objective 1: To provide affordable, sustainable and decent housing to meet local needs

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
+/-	+/-?	+	++/-	++	++	++	++	++	++/-	++	++?	++?	++	++

**7.9** All scenarios considered would contribute to meeting the local housing need for the District. Each scenario would provide homes over and above the 8,063 with planning permission or are otherwise identified for development by the Council and 1,875 expected windfalls for the plan period. These development commitments and windfall sites considered, each option would meet the objectively assessed 'local housing need' of 897 dwellings per annum (dpa).

**7.10** The Duty to Cooperate requires the Council to consider how much additional development can be accommodated to help meet the unmet needs of surrounding local authority areas. Horsham District falls within two main housing market areas. The majority falls within the North West Sussex Housing Market area (HMA), which also includes Crawley Borough and Mid Sussex District. A small area in the south east of the District falls within the Sussex coast HMA. The latter HMA primarily covers the south coast authorities of Worthing, Adur and Brighton and Hove. The District directly borders Crawley and Mid Sussex to the north and east and the South Downs National Park lies between Horsham and the south coast authorities to the south. Therefore, the growth delivered through the plan is considered to have the most potential to make a contribution to the unmet need of authorities within the North West Sussex HMA.

**7.11** For all scenarios, the total portion of development to be delivered through small sites plus expected windfall sites is not less than 10% of the total allocation, as required by the NPPF<sup>30</sup>. It is expected that large scale development sites in the plan area would most support the delivery of affordable homes, with viability issues less likely to result at these sites compared to smaller sites.

#### Lower Growth Scenarios

**7.12** Providing a substantially lower number of homes through the Lower Growth Scenarios is considered less likely to help address the issues of housing affordability in the District. These options are also likely to provide a lower level of affordable housing as part of the overall amount of new

housing delivered. Scenario 1a would support the delivery of homes mostly as urban extensions to the larger settlements in the District as well as to Crawley. This approach could contribute positively to the unmet need of Crawley Borough and delivering development mostly at large scale sites is likely to support some level of affordable housing delivery in the plan area (albeit the level achieved would be capped by the overall number of homes provided in the plan area). However, providing a relatively low number of homes at small sites through this scenario may have adverse impacts in terms of achieving faster build out rates in Horsham District. Scenario 1a is expected to have a mixed minor positive and minor negative effect.

**7.13** Scenario 1b would include a higher portion of growth at small sites, which could support faster build out rates. As there may be increased requirements for new infrastructure at the new settlement sites included through this scenario, the delivery of new homes at these locations may take longer, which could offset the increased rate of delivery at small sites. The inclusion of the new settlement site at Mayfield could, however, help to meet the unmet housing need of Mid Sussex given the site's close proximity to this local authority area. Scenario 1b is therefore also expected to have a mixed minor positive and minor negative effect. For Scenario 1b the minor negative effect is uncertain.

**7.14** Through Scenario 1c, development would be provided at mostly large scale urban extension sites to the larger settlements in the plan area and Crawley. This approach would help to deliver affordable housing in the District and could also provide new homes to help contribute to the unmet housing need of Crawley Borough. The remaining development would be provided at small sites broadly in line with the development hierarchy. Focussing development mainly towards the larger settlements of the plan area could help respond to areas of greatest housing demand in the plan area. Furthermore, the delivery of housing development at small sites could help to achieve faster completion rates. Overall a minor positive effect is expected for Scenario 1c.

<sup>30</sup> MHCLG (2019) National Planning Policy Framework

**7.15** Scenario 1d would not provide any new housing in close proximity to Crawley. This option would therefore provide little benefit in terms of contributing to the unmet housing need of that local authority area. It would, however, include a high number of smaller sites which could contribute to achieving faster build out rates. However, this could be offset by limiting larger site development to new settlements, which may take more time to deliver considering the new infrastructure required to support development in presently undeveloped areas. The increased number of homes delivered at small sites compared to Scenario 1b, is likely to support an overall increased rate of delivery, with reduced potential for delays at the new settlement sites to adversely affect the overall rate of delivery in the plan area. The increased proportion of development at small sites, however, is unlikely to be as supportive of affordable housing provision as development at large scale sites in the District. Scenario 1d is therefore expected to result in a mixed significant positive and minor negative effect.

#### Medium Growth Scenarios

**7.16** All of the Medium Growth Scenarios are likely to support the achievement of a more affordable stock of housing in the District. Allowing for a medium level of growth is also likely to help to contribute to meeting the housing needs of neighbouring local authority areas given that all scenarios would include sites that are well related to Crawley and/or Mid Sussex.

**7.17** Of the Medium Growth Scenarios, Scenarios 2a, 2b and 2c would allow for a level of growth at the sites West of Ifield and West of Kilnwood Vale which could contribute to meeting Crawley's unmet housing need given the proximity of these sites to Crawley. The delivery of much of the new housing growth at large scale urban extension sites (as well as the inclusion of a new settlement site) is likely to help support the delivery of affordable homes in the District. Each scenario would also include a moderate amount of development at small sites that could be achieved in line with the development hierarchy and would help to support faster build out rates in the plan area. A significant positive effect is expected overall for these three scenarios.

**7.18** Through Scenarios 2d and 2e, the majority of the housing development would be provided at large scale urban extension sites to larger settlements and at new settlement sites. As Scenario 2d includes the Mayfield new settlement site it could contribute to the unmet housing need for Mid Sussex, while Scenario 2e could respond more positively to

the unmet housing need of Crawley Borough by including sites West of Ifield and West of Kilnwood Vale. Both scenarios are expected to respond favourably to the delivery of affordable housing as well as housing completion rates by balancing development between large scale and smaller sites. The inclusion of development broadly in line with the development hierarchy could respond positively to areas of highest demand in the District. A significant positive effect is therefore expected for Scenarios 2d and 2e.

**7.19** Scenario 2f would include a relatively high overall level of housing development (10,800 dwellings), however, of the larger sites which could contribute to the unmet housing need of neighbouring authority areas, only West of Kilnwood Vale (350 homes) would be included. The provision of large scale development at urban extension sites to Billingshurst, Southwater would provide a substantial number of new homes where there has been historic demand and support affordable housing delivery. However, development at the main town of Horsham would be limited to densifying the North Horsham site. Through this scenario a particularly high level of development would be provided at small sites. This could support faster housing completion rates. However, this element of development is unlikely to secure the delivery of a large number of affordable homes. A mixed significant positive and minor negative effect is therefore expected for Scenario 2f.

**7.20** Scenario 2g could potentially help to meet the existing demand at the larger settlements of the District and support affordable housing delivery by allowing for a distribution of growth across urban extensions at the larger settlements of Billingshurst, Southwater and Horsham (including the site at Rookwood) as well as at Crawley. At Crawley this would include the sites at West of Ifield and West of Kilnwood Vale (which would be an extension of the existing allocation set out through the West of Bewbush JAAP<sup>31</sup>). At these relatively large sites it is likely that a substantial number of affordable homes might be delivered. The moderate level of housing delivery at small sites through this option would also support a higher rate of housing completions. A significant positive effect is therefore expected for Scenario 2g.

#### Higher Growth Scenarios

**7.21** The Higher Growth Scenarios are expected to contribute most substantially to meeting the housing need of Horsham District as well as potentially helping to meeting the unmet need for the surrounding local authority areas. All three options include the large sites which are in closest proximity to

<sup>31</sup> Horsham District and Crawley Borough Councils (July 2009) West of Bewbush Joint Area Action Plan

Crawley, while Scenarios 3a and 3c also include the Mayfield site. These scenarios may also be most effective in terms of delivering a supply of housing to positively impact housing affordability in Horsham District given the higher level of overall development (between 14,675 and 21,225 dwellings).

**7.22** Including a high level of growth at urban extensions and new settlements, which would be achieved through Scenarios 3a and 3c, could help to deliver a high level of affordable housing in the District. However, as Scenario 3a would not include any small sites, longer lead in times might be needed before the delivery of new homes could be achieved. This scenario would only include sites which would provide 400 or more new homes. A significant positive effect is expected for Scenario 3a. However, given the potential for longer lead in times to result, uncertainty is attached to this effect.

**7.23** Scenario 3b would include a high proportion of homes at small sites and it is likely less that these sites would support the delivery of affordable homes. An uncertain significant positive effect is also expected for Scenario 3b.

**7.24** Scenario 3c is considered most like to address affordability in the plan area. While this option would provide

the highest number of homes at small sites, the overall level of growth delivered is likely to contribute positively to housing affordability. The inclusion of all large scale sites would make a substantial contribution to the level of affordable housing in the District. A significant positive effect is therefore expected for Scenario 3c.

### Preferred Strategy

**7.25** The Preferred Strategy would deliver the majority of new development at large scale site urban extensions and small sites in line with the development hierarchy. This approach could help to deliver new affordable homes in the plan area and development could also respond positively to the areas of highest demand at the larger settlements, including at the main town of Horsham. The inclusion of the West of Ifield site and the West of Kilnwood Vale site would deliver a substantial amount of housing where it could contribute to the unmet need of Crawley Borough. Providing a reasonably high number of homes through the development of small sites could help achieve a faster rate of housing completions. A significant positive effect is therefore expected for the Preferred Strategy.

## SA Objective 2: To maintain and improve access to centres of services and facilities including health centres and education

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
+/-	--/+	--/+?	--/+	++/-	++/-	++/-	++/-	++/-	--/+	++/-	--/+	--/+	++/-	++/-

**7.26** Higher levels of growth in Horsham District are more likely to support investment in existing and new service provision than lower levels of growth. Conversely, lower levels of growth could place less pressure on existing services and facilities that may already have capacity issues.

### Lower Growth Scenarios

**7.27** By providing fewer than 10,000 new homes over the plan period, the lower growth scenarios are likely to place less pressure on existing services and facilities. However, these scenarios are also likely to support lower levels of investment in the provision of new services and facilities. By providing a portion of the new development (550 homes) at small sites, to be broadly in line with the existing settlement hierarchy, much of the new development through Scenario 1a would provide a

good level of access to existing services and facilities. As the growth at the small sites would be broadly in line with the existing settlement hierarchy, this scenario could also support service provision at the smaller settlements without overburdening existing provisions by allowing for an appropriate level of growth at these locations. Scenario 1a, however, would also include the provision of a high number of homes (400) at the Ashington cluster site, which adjoins a lower ranked settlement (Ashington) where current service provision is understood to be moderate (Ashington currently benefits from a primary school but no secondary school or GP surgery).

**7.28** Scenario 1b departs from the approach of focussing development at the larger settlements by including a high number of new homes at each of the new settlement sites

Land North East of Henfield (Mayfield); Adversane; and Buck Barn. At each of these sites around 2,000 homes is to be delivered over the plan period. The level of growth is likely to support new service provision but a high level of self-containment may occur in the longer term as the new settlements are built out further. Furthermore, a high number of residents could have limited access to services and facilities in the early stages of development, dependent upon the phasing of new development. In comparison to Scenario 1a, a high proportion of growth would be provided at small sites and a lower proportion of growth at the larger settlements where existing services and facilities are concentrated. Therefore, a mixed minor positive and significant negative effect is expected for Scenario 1b.

**7.29** Scenario 1c would result in a similar distribution of development to Scenario 1a, however, it would also include additional housing at the West of Billingshurst site (1,000 dwellings) and at small sites (2,500 dwellings). Through this option relatively high levels of development could come forward at small sites at the lower ranked settlements of Warnham and Christ's Hospital given that they provide access to a railway station. Both settlements provide access to either a primary school or a secondary school but not both and neither settlement provides access to a GP surgery. Focussing development at smaller sites at these settlements is unlikely to support high levels of new service provision. The scale of development at the West of Billingshurst site could support the delivery of new services and residents here would also help from nearby access to existing provisions. Overall a mixed minor positive and significant negative effect is expected for Scenario 1c. The negative effect is uncertain given that through this scenario residents may benefit from access to services and facilities further afield via public transport links.

**7.30** Scenario 1d would include all three new settlement site options, but no strategic urban extensions. The level of growth to be concentrated at each new settlement is expected to support new service provision. This is particularly likely to be case in the longer term and beyond the plan period as the sites are built out. Each site could potentially provide additional homes beyond the plan period, with the Land North East of Henfield (Mayfield) site expected to deliver 7,000 dwellings in the longer term. The potential to achieve a degree of self-containment is particularly likely at this location in the long term. This scenario would include a relatively high level of development (3,700 homes) to be distributed across the small sites which could result in a distribution which does not follow the development hierarchy. A high number of new homes could therefore be delivered in more rural locations. Some of these residents would have poor levels of access to existing service provision, particularly where development is provided beyond the existing settlement built up area boundaries and at

smaller settlements. This is also likely to be the case at some settlements which are higher in the development hierarchy such as Henfield which provides access to only one primary school and no secondary school. Overall a mixed minor positive and significant negative effect is expected for Scenario 1d.

### Medium Growth Scenarios

**7.31** Scenarios 2a, 2b and 2c include growth at urban extension sites and in line with the settlement hierarchy, similar to Scenario 1a. Each of the scenarios would, in addition, include one of the three new settlement site options Land North East of Henfield (Mayfield), Adversane or Buck Barn, respectively.

**7.32** Access to services and facilities for these three options is likely to be comparable to that under Scenario 1a. However, scenarios 2a, 2b and 2c may lead to benefits which are over and above those expected for Scenario 1a, given that a high proportion of growth would be delivered at the small sites which would be broadly in line with the settlement hierarchy. This element of growth could help to prevent the stagnation of existing service provision at the smaller settlements.

**7.33** The scale of new development at a single new settlement site is likely to support the incorporation of new services and facilities, but access to these for new residents will depend upon the phasing of new development. Overall, a mixed significant positive and minor negative effect is therefore expected for Scenarios 2a, 2b and 2c. The proposals for all sites include support for new healthcare and education facilities. The three new settlement site options would provide the same level of development over the plan period meaning a similar level of service provision and self containment is expected. None of these three sites are well related to existing town centres or all types of essential services. Mayfield and Buck Barn are relatively well related to the developed areas of Henfield and Buck Barn (included in Scenarios 2a and 2c) meaning residents could have relatively good access to some types of services. The Adversane site (included in Scenario 2b) lies almost adjacent to existing college facilities which would benefit some new residents at the site. All three scenarios would include the Ashington cluster site at from which residents are likely to need to travel to access to some essential services.

**7.34** Scenario 2d would include a relatively high number of large scale urban extension sites at the larger settlements in Horsham and by Crawley. Residents here would have good access to existing services and facilities. The scale of growth to be delivered at these sites is also likely to support new service provision. The West of Billingshurst site (1,000 dwellings) included in this scenario would provide a marginally lower level of access to existing services and facilities than the



East of Billingshurst site (650 dwellings), which is included in a number of other scenarios, given the location of existing healthcare, schools and the railway station towards the eastern part of Billingshurst.

**7.35** This option also includes the site Land North East of Henfield (Mayfield), at which a degree of self-containment is likely to be achieved given that its delivery is to be supported by new services and facilities, including healthcare and education facilities. The high level of development to be delivered in the longer term at this site (7,000 dwellings) is likely to increase the potential for substantial new service provision beyond the plan period. The level of development to be provided at small sites (2,500 dwellings) will likely result in this element of growth being distributed broadly in line with the development hierarchy. A large proportion of this growth is therefore likely to be provided at the larger settlements with some development also allowed at less developed areas which would help to prevent the stagnation of rural services. A mixed significant positive and minor negative effect is therefore expected for Scenario 2d.

**7.36** Under Scenario 2e growth would be focussed along the A24 and A264. In effect this would focus development at locations which are relatively well-related to Horsham town and Crawley. While this scenario would allow for some large scale growth at East of Billingshurst (650 dwellings) to support some new service provision at this larger settlement, it would not include large scale growth at Southwater which would be included in many of the other scenarios.

**7.37** This scenario is considered to make more limited use of existing service provision and would also be less supportive of new service provision to benefit existing residents. The inclusion of all large scale urban extension sites which are well related to Horsham town plus Kingsfold (which in effect would act as a satellite settlement to the main town) could result in capacity issues at services here. Residents at Kingsfold are likely to lack immediate access to services and facilities. While new provisions are likely to result to support the development, it is not of scale to allow for a new secondary school or healthcare. The new settlement at Buck Barn would achieve more substantial service provision as it is built out, but residents would have to travel from this location for essential services in the short term. The level of growth to be provided at small sites (2,500 dwellings) is likely to be achieved broadly in line with the development hierarchy. This is likely to support access to the more developed areas for many new residents while also allowing for some more rural growth to support existing services here. A mixed significant positive and significant negative effect is therefore expected for Scenario 2e.

**7.38** Under Scenario 2f, much of the new development would be provided at the new settlement sites Adversane; and Buck

Barn. This would provide a long term focus for new development and the scale of growth is likely to support substantial new service provision. This approach, however, is considered less likely to provide existing residents with good access to the new services which could be provided. At the new settlement sites, new residents would be most dependent upon the delivery of new services and facilities and would otherwise have to travel longer distances to access them. The inclusion of the West of Kilnwood Vale site (350 homes) in this scenario would provide residents with some new services within the Kilnwood Vale strategic allocation; however the extension site is not of a scale to support new schools or healthcare. By including a large number of small sites this scenario is likely to distribute a large proportion of the new growth more widely. Therefore, a large number of residents could be located where there is limited access to services. The wider distribution is also unlikely to support substantial new service provision. Overall a mixed minor positive and significant negative effect is expected for Scenario 2f.

**7.39** Scenario 2g would include all urban extension sites, many of which are well related to the larger settlements in Horsham District and also to the Crawley area, but no new settlements. The notable exception to this is site at Kingsfold which in effect would form a 'satellite' settlement to the existing development at the town of Horsham. While the site is relatively well related to Horsham it would not provide a direct extension to development at the settlement. The relatively high level of growth at this location (1,000 new homes) would be less than that provided at the three new settlement options but could support some more limited service provision. Proposals for the site include a new primary school but are unlikely to include a new secondary school or healthcare services. The level of development (2,500 homes) to be provided at small sites would allow for growth broadly in line with the settlement hierarchy. The more limited amount of growth provided at the smaller settlements might help to support existing rural service provisions. A mixed significant positive and significant negative effect is therefore expected for Scenario 2g.

### Higher Growth Scenarios

**7.40** Delivering a high level of growth in line with Scenarios 3a, 3b and 3c could support substantial new service provision in Horsham District. Furthermore, as all three options would provide a high level of growth as urban extensions of existing larger settlements, residents at these locations are likely to have a good level of access to existing services and facilities. However, the high level of growth (all three options include all potential urban extensions) may result in existing services at the settlements of the District and surrounding areas (most notably Crawley considering its proximity to the north eastern edge of the District) becoming overburdened. The potential for

overburdening of existing services to result is most likely through Scenario 3c given the very high level of overall growth to be provided (21,225 homes), much of which would be provided at small sites which are less likely to support substantial new service provision.

**7.41** Scenarios 3a, 3b and 3c also have the potential to result in a high proportion of residents being located in areas where services are not immediately accessible. For Scenario 3a this is at the new settlements of Mayfield, Adversane and Buck Barn. These new settlements will be supported by the delivery of new services and facilities; however access to new services and facilities for new residents will be dependent, in part, upon the phasing of new development. Development at the Kingsfold site is also likely to provide residents with limited access to existing services and facilities. These areas are not within close proximity of all necessary services (including schools and healthcare) with the Buck Barn site and Kingsfold site particularly poorly located in terms of access to existing schools and healthcare.

**7.42** Scenario 3a would allow for no development at small sites and this is likely to increase the potential for rural service provision to stagnate in Horsham, with reduced potential for services at smaller settlements to be used regularly over the plan period.

**7.43** For Scenario 3b, no new settlements would be included, with a very high proportion of growth (5,600 homes) focussed towards small sites. This approach could help support service provision at smaller settlements, but would also mean there is reduced potential to secure funding for new service provision which might be achieved at large scale development. Dispersing a large amount of growth to a higher number of small sites is likely to result in a proportion of new development being located in less developed locations where services are not immediately accessible. Furthermore, the scale of growth which is achieved as development is dispersed to a higher number of locations is less likely to support new service provision.

**7.44** Scenarios 3c would include all three new settlement site options and a high level of development at small sites (6,150 homes). This is likely to help support a high level of service provision in the long terms as well as limiting the potential for the stagnation of rural services. However, many residents may lack access to services and facilities in the short term in particular, as the new settlement sites are built out.

**7.45** A mixed effect is therefore expected for Scenarios 3a, 3b and 3c. For Scenario 3a, the failure to allow for any new growth at smaller sites could have particularly adverse impacts in relation to rural service provision and therefore the

negative effect is likely to be significant. The negative effect expected in relation to Scenario 3b is also likely to be significant given the potential for a large proportion of growth to come forward at more rural locations in a more dispersed approach. The significant negative effect recorded for Scenario 3c is particularly likely given that it reflects the potential for the very high of overall amount of development to result in overburdening of existing services and facilities. This is the only option that would include the Horsham Golf and Fitness Club site to the north of Southwater, which could place increased pressure on existing service provision within Southwater as well as Horsham town to the north. This option would also provide a high level of development in more rural locations and therefore similar effects to those expected for Scenario 3b are recorded in this regard. For this option the positive effect is also significant given the support for existing rural service provision and the potential to achieve a substantial uplift in service provision in the plan area through the high level of development delivered.

### Preferred Strategy

**7.46** The Preferred Strategy would provide for much of the new development as urban extension strategic sites at the larger settlements in the plan area and by Crawley. It would also include the West of Kilnwood Vale site where residents would be largely dependent on access to services and facilities at the existing Kilnwood Vale strategic allocation which is currently being built out to incorporate a good range of services and facilities. This site is also relatively well related to the settlement of Crawley. While this option would not include any new strategic scale urban extension sites at Horsham town, it would include the densification of the North Horsham site and a number of smaller site allocations at this town to make good use of the strong service provision here. A large proportion of residents are therefore expected to have a good level of access to existing services and facilities.

**7.47** The Preferred Strategy would also include the new settlement site option at Buck Barn. While that site option provides relatively limited access to existing services and facilities, its inclusion will support substantial new service provision in the plan area. This option excludes the Ashington cluster site where new residents would otherwise likely be required to travel longer distances to access healthcare and secondary schools. By including a relatively high level of development at small sites (2,500 homes) which could still be achieved by distributing development in line with the development hierarchy, this option would also provide some support for existing rural service provision. Overall a mixed significant positive and minor negative effect is expected for the Preferred Strategy.

### SA Objective 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
++/-	--/+	+/-	--/+	+/-	+/-	+/-	+/-	--/+	--/+	--/+	--/+	--	--	+/-

**7.48** It is expected that accommodating a particularly high level of growth in Horsham District over the plan period could have impacts relating to access to services and facilities. New development is likely to incorporate and support some new service provision; however adverse effects may occur both in terms of overburdening of existing services and in relation to the increased potential for some residents to be located in areas where service provision is not immediately accessible.

**7.49** Higher growth is considered more likely to result in issues relating to place making and integration with existing social networks in the District as well as wider community cohesion, particularly in the short and medium term until the new developments have bedded in.

**7.50** Although delivering higher levels of growth at large site options (i.e. through urban extensions or new settlements) is likely to incorporate new service provision, achieving a sense of place at these locations could take longer and will likely be dependent on their specific design and masterplanning. Conversely, lower growth is likely to support a lower level of new service provision in the District, but is less likely to place strain on existing services. Lower levels of growth are also considered more likely to be able to be integrated within the District without resulting in problems relating to place making and disruption of existing community cohesion.

#### Lower Growth Scenarios

**7.51** Scenario 1a would deliver a lower level of growth and includes urban extensions at settlements with good potential to achieve integration. While this scenario has reduced potential to disrupt existing social networks, it includes a high level of growth (400 homes) at the settlement of Ashington which is a lower order settlement. The high level of growth proposed at Ashington could represent an increase of approximately 40% of the current household numbers within the village if one new home is considered to be equivalent to one new household. This could have implications in terms of overburdening the more limited service provision at Ashington as well as leading to issues relating to the integrity of established local community networks and local placemaking.

**7.52** While Scenario 1b would also involve a lower level of growth over the plan period, it would incorporate much of this growth as new settlements and with a substantial proportion also delivered as small site development. In effect the new settlements included in this scenario would depart from an approach which focusses more development at the larger settlements which in the past have been considered most suitable to accommodate new growth. Delivering much of the new growth over the plan period at small sites would be mostly in line with the development hierarchy. It could lead to a more dispersed distribution of growth than Scenario 1a, which could result in some new residents having a limited level of access to community facilities. This element of Scenario 1b could also result in place making issues at more locations. However, it is recognised that the magnitude of any impacts is likely to be more limited considering that the reduced number of homes small sites would provide. As such this could result in implications relating to pressures on community networks as well as disruption of sense of place.

**7.53** For both Scenarios 1a and 1b there are likely to be mixed effects. However, for Scenario 1a this is likely to include a significant positive effect, whereas for Scenario 2 it is likely to include a significant negative effect.

**7.54** Under Scenario 1c a similar distribution of development to Scenario 1a would occur. Through Scenario 1c, however, additional housing at the West of Billingshurst site (1,000 dwellings) and at small sites (2,500 dwellings) would be delivered. Warnham and Christ's Hospital provide access to a railway station and could see a relatively high level of development through this scenario. The more limited service provision at these settlements and their smaller size is likely to mean that the existing community networks may not be able to easily accommodate higher levels of development. Focussing development at smaller sites at these settlements is unlikely to support high levels of new service provision. The scale of development at the West of Billingshurst site could support the delivery of new services and the large nature of this settlement is likely to mean that new residents can be accommodated with more limited distributions to existing community networks. However, it is noted that there may be issues with integrating this site into the existing settlement given that it is separated

from the existing developed area by the A272 and A29. Overall a mixed minor positive and minor negative effect is expected for Scenario 1c.

**7.55** Scenario 1d would potentially result in increased issues in terms of placemaking at the new settlement sites included at Adversane, Buck Barn and North East of Henfield (Mayfield). The creation of entirely new settlements is likely to support substantial new service provision but it may take longer to establish a sense of place. This scenario is also likely to result in issues in terms of the successful integration of new development and residents within existing social networks. This scenario would result in a relatively high level of homes being accommodated at small sites (3,700) which is likely to result in a wider distribution of development in the District. Through this element of Scenario 1d, it is likely many residents would lack immediate access to essential services. An overall mixed minor positive and significant negative effect is therefore expected for Scenario 1d.

### Medium Growth Scenarios

**7.56** The delivery of a medium level of growth would present increased challenges in terms of successfully integrating new development within the District, compared to the lower growth scenarios. Scenario 2a, 2b and 2c would, however, deliver urban extensions which have potential to integrate positively with existing settlements, as well as development at small sites which is largely in line with the settlement hierarchy. These elements of growth could result in adverse impacts in terms of established community cohesion of the larger settlements. However, the larger nature of these settlements and the relatively high number of services and facilities at these locations may mean any effects are more limited. While the delivery of a proportion of growth at small sites would be in line with the development hierarchy through these three options, there is potential for impacts on the existing community networks at a higher number of locations than through Scenario 1. As small site options would support a lower number of new homes, any effects at specific locations are likely to be limited, dependent upon whether or not a higher number of sites are taken forward in a single area. The potential for place making issues to arise is likely to be reduced.

**7.57** Scenarios 2a, 2b and 2c would include the development of the Ashington cluster. The sizeable increase of households at this settlement means there is potential for the limited service provisions at Ashington to become overburdened and community networks to be disrupted. The footprint of the site itself would also represent a sizeable increase to the settlement which is likely to present challenges relating to placemaking.

**7.58** Impacts relating to social cohesion are likely to be mostly similar if any of the new settlement options were delivered as they would incorporate similar levels of new services and facilities (including healthcare and education). Furthermore, the level of new homes provided through these three options through small site options would be the same and would broadly be in line with the settlement hierarchy. The higher levels of growth to be delivered through Scenarios 2a, 2b and 2c means that achieving social cohesion is likely to be more challenging than the Lower Growth Scenarios. However, these scenarios would provide much of the new development at locations where service provision is most likely to be able to accommodate new growth. An overall mixed minor positive and minor negative effect is expected for Scenarios 2a, 2b and 2c.

**7.59** Scenario 2d would include a relatively high number of large scale urban extension sites at the larger settlements in Horsham and by Crawley. Residents here would have good access to existing services and facilities and there is less potential for adverse impacts in terms of disrupting existing community networks. The inclusion of the Land North East of Henfield (Mayfield) site would support substantial new service provision but it is likely to prove more challenging to instil a sense of place to this new settlement. The inclusion of the West of Billingshurst site would provide residents with nearby access to services and facilities. However, it is noted that there may be issues with integrating this site into the existing settlement given that it is separated from the existing developed area by the A272 and A29. Providing a level of development (2,500 dwellings) which could be distributed broadly in line with the development hierarchy is likely to mean much of this would occur at the larger settlements. At these locations, community networks will generally be able to accommodate growth without experiencing significant adverse effects. Overall, a mixed minor positive and minor negative effect is therefore expected for Scenario 2d.

**7.60** Scenario 2e would deliver much of the new development towards the A24 and A264 corridors. A high proportion of new development would be provided close to Horsham town and Crawley at which community networks and service provisions are likely to be relatively strong. Large scale growth would also occur at East of Billingshurst (650 dwellings) which is also a well established settlement. All large scale urban extension sites at Horsham town plus Kingsfold (which in effect would act as a satellite settlement to the main town) would be delivered through Scenario 2e and this may result in some capacity issues at services here. Furthermore, the small size of the existing settlement at Kingsfold and limited services here will likely mean substantial adverse impacts on community networks here could result. Providing a new settlement at Buck Barn is also likely to providing place-



making challenges. A mixed minor positive and significant negative effect is therefore expected for Scenario 2e.

**7.61** Scenario 2f would deliver much of the new development at the new settlement sites Adversane and Buck Barn. A relatively large proportion of the growth to be delivered through this scenario could therefore result in place-making issues in the plan area. While new services would be provided at these sites, this approach would be of limited benefit to existing residents in the plan area. This scenario would also not include the West of Ifield site where new residents would have access to the service provision at Crawley. The delivery of the West of Kilnwood Vale site (350 homes) through this scenario would provide residents with access to some new services within the Kilnwood Vale strategic allocation. While this site is an extension to the developed area of Crawley, it has only recently been completed meaning the community networks may be more sensitive to change compared to the more established settlements in the plan area.

**7.62** This scenario would also include a relatively high level of development (4,200 dwellings) at small sites and is thereby likely to achieve a wider distribution of development. Therefore, a larger number of residents could be located in more rural locations where services are more limited and community networks less suitable to accommodate a high number of new homes. Overall a mixed minor positive and significant negative effect is therefore expected for Scenario 2f.

**7.63** Scenario 2g could result in impacts in terms of the successful integration of new development and residents within existing social networks at some of the smaller settlements in the plan area. The level of development to be delivered at the small site options (2,500 homes) would achieve growth to be broadly in line with the development hierarchy. This element of growth, as well as growth provided at large scale urban extension sites at the larger settlements is likely to be accommodated without substantial disruption to existing community networks or services.

**7.64** This scenario would, however, deliver 1,000 new homes at the Kingsfold site which currently lacks immediate access to most essential services and facilities. It would also include 400 homes at the relatively small settlement of Ashington. Neither site would be of the scale to integrate substantial new services and there could be substantial adverse impacts on existing community networks at both locations. It is expected that the inclusion of the West of Billingshurst site would provide residents with nearby access to services and facilities. However, it is noted that there may be issues with integrating this site into the existing settlement given that it is separated from the existing developed area by the A272 and A29. Scenario 2g is therefore expected to result in a mixed minor positive and significant negative effect.

## Higher Growth Scenarios

**7.65** The High Growth Scenarios (particularly Scenario 3c) are likely to be most successful in terms of supporting long term service provision which could help facilitate the integration of new residents in the District. The delivery of much of the new development over the plan period at both urban extension sites and new settlement sites through Scenario 3a would help to limit the potential for overburdening of existing provisions in comparison to Scenario 3b. By concentrating growth at large scale sites, the provision of new services and facilities is more likely to be directly supported or achieved through financial contributions from developers.

**7.66** Conversely, the high level of growth to be delivered through urban extensions and small sites without including any new settlements sites in Scenario 3b could result in the overburdening of existing facilities at existing settlements. This impact is most likely at the less developed areas of the District given the wider distribution of development which may result and the limited existing service provision at these locations. It is expected that any positive effect relating to new service provision would be significantly outweighed by delivering this high proportion of growth at rural locations which could be seen to fundamentally change existing settlement character and cohesion. The delivery of more piecemeal development through small site options under this scenario could also result in adverse impacts in relation to place making at a high number of locations. While impacts relating to place making could be more limited at specific locations considering the lower level of development to be accommodated at small site options, the high proportion of overall growth provided in this manner could result in overall cumulative effects.

**7.67** Impacts relating to the disruption of local community networks and place making are also likely through all three Higher Growth Scenarios. This is most likely through Scenario 3c, however, given the overall level of development (21,225 dwellings) to be provided up to 2038. While this option would include the new settlement sites at which there could be a focus for new long term service provision, these sites are likely to experience issues relating to place making when creating new communities from scratch. Furthermore, this is the only option that would include the Horsham Golf and Fitness Club site to the north of Southwater. While the site would have reasonable potential to be integrated with the existing settlement at Southwater it is separated from the main developed area by the A24 which could affect the potential for this. Scenario 3c also includes the highest level of housing to be delivered through small sites (6,150 dwellings) meaning the issues relating to the potential overburdening of services may be more pronounced than under Scenario 3b.

**7.68** While a mixed minor positive and significant negative effect is expected for Scenario 3a, a significant negative effect alone is expected for Scenarios 3b and 3c.

#### Preferred Strategy

**7.69** Through the Preferred Strategy, a large proportion of the new development would be delivered as urban extension strategic sites at the larger settlements in the District and by Crawley. At these locations, residents are likely to benefit from a good level of access to existing services and facilities. The established nature of these settlements may also limit the potential for new development to disrupt existing community networks. The Preferred Strategy also includes the West of Kilnwood Vale site. This site would build on the existing strategic allocation site Kilnwood Vale, which is currently being built out to incorporate new services and facilities. It is recognised that the Kilnwood Vale is a recent development and therefore community networks at this location may be more sensitive to change.

**7.70** The inclusion of the Buck Barn new settlement site could support long term service provision in the plan area, although development at the site is likely to have to overcome place making issues given that it would involve the creation of a new community from scratch. There is less potential for disruption of more fragile community networks at smaller settlements such as Ashington, through the Preferred Strategy. Development at Ashington would be of a more limited scale. The Preferred Strategy would include 2,500 homes at small sites. It is expected that this level of development could be delivered to be broadly in line with the development hierarchy meaning a large proportion would be provided at the larger settlements and a limited amount provided at smaller settlements. This could help support existing services at these locations without resulting in overburdening. Overall a mixed minor positive and minor negative effect is expected for the Preferred Strategy.

#### SA Objective 4: To support the creation of safe communities in which levels of crime, anti-social behaviour and disorder and the fear of crime are reduced

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

**7.71** It is expected that the potential for reducing the occurrence and fear of crime in the District will be most influenced by design considerations. Design measures incorporated in new developments and open spaces, including those which promote natural surveillance, may help to address this issue.

**7.72** While each scenario considered would result in varying distributions of growth within the District, they would not influence the design of the new development which comes forward. A negligible effect is therefore expected for each scenario considered.

#### SA Objective 5: To improve public health and wellbeing and reduce health inequalities

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
++/-	++/-	--/+?	--/+	++/-	++/-	++/-	++/-	--/+	--/+	--/+	--/+	--	--/+	++/-

**7.73** Health and wellbeing in the District will be influenced by access to healthcare facilities and recreation facilities which

might help to encourage the uptake of physical activities. Where development is located in areas where residential



amenity might be impacted upon by noise and air pollution, additional adverse impacts may result in terms of local public health. Similar to the situation regarding service provision in Horsham District (described previously in relation to SA objective 2), the delivery of a lower level of growth could reduce the potential for new healthcare facilities to be provided. Lower growth could, however, also reduce the potential for existing healthcare facilities to become overburdened as new development is provided, compared to higher growth.

**7.74** While AQMAs have been declared within the District at Storrington and Cowfold, none of the sites considered for development fall within these areas. As such it not expected that any of the scenarios would deliver a high level of development in areas where specific air pollution issues have been identified. While some options may result in increased levels of traffic within the AQMAs, the potential to intensify existing air quality issues has been considered separately under SA objective 14 further ahead in this chapter.

#### Lower Growth Scenarios

**7.75** Delivering the majority of new development as urban extensions under Scenario 1a would provide many residents with a good level of access to existing healthcare facilities, with healthcare facilities to be incorporated within many of these large sites.

**7.76** Strategic urban extensions at Horsham Town and by Crawley include land which lies partially within the noise contour for Gatwick Airport or is adjacent to an A-road, as well as land which currently provides outdoor sports uses. The significant positive effect expected for Scenario 1 is therefore likely to be combined with a minor negative effect.

**7.77** Scenario 1b would depart from the approach of providing most of the development at the larger settlements, with the three new settlements of Mayfield, Adversane and Buck Barn accommodating a high level of development. While none of these sites are in close proximity to any existing healthcare facilities, they are all expected to accommodate new healthcare facilities when fully built out. Each site would also incorporate features that could encourage active recreation, such as open spaces and walking/cycling routes. Access to healthcare for new residents at each site would be dependent upon the timing of new service provision in relation to the housing delivery.

**7.78** Accommodating the remainder of the growth under Scenario 1b (2,050 homes) at smaller sites would mean that the distribution of growth would be less likely to support substantial new healthcare provision. However, much of this growth is expected to be delivered in line with the development hierarchy meaning that many new residents could be located at the large settlements where provision

already exists. It is recognised that there is some limited potential for existing facilities to become overburdened as growth occurs. A mixed significant positive and significant negative effect is therefore expected for Scenario 1b.

**7.79** Through Scenario 1c, a similar distribution of development to Scenario 1a would occur. However, this scenario would include additional housing at the West of Billingshurst site (1,000 dwellings) and at small sites (2,500 dwellings). Through this scenario, relatively high levels of development could come forward at small sites at the lower ranked settlements of Warnham and Christ's Hospital given that they provide access to a railway station. Neither of these settlements provide access to a GP surgery. The delivery of growth through smaller sites at these settlements is unlikely to support high levels of new healthcare provision.

**7.80** As the scale of development to be provided at the West of Billingshurst site is relatively large, the delivery of new services might be supported. Residents here would also benefit from nearby access to healthcare within the settlement, although it is noted that healthcare at Billingshurst is located in the eastern part of the settlement. This site is also bordered by an A-road to the south meaning there is some potential for noise pollution to affect residents. Overall a mixed minor positive and significant negative effect is expected for Scenario 1c. The negative effect is uncertain given that through this scenario residents may benefit from access to healthcare facilities further afield via public transport links.

**7.81** Scenario 1d would result in all three new settlement site options at Mayfield, Adversane and Buck Barn coming forward for development. While these locations would not provide immediate access to healthcare facilities, their development would incorporate new facilities to the benefit of new residents as well as those in the surrounding areas.

**7.82** Scenario 1d would also result in a high level of growth (3,700 homes) at small sites. This level of development is expected to result in a more marked departure from the existing development hierarchy in the District. It is expected that this approach would result in a high proportion of new residents having poorer access to healthcare facilities. It is also considered less likely to support new facilities given that a more dispersed distribution of growth may result. This scenario is expected to result in an overall mixed minor positive and significant negative effect.

#### Medium Growth Scenarios

**7.83** Scenarios 2a, 2b and 2c would provide similar overall distributions of development but differ in terms of the location of new settlements which would be delivered. None of the three sites considered for new settlements are particularly well-related to existing healthcare facilities. However, each

new settlement site option would include some new healthcare and recreation provisions as part of the development.

**7.84** Delivering the remainder of growth at urban extensions and at small sites broadly in line with the settlement hierarchy is likely to provide further opportunities for supporting the delivery of new healthcare facilities which could benefit many existing residents. This approach is likely to help prevent the overburdening of existing facilities as new development occurs. In all, this approach is likely to help ensure that the majority of new resident would have suitable access to existing or new healthcare facilities in the District.

**7.85** The significant positive effects expected for Scenarios 2a, 2b and 2c are likely to be combined with significant negative effects as residents at the new settlements included under each option would not benefit from immediate access to any existing healthcare facilities. Each new settlement site option is expected to include new healthcare provision. However, the Land North East of Henfield (Mayfield) site would provide the greatest certainty in terms of its ability to support substantial new service provision in the longer term. This site would deliver 2,000 homes over the plan period and potentially 7,000 homes beyond. In terms of the potential for residents to be affected by noise pollution, the strategic development sites at Rookwood (725 dwellings) and Ifield (3,250 dwellings) are both bordered by substantial stretches of A-road or are within the noise contour for Gatwick Airport as well as containing land currently in recreational use. The new settlement sites at Adversane and Buck Barn are also bordered by A-roads which could compound the negative effect identified compared to the Land North East of Henfield (Mayfield) site which is free from constraints of this nature.

**7.86** Under Scenario 2d a relatively high number of large scale urban extension sites at the larger settlements in Horsham and by Crawley would be delivered. Residents here would have good access to existing healthcare facilities, although some residents are likely to be adversely affected by noise pollution from A-roads or airplanes travelling to and from Gatwick airport. These sites may also result in the loss of open spaces which currently support recreational uses. New healthcare facilities would be provided at the new settlement site at North East of Henfield (Mayfield), however, earlier occupiers of the site may be required to travel longer distances to access healthcare. Much of the remaining development (2,500 dwellings) would occur at small sites to be distributed broadly in line with the development hierarchy. While this portion of development is less likely to support new healthcare provisions, much of it would occur at the larger settlements where residents would have access to existing facilities. A mixed significant positive and significant negative effect is therefore expected for Scenario 2d.

**7.87** Much of the new development through Scenario 2e would be delivered towards the corridors of the A24 and A264. All strategic urban extension sites at Horsham town and also towards Crawley (Ifield and the West of Kilnwood Vale site) would come forward. At these locations, residents would have a relatively good level of access to existing healthcare facilities and the scale of development at Ifield also has potential to support new healthcare.

**7.88** However, sites at Rookwood and Ifield could result in the loss of existing recreational uses and residents being subject to increased levels of noise pollution. Furthermore, by including all urban extension sites at Horsham town as well sites which would be delivered in line with the development hierarchy, capacity issues might result at healthcare facilities towards the town. This would include effects from the development at Kingsfold (1,000 dwellings) which in effect would act as a satellite settlement to Horsham town and is unlikely to incorporate new healthcare. Residents here would be dependent on healthcare at Horsham town. The large scale site at East of Billingshurst (650 dwellings) is relatively well related to a settlement which includes healthcare facilities, although it should be noted that these facilities are located in the east of the settlement. The new settlement at Buck Barn would provide its own new healthcare provisions, however, these may take some time to incorporate. Overall a mixed minor positive and significant negative effect is expected for Scenario 2e.

**7.89** Through Scenario 2f much of the new development in the District would be provided at the new settlement sites Adversane and Buck Barn. At these locations, new healthcare facilities would be provided; however earlier occupiers of the site could have limited access to these provisions. This scenario would not include the West of Ifield site where new residents would otherwise have access to healthcare at Crawley and is of a scale to support substantial service provision. By excluding this site option, however, the potential for residents to be adversely affected by noise from Gatwick airport or the loss of existing recreational space, would be reduced. The West of Kilnwood Vale site would provide access to existing healthcare at Crawley but the Kilnwood Vale strategic allocation lies between the site and this settlement. The existing strategic allocation will not provide healthcare facilities. Providing 4,200 dwellings at small sites is likely to result in a wider distribution of development which is unlikely to support substantial new service provision including healthcare. This scenario could therefore result in a higher proportion of residents being located in less developed areas where there is limited access to healthcare. Overall a mixed minor positive and significant negative effect is expected for Scenario 2f.

**7.90** Scenario 2g would result in much of the new development occurring at urban extension sites, with a

substantial amount of growth also at small sites. The urban extension locations mostly benefit from access to existing healthcare facilities, with the notable exception of the Kingsfold site due to the lack of healthcare provision at the existing settlement. Some of the development at Kingsfold could also fall within the noise contour associated with Gatwick Airport. This scenario could also result in the development of areas of open space/outdoor sport provision at the sites at Rookwood and West of Ifield, although these could be protected from development in the masterplanning process. Overall scenario 2g is expected to have a mixed minor positive and significant negative effect.

### Higher Growth Scenarios

**7.91** The Higher Growth Scenarios present the greatest opportunity to secure the delivery of new healthcare services or support for improvements of existing facilities through S106 or CIL contributions. Considering the large proportion of growth to be focussed at large sites through Scenario 3a in the form of new settlements or urban extensions, this option may have the greatest potential to achieve these benefits. The inclusion of large scale urban extension sites is also likely to help ensure new residents have access to healthcare provisions from the early stages of development.

**7.92** All three scenarios could, however, result in existing facilities becoming overburdened given the high levels of growth, with between 14,675 and 21,225 homes to be delivered. All scenarios would include the large sites at Kingsfold, Rookwood and West of Ifield where residents would not be provided with immediate access to existing facilities and/or could be affected by the noise contour for Gatwick Airport or an A-road. The Rookwood and West of Ifield sites would also potentially result in the loss of existing open spaces to development. It should be noted that under Scenario 3c, the Horsham Golf and Fitness Club site would be included which could potentially place additional pressures on healthcare services within Southwater and Horsham town.

**7.93** Scenario 3b is considered less likely to support new healthcare provision given that it would result in a high proportion of new growth (5,600 dwellings) at small sites. Focussing this level of growth at small sites is likely to result in a more dispersed pattern of growth where a substantial number of residents are located at lower tier settlements or at more rural locations. These locations are unlikely to provide immediate access to healthcare services and the dispersed distribution of development is considered less likely to support new healthcare provision, except through CIL contributions.

Scenario 3c would also include a high proportion of development at small sites (6,150 dwellings), but by including all strategic site options the potential for the delivery of healthcare improvements is likely to be increased which might help to mitigate adverse effects.

**7.94** While Scenarios 3a and 3c are expected to result in a mixed minor positive and significant negative effect, Scenario 3b is expected to result in a significant negative effect alone.

### Preferred Strategy

**7.95** The Preferred Strategy would result in much of the new development being providing as urban extension strategic sites. This element of the strategy focusses development at the larger settlements in the District and by Crawley. While no new strategic scale urban extension sites are included at Horsham town, the strategy includes the densification of the North Horsham site and development at a number of small scale sites at the settlement. From these locations residents will have nearby access to existing healthcare facilities. The good level of access to other services and facilities may encourage more frequent use of active modes of travel in the plan area. It would also include the relatively large West of Kilnwood Vale site as an extension to the existing strategic allocation at Kilnwood Vale. This site is currently being built out but is not proposed to incorporate new healthcare facilities, although residents would have reasonable access to healthcare within Crawley or at Horsham town. The large scale of the West of Ifield site is also likely to support improvements which could benefit health and wellbeing. This site would result in loss of exiting open space in the plan area and some residents could be affected by the noise contour for Gatwick Airport.

**7.96** The inclusion of the new settlement site option at Buck Barn would provide new healthcare facilities in the District; however early occupiers of the site may not benefit from access to these provisions. The delivery of 2,500 homes at small sites would mean that this element of the Preferred Strategy would be achieved to be in line with the development hierarchy and therefore a large proportion of residents would have good access to existing facilities. This could help support existing services at these locations without resulting in overburdening. The strategy limits the level of development at smaller settlements such as Ashington where there is limited access to healthcare. Overall a mixed significant positive and significant negative effect is expected for the Preferred Strategy.

**SA Objective 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest**

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
--?	--?	--?	--?	--?	--?	--?	--?	--/+?	--?	--/+?	--?	--?	--?	--?

**7.97** All scenarios considered would result in a relatively large amount of greenfield land take as well as the accommodation of a substantial number of new residents in the District. Direct habitat loss, as well as habitat fragmentation and other pressures on ecological networks are likely to result from human activities and associated pollution. Impacts will be dependent in part on effects relating to non-designated assets as well as the specific design of new development, which may include mitigation measures as well as habitat improvements. Therefore, the effects of each scenario are uncertain.

**Lower Growth Scenarios**

**7.98** Delivering a lower level of growth over the plan period is likely to reduce the number of biodiversity and geodiversity assets which are affected and potentially the significance of any effects which occur. Where development occurs as extensions of existing settlements and in line with the settlement hierarchy (Scenario 1a), effects relating to assets in the open countryside are less likely to result.

**7.99** However, there are biodiversity assets in close proximity to Horsham town including Brockhurst Wood and Gill and Morris's Wood Local Wildlife Site which is linked to Warnham SSSI to the north and there could be adverse effects as a result of the densification of the North Horsham site. The Rookwood site is adjacent to Warnham Mill Pond Local Wildlife Site. Including the urban extension at the West of Ifield site has the potential to affect the House Copse SSSI. Furthermore, development within the western part of the District through Scenario 1a at East of Billingshurst and West of Southwater would lie within the bat sustenance zone which has been declared in relation to the Mens SAC. The East of Billingshurst site is also adjacent to Wilden's Meadow and Rosier Wood Local Wildlife Sites. The West of Kilnwood Vale site would locate development in close proximity to areas of ancient woodland and Kilnwood Copse Local Wildlife Site. An overall significant negative effect is therefore expected for Scenario 1a.

**7.100** Scenario 1b would also result in a lower level of development being delivered over the plan period, meaning

that effects relating to biodiversity may be reduced in terms of their magnitude and/or the number of assets which are affected. This scenario would, however, include the new settlements of Mayfield, Adversane and Buck Barn, which would result in significant greenfield land take at each location. Land North East of Henfield (Mayfield) falls within an Impact Risk Zone (IRZ) for Beeding Hill to Newtimber Hill SSSI, which has been declared in relation to industrial development, and also contains areas of Ancient Woodland. The Buck Barn site contains part of The Downs Link, Nutham Wood and Greatsteeds Farm Meadow Local Wildlife Site. The development of this site could also have implications for the rewilding project at the nearby Knepp Estate. The site, however, would deliver a new country park which is likely to benefit wildlife in the area. The site at Adversane lies within an IRZ for the Upper Arun SSSI as well as the bat sustenance zone. This scenario also includes the Ashington cluster site and although this site is not located within a SSSI IRZ relating to residential developments, it is located within relatively close proximity (600m) of Warminghurst Road Cutting Local Geological Site. This site also falls within the bat sustenance zone. Considering the potential detrimental impacts that new development may have in relation to these designations, a significant negative effect is expected for Scenario 1b.

**7.101** Scenario 1c would deliver a relatively low level of development, but higher than that provided for through Scenarios 1a or 1b. There is potential for impacts on the Brockhurst Wood and Gill and Morris's Wood Local Wildlife Site through densification of North Horsham and House Copse SSSI at the West of Ifield site. The West of Billingshurst and West of Southwater sites included in this scenario lie within the sustenance zone which has been declared in relation to the Mens SAC. The West of Billingshurst site is also within the IRZ identified for the Upper Arun SSSI in relation to all planning applications extending existing settlements. While the development of the West of Billingshurst site is expected to deliver a country park, given the location of new development in relation to valued biodiversity sites and the potential magnitude of effects, an overall significant negative effect is expected for Scenario 1c.



**7.102** Scenario 1d would include all of the three potential new settlements meaning that the impacts identified for each individual site are all expected to occur. This scenario would also include a high level of growth (3,700 homes) as small sites. This growth is likely to result in a significant amount of development of greenfield sites at less developed locations considering the wider distribution which could occur. This component of growth could have additional impacts in terms of habitat fragmentation and degradation of existing ecological networks at more rural locations. It is also likely to reduce the potential to incorporate a more joined up approach to green infrastructure and habitat provision, which might otherwise be achieved at large sites. A significant negative effect is expected overall for Scenario 1d.

#### Medium Growth Scenarios

**7.103** Scenarios 2a, 2b and 2c would include all the development set out for Scenario 1a plus one of the new settlements which are being considered at Mayfield, Adversane and Buck Barn. As such, the effects described in relation to Scenario 1 also apply to these three scenarios.

**7.104** Adverse effects relating to a number of areas of ancient woodland which lie within and in close proximity to the Land North East of Henfield (Mayfield) site may result through Scenario 2a. Similarly, the effects identified in relation to the Upper Arun SSSI as well as the bat sustenance zone for site at Adversane may potentially result through Scenario 2b. Given that Scenario 2c would include development at the new settlement at Buck Barn, there is potential for impacts to result at the Downs Link, Nutham Wood and Greatsteeds Farm Meadow Local Wildlife Site considering the close proximity of this designation. Development at Buck Barn could also result in impacts on the rewilding of the Knepp Estate, but is expected to deliver a new country park. These three scenarios would also include the Ashington cluster site. As such, there is also potential for adverse impacts in relation to the bat sustenance zone and Warminghurst Road Cutting Local Geological Site. A significant negative effect is expected for Scenarios 2a, 2b and 2c.

**7.105** For Scenario 2d, a similar overall effect to Scenario 2a is expected given that Scenario 2d includes many of the same urban extension sites as well as the Mayfield new settlement site. Therefore, adverse effects relating to the areas of ancient woodland within and close to the Mayfield site are expected. Additional effects may result in relation to Warnham Mill Pond Local Wildlife Site, House Copse SSSI, and the bat sustenance zone which has been declared in relation to the Mens SAC. Scenario 2d would also include the West of Billingshurst site meaning there is potential for adverse impacts relating to the Upper Arun SSSI and Wey and Arun Canal, River Arun and adjacent meadows Local Wildlife Site. A significant negative effect is recorded for Scenario 2d.

**7.106** Through Scenario 2e, the Buck Barn site would be taken forward for development instead of the Mayfield site. The additional large sites of East of Billingshurst and Kingsfold would also be included for development as would the West of Kilnwood Vale site. Including the East of Billingshurst site would increase the level of development within the bat sustenance zone associated with the Mens SAC and could place development pressures on Wilden's Meadow and Rosier Wood Local Wildlife Sites. The development of the Kingsfold and West of Kilnwood Vale sites could have adverse impacts in relation to Brockhurst Wood and Gill Local Wildlife Site and Kilnwood Copse Local Wildlife Site. This medium growth scenario would include the Buck Barn site and Kingsfold site which are expected to support the provision new country park land in the plan area. An overall mixed minor positive and significant negative effect is expected for Scenario 2e.

**7.107** The West of Ifield site is excluded for development under Scenario 2f, with the West of Kilnwood Vale site and the new settlements at Adversane and Buck Barn taken forward instead. This scenario also excludes the Rookwood site. The inclusion of two new settlement site options at locations which are currently relatively undisturbed by development could result in adverse impacts in relation habitat connectivity in the wider area. Specific impacts relating to the Downs Link, Nutham Wood and Greatsteeds Farm Meadow Local Wildlife Site, the rewilding project at the Knepp Estate, as well as the Upper Arun SSSI and the bat sustenance zone associated with the Mens SAC are also expected. The development of the Buck Barn site is expected to provide some benefits in relation to biodiversity in the plan area through the incorporation of a new country park. However, these effects are expected to be substantially outweighed by impacts relating to areas of importance for wildlife in the plan area. This option would also include a relatively high level of development (4,100 homes) and this element of growth may result in more development being accommodated at more rural locations which are relatively undisturbed. This could be detrimental to designated and undesignated ecological networks across a number of locations in Horsham. Overall, a significant negative effect is expected for Scenario 2f.

**7.108** Scenario 2g would include additional land at the East of Kingsfold site which would accommodate 1,000 new homes as well as at the West of Billingshurst site. Effects relating to the urban extensions already described as well as relating to Brockhurst Wood and Gill and Morris's Wood Local Wildlife Site which is in close proximity to Kingsfold are therefore expected for Scenario 2g. Development at West of Billingshurst could have implications for Wey and Arun Canal, River Arun and adjacent meadows Local Wildlife Site as well as the Upper Arun SSSI and The Mens SAC given that the site falls within the bat sustenance zone. This scenario would, though, include the provision of two new country parks at the



West Billingshurst urban extension site and Kingsfold. Considered cumulatively, the level and location of new development is still likely to result in a significant negative effect, however, this is combined with a minor positive effect.

### Higher Growth Scenarios

**7.109** Scenarios 3a and 3c would include the three new country park areas at the West Billingshurst urban extension and the Buck Barn and Kingsfold sites. Through Scenario 3b, the country parks at Kingsfold and West of Billingshurst would be delivered. However, the substantially higher number of new homes (between 14,675 and 21,225 dwellings) is likely to offset some of the beneficial effects relating to biodiversity arising these provisions for each option.

**7.110** Scenario 3a would focus all development at large sites at either urban extensions or new settlements, meaning that the effects identified in relation to designations such as areas of ancient woodland, Upper Arun SSSI, the Upper Arun SSI and House Copse SSSI as well as the bat sustenance declared for the Mens SAC may occur for this scenario.

**7.111** Scenario 3b would include only those large sites which are urban extensions. As such, the potential for new settlements to cause habitat disturbance in more rural open countryside would be avoided. New urban extensions would still result in losses of large areas of greenfield land to development and there is potential for impacts relating to designations such as the Upper Arun SSSI, as well as the bat sustenance zone declared for the Mens SAC. The high amount of growth (5,600 homes) which would be accommodated through small sites in Scenario 3b would mean that a wider distribution of development is likely. This is likely to include a higher number of sites in more rural locations, thereby potentially affecting relatively undisturbed designated and non-designated biodiversity assets. As Scenario 3b would include the Ashington cluster there is potential for development to result in further adverse impacts in relation to the bat sustenance zone and Warminghurst Road Cutting Local Geological Site.

**7.112** Scenario 3c would include all sites included separately through Scenarios 3a and 3b. The overall level of development would be higher than both of these scenarios meaning that impacts relating to human activities and pollution are likely to be most pronounced through this scenario. This scenario would also increase the number of homes to be delivered at small sites to 6,150. This scenario is considered likely to result in the most adverse impacts in terms of delivering development at more rural locations which are relatively undisturbed which could affect designated and non-designated ecological networks.

**7.113** Significant negative effects are therefore expected in relation to Scenarios 3a, 3b and 3c.

### Preferred Strategy

**7.114** Through the Preferred Strategy impacts may result in relation to House Copse SSSI as well as Brockhurst Wood and Gill and Morris's Wood, Wilden's Meadow and Rosier Wood Local Wildlife Sites. The effects are likely given the development to be provided at North Horsham, West of Ifield and East of Billingshurst. The East of Billingshurst site and West of Southwater site would provide development within the bat sustenance zone associated with the Mens SAC. The inclusion of 2,000 homes at the Buck Barn new settlement site could have implications for rewilding project at the Knepp Estate and The Downs Link, Nutham Wood and Greatsteeds Farm Meadow Local Wildlife Site. It is noted that this site is expected to provide a new country park which could provide some ecological benefits. The strategy would also include development as an extension to the existing strategic allocation site at West of Kilnwood Vale. This area has recently seen a relatively high level of development at the existing allocation. The site is in close proximity to part of the Kilnwood Copse Local Wildlife Site as well as some areas of ancient woodland and further development could have implications for these designations. Overall a significant negative effect is expected to result from the Preferred Strategy.

### SA Objective 7: To conserve and enhance the character and distinctiveness of the district's landscape and townscapes, maintaining and strengthening local distinctiveness and sense of place

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
--?	-?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?

**7.115** Impacts on landscape will depend on the potential for development to integrate with existing local character and the capacity for new development to be accommodated. Designated landscapes are of particular sensitivity. These areas comprise High Weald AONB to the north east and the South Downs National Park to the south. Development within or within the setting of these areas is most likely to have significant adverse effects in landscape terms.

**7.116** The rural character of the District means that some areas have been assessed through the Landscape Capacity Assessment as being highly sensitive to change as a result of new development<sup>32</sup>. All effects recorded in relation to landscape and townscape are dependent in part on the potential for mitigation and the detailed design of development and therefore have an element of uncertainty attached to them.

#### Lower Growth Scenarios

**7.117** Delivering a lower level of growth in the District could help to limit the potential for adverse impacts on the existing landscape character of the District. This would include elements of the townscape and rural landscape such as existing land uses and areas of tranquillity.

**7.118** Scenario 1a would include urban extensions at the larger settlements as well as a proportion of growth at small sites which would broadly be in line with the settlement hierarchy. While there is a limited supply of previously developed land in Horsham, this approach could accommodate some development at brownfield land at the larger settlements and existing urban edges, which could help to safeguard much of the existing character of the plan area. Of the large sites set out for development through this scenario, all sites contain some areas of land which have been assessed as having no/low or low-moderate capacity for large scale housing development and/or employment development.

**7.119** Sites at Ifield and West of Kilnwood Vale could help to facilitate the delivery of the Crawley Relief Road which could have additional impacts in terms of the tranquillity of the wider area. The Ashington cluster site has been assessed as having low-moderate landscape capacity to accommodate medium scale residential development. Parts of the North Horsham site and West of Kilnwood Vale site lie within close proximity of the High Weald AONB. Development at the West of Kilnwood Vale site could also impact on the perception of separation between the settlements of Crawley and Horsham. The Ashington cluster site lies within 2.3km of the South Downs National Park, although the existing settlement lies between these areas meaning the potential for impacts on the

setting of the National Park is reduced. While a lower level of development is set out through Scenario 1a, and there may be potential for achieving some development on brownfield land, this scenario would include a number of sites that take in land that has limited landscape capacity for new development. This option would furthermore include a number of sites in close proximity to the AONB and National Park and therefore a significant negative effect is expected.

**7.120** Scenario 1b would involve a similar level of development as Scenario 1a. However, it would require the delivery of three new settlements in the District. Over the plan period 2,000 homes would be delivered at each site. Delivering large scale development in areas of the open countryside is likely to present particular challenges in terms of disruption of established character at these locations. This would include the delivery of new supporting infrastructure such as roads. For the Buck Barn site, specific improvements are likely to result at the A24 and A272 junction. Land at site Land North East of Henfield (Mayfield) which is included through Scenario 1b to accommodate new settlement growth has been assessed as containing large areas which have no/low capacity or low-moderate capacity for large scale residential and employment development, although it is noted that some of the land within this site has moderate capacity for large scale residential development. The Adversane site has been assessed as having moderate capacity for large scale housing but low-moderate capacity for large scale employment development. The site at Buck Barn mostly includes land which has been assessed as having moderate to moderate-high landscape capacity for large scale residential and low-moderate to moderate scale landscape capacity for large scale employment development.

**7.121** Scenario 1b would also include the delivery of 2,050 homes at small sites. As such, this approach has the potential to result in impacts relating to landscape at wider range of locations as well as existing townscape in a higher number of settlements considering the wider distribution of growth compared to Scenario 1a. The element of uncertainty attached to this scenario therefore has the potential to be stronger than for Scenario 1. Given the relatively low level of development to be accommodated through Scenario 1b and the capacity for new development at the large scale sites included, a minor negative effect is expected.

**7.122** Scenario 1c would also deliver a relatively low level of development, albeit higher than that associated with Scenarios 1a or 1b. This scenario involves a similar distribution to Scenario 1b but would not include the West of Kilnwood Vale site and the Ashington cluster site, instead including the West of Billingshurst site. This scenario would therefore reduce the potential for impacts on the High Weald

<sup>32</sup> Horsham District Council (2020) Landscape Capacity Assessment

AONB by limiting the level of development provided near to the designation. However, land to the West of Billingshurst has low-moderate capacity for large scale residential or employment development. Furthermore, given the relatively strong sustainable transport provisions at Pulborough and Codmore Hill, which contains a railway station, this option could provide increased development close to the South Downs National Park. The number of homes to be provided at small sites (2,500 dwellings) is expected to be delivered in line with the development hierarchy but is higher than under Scenario 1a, meaning a wider distribution of development may occur with landscape impacts at a wider number of locations. Overall, a significant negative effect is expected for Scenario 1c.

**7.123** Scenario 1d includes all three new settlement site options, of which Buck Barn has been assessed as performing most favourably in relation to landscape capacity. This scenario would also include a high level of development (3,700 homes) at the small site options. This scenario could result in a wider distribution of development and therefore is likely to introduce new development to more rural locations, with potential landscape impacts at a wider range of previously undisturbed locations. Dispersing a high level of growth across a high number of sites also has the potential for impacts relating to townscape at a wider range of settlements to result. A significant negative effect is therefore expected for Scenario 1d.

### Medium Growth Scenarios

**7.124** The higher level of growth supported through Scenarios 2a, 2b and 2c is likely to present increased potential for erosion of the established character of the District. Infrastructure (such as new roads) required to support the overall level of development is likely to have further impacts relating to landscape character. While there is also potential for these types of impacts at sites which would provide a high level of development as urban extensions, new infrastructure of this type provided to support new settlements could have particularly detrimental impacts considering the more rural nature of such locations. For the new settlement options this would include improvements to the A24 and A272 junction at the Buck Barn site.

**7.125** Scenario 2c includes the Buck Barn site and it is noted that this site performed comparatively favourably in terms of its landscape capacity for large scale residential and employment development. Each option would also include all urban extension site options under Scenario 1a. All of these site options contain land which has been assessed as having no/low or low-moderate capacity for the scale of housing development (large scale for all sites except for the Ashington cluster site) and/or employment development for which the site has capacity. These three scenarios also include sites

which could have adverse impacts on the respective settings of the High Weald AONB (West of Kilnwood Vale and North Horsham) and South Downs National Park (the Ashington cluster) considering their close proximity.

**7.126** There is limited availability of brownfield land in Horsham. Considering the higher overall level of growth set out through these scenarios there is potential for increased harm to the established townscapes in Horsham District. All three scenarios include a level of development at small sites which is likely to be accommodated in line with the settlement hierarchy. While there is potential for a range of townscape impacts the level of development at the less developed and potentially more sensitive settlements may be limited. Overall, significant negative effects are expected for Scenarios 2a, 2b and 2c.

**7.127** Scenario 2d would include large urban extension sites which take in some areas of land which have been assessed as having no/low or low-moderate capacity for large scale housing development and/or employment development. This includes the sites at West of Billingshurst, West of Southwater and Rookwood. While some of the land at West of Ifield has moderate capacity for large scale residential development, this site is likely to support the delivery of a new relief road which could have implications for tranquillity in the area. Furthermore, part of the north Horsham site is close to the High Weald AONB. Some of the Land North East of Henfield (Mayfield) site has moderate capacity for large scale residential development; however this site also contains large areas of land with no/low capacity or low-moderate capacity for large scale residential and employment development. Overall, a significant negative effect is therefore expected for Scenario 2d.

**7.128** Scenario 2e includes the Buck Barn site instead of the Mayfield site. It also includes the additional sites of East of Billingshurst and Kingsfold. While the Buck Barn site performs relatively favourably in comparison to the other new settlement site options, the Kingsfold site has particularly limited landscape capacity to accommodate new large scale development. The land at East of Billingshurst contains areas which have been assessed as having no/low to moderate landscape capacity for large scale residential and no/low to low-moderate landscape capacity for employment development. An overall significant negative effect is therefore expected for Scenario 2e.

**7.129** Scenario 2f would exclude the West of Ifield site for development. Through this scenario, however, the West of Kilnwood Vale site would be taken forward meaning there is some potential for the relief road to the west of Crawley to be provided which could have implications for tranquillity in the area. This site is also in close proximity to the High Weald AONB and its development could contribute to coalescence

between Crawley and Horsham town. Further development at the north of Horsham site could also have impacts on the setting of the AONB. This scenario would also include site Adversane which has been assessed as having moderate capacity for large scale housing but low-moderate capacity for large scale employment development. The Buck Barn site would also be included for development. This site includes land which has mostly been assessed as having moderate to moderate-high landscape capacity for large scale residential and low-moderate to moderate scale landscape capacity for large scale employment development. The relatively high level of development to be provided through this scenario at small sites (4,100 dwellings) is likely to mean a wider distribution of development with less developed areas having to accommodate more growth. Therefore, landscape and townscape effects may occur at a higher number of previously undisturbed locations and a significant negative effect is expected for Scenario 2f.

**7.130** Scenario 2g would not include any of the new settlement site options, instead setting out development at all urban extension site options. There is potential for adverse impacts relating to the respective settings of the High Weald AONB and South Downs National Park. This scenario also includes two sites over and above those included in Scenario 1a – site West of Billingshurst and site East of Kingsfold. These sites contain large areas of land which have been assessed as having no/low to low-moderate landscape capacity for new large scale residential and employment development. This scenario also includes a similar level of growth at small site options as included for Scenarios 2a, 2b, and 2c. As such there is potential for this scenario to result in effects across a wide range of landscapes and townscapes in the District. A significant negative effect is therefore expected for 2g.

### Higher Growth Scenarios

**7.131** The high level of growth (14,675 homes) to be provided through Scenario 3a would be accommodated by allowing for development at all large sites being considered for inclusion in the Local Plan. This takes in all urban extension sites and the three new settlement options. This would involve the development of large areas of land which have been assessed as having no/low capacity for housing development. While this scenario would not include any small sites, meaning the potential adverse impacts across a high number of locations is more limited, the inclusion of such a high number of large new settlement sites presents increased potential for cumulative effects on the existing rural character of the District. To support new growth of this scale, new infrastructure is likely to be required which could have further impacts in terms of landscape character. As previously described, this would include improvements to the A24 and A272 junction at the

Buck Barn site and the delivery of the Crawley Relief Road at sites West of Ifield and West of Kilnwood Vale sites.

**7.132** Scenario 3b would include all urban extension site options, but none of the new settlement options. As discussed previously, all of the urban extension sites contain some land which performs poorly in terms of existing landscape capacity for large scale residential and/or employment development. At the Ashington cluster site land is included which has low-moderate landscape capacity to accommodate medium scale housing development. This site is also relatively close to the South Downs National Park. This scenario would also include a large amount of new development (5,600 homes) at small sites. As this approach is likely to mean a distribution of growth to numerous areas of a more rural character, adverse effects on the open and rural character of Horsham District may result.

**7.133** Scenario 3c includes all sites set out for development through Scenarios 3a and 3b as well as an increased level of development at small sites. The additional growth to be provided at small sites (6,150 dwellings) and any additional infrastructure required to support this growth could lead to increased impacts on the existing character of the plan area. This is the only option that would include the Horsham Golf and Fitness Club site to the north of Southwater. The land this site lies on has no/low landscape capacity for medium or large scale residential development. Development at this location could also contribute to coalescence between Southwater and Horsham town. This scenario is considered most likely have cumulatively impacts on landscape character, given that it not only includes all large scale sites but a higher level of development at small scale sites.

**7.134** All three of the Higher Growth Scenarios also include large site options which have the potential to result in adverse impacts on the respective settings of the High Weald AONB and the South Downs National given their close proximity to these areas. Overall, significant negative effects are expected for Scenarios 3a, 3b and 3c.

### Preferred Strategy

**7.135** The Preferred Strategy would include large urban extension sites at West of Ifield, Southwater and Billingshurst. This scenario would also see the existing strategic allocation site at Kilnwood Vale being extended to the west. The existing allocation site has recently accommodated a relatively high level of development. However, all of these sites contain some land which is assessed as having no/low landscape capacity for large or medium scale housing and employment development. Through the inclusion of the densification of the North Horsham and the West of Kilnwood Vale site there is potential for the Preferred Strategy to have impacts on the setting of the High Weald AONB. The West of Kilnwood Vale



site also contributes to the perception of visual separation between the towns of Crawley and Horsham.

**7.136** The new settlement site at Buck Barn included through the Preferred Strategy performs more favourably than the other new settlement sites considered, given that a large portion of the land has moderate-high capacity for large scale housing and moderate capacity for large scale employment.

However, the development of the site in a previously less developed location will require the delivery of substantial new infrastructure (including improvements to the A24 and A272 junction). This is likely to have implications in terms of both land take and for the tranquillity of the surrounding area. Overall a significant negative effect is expected for the Preferred Strategy.

**SA Objective 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment**

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?

**7.137** The level of development which is to be provided over the plan period under all scenarios is likely to present challenges in terms of protecting the setting of designated heritage assets as well as the existing character of the District. Mitigation and enhancement may be achieved through the design of new development; therefore the effects recorded are uncertain for all scenarios.

**7.138** The high amount of greenfield land take required under all scenarios is likely to result in a range of impacts on the historic environment in Horsham District. This is particularly likely to be case at new urban extensions and new settlements considering the large amount of land take involved. It is recognised, however, that urban extensions may present opportunities to soften the transition at the existing settlement edges.

**Lower Growth Scenarios**

**7.139** Many of the heritage assets (including Conservation Areas and Listed Buildings) in the District are located within the larger settlements. As many of the scenarios include new urban extensions it is likely that effects will occur in relation to the setting of many such assets. For Scenario 1a this would include site West of Ifield which is in close proximity to Ifield Conservation Area, site East of Billingshurst which is in close proximity to Billingshurst Conservation Area and site Rookwood which is in close proximity to Warnham Conservation Area and Warnham Court Registered Park and Garden. Furthermore, the Ashington cluster site is located adjacent to a number of Grade II Listed Buildings along Billingshurst Road. Scenario 1a would include the delivery of a relatively low number of homes (550) at small sites, meaning

that a relatively low proportion of the overall growth would be achieved through a potentially more dispersed distribution.

**7.140** As such, this scenario could help limit the number of heritage assets which might be adversely affected. However, considering the number of heritage assets which are in close proximity to sites which would accommodate significant levels of new development (i.e. at urban extension sites), a significant negative effect is expected for Scenario 1a.

**7.141** Scenario 1b would deliver a similar level of overall growth (8,050 new homes) as Scenario 1a. The new settlements site options Land North East of Henfield (Mayfield), Adversane and Buck Barn are all located within close proximity of designated heritage assets including Henfield Conservation Area, Adversane Conservation Area and Knepp Castle Registered Park and Garden respectively. The scale of growth to be provided at each of these sites has the potential to result in detrimental impacts in terms of setting and significance.

**7.142** The level of development (2,050 new homes) to be provided at small site options through Scenario 1b is likely to be achieved broadly in line with the development hierarchy. There is likely to be reduced potential for a high level of growth to occur in more rural areas. A more dispersed distribution of growth than Scenario 1a is likely to result through this element of growth, however, meaning there is potential for adverse impacts in relation to a higher number of heritage assets. Overall a significant negative effect is also expected for Scenario 1b.

**7.143** Through Scenario 1c a relatively low level of development would result, but this would be higher than through Scenarios 1a or 1b. This scenario would result in a



similar distribution of development to Scenario 1a but would exclude the West of Kilnwood Vale site and the Ashington Cluster site and would include the West of Billingshurst site which is not included in Scenarios 1a or 1b. The West of Billingshurst is in close proximity to a number of listed buildings along Newbridge and Lordings Road as well as the northern edge of Billingshurst Conservation Area. Through this scenario the number of homes to be provided at small sites (2,500 dwellings) is expected to be delivered in line with the development hierarchy. This level of development is higher than Scenario 1a, however, and therefore a wider distribution of development may occur. Impacts on a higher number of heritage assets are likely to result. Furthermore, delivering growth at locations with the strongest sustainable transport links could result in additional development occurring Pulborough and Codmore Hill, which benefits from a railway station. This area contains a high concentration of designated heritage assets. Overall, a significant negative effect is expected for Scenario 1c.

**7.144** Scenario 1d would include all three new settlement site options. The remaining development (3,700 new homes) would be provided at small site options. As such, this scenario has the potential to result in changes to the setting of the Henfield Conservation Area, Adversane Conservation Area; and Knepp Castle Registered Park and Garden. The high level of growth to be delivered at small sites is likely to result in a wider dispersal of development occurring and a higher proportion of new homes sited at more rural locations. This more dispersed approach to growth has the potential to impact on a larger number of heritage assets and could have cumulative impacts in terms of the rural character of the District. As such, a significant negative effect is expected for Scenario 1d.

### Medium Growth Scenarios

**7.145** Scenarios 2a, 2b and 2c would involve development at all of the sites included through Scenario 1a (i.e. urban extension sites) meaning similarly adverse impacts in relation to the previously identified heritage assets might result. These three options would also include one of the new settlement site options of Mayfield, Adversane and Buck Barn. As such, Scenario 2a has the potential to result in additional adverse impacts in relation to Henfield Conservation Area; Scenario 2b has the potential to result in additional adverse impacts in relation to Adversane Conservation Area; and Scenario 2b has the potential to result in additional adverse impacts in relation to Knepp Castle Registered Park and Garden.

**7.146** The level of growth provided at small sites through these three scenarios is higher than under Scenario 1a, to contribute to the overall higher level of development. This could support a more dispersed distribution of growth in the plan area, meaning that a higher number of heritage assets

might be adversely affected. Overall, a significant negative effect is expected for Scenarios 2a, 2b and 2c.

**7.147** Through Scenario 2d, development at the West of Ifield, Rookwood and West of Billingshurst sites could have impacts on the Ifield Conservation Area, Warnham Conservation Area and Warnham Court Registered Park and Garden and Billingshurst Conservation Area as well as a number of listed buildings. Furthermore, the development of the West of Southwater site could have impacts on the settings of a number of listed buildings, including the Grade II\* Listed Great House Farmhouse which the site surrounds. The inclusion of the Mayfield new settlement site could have impacts on the Henfield Conservation Area. This element of Scenario 2d would see development accommodated at a location which was previously mostly undistributed which may mean the settings of nearby heritage assets may be particularly sensitive to development. Overall, a significant negative effect is expected for Scenario 2d.

**7.148** Under Scenario 2e, the Buck Barn site would be included instead of the Mayfield site which is included in Scenario 2d. Through this scenario, the additional sites of East of Billingshurst, Kingsfold and West of Kilnwood Vale would also be taken forward. At the Buck Barn site there is potential for impacts on the Knepp Castle Registered Park and Garden, while development at the East of Billingshurst site has potential for impacts on the nearby Billingshurst Conservation Area. The Kingsfold site is not located in close proximity to any conservation areas, however, the site is in close to a number of Grade II Listed Buildings, including those to the west within the village of Kingsfold. This takes in the listed buildings Kingsfold Place and High Buildings. The development of the Kilnwood Vale site has more limited potential to impact upon designated heritage assets given its more isolated location from these types of features. An overall significant negative effect is expected for Scenario 2e.

**7.149** Scenario 2f would exclude the West of Ifield site for development, instead taking forward the West of Kilnwood Vale site which is less sensitive in terms of the historic environment. The Rookwood site would also be excluded meaning that the potential for impacts on the Warnham Court Registered Park and Garden would be removed. To provide an overall medium level of growth, this scenario would also include site the Adversane and Buck Barn sites. The development of these two sites has the potential to have impacts on the Adversane Conservation Area and the Knepp Castle Registered Park and Garden at locations which presently accommodate limited development and are rural in character. By providing a relatively high level of development at small sites (4,100 dwellings) this scenario is likely to result in a wider distribution of development. This relatively high level of growth at small sites, therefore, has the potential for impacts on a higher number of heritage assets in the plan

area, including assets at less developed locations which might be more sensitive to change. A significant negative effect is expected for Scenario 2f.

**7.150** Scenario 2g would include all large sites set out through Scenario 1a, plus the additional sites East of Kingsfold and West of Billingshurst. Therefore, additional effects may result through this scenario in relation to a number of Grade II Listed Buildings: Cripplegate, Friday Farm and Little Benhams by Kingsfold and the listed buildings along Newbridge and Lordings Road by Billingshurst as well as the Billingshurst Conservation Area. Scenario 2g would include a proportion of growth (2,500 homes) at small sites which is likely to be achieved broadly in line with the development hierarchy but is substantially higher than Scenario 1a. This element of the scenario could result in some dispersal of growth to the detriment of a relatively high number of heritage assets in the District. A significant negative effect is therefore also expected for Scenario 2g.

### Higher Growth Scenarios

**7.151** The comparatively high level of growth to be delivered through the Higher Growth Scenarios (between 14,675 and 21,225 dwellings) could result in impacts on a wide range of heritage assets. Scenario 3a would include all large urban extension site options with the exception of the Ashington cluster site meaning that the effects identified for Scenario 2g would all mostly apply. It would also include all new settlement site options. Scenario 3a would include no small site options meaning that development would be more concentrated than other scenarios considered. As such, the potential for impacts on a wide range of heritage assets is likely to be reduced. However, as all impacts relating to the large site options (with the exception of the Ashington cluster site) would be included, the overall effect for Scenario 3a is expected to be significant negative.

**7.152** Scenario 3b would result in a level of housing development being set out for small sites (5,600 new homes) which is likely to result in a higher amount of development being delivered at the smaller settlements and more rural locations. For this scenario there is potential for a wider range of effects to result in terms of the established rural character and heritage assets at these locations. Scenario 3b would also include all large urban extension site options (including the Ashington cluster) meaning there is potential for specific adverse impacts in relation to each of the heritage assets identified in close proximity to these sites. As such, a significant negative effect is expected for Scenario 3b.

**7.153** Scenario 3c would include all large site options as well as a higher level of development at small sites (6,150 dwellings). This scenario would therefore likely result in impacts on all specific heritage assets previously identified. The potential for a wider distribution of development is likely to result in impacts on a higher number of heritage assets at other locations in the District, including those in less developed areas which may be more sensitive to change. Scenario 3c is therefore expected to result in a particularly significant negative effect in comparison to all other scenarios considered.

### Preferred Strategy

**7.154** Through the inclusion of many of the large scale urban extension sites, the Preferred Strategy could result in impacts on the settings of a number of designated heritage assets. This includes at the West of Ifield site which is in close proximity to Ifield Conservation Area and the East of Billingshurst site which is in close proximity to Billingshurst Conservation Area. Furthermore, the West of Southwater site is in close proximity to a number of listed buildings including Grade II\* Listed Great House Farmhouse, which it surrounds. The development of the new settlement site at Buck Barn could have impacts on the Knepp Castle Registered Park and Garden, although it is noted that the presence of the A24 dual carriageway and Buck Barn services between these areas reduces the potential for these impacts. Development of this site has the potential for impacts on the settings of a number of additional Listed Buildings including 8 Bar Lane, Tuckmans Farmhouse, Little Tucklands and the Old Cottage (Bar Lane). It should be noted that the exclusion of the Rookwood site through this option would remove the potential for adverse impacts on the Warnham Court Registered Park and Garden.

**7.155** The inclusion of the West of Kilnwood Vale site through the strategy would have comparatively limited impacts on the historic environment given its location away from designated heritage assets. The nearest designated heritage assets (Grade II and II\* Listed Carylls Lea Farm House and Holmbush House) are more than 600m from the site. The level of development to be delivered at small sites (2,500 dwellings) would be achieved broadly in line with the development hierarchy, but would result in wider dispersal of development than scenarios which include less development through small sites. Overall a significant negative effect is expected for the Preferred Strategy.

**SA Objective 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils**

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
+/-	-	--/+	--	--/+	--/+	--/+	--/+	--/+	--	--	--	--	--	--/+

**7.156** The rural character of Horsham District means that there are few brownfield sites available for development. As such, much of the new growth over the plan period is likely to come forward on greenfield land.

#### Lower Growth Scenarios

**7.157** The Lower Growth Scenarios 1a and 1b will require the development of a lower amount of land in the District than all other scenarios considered. These scenarios are therefore only expected to have a minor negative effect in relation to efficient land use, including the development of higher value agricultural soils.

**7.158** As Scenario 1a would allow for large scale growth through urban extensions as well as some growth in line with the settlement hierarchy it is considered more likely to provide a higher proportion of overall growth where there will be opportunities for the re-use of brownfield land within the existing built-up areas as well as at the urban edge. The inclusion of the North Horsham densification site may present particular opportunities for more efficient use of land by promoting higher but still appropriate densities of development. Of the small sites appraised through the SA, only one residential site at Barns Green lies on brownfield land meaning that there is potential to promote efficient use of land there. Furthermore, much of the land at the urban extensions of Ifield and Horsham (sites North Horsham and Rookwood) and to a lesser extent the Ashington cluster site which would be included through Scenario 1a, is of lower agricultural value (Grade 4). Overall a minor positive effect is expected in combination with the minor negative effect for Scenario 1a.

**7.159** The new settlement site options included in Scenario 1b takes in land which is greenfield and of Grade 3 and Grade 4 agricultural value. Land at Adversane comprises Grade 3 soils, while land at both North East of Henfield (Mayfield) and Buck Barn contains large areas of both Grade 3 and Grade 4 soils. Scenario 1b is less likely than Scenario 1a to result in a high proportion of overall development being achieved at brownfield land or on lower value agricultural soils and therefore a minor negative effect alone is expected.

**7.160** Scenario 1c would include a similar distribution of development to Scenario 1a. However, through this scenario the West of Billingshurst site would be taken forward instead of the sites West of Kilnwood Vale and Ashington cluster. The West of Billingshurst site is mostly greenfield land and comprises a higher proportion of Grade 3 agricultural value land than the West of Kilnwood Vale and Ashington cluster sites. The level of development to be provided through small sites under this scenario (2,500 dwellings) is likely to be achieved mostly in line with the development hierarchy meaning there is some potential for the use of brownfield land; however, the majority of the small site options are on greenfield land. This scenario would also include the North Horsham densification site where the efficient use of land would be promoted by achieving a higher density of development. Overall, this scenario is expected to result in development of mostly greenfield land and the level of growth is slightly higher than Scenarios 1a and 1b. Therefore, a mixed minor positive and significant negative effect is expected for Scenario 1c.

**7.161** Scenario 1d would include the new settlement site options plus a higher amount of growth at small sites (3,700 dwellings). This approach is likely to result in higher amounts of greenfield land being lost to new development. Only one small residential site appraised at Barns Green contains a large proportion of brownfield land where a more efficient pattern of land use might be promoted. Furthermore, the relatively high level of development at small sites is likely to result in a more dispersed distribution of development meaning this element of growth may be disturbed to greenfield sites in more rural locations. This could include land take required for new infrastructure which is needed to support rural growth. While the impacts relating to agricultural soils at these locations are less certain, much of the District is covered by Grade 3 agricultural soils meaning there is potential for new development to affect this resource. As such, a significant negative effect is expected for Scenario 1d.

### Medium Growth Scenarios

**7.162** The increased level of growth which would result through the Medium Growth Scenarios is expected to result in higher greenfield land take than the Lower Growth Scenarios. As such significant negative effects are expected in relation to these scenarios.

**7.163** All of the new settlement options (Mayfield, Adversane and Buck Barn) include areas of Grade 3 and Grade 4 agricultural land. Scenarios 2a, 2b and 2c would each include one of these sites. At the Adversane site, included in Scenario 2b, the land is almost exclusively Grade 3. All three options would allow for proportion of growth at small site options. The level of growth supported at small sites is likely to be achieved broadly in line with the development hierarchy. These three scenarios would also include new development at urban extensions. In addition to providing development at small sites in line with the settlement hierarchy, this element of growth may result in increased potential for some development to promote the re-use of previously developed land. Therefore, the significant negative effects expected for Scenarios 2a, 2b and 2c are combined with minor positive effects.

**7.164** Under Scenario 2d the East of Billingshurst and West of Kilnwood Vale site would be excluded and instead the urban extension site at West of Billingshurst would come forward for development. The West of Billingshurst site comprises mostly greenfield, Grade 3 agricultural land. The inclusion of the new settlement Mayfield site would involve the focussed development of large area of greenfield land which comprises both Grade 3 and 4 agricultural soils. Through this scenario, 2,500 dwellings would be provided at small sites which could be accommodated broadly in line with the settlement hierarchy. This approach could allow for the re-use of brownfield land in the more developed areas of the District. However, only one site appraised in Barns Green contains a substantial proportion of brownfield land. Overall, a mixed minor positive and significant negative effect is therefore expected for Scenario 2d.

**7.165** Scenario 2e is similar to Scenario 2d but would include the Buck Barn site instead of the Mayfield site. Under this scenario, the additional sites of East of Billingshurst, Kingsfold and West of Kilnwood Vale would also be taken forward. At the Buck Barn site is mostly greenfield and land comprising Grade 3 and Grade 4 agricultural soils would be developed. This is also the case at the Kingsfold site. The West of Kilnwood Vale site would extend an existing site allocation but lies mostly on Grade 3 agricultural land, while the East of Billingshurst site comprises almost entirely greenfield Grade 3 agricultural land. This scenario includes the North Horsham densification site, as well as a level of housing (2,500 dwellings) at small sites which would likely be achieved broadly in line with the settlement hierarchy which could allow

for a more efficient pattern of land use in the plan area. An overall mixed minor positive and significant negative effect is expected for Scenario 2e.

**7.166** Scenario 2f would allow for some development towards Crawley through the inclusion of the West of Kilnwood Vale but would not take forward the West of Ifield site for development. Through this scenario a substantial proportion of the other growth would be achieved at the Adversane and Buck Barn sites. The West of Kilnwood Vale and Buck Barn sites comprise areas of both Grade 3 and Grade 4 agricultural land while Adversane comprises Grade 3 land. This scenario would allow for a relatively high level of development at small sites (4,100 dwellings). Therefore, a wider distribution of development which requires more undeveloped locations beyond the higher tier settlements to come forward may occur. This could result in increased greenfield land take, including through new infrastructure provision required to support rural development. A significant negative effect is therefore expected for Scenario 2f.

**7.167** Scenario 2g would result in development occurring at the urban extension sites and small sites only. However, all urban extension sites would come forward through this scenario. The urban extension sites at West of Billingshurst and East of Kingsfold would be included through this scenario as well as those sites already considered for the Lower Growth Scenarios as well as other Medium Growth Scenarios. Both of the West of Billingshurst and East of Kingsfold sites take in substantial areas of Grade 3 agricultural land. A significant negative effect is therefore expected for Scenario 2g.

### Higher Growth Scenarios

**7.168** The Higher Growth Scenarios would deliver a substantially higher level of development (between 14,675 and 21,225 dwellings) than all other scenarios considered and would require substantial greenfield land take, to allow for development and new infrastructure to support that development. Scenario 3a would include all urban extensions and new settlement sites and no small sites, which might otherwise be provided in line with the settlement hierarchy. As such, the potential for a substantial proportion of development to delivered at brownfield sites is likely to be reduced.

**7.169** Conversely, the higher amount of development to be provided at small sites (5,600 dwellings) included in Scenario 3b would result in a much more dispersed distribution of development meaning a high number of sites may come forward at greenfield locations in more rural locations. This scenario could potentially result in development of a high number of locations which take in higher value soils considering the widespread nature of Grade 3 agricultural soils in Horsham District.



**7.170** Scenario 3c would result in all sites included in Scenarios 3a and 3b being taken forward for development. It would also include a higher number of homes at small sites (6,150 dwellings) as well as the large Horsham Golf and Fitness site to the north of Southwater. This overall approach is likely to result in focussed large-scale greenfield land take at urban extension and new settlement sites as well as more piecemeal greenfield land take (which may include a high number of sites in locations which are presently less developed) through the high number of small sites which would be included.

**7.171** A significant negative effect is therefore expected for Scenarios 3a, 3b and 3c. The negative effect expected for Scenario 3c is likely to be particularly significant compared to the other options.

### Preferred Strategy

**7.172** The Preferred Strategy would deliver much of the growth over the plan period at urban extension sites and in

line with the settlement hierarchy at small sites (2,500 dwellings). This approach may allow for growth where there will be opportunities for the re-use of brownfield land within the existing built-up areas as well as at the urban edge. It is noted that of the small sites included for allocation, most are on mostly greenfield land. Of the large sites included in this scenario, the West of Southwater and East of Billingshurst sites contain the highest proportion of Grade 3 agricultural soils, while sites at Buck Barn and West of Ifield contain a mix of Grade 3 and Grade 4 soils. The inclusion of the West of Kilnwood Vale site would result in an extension to the existing allocation adjacent to the western boundary of Crawley. This land is greenfield and consists mostly of Grade 3 agricultural soils meaning its development is likely to contribute to loss of some higher value agricultural soils in the District, depending on whether it is Grade 3a or 3b land. Overall, a mixed minor positive and significant negative effect is expected for the Preferred Strategy.

## SA Objective 10: To conserve natural resources, including mineral resources in the District

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?

**7.173** Impacts on mineral resources in the District will be dependent in part on the location of new development. Locations of new development will be influenced by the overall level of development proposed for the District. While Horsham contains several Mineral Safeguarding Areas (MSAs) which cover much of its area, there may be potential to maintain access to mineral reserves as development is provided, or to extract minerals prior to development to prevent their sterilisation. Therefore, the negative effects recorded for all scenarios are uncertain.

### Lower Growth Scenarios

**7.174** There are areas at the urban edges of the larger settlements of the District which fall outside of MSAs. Delivering a lower level of growth in line with Scenario 1a could present opportunities for development to avoid the sterilisation of mineral resources. Scenario 1a would include a proportion of development (550 dwellings) at small sites in line with the development hierarchy as well as urban extension sites, the majority of which extend into MSAs within the

District. Therefore, an uncertain minor negative effect is expected for Scenario 1a.

**7.175** Development at the new settlement options Land North East of Henfield (Mayfield), Adversane and Buck Barn would fall within a brick clay safeguarding MSA. Scenario 1b would provide for a level of development at small sites (2,050 dwellings) which would result in a more dispersed distribution of development. The level of growth is, however, also expected to be achieved broadly in line with the development hierarchy, which could limit the need for the development in previously undisturbed locations of the District. As all three new settlement sites included in Scenario 1b fall within a MSA, a significant negative effect is expected for this scenario.

**7.176** Scenario 1c includes all sites included in Scenario 1a with the exception of the West of Kilnwood Vale and the Ashington Cluster sites. By taking forward the west of Billingshurst site for 1,000 homes, this scenario would result in additional development within a brick clay MSA. The amount of development at small sites through Scenario 1c (2,500 dwellings) is higher than that set out through Scenarios 1a or



1b, but is expected to be broadly delivered in line with the development hierarchy which could limit the amount of development at previously undisturbed locations which might otherwise have particular implications for mineral resources which have not yet been extracted. Overall, a significant negative effect is expected for Scenario 1c.

**7.177** Scenario 1d would deliver a similar level of development (9,700 dwellings) to Scenario 1c, but would include all three new settlement sites and no urban extension sites. This scenario would also include a high number of homes at small sites (3,700 homes) which would limit the potential for achieving this element of the scenario in line with the development hierarchy. Therefore, this option could result in a high number of new homes being delivered at sites at more rural locations in the District. Considering the extent of the MSAs in Horsham, it is likely that many of these sites would lie within MSAs. A significant negative effect is therefore expected for Scenario 1d.

#### Medium Growth Scenarios

**7.178** The Medium Growth Scenarios 2a, 2b and 2c would include one of each of the new settlement options, as well as all the urban extension sites included in Scenario 1a. These scenarios increase the overall number of homes to be delivered and this would include more homes at small sites to be achieved largely in line with the development hierarchy. Each scenario also includes a new settlement which would involve the development of large areas of greenfield land which fall mostly within an MSA. Therefore, significant negative effects are expected for Scenarios 2a, 2b and 2c.

**7.179** Scenario 2d includes all of the urban extension sites included in Scenario 1a with the exception of the East of Billingshurst and West of Kilnwood Vale sites. The Mayfield new settlement site and West of Billingshurst urban extension site are also included in Scenario 2d. These sites lie entirely within a brick clay MSA and therefore development at these locations could result in sterilisation of substantial areas of mineral reserves in the plan area. It is likely that development of the 2,500 new homes to be provided at small sites could be achieved in line with the development hierarchy which could limit the potential for a high amount of development occurring at previously undisturbed greenfield land in more rural locations. However, much of the land around the large settlements still falls within MSAs. Overall a significant negative effect is expected for Scenario 2d.

**7.180** Under Scenario 2e the majority of the urban extension sites included in Scenario 1a would be developed. The notable exception to this is the exclusion of the West of Southwater site. Scenario 2e instead brings in the new settlement site at Buck Barn and urban extension site at Kingsfold which would in effect form a satellite settlement to

Horsham town. It also includes the development of 2,500 new homes to be provided at small sites which could be achieved in line with the development hierarchy. The Buck Barn and Kingsfold sites lie within brick clay and building stone MSAs in the District, meaning the development of these sites could potentially result in loss of access to some of the finite mineral resources in the plan area. Therefore, significant negative effect is expected for this scenario.

**7.181** Scenario 2f includes the majority of the urban extension sites included in Scenario 1a but does not take forward the West of Ifield site or the Rookwood site. Similar to Scenario 2e, the Buck Barn new settlement site would be included in this scenario, but it would also include the Adversane site new settlement site. Both sites lie within MSAs (for brick clay and building stone and brick clay only, respectively). The relatively high level of development to be provided at small sites (4,100 homes) through this scenario would likely result in a wider distribution of development and higher level of development occurring within more rural, previously undeveloped sites which fall within MSAs. Scenario 2f is therefore expected to have a significant negative effect.

**7.182** Scenario 2g includes the same sites as those included for Scenario 1a with the addition of site East of Kingsfold and site West of Billingshurst, both of which lie within a brick clay MSA. In all these sites account for the delivery of a total of 2,000 new homes over the plan period. As such, Scenario 2g would result in a sizeable increase in the amount of growth which occurs within MSAs when compared with Scenario 1a. Therefore, a significant negative effect is also expected for Scenario 2g.

#### Higher Growth Scenarios

**7.183** The Higher Growth Scenarios would deliver particularly high levels of growth which would require greenfield land take which is well above the other scenarios considered. Scenario 3a would deliver this high level of growth (14,675 dwellings) by taking forward all of the urban extension options (apart from the Ashington cluster) and new settlement sites for development. No development at small site options would be delivered under this scenario. While this approach could reduce the potential for development at small sites at more rural locations, which could potentially include land with MSAs, it would result in increased effects associated with the development of large greenfield sites within MSAs for the urban extension and new settlement sites.

**7.184** Scenario 3b would also include all urban extensions but would limit the need to provide development at the new settlements site options, by accommodating a high level of growth (5,600 homes) as small sites. As previously described this approach would result in a higher amount of growth occurring at sites which could deliver a wider distribution of

growth. Scenario 3b is therefore likely to include a high number of greenfield sites in the open countryside many of which fall within MSAs.

**7.185** Under Scenario 3c all urban extension sites (including the Horsham Golf and Fitness site) and new settlement sites considered would be taken forward for development. The highest level of growth through small sites (6,150 dwellings) and highest overall level of development (21,225 dwellings) would be delivered through this scenario. This scenario would require the largest amount of greenfield land take within MSAs to accommodate the level of growth to be achieved. A significant negative effect is therefore expected for Scenarios 3a, 3b and 3c.

#### Preferred Strategy

**7.186** All large scale urban extension sites and the new settlement site included in the Preferred Strategy lie within

either a brick clay or building stone MSA. This includes all sites at West of Ifield, East of Billingshurst, West of Southwater and the new settlement at Buck Barn. The West of Kilnwood Vale site would also be included for development. This site lies within MSAs for building stone and brick clay in the north east of the District. The 2,500 dwellings to be provided at small sites is likely to be achieved to be broadly in line with the development hierarchy, which could limit the need for development at greenfield sites within the open countryside which lie within MSAs. However, the majority of the small sites for allocation lie within or in close proximity to MSAs meaning there is some potential for impacts on finite mineral resources. The exception to this is some of the sites at Lower Beeding, Steyning and Bramber and Upper Beeding. Overall a significant negative effect is expected for the Preferred Strategy.

#### SA Objective 11: To achieve sustainable water resource management and promote the quality of the District's waters

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?

**7.187** The potential for impacts relating to sustainable use of water resources and water quality will be dependent upon the sensitivities of water resources in District as well as existing and potential future pressures on water infrastructure as development occurs. Thames Water supplies a small area in the north eastern part of the District towards the boundary with Crawley. The Crawley Wastewater Treatment Works (WwTW) would serve sites in this location. The rest of the District is served by Southern Water.

**7.188** The Water Cycle Study<sup>33</sup> has identified areas of the District as having potential for impacts relating to WwTW capacity if development was to occur. The findings of this study also reflect discussions that the Council has had with water suppliers for the District. WwTW infrastructure in the plan area may need to be upgraded to accommodate substantial additional development towards Billingshurst, Henfield and the north east of the District, by Crawley. It is expected that large scale growth could support investment in new or upgraded infrastructure to help address requirements

and therefore the effects identified against this objective are uncertain.

**7.189** While many of the large site options included in the various scenarios contain a watercourse, it is assumed that the incorporation of SuDS and appropriate construction management practices will help to prevent run off which might otherwise cause adverse impacts on water quality at these locations.

#### Lower Growth Scenarios

**7.190** The Lower Growth Scenarios have more limited potential to place additional demands on water resources and supporting infrastructure in the District. None of the large site options considered (urban extensions or new settlements) fall within a Source Protection Zone (SPZ). The only SPZs within the plan area fall to the west of Ashington across the area by West Chiltington Village and Common. However, the Ashington cluster site included in Scenario 1a does not fall within the SPZ. While Scenario 1a includes urban extensions

<sup>33</sup> JBA Consulting on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Reigate and Banstead District Council (2020) Gatwick Sub-Region Water Cycle Study

which do not lie within SPZs, sites West of Ifield and East of Billingshurst may have implications for WwTW infrastructure. The low level of development at small sites (550 dwellings) is unlikely to result in a wide distribution of development which might otherwise increase the potential for development within SPZs. Overall, a minor negative effect is expected for Scenario 1a.

**7.191** Scenario 1b would not deliver any development in close proximity to Crawley or Billingshurst meaning there is limited potential for any adverse impacts at these locations. The inclusion of the new settlement at Mayfield by Henfield in this scenario could, however, result in potential need to upgrade the existing WwTW infrastructure at this location. This scenario would provide development at small sites (2,050 dwellings) which is broadly in line with the settlement hierarchy. Therefore, while a wider distribution of development might result than Scenario 1a, it is unlikely to result in such a wide distribution as to provide a high level of development within SPZs, which take in land towards Pulborough and West Chilmington Village and Common in the District. An overall minor negative effect is expected for Scenario 1b.

**7.192** Through Scenario 1c, development at West of Ifield and East of Billingshurst as well as West Billingshurst may need to be supported by improvements to the WwTW infrastructure. The overall level of development (9,445 dwellings) through this scenario is slightly higher than Scenario 1a (7,625 dwellings). In comparison to Scenario 1a, Scenario 1c also includes one additional urban extension site at Billingshurst where there could be impacts relating to WwTW infrastructure. This scenario would include 2,500 homes at small sites which would be delivered broadly in line with the development hierarchy. Therefore, while a wider dispersal of growth than under Scenario 1a would occur, it is expected that the potential for particularly high levels of development within SPZs in the plan area is relatively limited. As this scenario is set out to follow a sustainable transport focussed approach, additional development may occur towards Pulborough and Codmore Hill where a railway station is located. Development here may occur within the SPZ which covers much of the area towards these settlements. Overall Scenario 1c is expected to have a significant negative effect.

**7.193** Scenario 1d would not include any new development by Crawley and therefore impacts in relation Crawley WwTW are considered less likely under this scenario. It would, however, include development at Mayfield by Henfield, where there is potential need for upgrades to the existing WwTW infrastructure. Furthermore, this scenario would include a substantially higher level of growth (3,700 new homes) to be accommodated at small site options. The more dispersed distribution of growth provided has increased potential to result in a high level of growth within the SPZs in close proximity to Pulborough and West Chilmington Village and

Common. A minor negative effect is therefore expected for Scenario 1d.

### Medium Growth Scenarios

**7.194** Scenarios 2a, 2b and 2c would include all large urban extension sites included in Scenario 1a. Each of these scenarios would also include one of the new settlement site options at Mayfield, Adversane and Buck Barn as well as some development to be provided at small sites that would be achieved broadly in line with the development hierarchy, thereby limiting the potential for high level of development to be dispersed to areas covered by SPZs. As such, the effects for this scenario are mostly in line with those expected for Scenario 1a. These scenarios all include development at Ifield and the Kilnwood Vale by Crawley, as well as the East of Billingshurst site. Scenario 2a would include the new settlement at Mayfield by Henfield where there is also potential need to upgrade the existing WwTW infrastructure. For Scenarios 2a, the negative effect expected is significant and for Scenarios 2b and 2c the negative effect expected is minor.

**7.195** Under Scenario 2d, the urban extension sites West of Ifield and West of Billingshurst as well as the Mayfield new settlement site would be included for development. These are sites at which pressures on the WwTW infrastructure may result through new large scale development. The level of development to be provided through small site development (2,500 dwellings) is likely to be achieved broadly in line with the development hierarchy which limits the potential for a highly dispersed distribution of development which might otherwise include a high number of dwellings within SPZs. Overall a significant negative effect is expected for Scenario 2d.

**7.196** Similar to Scenario 2d, Scenario 2e would also include three large scale sites at which a large amount of development could result in further pressures on WwTW infrastructure. These sites are West of Ifield and the West of Kilnwood Vale towards Crawley as well as the East of Billingshurst site. The level of development to be provided through this scenario is the same as Scenario 2d (2,500 dwellings) and therefore this element of the scenario is not expected to result in additional substantial impacts on water quality in the plan area. Overall a significant negative effect is expected for Scenario 2e.

**7.197** Scenario 2f would only include two of the large sites at which large scale development could cause further pressures on WwTW infrastructure. Through this scenario, 650 homes would be provided at East of Billingshurst and 350 homes would be provided at the West of Kilnwood Vale site. None of the additional large scale sites included through this scenario are expected to have substantial impacts on water resources

in the plan area. However, this option would also include a relatively high level of growth at small sites (4,100 dwellings). This is likely to mean a wider dispersal of development with the potential for increased numbers of new homes within SPZs in the plan area. Overall a significant negative effect is expected for Scenario 2f.

**7.198** Similar to Scenarios 2a, 2b and 2c, Scenario 2g would include development at Ifield and the West of Kilnwood Vale site by Crawley, as well as at East of Billingshurst. It would also include the West of Billingshurst site meaning there is potential for increased cumulative impacts in terms of demands on the WwTW infrastructure in the plan area. The level of development at small sites (2,500 dwellings) would be achieved to be broadly in line with the development hierarchy, thereby limiting the potential for development within SPZs. Overall a significant negative effect is expected for Scenario 2g.

#### Higher Growth Scenarios

**7.199** The Higher Growth Scenarios would deliver between 14,295 and 20,845 dwellings. These scenarios therefore have increased potential to put pressure on the capacity of wastewater infrastructure. All three options would also include the large sites being considered by Crawley and both sites at Billingshurst meaning there is potential for the identified capacity issues at these locations to result. Scenarios 3a and 3c would also include the new settlement site at Mayfield by Henfield where there could be further implications relating to pressures on the WwTW infrastructure.

**7.200** Scenario 3b and 3c would allow for a particularly high amount of development at smaller sites (5,600 and 6,150 new

homes, respectively) and therefore would result in a higher number of options which are at more rural locations potentially coming forward for development. This high level of growth at small sites is likely to result in a greater dispersal of growth and could mean a higher amount of development within the SPZs to the west of Ashington and in close proximity to West Chiltington Village and Common.

**7.201** All Higher Growth Scenarios are likely to have significant negative effects, particularly Scenario 3c as it includes all large sites which could put further pressures on the WwTW infrastructure, as well as a particularly high number of small sites meaning there is increased potential for development to fall within SPZs.

#### Preferred Strategy

**7.202** The Preferred Strategy includes a high level of development towards Crawley at West of Ifield and also at East of Billingshurst where there is potential for impacts on the capacity of the WwTW infrastructure. Development at the West of Kilnwood Vale site could have further implications for pressures on the WwTW infrastructure given its close proximity to Crawley. The strategy would allow for an appropriate level of development at small sites which would be achieved broadly in line with the development hierarchy as to avoid further impacts on the capacity of the WwTW infrastructure. Only a small number of small sites to be allocated at Thakeham and West Chilington Village and Common fall within SPZs which could have further implications for water quality in the District. Overall, a significant negative effect is expected for the Preferred Strategy.

#### SA Objective 12: To manage and reduce the risk of flooding

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?

**7.203** All effects relating to flood risk will have an element of uncertainty attached as new development will likely present opportunities to achieve flood risk mitigation through appropriate design measures including the incorporation of SuDS. For all scenarios that would result in strategic sites which contain some areas of higher flood risk being brought forward, it is recognised that the large size of the sites question and the relatively small proportion of land within areas of higher flood risk is likely to mean that development

could be directed away from these areas. In spite of this, the inclusion of these sites for development (appraised based on their outer boundaries) could increase the potential for a higher number of residents and businesses to be affected by flooding events.

### Lower Growth Scenarios

**7.204** Delivering a lower amount of new development over the plan period will result in reduced land take being required which is likely to mean that any increase in impermeable surfaces will be more limited. There is also potential for the lower level of development to mean that new housing and other sensitive uses could be delivered within areas which are not identified as being at higher risk of flooding.

**7.205** Scenario 1a would accommodate growth as urban extensions and small sites, broadly in line with the development hierarchy. Delivering growth in line with the hierarchy is likely to provide some opportunities to encourage the re-use of brownfield land; although it is recognised that the rural nature of the District will mean that any opportunities might be limited.

**7.206** Of the land considered for potential urban extensions in Horsham, the West of Ifield site contains land within Flood Zone 2 and Flood Zone 3 at the River Mole and Ifield Brook. Furthermore, some of the Rookwood site falls within higher risk flood zones close to the Chennels and Bolding Brooks. These sites are included in Scenario 1a. However, considering the relatively small portion of both sites which fall within these areas, it is likely that development could be accommodated without providing in homes in areas of higher flood risk. It is expected that Scenario 1a would have a minor negative effect.

**7.207** Scenario 1b would result in substantial increases in the area of impermeable surfaces at concentrated locations in the District by supporting much of the new development at the new settlement site options. Furthermore, sites Buck Barn and Land North East of Henfield (Mayfield) contain land that is within Flood Zone 3. Considering the increased likelihood of concentrated greenfield land take to result through Scenario 2, a significant negative effect is expected for this option.

**7.208** Scenario 1c takes forward the West of Ifield and Rookwood sites, both of which include some land within Flood Zone 2 and Flood Zone 3. Through this option a further 1,000 homes would be provided at West of Billingshurst, the western edge of which is within higher risk flood zones. The level of development to be delivered at small sites through this scenario is expected to be achieved broadly in line with the development hierarchy which is likely to promote some level of brownfield land development. However, the mostly rural nature of the District means that a relatively high level of greenfield land take is likely to be required which would contribute to an increased amount of impermeable surfaces in the plan area. An overall significant negative effect is expected for this scenario.

**7.209** Scenario 1d would include all three of the new settlement site options. Of the Lower Growth Scenarios considered, it is expected that concentrated greenfield land

take would be most notable through this option. This option is likely to result in a substantial increase in impermeable surfaces in areas which were previously entirely greenfield. In contrast to where urban extensions are being delivered these areas are also surrounded by land which presently benefits entirely from natural drainage patterns. The large amount of growth to be provided at small sites (3,700 dwellings) would mean that the distribution of growth is less likely to be in line with the settlement hierarchy, with a more dispersed distribution resulting. Given the less developed character of rural areas where development may occur, there may be reduced opportunities for development to occur at previously developed sites. As such, a significant negative effect is expected for Scenario 1d.

### Medium Growth Scenarios

**7.210** Providing an increased number of homes and supporting infrastructure under the Medium Growth Scenarios is likely to result in more loss of permeable surfaces. Providing a higher amount of development in the District may also mean that an increased number of locations may be required to support new growth, meaning that sites in areas of higher flood risk may be more likely to be taken forward.

**7.211** For Scenarios 2a, 2b and 2c development would include one of the new settlement options at Mayfield, Adversane or Buck Barn. All three of these options would lead to a concentration of new impermeable surfaces at the new settlement which is taken forward. Furthermore, the Land North East of Henfield (Mayfield) and Buck Barn would include areas of Flood Zone 3 at tributaries of the River Adur. While Scenario 3b would include land for a new settlement at Adversane which is unlikely to take in areas of higher risk flood, it would still include a large amount of greenfield land take at this location, particularly when compared to overall amount of greenfield take required for Scenario 1a.

**7.212** Furthermore, Scenarios 2a, 2b and 2c would all include at least double the number of new homes to be delivered at small sites in comparison to Scenario 1a. The number of homes to be delivered at small sites is expected to be delivered in line with the development hierarchy which could increase the potential for use of brownfield land, however, the rural nature of the District is likely to mean that much of this element of growth is likely to occur on greenfield land. Therefore, a significant negative effect is also expected for these three scenarios.

**7.213** Both Scenarios 2d and 2e include the large scale urban extension sites West of Ifield and Rookwood, which could result in new homes being provided in areas of higher flood risk. Scenario 2d would include the new settlement site at Mayfield which takes in areas of higher flood risk associated with tributaries of the River Adur. Development here would



also involve focussed greenfield land take where previously natural patterns of drainage would occur. This scenario also included the West of Billingshurst site, the western edge of which falls within Flood Zone 2 and Flood Zone 3. Scenario 2e also includes additional large scale development sites which are constrained by higher flood risk areas at Kingsfold through which Brookhurst Brook runs and the new settlement site at Buck Barn. Scenarios 2d and 2e are both expected to have a significant negative effect.

**7.214** The large scale development sites included in Scenario 2f are mostly unconstrained by higher risk flood areas. Only the new settlement site at Buck Barn included for development though this scenario contains areas of Flood Zone 2 and Flood 3 associated with tributaries of the River Adur. At this site the focussed greenfield land take within a relatively undisturbed location could interrupt existing natural drainage patterns in the surrounding areas. The higher number of homes at small sites (4,100 dwellings) could promote a wider distribution of development, taking in more greenfield locations, some of which may be within high flood risk areas. Overall a minor negative effect is expected for Scenario 2g.

**7.215** A significant negative effect is expected for Scenario 2g given that all of the urban extensions considered, including those at Kingsfold and West of Billingshurst would be taken forward. These additional two sites take in areas of Flood Zone 2 and Flood Zone 3 at Brookhurst Brook and Boldings Brook, respectively.

### Higher Growth Scenarios

**7.216** The Higher Growth Scenarios considered would result in higher greenfield land take than both the Lower Growth Scenarios and the Medium Growth Scenarios.

**7.217** For Scenario 3a a high amount of greenfield land take would occur as, with the exception of the Ashington cluster site, the majority of large scale sites would be taken forward. Therefore, this option would also include all large scale sites which take in areas of higher flood risk and a significant negative effect is expected.

**7.218** Under Scenario 3b greenfield, land take would result at all urban extension sites with the remaining growth (5,600 homes) to be delivered at small sites. The high level of growth to be provided in this manner would result in a wider distribution of development and it is likely to include those at smaller settlements and more rural locations. It could also increase the potential for small sites to come forward at higher risk flood areas given the larger number of small sites required for development. While neither of new settlement sites which include Flood Zones 2 or 3 are included for development, this scenario would include the sites West of Ifield, Rookwood, Kingsfold, and West of Billingshurst at which development might occur in these higher risk flood zones. A significant negative effect is therefore expected for Scenario 3b.

**7.219** Scenario 3c is expected to result in the most substantial increases in impermeable surfaces. This scenario delivers the highest level of development of all scenarios considered and would involve the development all large scale sites considered (including the Horsham Golf and Fitness site), including those which take in land at higher risk of flooding. The particularly high level of development to be provided at small sites (6,150 dwellings) is also likely to contribute to the overall increase in impermeable surfaces in the plan area. A significant negative effect is therefore expected for Scenario 3c.

### Preferred Strategy

**7.220** The Preferred Strategy would include a number of large scale sites which take in land at higher risk of flooding. These are sites at West of Ifield and Buck Barn. At the Buck Barn site there is also potential that the greenfield land take required at a previously undisturbed location could result in impacts on the existing natural drainage patterns in the surrounding areas. The level of development to be provided at small sites (2,500 dwellings) is likely to be achieved broadly in line with the development hierarchy which is likely to provide many homes at more developed locations where brownfield land might be made use of. This point considered, while none of the small sites set out for allocation are within higher flood risk areas, only one of these sites, at Barns Green, lies on brownfield land. Overall a significant negative effect is expected for the Preferred Strategy.

**SA Objective 13: To reduce congestion and the need to travel by private vehicle in the District**

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
++/-?	--/+	++/-	--	++/-?	++/-?	++/-?	++/-	++/-- ?	--	--/+?	--/+?	--?	--/+?	++/-

**7.221** The level of development set out through each of the scenarios considered would result in substantial increases in the number of journeys being undertaken in the District as new residents need to travel to meet day-to-day requirements. Where development is provided at urban extensions which are expected to have the highest potential to integrate with the existing settlements, it is likely that residents would need to travel shorter distances to access essential services and facilities. This may mean that a higher number of journeys are made by sustainable modes of transport, such as walking and cycling. Locations that have good access to sustainable transport services, such as bus and rail, are also likely to help support achievement of this SA objective.

**7.222** The delivery of high levels of development at new settlements has the potential to incorporate design which encourages walking and cycling, and be integrated into the public transport network, depending on where they are located. While new settlements have the potential to, and are expected to, provide a full range of services (including jobs and facilities such as schools and healthcare) the range of new provisions and their accessibility for early residents in particular will be dependent upon the scale of growth and its phasing.

**Lower Growth Scenarios**

**7.223** Scenario 1a would include urban extensions which are well related to Crawley (sites West of Ifield and the West of Kilnwood Vale). Commuting data<sup>34</sup> shows that this area and the surrounding Gatwick Diamond are particularly important destinations for residents of the District. Furthermore, these sites would support the delivery of the Crawley Western Relief Road. This new route may help to alleviate congestion in the area but may also reduce the potential for the achievement of modal shift. Including this site in combination with sites in close proximity to Horsham (sites at North Horsham and Rookwood) through Scenario 1a could implications for

congestion on the road network surrounding Horsham town and Crawley.

**7.224** Overall, Scenario 1a would include urban extensions and small sites which are broadly in line with the settlement hierarchy, including the larger settlements of Horsham, Billingshurst and Southwater which provide access to a range of existing services and facilities as well as employment opportunities. These settlements all lie on more frequent bus routes (at least once every 30 minutes) and, with the exception of Southwater, benefit from good access to a railway station. A high proportion of development through this scenario is expected to help promote travel by more sustainable means.

**7.225** This scenario would also include a substantial level of development (400 new homes) at the Ashington cluster site. The settlement of Ashington is a Medium Village in the development hierarchy and therefore meets only some of the day to day needs of residents. This means the development of this site could result in a sizeable increase in the number of trips being made by car in the area. This site would not provide immediate access to more frequent bus services or a railway station. It is, however, noted that the level of development to be provided at this site is lower than at many of the other large sites considered and therefore comprises a relatively low proportion of overall growth over the plan period.

**7.226** Scenario 1b would deliver most of the new development at new settlements at Mayfield, Adversane and Buck Barn which is likely to mean that a proportion of new residents will need to travel to access services and facilities as well as employment opportunities at more established settlements. While all new settlements are expected to provide new essential services, the potential need for residents to travel longer distances, is particularly likely in the early stages of development. Furthermore, considering the established commuting patterns of the District many new residents will travel out of the District towards Crawley and the Gatwick

<sup>34</sup> ONS (2011) 2011 Census – Datashine Commute

Diamond. Scenario 1b would provide little development in close proximity to this area.

**7.227** The new settlement options are well located to the A-road network, but none are close to existing rail stations, which may further encourage travel by car. The delivery of development at the Buck Barn site would support the upgrading of the strategic road network at the A272. These improvements could help to alleviate local congestion, but could also discourage modal shift. The new settlements would include new public transport provisions as well as employment land which could reduce the need for travelling, particularly by car. It is also noted that the Adversane site has the potential to include the safeguarding of land for a new railway station which could promote longer term modal shift. However, there is currently no agreement for the new station with Network Rail. Overall a mixed minor positive and significant negative effect is expected for Scenario 2.

**7.228** Scenario 1c would result in similar distribution of development to Scenario 1a but would allow for a higher level of overall development (9,825 dwellings). This scenario is set out to promote access to sustainable transport. Therefore, compared to Scenario 1a, the West of Kilnwood Vale site and Ashington cluster site would be removed and the West of Billingshurst site would be taken forward to make best use of existing rail links in the plan area. The inclusion of a relatively high level of development at small sites which could still be delivered in line with the development hierarchy (2,500 dwellings) could allow for further development in the mostly urban areas where sustainable transport links are strongest. It could also allow for some growth at less developed locations where the viability of existing rural bus services might be supported, or the extension of services might occur. While this option is linked to sustainable transport in the plan area, the overall level of housing growth supported is expected to result in some increase in congestion in the plan area. Overall a mixed significant positive and minor negative effect is expected for Scenario 1c.

**7.229** Scenario 1d would deliver a high level of development at small sites (3,700 dwellings) and this is likely to result in a wider distribution of growth. Development would therefore be less likely to follow the existing settlement hierarchy through this scenario, with a high proportion of growth also occurring at the three new settlement options. This scenario would therefore fail to make best use of existing services, sustainable transport and employment provisions. It would also not respond positively to the realities of commuting patterns for the District by failing to include any substantial provision by the settlement of Crawley. A significant negative effect is therefore expected for Scenario 1d.

## Medium Growth Scenarios

**7.230** Scenarios 2a, 2b and 2c would include those urban extension locations with good potential to achieve integration with existing settlements and would broadly allow for growth in line with the settlement hierarchy. They would also include 400 new homes at the Ashington cluster site, thereby deviating slightly from the settlement hierarchy approach.

**7.231** Each of these options would also include one of the new settlement options. All of the three new settlement options are expected to perform similarly in terms of promoting travel by more sustainable means, given that they are not particularly well related to existing higher order settlements or services and facilities. While the Mayfield and Buck Barn sites are relatively close to the boundaries of settlements of Henfield and Southwater respectively, essential services and town centres with those settlements are not close to either site. Adversane is located close to a college facility; however it is expected that only a small proportion of new residents would make regular use of this facility. Each of the new settlements would also include new provisions which would potentially reduce the need to travel by private vehicle but their location in close proximity to the strategic road network may encourage car travel anyway. This is particularly likely to be the case in the early stages of development as new infrastructure is provided.

**7.232** Overall a mixed significant positive effect and negative effect is expected for Scenarios 2a, 2b and 2c. Scenario 2b would include the safeguarding of land at Adversane for a railway station although the provision of a new railway station is not supported by the relevant statutory bodies. The overall effect for each scenario is uncertain given that there may be in-combination impacts relating to traffic and congestion as a result of the development of sites by Crawley and Horsham Town (at North Horsham, Rookwood and West of Kilnwood Vale).

**7.233** Scenario 2d would include the large scale urban extensions sites at West of Ifield, West of Southwater, Rookwood and West of Billingshurst which are well related to the larger settlements in the plan area and areas immediately surrounding. This approach would provide many residents with nearby access to services and facilities and employment as well as existing sustainable transport links. It would also respond appropriately to commuter patterns in the area by delivering large scale development towards Horsham town and Crawley. The scale of development is also likely to support the incorporation of new jobs and services, reducing the need to travel. At the new settlement of Mayfield, the incorporation of new services and facilities would be of particular importance to limit the need for new residents to travel longer distances given that access to existing provisions will be limited. The scale of growth at small sites (2,500

dwelling) is likely to be achieved broadly in line with the development hierarchy, thereby limiting the potential for a high level of growth in more rural areas. An overall mixed significance positive and minor negative effect is expected for Scenario 2d.

**7.234** Scenario 2e would also include many of the large scale development sites which are well related to the larger settlements at West of Ifield, East of Billingshurst, West of Southwater and Rookwood. While this could lead to some limited need to travel in the plan area, residents at Buck Barn would need to travel longer distances to access certain provisions, in the short term in particular. This is also likely to be the case at the Kingsfold site, at which the new services to be delivered would be more limited. From here residents would have to travel to Horsham town to access many provisions. It is expected that the focus of large sites along the strategic road network at the A24 and A264 could increase the potential for residents to travel by car and could increase congestion on these routes. An overall mixed significant positive and significant negative effect is expected for Scenario 2e. The effect is uncertain given that the inclusion of all sites considered at Crawley and Horsham town could lead to further congestion towards these areas.

**7.235** Scenario 2f includes some large scale sites as urban extensions to settlements which lie directly below Horsham town in the development hierarchy. Residents at new urban extensions at Southwater and Billingshurst would be provided with access to some services and facilities, but the level of provision would be more limited than that at Horsham town. This scenario would only include development towards Crawley at the West of Kilnwood Vale site, and therefore would make more limited use of the strong service provision and employment offer here and the potential to increase travel by active and more sustainable modes. The inclusion of two new settlement sites (Adversane and Buck Barn) would provide a long term focus for new service provision, but some earlier site occupiers are likely to have to travel longer distances to access certain services and facilities. Furthermore, the scale of development provided through small sites (4,100 dwellings) would result in a wider distribution of development. This element of growth is unlikely to support substantial service provision and could increase the need to travel to access certain services. An overall significant negative effect is expected for Scenario 2f.

**7.236** The medium level of growth (11,575 new homes) set out through Scenario 2g would be mainly distributed across the urban extension sites. However, it would also include an additional site East of Kingsfold which would act as a satellite settlement to the larger settlement of Horsham (which would provide access to many essential services for residents) which is still almost 2km to the south of the new site. The West of Billingshurst site would also be included in this scenario, and

would be relatively well related to the larger settlement of Billingshurst as well as the existing railway station there. This scenario would result in a portion of development (2,500 homes), which is likely to be achieved mostly in line with the settlement hierarchy, with reduced potential for small sites to come forward at smaller settlements or more rural locations. Overall a mixed minor positive and significant negative effect is expected for Scenario 2g. As Scenario 2g would include sites by Crawley and Horsham Town (notably sites North Horsham, Rookwood and West of Ifield) the overall effects are uncertain given that there may be further in combination impacts relating to traffic and congestion as these sites are developed.

### Higher Growth Scenarios

**7.237** The Higher Growth Scenarios would set out a level of development which is substantially higher than the other scenarios considered at between 14,675 and 21,225 dwellings respectively. Scenario 3a would include all urban extension (but not the 400 homes considered for provision at the Ashington cluster site) and new settlement options. This approach would include areas which are well related to the larger settlements and Crawley and the Gatwick Diamond area. However, it would also include well as land by Kingsfold and new settlements which would be less accessible to existing services and facilities as well as sustainable transport infrastructure and employment opportunities.

**7.238** The new settlement sites are, however, likely to support new service provisions, employment opportunities and public transport provisions which could help to instil a degree of self-containment and reduced requirement to travel by private vehicle from these locations. In all, a mixed minor positive and significant negative effect is expected for Scenario 3a.

**7.239** As Scenario 3b would include a particularly high level of development at small sites (5,600 homes) it is likely that a more dispersed pattern of growth would result. The inclusion of all urban extension options would include some which are well related to larger settlements in the District and surrounding area as well as sites such as East of Kingsfold which would provide more limited access to existing provisions. It would also include the delivery of 400 new homes at the Ashington cluster site, which provides more limited access to existing services and facilities (for example this settlement does not contain a secondary school) as well as sustainable transport links. Given the more dispersed distribution of growth which would be less likely to support substantial new service provision (including sustainable transport infrastructure) at more rural locations and the high level of total growth supported it is likely that Scenario 3a would result in a significant negative effect.

**7.240** Scenario 3c would include all large scale site options as well as the highest number of homes (6,150) at small sites. The additional large site Horsham Golf and Fitness to the north of Southwater would be included in this option. While residents at this location would be provided with good access to services and facilities at Southwater, there could be increased potential for travel to the north to Horsham town along the A24 which the site is adjacent to. This could be offset in part by the relatively good sustainable transport links between the two settlements.

**7.241** This option is considered most likely to support new service provision in the plan area and support the viability of existing rural service provision which could lead to some residents having a reduced need to regularly travel longer distances. It would also potentially support the viability and extension of public transport links in the plan area. The particularly high level of development over the plan period (21,225 dwellings) is likely to result in a substantial increase in the number of daily journeys made in the plan area. Overall a mixed minor positive and significant negative is expected for Scenario 3c.

**7.242** The overall effects expected for Scenarios 3a, 3b and 3c are uncertain given that there is potential for in combination impacts relating to traffic and congestion if the sites by Horsham Town and Crawley were all to come forward for development.

#### Preferred Strategy

**7.243** The Preferred Strategy would include much of the growth over the plan period at urban extension sites and in

line with the settlement hierarchy at small sites (2,500 dwellings). This includes development at large scale sites at West of Ifield, East of Billingshurst and West of Southwater where residents would benefit from nearby access to existing services and facilities and the scale of growth is likely to support new provisions. These settlements provide access to relatively strong bus services and furthermore (with the exception of Southwater) all settlements provide access to a railway station. By delivering large scale development by Crawley and the smaller site at West of Kilnwood Vale, the strategy would respond in a positive manner to existing commuting patterns. At Kilnwood Vale, residents would benefit from relatively nearby access to the settlement of Crawley as well as Faygate railway station. While the strategy fails to include a new strategic scale urban extension at Horsham town where there is a particularly strong service and job offer, the inclusion of the North Horsham densification site and some smaller development sites at the settlement would respond positively in this manner. Limiting the level of growth at Horsham town may also help to prevent undue levels of congestion resulting on the road network towards the settlement.

**7.244** The inclusion of the new settlement site at Buck Barn would incorporate new services and facilities, although some residents may have to travel longer distances in the short term to access these. Importantly this scenario would not include the large scale site at Ashington from which residents would have to travel regularly to access healthcare and secondary school facilities. Overall a mixed significant positive and minor negative effect is expected for the Preferred Strategy.

#### SA Objective 14: To limit air pollution in the District and ensure lasting improvements in air quality

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
++/-	--/+	++/-	--	++/--	++/-	++/--	++/-	--/+	--/+	--/+	--/+	--	--	++/--

**7.245** Air quality issues in Horsham and surrounding districts are primarily related to traffic. While all traffic increases can increase air pollution, particular attention is placed on those scenarios that could increase traffic within Air Quality Management Areas (AQMA), which are typically parts of the road network that experience high traffic flows and/or congestion.

**7.246** It should be noted that, in future years, increased use of electric and hybrid vehicles, and reduced use of diesel and

petrol fuelled cars, could help to address air quality issues. However, particulate matter from tyre wear is still likely to contribute to air pollution.

#### Lower Growth Scenarios

**7.247** Scenario 1a would provide the lowest level of overall growth (7,625 dwellings) of all scenarios considered and is therefore likely to result in the lowest increase in journeys made in the area. This scenario would focus a large amount of



development towards the larger settlements in Horsham as urban extensions. This would include two sites at the main town of Horsham, as well as sites at Southwater and Billingshurst. These settlements benefit from access to rail links and/or bus services which are more frequent than 30 minutes. These settlements also provide residents with immediate access to a relatively wide range of services and facilities as well as employment opportunities. As such modal shift might be encouraged which might help to limit any increase in air pollution as new development is delivered in the District.

**7.248** As this scenario also includes development by Crawley at site West of Ifield and site West of Kilnwood Vale it would also support development which responds positively to existing commuting patterns out of the District. Increasing levels of travel into Crawley, however, has the potential to intensify existing air quality issues at the Hazelwick AQMA along the A2011 and A2004.

**7.249** Large scale growth at the Ashington cluster site is likely to perform less favourably in terms of helping to promote modal shift in the District considering that this settlement has a more moderate service offer and does not benefit from frequent bus services or rail links. Providing new growth at this location may therefore lead to residents being required to travel by private vehicle on a more regular basis which is likely to have adverse impacts in terms of air quality in the wider area. Overall a mixed significant positive and minor negative effect is expected for Scenario 1.

**7.250** Scenario 1b would provide a similar level of growth to Scenario 1a (8,050 dwellings), but instead would allow for growth at the three new settlement sites rather than urban extensions. While providing a low level of growth in the plan area is likely to lead to fewer car journeys compared to the Medium and Higher Growth Scenarios, the delivery of new growth at locations which do not provide immediate access to services and facilities, employment opportunities or sustainable transport links is likely to lead to affect air quality. New services and facilities, as well as employment development, are expected to be provided at each new settlement but early occupiers of the site may not immediately benefit from access to these provisions.

**7.251** The location of the new settlement options may further encourage car use given the access that they provide to the strategic road network. Furthermore, development at sites Land North East of Henfield (Mayfield) and Buck Barn may lead to increased travel within the Cowfold AQMA, thereby exacerbating existing air quality issues at this location.

**7.252** This scenario would also include a higher level of growth at small sites than Scenario 1a. However, the level of growth is still expected to be achieved broadly in line with the settlement hierarchy. Achieving this more dispersed approach

to development could result in increased need to travel by private vehicle from some locations but could help to support some service provision at smaller settlements which is likely to reduce the need to travel from these locations in the longer term. Overall a mixed minor positive and significant negative effect is expected for Scenario 1b.

**7.253** Scenario 1c includes large scale sites that would allow for a good level of access to sustainable transport links. This includes urban extension sites at Horsham town, Billingshurst and Crawley (West of Ifield) where railway links can be accessed. The West of Southwater site would not provide access to existing railway links, however, bus services within the settlement are relatively frequent and provide access to Crawley, Horsham town and Worthing. All settlements provide access to existing services and facilities and employment opportunities and the inclusion of development towards Crawley responds positively to existing commuting patterns. Development at the West of Ifield site could, however, contribute to increased levels of traffic within the Hazelwick AQMA. The level of development at small sites through this scenario is expected to be achieved broadly in line with the development hierarchy. Overall a mixed significant positive and minor negative effect is expected for Scenario 1c.

**7.254** All three of the new settlement sites would be included for development through Scenario 1d. This scenario would also include a high proportion of growth (3,700 homes) at small sites. This could result in a wider distribution of development in the plan area and a higher proportion of development may come forward in areas which are less well related to the larger settlements in the District.

**7.255** This approach would fail to make best use of existing sustainable transport links in Horsham and would fail to respond positively to the realities of the economy and commuting patterns in Horsham District. As such, although the development of new settlements could deliver new sustainable transport links, employment opportunities and services, it is likely that many residents would need to travel longer distances to access these types of provision to the detriment of air quality. This is particularly likely to be the case in the shorter term dependent upon the phasing of new services and facilities. The inclusion of new settlement options at Mayfield and Buck Barn in this scenario has the potential to result in particular adverse impacts on air quality at the Cowfold AQMA, considering that many people travelling to and from these sites will be required to travel through this AQMA. Therefore, a significant negative effect is expected for Scenario 1d.

### Medium Growth Scenarios

**7.256** Scenarios 2a, 2b and 2c would allow for the majority of new development as urban extensions to the larger

settlements and would also include one of the new settlement site options. Each scenario would also include the delivery of 400 new homes at the Ashington cluster site which provides access to some sustainable transport links but does not benefit from access to nearby stronger service provision. This element of growth could have particular implications for the promotion of sustainable travel in Horsham and air quality in relation to this.

**7.257** The remainder of the growth would be provided in line with the development hierarchy at small sites through all three scenarios. This is likely to provide a majority of new residents with good access to existing services and facilities, as well as job opportunities and sustainable transport links which will reduce the need to travel longer distances. By delivering growth in line with the settlement hierarchy, these scenarios are also likely to provide some growth at the smaller settlements which could help to prevent the stagnation of rural services.

**7.258** It is likely that the new settlements could support some degree of self-containment in the longer term considering the level of growth supported, depending upon the range of jobs and services and facilities provided. Therefore, any increased need to travel by private vehicle and impacts relating to air quality are likely to be reduced. Allowing for development at sites Land North East of Henfield (Mayfield) or Buck Barn, however, could have adverse impacts in relation to the existing air quality issues at the Cowfold AQMA. This would be in addition to the potential for adverse impacts on air quality within the Hazelwick AQMA by including the West of Ifield and West of Kilnwood Vale sites through each of these scenarios. Therefore, a mixed significant negative and significant positive effect is expected for Scenarios 2a and 2c and a mixed significant positive and minor negative effect is expected for Scenario 2b.

**7.259** Through Scenario 2d, the large scale urban extensions sites at West of Ifield, West of Southwater, Rookwood and West of Billingshurst which are well related to the larger settlements in the plan area and areas immediately surrounding would be developed. This approach could limit the need for residents to travel longer distances given that many residents would have good access to existing services and the scale of growth would help support new provisions of this nature. Delivering growth towards Crawley would also respond positively to established commuting patterns in the area. This scenario would also include the new settlement site at Mayfield where the incorporation of new services and facilities would be of particular importance to limit the need for new residents to travel longer distances. Access to existing services will be limited at this location. Of the large scale sites to be developed, the West of Ifield and Mayfield sites could exacerbate air quality issues within AQMAs at Hazelwick in Crawley town and Cowfold, respectively. The level of

development at small sites (2,500 dwellings) would occur broadly in line with the development hierarchy meaning there is likely to be limited potential for substantial numbers of new residents having to travel longer distances on a regular basis. An overall mixed significant positive and minor negative effect is expected for Scenario 2d.

**7.260** Many of the large scale development sites that are well related to the larger settlements would also be included in Scenario 2e, at West of Ifield, East of Billingshurst, West of Southwater and Rookwood. While this approach could lead to some limited need to travel in the plan area, the delivery of a new settlement at Buck Barn would likely result in a higher number of residents having to travel longer distances to access certain provisions, in the short term in particular. A similar situation is likely at the Kingsfold site and this site would not incorporate the same level of service provision as Buck Barn in the longer term. Focussing large sites along the A24 and A264 could also increase the potential for residents to make use of private vehicles thereby contributing to further air pollution along these routes. Though this scenario, a higher number of large sites than Scenario 2d would be developed that could contribute to increased air pollution within AQMAs at Hazelwick in Crawley town and at Cowfold. These are West of Ifield and West of Kilnwood Vale and Buck Barn. A mixed minor positive and significant negative effect is therefore expected for Scenario 2e.

**7.261** Scenario 2f would include the large scale urban extension sites at settlements which lie directly below Horsham town in the development hierarchy. It is likely that new residents at the urban extensions to Southwater and Billingshurst would be provided with access to some services and facilities. However, at these locations the level of service provision is more limited than at Horsham town. The only development to be provided towards Crawley would be at the West of Kilnwood Vale site. This scenario would make more limited use of the strong service provision and employment offer at this settlement, where there may be opportunities to promote travel by more sustainable modes.

**7.262** At the two new settlement sites included in Scenario 2f (Adversane and Buck Barn) there is likely to be substantial service provision and job provision, however, access to these provisions may only be achieved in the longer term. Of the large sites included for development only West of Kilnwood Vale and Buck Barn are expected to result in substantial increases in travel within the AQMAs at Hazelwick in Crawley town and Cowfold. However, the high level of development to be provided at small sites (4,100 dwellings) through this scenario would result in a wider distribution of development. The scale of growth at smaller sites is unlikely to support substantial new service provision and could increase the need to travel particularly where new residents are located in less developed areas. An overall mixed minor positive and

significant negative effect is therefore expected for Scenario 2f.

**7.263** Scenario 2g would include the vast majority of development as urban extensions, instead of at new settlements. Therefore, the requirement for residents to regularly travel by car may be reduced. This scenario would include the additional urban extension site at West of Billingshurst. This site is relatively well related to Billingshurst which provides access to a good range of services and facilities, local employment opportunities (including key employment areas) and a railway station. Conversely, the inclusion of the Ashington cluster site through this scenario may also result in a requirement for new residents to travel regularly by car. The Kingsfold site, which is included for development through Scenario 2g, would in effect act as a satellite settlement to Horsham town. The service provision to be incorporated at the site would be relatively limited (no secondary school or GP surgery is expected to be provided) meaning residents would have to travel further afield to access some essential services. The inclusion of development by Crawley at sites West of Ifield and Kilnwood Vale, has the potential to result in increased levels of traffic within the Hazelwick AQMA.

**7.264** This scenario would include a portion of growth at small sites (2,500 homes) that is likely to be achieved broadly in line with the development hierarchy. This would help to provide many residents with good access to services and facilities and sustainable transport links. Some appropriate level of development might occur at smaller settlements thereby helping to maintain the viability of services and facilities at these locations. Overall a mixed minor positive and significant negative effect is expected for Scenario 2g.

### Higher Growth Scenarios

**7.265** The substantially higher amounts of development to be provided through Higher Growth Scenarios (between 14,675 and 21,225 dwellings) is expected to result in the greatest increase in journeys being made on a regular basis in the District. The importance of out commuting for people in Horsham District means that many new residents will have to travel beyond the plan area and many of these journeys are likely to be made by private vehicle.

**7.266** Scenario 3a would include all new settlement and urban extension sites. It would, however, not include the delivery of 400 new homes at the Ashington cluster site. This scenario therefore has the potential for existing air quality issues at the AQMAs at Crawley and at Cowfold to be adversely affected by increased numbers of journeys through them. By delivering concentrated levels of development at urban extension and new settlement sites this scenario would present opportunities

to secure a degree of self-containment with the provision of new services and employment opportunities.

**7.267** Scenario 3a would include no growth at small sites and therefore could lead to pressure on the viability of services and public transport at more rural settlements. In the longer term this could result in residents having to travel more frequently by private vehicle from these locations, hence increasing air pollution. Overall a mixed minor positive and significant negative effect is expected for Scenario 3a.

**7.268** Scenario 3b would include all urban extension sites. This includes sites at Kingsfold (which in effect would act as a satellite settlement to Horsham town) and Ashington which are less well related to the larger settlements in the District. It is noted that Kingsfold is in close proximity to a key employment area, but other types of provision are more limited. New residents are more likely to need to travel regularly by private vehicle from these locations which will be to the detriment of local air quality. Scenario 3b would also include the urban extensions by Crawley which have the potential to result in increased levels of traffic within the Hazelwick AQMA which could aggravate existing air quality issues at this location.

**7.269** This scenario would furthermore include a very high amount of development at small sites (5,600 homes). It is likely that a more dispersed distribution of development would result and many sites which are poorly related to larger settlements as well as those at more rural locations would come forward for development. The inclusion of these smaller sites would be less likely to support the delivery of more substantial new service provision or public transport improvements. As such, the potential for benefits which might be achieved by including much of the new growth at urban extensions through this scenario is likely to be substantially outweighed by providing a high level of growth at locations where residents will need to travel long distances by private vehicle on a regular basis. The wider dispersal of development could also increase the level of traffic within the AQMA at Storrington in the south west of the District. Overall, this scenario is expected to result in increased need for residents to travel by private vehicle from a wider number of locations in Horsham District thereby increasing the potential for widespread erosion of local air quality. A significant negative effect is therefore expected for Scenario 3b.

**7.270** Through Scenario 3c all large scale site options and the highest number of homes (6,150) at small sites would be developed. The additional large site Horsham Golf and Fitness to the north of Southwater would be included through this option. While residents at this location would be provided with good access to services and facilities at Southwater there could be increased potential for travel to the north to Horsham town along the A24 which the site is adjacent to which could

affect air quality. This could be offset in part by the relatively good sustainable transport links between the two settlements.

**7.271** Scenario 3c is most likely to support new service provision in the plan area and support the viability of existing rural service provision. This could reduce the need for some residents to have to travel longer distances in the plan area to the benefit of air quality. It could also have benefits in terms of supporting the viability and extension of public transport links in the plan area. The particularly high level of development over the plan period (21,225 dwellings) is likely to result in a substantial increase in the number of daily journeys made in the plan area. This scenario could also see the greatest number of journeys within AQMAs in the District and surrounding areas given the overall level of development and the location of the new settlements at Mayfield and Buck Barn as well as development towards Crawley. The wider dispersal of development through small sites growth, could also increase traffic within the AQMA at Storrington to the south west of the District. Overall a significant negative is expected for Scenario 3c.

#### Preferred Strategy

**7.272** Through the Preferred Strategy the majority of the growth over the plan period would occur at urban extension sites and in line with the settlement hierarchy at small sites

(2,500 dwellings). Through the inclusion of the large scale sites at West of Ifield, East of Billingshurst and West of Southwater residents would benefit from nearby access to existing services and facilities and the scale of growth is likely to support new provisions. While no strategic scale development is to be provided at the main town of Horsham, residents at the North Horsham densification site and small scale sites at this settlement would have good access to the strong service and job offer at this location. Access to a nearby railway station is provided at all settlements apart from Southwater. Development by Crawley (at the West of Ifield and West of Kilnwood Vale sites) would respond positively to commuting patterns in the area.

**7.273** Large scale development at the Buck Barn new settlement site would incorporate new services and facilities, but earlier occupiers of the site may need to travel longer distances to access certain provisions. This scenario would not include the larger site at Ashington at which there is no GP surgery or secondary school which might otherwise increase the need to travel from this settlement. However, the inclusion of the Buck Barn site and development towards Crawley could have implications for air quality within the existing AQMAs at Cowfold and Hazelwick in Crawley town. Overall a mixed significant positive and significant negative effect is expected for the Preferred Strategy.

#### SA Objective 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
++/-	--/+	++/-	--/+	++/-	++/-	++/-	++/-	+/-	--/+	++/--	--/+	--	--/+	++/-

**7.274** New development provides an opportunity to design in energy efficiency and renewable energy provision, helping to address carbon emissions. Larger developments offer the greatest potential to include district heating or CHP.

**7.275** In locational terms, as with air quality, the greatest influence on carbon emissions is likely to be from traffic generated by new development. Providing any new level of growth in the District of the plan period will inevitably result in higher number of journeys being undertaken by new residents. A significant proportion of these is likely to be taken by private vehicle. The rural character of much of Horsham District is likely to mean a trend of this nature is continued. While there may be uptake of use of electric vehicles over the plan period, an overall increase in the number of journeys made in the

area is likely to result in an increase in greenhouse gas emissions.

#### Lower Growth Scenarios

**7.276** Scenario 1a would include the urban extension sites which are well related to the larger settlements in Horsham District as well as sites which are in close proximity to Crawley; namely sites West of Ifield and West of Kilnwood Vale. These sites provide nearby access to a wide range of services and facilities as well as employment opportunities and sustainable transport links and therefore residents may be encouraged to make use of more sustainable modes of transport. The inclusion of the Ashington cluster site is the exception to this, considering that it is at a settlement which is outside of the higher order settlements in the development



hierarchy. This settlement provides access to only limited services and facilities (including a primary school) and does not provide access to rail.

**7.277** The delivery of a high proportion of new growth at urban extensions which would accommodate a large amount of development is likely to help secure contributions through S106 and CIL for infrastructure improvements, including new renewable energy generation. This approach to development may also provide increased opportunities to link to district heating schemes which planning policy in the District seeks to promote.

**7.278** Furthermore, Horsham planning policy includes an energy hierarchy where CHP is considered to be most favourable. Where development would be focused together at larger population centres this type of provision may be more feasible. As this scenario would provide the remaining growth in line with the settlement hierarchy this could allow for some growth to support the viability of services at the smaller settlements. As such this scenario could result in residents at rural locations having a reduced need to travel on a regular basis. Overall a mixed significant positive and minor negative effect is expected for Scenario 1.

**7.279** It is likely that Scenario 1b would provide similar opportunities for securing new infrastructure provisions and making more sustainable energy choices (including renewable energy provisions, CHP and connecting to district heating schemes) at the new settlements of Mayfield, Adversane and Buck Barn. It is likely that this scenario would result in a high proportion of new residents requiring to travel longer distances to work and access services and facilities, particularly given that the new settlements are not that well located to the main commuting destinations. These new settlements are likely to incorporate new services, however, access to these would be dependent upon the phasing of new development. The overall amount of new development supported at new settlements is likely to make these types of provisions more viable. Scenario 1b would include a substantially higher proportion of growth at small sites (2,050 homes) than Scenario 1 (550 homes). While this element of growth is likely to be achieved in line with the development hierarchy a suitable level of critical mass would be less likely to come forward to support new service provision at small sites. A more dispersed distribution of growth resulting from a higher number of small sites is also less likely to support the integration of development into district heating and CHP schemes. Overall a mixed minor positive and significant negative effect is expected for Scenario 1b.

**7.280** Scenario 1c would provide a large proportion of development at settlements which benefit from strong sustainable transport links. This includes urban extensions at Crawley town, Billingshurst, Horsham town and Southwater. All sites apart from the site at West of Southwater would

provide at least reasonable access to railway links, which could support the District's move towards a less carbon intensive transport system. These large sites would provide the scale of development which could support new service provision and focusing growth at larger population centres could also support the connection of developments to CHP systems. The level of development to be provided at small sites (2,500 dwellings) would be achieved broadly in line with the development hierarchy. This approach would provide many new residents with a good level of access to existing service provision, however, the wider dispersal of development than that achieved at large scale sites is likely to be less supportive of incorporating systems for district heating and CHP. Overall a mixed significant positive and minor negative effect is expected for Scenario 1c.

**7.281** Scenario 1d would include all three new settlement sites as well as a large proportion of growth at small sites. The relatively high level of growth (3,700 homes) at the small sites is likely to result in increased development at more rural locations. This approach to growth is likely to result in a more dispersed distribution of development and is less likely to support substantial new service provision. As such, increasing numbers of car journeys may be required. It may also make incorporating development into district heating and CHP systems unfeasible.

**7.282** The new settlement site options are less well related to existing services and stronger bus services and railway stations, particularly when compared to development at the larger settlements in the District. The level of growth to be provided at each location could support new services and sustainable transport improvements in the long term. It is also likely to be of a scale to support the incorporation of district heating or CHP. However, including all three sites could result in a sizeable proportion of new residents being required to regularly travel by private car. This is particularly likely in the early stages of development. As such an overall mixed minor positive and significant negative effect on carbon emissions is expected for Scenario 1d.

### Medium Growth Scenarios

**7.283** Scenarios 2a, 2b and 2c include the provision of a substantial amount of new growth at one of the three new settlement sites, with the remaining growth provided at urban extension sites and at small sites in line with the development hierarchy. As such the effects recorded mainly mirror those which have been recorded for Scenario 1a. It is, however, noted that growth to be delivered at small sites through these Medium Growth Scenarios is substantially higher than Scenario 1a. The higher levels of growth to be provided at small sites is likely to mean that a higher proportion of growth would be less likely to be of scale which would support



substantial new service provision and may be less likely to support the incorporation of schemes such as CHP.

**7.284** Each of these scenarios could however lead to some benefits by including a proportion of growth at small sites as this growth would broadly be in line with the settlement hierarchy. In contrast to the detrimental impacts already discussed, this element of growth could help to support service provision at the smaller settlements and thereby limit the need for journeys to be made elsewhere by residents at these locations. Mixed significant positive and minor negative effects on carbon emissions are therefore expected for Scenarios 2a, 2b and 2c. Growth Scenario 2b includes Adeversane which is better related to existing college facilities than the new settlement sites included in other two scenarios. It is recognised that these facilities are likely to be made use of by only a small portion of new residents on a regular basis. The Adversane site is relatively well related to existing key employment areas; however this site is slightly less well related to the existing settlement boundary of the nearest large settlement at Billingshurst than Buck Barn and Mayfield sites are related to Southwater and Henfield, respectively. In all, the three sites do not provide immediate access to services and facilities residents that will require access to on a regular basis and without onsite provisions an increased number of daily journeys are likely to result.

**7.285** Scenario 2d includes large scale urban extensions sites at West of Ifield, West of Southwater, Rookwood and West of Billingshurst which are well related to the relatively large settlements which benefit from existing services and sustainable transport links. This approach could limit the need for residents to travel longer distances and the concentration of a large amount of development at the settlement edge could make connections to district heating and CHP schemes feasible. The delivery of growth towards Crawley would respond in a positive manner to established commuting patterns in the area. The delivery of the new settlement site at Mayfield would support new service provision as well as infrastructure which could support better energy efficiency. At this location, the phasing of development would greatly influence access to services and the need to travel. Providing some development at small sites (2,500 dwellings) broadly in line with the development hierarchy would give many new residents good access to existing services and could help prevent rural service stagnation. However, this element of development is less likely to support connections to district heating or CHP schemes. An overall mixed significant positive and minor negative effect is expected for Scenario 2d.

**7.286** Scenario 2e would include large scale sites at West of Ifield, East of Billingshurst, West of Southwater and Rookwood. These sites are well related to existing larger settlements with good service provisions. Development at these sites is likely to limit the need to travel in the plan area

and the large of development could support the connection of large numbers of residents to district heating or CHP. However, in the short term the delivery of a new settlement at Buck Barn would likely result in a higher number of residents having to travel longer distances to access certain provisions. The Kingsfold site, similarly, does not provide good access to existing services but in contrast to the Buck Barn site it would not incorporate the same level of service provision. By focussing large scale development along the A24 and A264, this scenario could also promote the use of private vehicles thereby contributing to higher levels of carbon emissions. A mixed minor positive and minor negative effect is expected for Scenario 2e.

**7.287** Through Scenario 2f, much of the development over the plan period would occur as large scale urban extension sites at settlements which lie directly below Horsham town in the development hierarchy. At these locations new residents would be provided with access to some services and facilities, but the level of service provision would be more limited than at Horsham town. Only the West of Kilnwood Vale site would provide new development in close proximity to Crawley town. While this scenario would make more limited use of the strong service provision and employment offer at the settlements of Crawley and Horsham town, the scale of growth concentrated at slightly lower order settlements may still support the incorporation of new services and allow for the connection of high number of residents to district heating or CHP.

**7.288** The new settlement sites of Adversane and Buck Barn would incorporate substantial service provision and job provision and infrastructure to allow for improved energy efficiency. Access to services would, however, be dependent largely on the phasing of new development. The high level of development to be provided at small sites (4,100 dwellings) would provide for a wider distribution of development which is unlikely to support substantial service provision or the connection of new homes to district heating or CHP where they are provided in more rural areas. An overall mixed minor positive and significant negative effect is expected for Scenario 2f.

**7.289** Scenario 2g would provide much of the new development at urban extension sites. This would include 1,000 new homes at the West of Billingshurst site at which new residents would be provided with a relatively good level of access to Billingshurst railway station. Many of the other urban extension sites are well related to the larger settlements of Horsham District and the established services and facilities and sustainable transport links here. However, the sites at Ashington and Kingsfold are less so and therefore could result in increased need to travel. Service provision at these sites is also expected more limited. While the Ashington site is relatively small (400 new homes), development at Kingsfold would provide 1,000 new homes meaning that particularly high

numbers of private vehicle journeys might result over the plan period. If developed, this site could see increased travel along the A24 towards Horsham town.

**7.290** This scenario would also provide some growth at small sites (2,500 dwellings) to be achieved broadly in line with the development hierarchy. This element of growth would also provide many new residents with good access to existing services and facilities and sustainable transport links. Overall a mixed significant positive and significant negative effect is expected for Scenario 2g.

### Higher Growth Scenarios

**7.291** The Higher Growth Scenarios would deliver substantially higher levels of growth (between 14,675 and 21,225 dwellings) than the other options considered. For Scenario 3a all urban extension sites would be included for development. This would take in those urban extension sites which are less well related to the larger settlements in the area, such as the Ashington cluster and East of Kingsfold (which in effect would act as a satellite settlement to Horsham town).

**7.292** Focusing growth at a number of large sites, without including any small sites is likely to help secure financial contribution to support the delivery of new infrastructure including sustainable transport links and renewable energy. These sites would accommodate a large number of residents meaning that CHP or district heating is likely to be more feasible. It is noted, however, that the new settlement site options would not provide residents with immediate access to existing railway stations or stronger bus services and access to new service provision will depend on the phasing of development. By including no growth at small sites, however, there is increased potential for service provision at smaller settlements to become unviable. A high proportion of new residents in Horsham District may need to travel longer distances in this scenario. Overall a mixed minor positive and significant negative effect is expected for Scenario 3a.

**7.293** Conversely Scenario 7 would include a high level of growth at small sites (5,600 homes) and include none of the three new settlements sites for development. This is likely to mean that a much more dispersed distribution of development would result. This would include some sites in the open countryside, from which travel to access services and employment opportunities is likely to be required on a regular basis. This approach is likely to result in a substantially more dispersed patterns of travel among residents meaning that the potential to establish new sustainable transport networks is likely to be limited. The more dispersed distribution of growth is also considered less likely to be supportive of connections to CHP and district heating schemes.

**7.294** As this scenario would not include any of the new settlement options, opportunities to secure financial contributions for more substantial renewable energy provision and sustainable transport links might be reduced. Overall a significant negative effect on carbon emissions is expected for Scenario 3b.

**7.295** Scenario 3c would include all large scale new settlement and urban extension development sites. Through this option the highest number of journeys is likely to result on a daily basis given the overall level of development to be achieved. However, providing scale large development would support substantial new service and infrastructure provision in the District. Concentrated high level of growth could also allow for the connection of a high number of residents to CHP or district heating schemes.

**7.296** At new settlement sites residents' access to services and facilities would be influenced by the phasing of development. Through this scenario a high level of development would be provided at small sites (6,150 dwellings) meaning that this element of the scenario would achieve a more dispersed distribution. It is likely that some residents would be located in more rural locations and furthermore this element of the scenario would be less supportive of connections to district heating or CHP schemes. A significant negative effect is expected for Scenario 3c considering the substantial increase in vehicular journeys in the plan area. Given that this scenario could support the highest level of service and infrastructure provision and allow for the incorporation of a large proportion of development into district heating or CHP schemes, a minor positive effect is expected in combination.

### Preferred Strategy

**7.297** The Preferred Strategy would provide much of the new development at urban extension sites and in line with the settlement hierarchy at small sites (2,500 dwellings). The inclusion of the large scale sites at West of Ifield, East of Billingshurst and West of Southwater would provide residents with nearby access to existing services and facilities and sustainable transport links. The scale of growth is also likely to support new provisions of this type. The strategy does not include a new strategic scale urban extension at Horsham town; however residents at the North Horsham densification site and the smaller site allocations at Horsham town would accommodate residents in areas which provide good access to the widest range of services and facilities in the plan area. Existing commuting patterns in the area would be responded to positively by the inclusion of large scale growth at West of Ifield by Crawley as well as the West of Kilnwood Vale site. At the West of Kilnwood Vale site, new residents would largely depend on services within the existing Kilnwood Vale strategic allocation for many provisions (the site is being built out and a

primary school is accessible here). The West of Kilnwood Vale site is not of a scale to support substantial new provisions in its own right. Many of these locations by larger settlements could support links to district heating and CHP schemes for a high number of residents.

**7.298** The scale of development to be achieved at the Buck Barn new settlement site would support the incorporation of new services and facilities as well as new infrastructure which

could support better energy efficiency. Residents at the site would, however, be largely dependent upon the phasing of development for access to essential services. The Preferred Strategy would not include the large scale site at Ashington (Ashington cluster) which might otherwise result in a high number of residents lacking immediate access to a GP surgery or secondary school. Overall a mixed significant positive and minor negative effect is expected for the Preferred Strategy.

### SA Objective 16: To facilitate a sustainable and growing economy

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
+/-	--/+	++/-	--/+	+/-	+/-	+/-	+/-	+/-?	--/+	++/-	++/-	++/-	++/-	+/-

**7.299** Economic growth in the District will be influenced by both the level and location of growth proposed over the plan period. While the average workforce productivity in the District (£57,100 GVA per worker) is higher than the levels for the UK (£51,700) and south east (£51,700), a net daily outflow from the District of almost 10,000 commuters is recorded. Areas to which most commuters travel are the nearby areas of Crawley, Mid Sussex, the London Boroughs of Westminster and the City of London and Brighton and Hove. More than 4,000 residents from the District travel towards Crawley and boroughs in London for work. The Gatwick Diamond and Gatwick Airport represent an important locational factor for some business occupiers in the sub-region of North West Sussex. The commercial property market is by in large relatively contained in the area, however, national occupiers looking for a new presence in Sussex often seek to locate in the Gatwick Diamond. Within the District itself, the town of Horsham accommodates the largest concentration of jobs at 37.8% of the total District provision<sup>35</sup>.

#### Lower Growth Scenarios

**7.300** The Lower Growth Scenarios are expected to provide comparatively limited potential to increase expenditure from residents at businesses in the area. It would also be less effective in supporting the town centres in the plan area.

**7.301** By locating most of the new development as urban extensions or small sites Scenario 1a would result in growth

broadly in line with the existing settlement hierarchy. It would also include some development near Crawley (at sites West of Ifield and West of Kilnwood Vale) which plays an important role for commuters from the plan area, as well as in close proximity to the town centre locations in Horsham which could attract skilled employees to the area. The site at Ifield (SA101) in particular offers the potential to attract new businesses to the area considering its large size which would include new employment floorspace, as well as its proximity to Crawley. By including the urban extension sites at North Horsham and Rookwood new residents here would be located in areas which historically have provided access to a high number of employment opportunities.

**7.302** It is expected that providing growth in a manner which is mostly in line with the development hierarchy would help to ensure the viability of existing centres in the settlement hierarchy and businesses in Horsham District. This approach will be important for the town of Horsham as well as the success of businesses at settlements which sit immediately below Horsham in the hierarchy. These settlements provide some additional local employment provision. The strong relationship between most of the urban extension site options and small sites delivered in line with settlement hierarchy means that residents are likely to benefit from access to sustainable transport links which allow for access employment opportunities further afield as well as access to new employment land provided at the large sites.

<sup>35</sup> Lichfields on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council Northern West Sussex (2020) Northern West Sussex EGA Update

**7.303** The key employment areas in the District are mostly focussed towards the larger or medium settlements, with the exception of the sites at Small Dole and Kingsfold. This scenario would focus more the development towards areas which provide good access to these locations. It could provide some limited support for the rural economy in line with the settlement hierarchy given that only 550 homes would be provided at small sites. Scenario 1a would not include any of the new settlement options which may provide the opportunity to deliver new, high quality employment floorspace. While it responds positively to economic realities in the District it would provide only a modest level of overall growth (8,050 new homes) which could contribute to the viability of local businesses and economic centres. Overall a mixed minor positive and minor negative effect is expected for Scenario 1a.

**7.304** Scenario 1b would include new growth mostly at the three new settlement site options (Buck Barn, Mayfield and Adversane). These sites are to include new employment opportunities but would be less well related to existing key employment areas and existing larger settlements in Horsham and nearby Districts such as Crawley. All the new settlement sites are well related to the existing strategic road network which could help to encourage inward investment but do not benefit from established sustainable transport links meaning these sites may not be as attractive in terms of securing skilled workers.

**7.305** The remaining growth (2,050 homes) would be provided at small site options. This level of growth would be delivered broadly in line with the settlement hierarchy. Small sites are less likely to provide new employment floorspace. Providing development at these sites in line with the development hierarchy could support some growth at smaller settlements and more rural locations which is likely to benefit the economic viability of such locations. However, the exclusion of large scale urban extensions which could provide new employment opportunities for existing residents would respond less positively to the existing commuting relationships in the District. Overall a mixed minor positive and significant negative effect is expected for Scenario 1b.

**7.306** Scenario 1c would deliver development in locations which benefit from strong sustainable transport links. This includes the large scale urban extension sites by Crawley, as well as at the main town of Horsham and the other relatively large settlements of Billingshurst and Southwater. These large scale sites are likely to provide new employment opportunities in areas where existing residents can access them given their proximity to the settlement boundary and existing sustainable transport links. The location of these large sites is also likely to support the viability of town centres in the plan area. The strong relationship between the existing key employment areas and larger settlements is likely to mean that new residents will benefit from access to existing employment

opportunities before new employment land at the urban extension sites is occupied.

**7.307** The remaining growth through this option (2,500 dwellings) is to be provided in broadly in line with the development hierarchy. As this would allow for most development at the larger settlements but for some small scale growth at less developed locations, it is likely that the majority of residents would be provided with good access to existing employment and there could be some support for the diversification of the rural economy. Providing development to be broadly in line with the development hierarchy is also likely to support the town centres of the plan area. This scenario does not include any new settlements which might otherwise provide a long term focus for infrastructure provision and new employment growth in the plan area. Overall a mixed significant positive and minor negative effect is expected for Scenario 1c.

**7.308** Scenario 1d would include the three new settlement sites as well as a substantial amount of growth (3,700 homes) at small sites. The inclusion of the new settlement sites could provide a long term focus for new employment growth in the plan area. Each site is expected to provide substantial new employment land with the scale of growth likely to support new infrastructure provision to support development of the local economy. However, the location of each site is relatively remote from the majority of the existing key employment areas as well as the larger population centres in the plan area.

**7.309** The level of growth to be provided at small sites through this scenario would mean that a wider dispersal of development would occur to include a higher number of sites at smaller settlements and more rural locations. This is likely to mean that sites at more rural locations as well as some at the smaller settlements would be included for development. This could help to support the economy of the rural area. However, many of these locations do not benefit from infrastructure which will make them attractive to new businesses. Furthermore, distributing growth to a high number of sites is likely to mean that the potential to support new infrastructure provision would be more limited given the smaller scale of growth achieved at each location. This scenario would also fail to respond in the positive manner to the economic realities and existing commuting patterns for the District. Beyond small sites at the town of Horsham it would not allow for sizeable growth in close proximity to the economic drivers of the area; namely at Crawley and at Horsham town. A mixed minor positive and significant negative effect is therefore expected for Scenario 1d.

### Medium Growth Scenarios

**7.310** Scenarios 2a, 2b and 2c would deliver much of the new development over the plan period in line with the settlement



hierarchy and also include development at sites West of Ifield and West of Kilnwood Vale which are well related to Crawley. The overall level of growth to be provided at small site options for each scenario would be delivered broadly in line with the settlement hierarchy. This element of growth might better support the rural economy by allowing for some growth at the smaller settlements. However, it is noted that this more dispersed element of growth could perform less favourably in terms of establishing new commuting patterns by sustainable transport in particular. The scale of growth achieved is also likely to provide more limited support for the delivery of new large scale transport and other infrastructure to support employment growth.

**7.311** These options would each also include one of the new settlement site options. The new settlement options are expected to provide high quality new employment space which could help to encourage inward investment, but are less well related to the larger settlements, key employment areas and existing sustainable transport links. They could provide a longer term focus for new infrastructure provision which may support the viability of businesses at these locations. Overall a mixed minor positive and minor negative effect is expected for Scenarios 2a, 2b and 2c.

**7.312** Through Scenario 2d, development would be delivered at the large scale urban extension site towards Crawley at West of Ifield. Sites by the District's main settlement of Horsham town at Rookwood and North Horsham would also be included. At these locations, development would respond positively to the economic realities of the plan area. The scale of growth at each location is also likely to support new infrastructure provision to encourage economic growth. While the West of Southwater and West of Billingshurst site are at smaller settlements, these provide access to local employment opportunities with existing also key employment areas present.

**7.313** Through this scenario the new settlement at Mayfield (2,000 dwellings) would support a longer term infrastructure provision. This site is also to deliver new jobs to achieve a level of self-containment. However, this may only be achieved in the longer term with substantial levels of economic growth most likely to be supported following the incorporation of required infrastructure improvements. The delivery of 2,500 new homes through small sites would be achieved broadly in line with the development hierarchy. The small scale of growth is unlikely support significant economic growth. Growth would mostly occur at the larger settlements with some smaller level of development occurring at less developed areas. Scenario 2d may, therefore, promote some diversification of the rural economy. Overall a mixed minor positive and minor negative effect is expected for Scenario 2d.

**7.314** Scenario 2e would include the majority of those sites set out through Scenario 2d. However, it would take forward the Kingsfold site and the new settlement site at Buck Barn. This would result in much of the new development occurring along the strategic road network at the A24 and A264. The focus of large scale growth along these routes could allow for incorporation of substantial infrastructure improvements which could encourage inward investment at locations which also benefit from nearby access to the strategic road network. The location of a number of sites along these routes could allow for some level of synergy, however, there is also potential for congestion to occur to the detriment of economic growth.

**7.315** This scenario would not include the large scale site at Ashington which is a relatively small settlement but is within relatively close proximity of an existing key employment area. The Kingsfold site included through this scenario would, in effect, form a satellite settlement to Horsham town. However, the site would be well related to the existing key employment area at this village. This scenario would allow for the same level of small site development as Scenario 2d (2,500 dwellings) and therefore diversification of the rural economy may be promoted. Overall a mixed uncertain minor positive and minor negative effect is expected for Scenario 2e.

**7.316** Scenario 2f would deliver a relatively large amount of development towards the main town of Horsham at the North Horsham densification site. However, there would be no large scale development at the town beyond this and development towards Crawley would be mainly limited to development at the West of Kilnwood Vale site (350 dwellings). This scenario would therefore not respond as positively as some of the other scenarios to the economic realities and commuting patterns of the plan area. It would also include large scale development at the settlements of Southwater and Billingshurst which sit directly below Horsham town in development hierarchy and benefit from local opportunities and existing key employment areas.

**7.317** The new settlement sites included through this scenario at Buck Barn and Adversane would provide new employment land and a long term focus for new infrastructure provision. However, these areas are less well related to existing employment opportunities and development at these locations would be less supportive of the viability of town centres in the plan area. Scenario 2f would also include a relatively high level of growth at small sites. This would result in a more dispersed distribution of development meaning some residents would be located in areas which do not provide convenient access to employment areas. This dispersal of development would also be less likely to supportive substantial infrastructure provision. Overall a mixed minor positive and significant negative effect is expected for Scenario 2f.



**7.318** Much of the new development to be provided through Scenario 2g would be provided at the urban extension sites which are well related to the larger settlements in the District and surrounding area, including sites by Crawley. Development which would be over and above most of the Lower Growth Scenarios and most of the other Medium Growth Scenarios considered includes, 1,000 new homes at site West of Billingshurst. This site is well related to this village which provides access to local employment opportunities and includes a number of key employment areas. The railway station at this settlement may also allow residents to access employment opportunities further afield. In contrast the relatively large sites at Kingsfold and Ashington are not well related to larger settlements, although there is a key employment area in close proximity to the site at Kingsfold.

**7.319** The remaining development would be provided at small sites. The level of growth (2,500 homes) to be delivered in this manner would be delivered mostly in line with the development hierarchy and would allow for some limited development at the smaller settlements and at rural locations. In all, this scenario would include larger sites for growth which are mostly well related to areas which are historically important for economic growth but would also allow for some dispersal of growth through smaller sites which might support and help diversify the rural economy. Overall a mixed significant positive and minor negative effect is expected for Scenario 2g.

### Higher Growth Scenarios

**7.320** The level of growth supported through the Higher Growth Scenarios (between 14,675 and 21,225 dwelling) is likely to greatly increase local expenditure and encourage investment in the local construction economy. The Higher Growth Scenarios are also likely to result in economic benefits being felt more noticeably in related supply chains.

**7.321** Where development would be in close proximity to the existing larger settlements and also include new settlements which allow for the incorporation of new high quality employment space as set out through Scenario 6 the potential to attract highly skilled workers may be increased. However, the new settlement options being considered are not well located to the main employment destinations in and around the District. This scenario would not allow for any new growth at small sites in Horsham District which is considered less likely to help promote the diversification of the rural economy. Overall a mixed significant positive and significant negative effect is expected for Scenario 3a.

**7.322** Scenario 3b would include all urban extension sites for development as well as a very high number of small sites to support the delivery of 5,600 homes. At urban extension sites many residents would have good access to existing

employment sites. The scale of growth would also allow for the delivery of new jobs and infrastructure provision which is necessary to support employment growth.

**7.323** The small scale growth provided through the delivery of high number of small sites could promote some level of rural economic growth and diversification by allowing for a wider distribution of development. However, delivering such a high level of growth at a high number of small sites is also likely to mean it would be more difficult to relate growth over the plan period to existing and new employment land to support the growth of the economy in Horsham District. Providing small scale development at a high number of locations is also likely to mean that much of the development would be unlikely to support the necessary infrastructure improvements to allow for economic growth. A mixed significant positive and significant negative effect is therefore expected for Scenario 3b.

**7.324** Scenario 3c would deliver a substantially higher level of overall housing development (21,225 dwellings) than any other scenario considered. This would be achieved by including all large scale urban extension and new settlement sites, as well as 6,150 homes at small sites. This approach would provide many new residents with good levels of access to existing key employment areas and town centres at urban extension sites. This would include growth by settlements which are of greatest importance in terms of job provision for the area, at Horsham town and Crawley.

**7.325** The inclusion of new settlement sites would provide more limited access to existing key employment areas and would be less supportive of town centres in the plan area. However, the scale of growth at these sites would be similarly supportive of new infrastructure provision to encourage inward investment. These sites are also expected to provide a large number of new jobs, in a similar manner to the larger new urban extension sites. This scenario is likely to achieve the widest distribution of development given the high number of homes at small sites. However, the high level of overall housing development is expected to make this scenario most supportive of economic growth through increased local expenditure and benefits for construction and related supply chains. Overall a mixed significant positive and minor negative effect is expected for Scenario 3c.

### Preferred Strategy

**7.326** Through the Preferred Strategy new growth would occur at urban extension sites as well as at small sites (2,500 dwellings) to be broadly in line with the development hierarchy. Large scale urban extension sites at West of Ifield, East of Billingshurst and West of Southwater would provide many residents with nearby access to existing key employment areas and could also encourage journeys made to the town centres of those settlements. The inclusion of

development by Crawley (at West of Ifield and West of Kilnwood Vale) would also respond positively to the existing commuting patterns of the plan area. While the strategy does not include a new strategic scale urban extension site at Horsham town, where the highest concentration of jobs and the main town centre of the District is located, it includes the North Horsham densification site and small scale sites at this settlement. Development at these locations is likely to support the continued economic growth of the town as well as supporting the viability of the town centre. Furthermore, small sites delivered in line with the development hierarchy across the District would provide the majority of new residents with good access to jobs at the larger existing settlements and could also support some rural economic growth.

**7.327** Delivering large scale development at the urban extension sites as well as at the Buck Barn new settlement site would support the delivery of new infrastructure which could support further economic growth in the plan area. New development of this scale is also to incorporate new employment opportunities. However, it is recognised that the Buck Barn site could provide relatively limited access to existing employment opportunities in the short term, before new job provision is made at the site. Overall a mixed significant positive and minor negative effect is expected for the Preferred Strategy.

**SA Objective 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.**

Likely Sustainability Effects														
Lower growth scenarios				Medium growth scenarios							Higher growth scenarios			Preferred strategy
1a	1b	1c	1d	2a	2b	2c	2d	2e	2f	2g	3a	3b	3c	
++/-	+/-	++/-	--/+	++/-	++/-	++/-	+/-	+/-?	--/+	++/-	++/--	++/--	++/--	++/-

**7.328** Providing development which is broadly in line with the settlement hierarchy in Horsham is likely to provide a high number of new residents with more immediate access to existing employment opportunities. The larger settlements of the District provide access to the widest range of employment opportunities. This includes those at the key employment areas most of which are well related to the large settlements.

**7.329** Many of these settlements (with the exception of Bramber and Upper Beeding, Steyning and Storrington and Sullington) also provide access to rail links and/or more frequent bus services which could provide access to employment opportunities further afield.

**Lower Growth Scenarios**

**7.330** Scenario 1a would allow for urban extensions to Horsham town (sites North Horsham and Rookwood) at which the largest concentration of jobs in the District is provided. Further growth would be provided at settlements which site directly below Horsham in the development hierarchy. These settlements provide access to local employment opportunities and key employment areas are located within their built-up area boundaries. This scenario would also respond to existing commuting patterns in the District, by providing new growth at sites West of Ifield and West of Kilnwood Vale which are in

close proximity to Crawley and the wider Gatwick Diamond area.

**7.331** However, it would not support growth at Bramber and Upper Beeding, Steyning and Storrington and Sullington. Furthermore, it would provide development at the smaller settlement of Ashington which does not contain a key employment area. It is, however, noted that a key employment area is located within close proximity of this settlement to the south. Overall a mixed significant positive and minor negative effect is expected for Scenario 1a.

**7.332** Scenario 1b would not make use of the existing settlement hierarchy, instead focusing most new development at new settlements. These sites are expected to provide high quality employment space which would give new residents at these locations a good level of access to high quality jobs and promote a degree of self-containment. The level of development to be delivered at each new settlement site (2,000 homes over the plan period) through this scenario could, however, limit the potential for the achievement of self-containment.

**7.333** Residents at new settlement site options would have more limited access to the key employment areas and existing employment opportunities of the District as well as employment opportunities in Crawley. It is, however,

recognised that some employment land is currently allocated (with some currently being built out) to the west of Adversane and to the south east of Mayfield. The provision of a moderate level of growth (2,050 homes) as small sites through Scenario 1b would be mostly be in line with the settlement hierarchy and could help to support employment growth at the smaller and more rural settlements. Overall a mixed minor positive and minor negative effect is expected for Scenario 1b.

**7.334** Through Scenario 1c development would be focussed to areas of the District that benefit from strong sustainable transport links. Large scale urban extension sites would be delivered towards Crawley, the main town of Horsham, Billingshurst and Southwater. The new employment opportunities to be supported at these large scale sites would be accessible to existing residents given their proximity to larger settlements and also to existing sustainable transport links. New residents at these large sites could also benefit from access to existing employment opportunities at existing key employment areas and the town centres of the settlements to which they are best related.

**7.335** Small sites included through this scenario would provide 2,500 dwellings. This level of development is expected to be delivered broadly in line with the development hierarchy meaning that the majority of residents would be provided with good access to existing employment. Some new homes would be provided at less developed locations where there would be more limited access to employment opportunities, however, a lower and more appropriate level of development at these locations would support some growth of the rural economy. Through this scenario no growth at new settlement sites would be delivered meaning that opportunities to support a long term new focus for economic growth and employment provision might be missed. Overall a mixed significant positive and minor negative effect is expected for Scenario 1c.

**7.336** Scenario 1d would respond notably less favourably to the existing settlement hierarchy in Horsham District as well as the strong commuting link between the District and Crawley. It would include all three new settlements and a high level of growth at small sites. The level of growth (3,700 homes) proposed for inclusion at small sites through this scenario is likely to mean that development would be distributed at a high number of sites at smaller settlements or more rural locations where employment opportunities are less likely to be accessible.

**7.337** While residents at the new settlement sites would have access to new employment opportunities at these sites once they are provided, they would lack immediate access to existing key employment areas and employment opportunities

at the larger settlements. The delivery of new employment opportunities at the new settlement sites would not be immediately accessible to many existing residents in the plan area given that they would be located away from the existing larger settlements. Overall a mixed minor positive and significant negative effect is expected Scenario 1d.

### Medium Growth Scenarios

**7.338** Scenarios 2a, 2b and 2c would provide the majority of new growth at urban extensions which are well related to the larger settlements of the District as well as the sites at Ifield and West of Kilnwood Vale which are in close proximity to Crawley. Some of the remaining growth would be provided at small sites, to be delivered broadly in line with the development hierarchy. Overall, the growth provided would respond positively to the existing settlement hierarchy and the commuting patterns of residents.

**7.339** These scenarios would each include one of the new settlement sites Land North East of Henfield (Mayfield), Adversane or Buck Barn. While these areas are less well related to the larger settlements where most of the employment opportunities are found they would include some employment space and therefore could encourage some degree of self-containment.

**7.340** The commuting trends highlighted in the North West Sussex EGA<sup>36</sup>, indicate that Crawley and the Gatwick Diamond and to a lesser extent the London boroughs provide important employment opportunities for residents. Mid Sussex and Brighton and Hove are also important commuting destinations for Horsham's residents. The most recent evidence shows that many of Horsham's residents commute to areas outside of the District to access higher paid jobs. Providing new high-quality employment floorspace at new settlement sites presents a potential opportunity to address this issue and promoting a higher degree of self-containment.

**7.341** As all three of these scenarios would allow for a moderate level of development at small sites, this element of growth is likely to be distributed mostly at the larger settlements with some growth also at the smaller settlements. Development at the smaller settlements could support limited new employment opportunities and reduce the need to commute at these locations. It is noted that this element of growth could, however, result in housing development at locations which does not correlate with historic commuting patterns in the District. Furthermore, achieving a more dispersed distribution of growth at a higher number of small sites is less likely to support substantial new employment floorspace or the delivery of infrastructure required for

<sup>36</sup> Lichfields on behalf of Crawley Borough Council, Horsham District Council and Mid Sussex District Council (2020) Northern West Sussex EGA Update

economic growth at these same sites. As such, some residents may have more limited access to employment opportunities. Overall a mixed significant positive and minor negative effect is expected for Scenarios 2a, 2b and 2c.

**7.342** Scenario 2d includes the large scale urban extension site towards Crawley at West of Ifield as well as towards the main settlement of Horsham town at Rookwood and North Horsham. By including these sites as well as the West of Southwater and West of Billingshurst sites, many residents are likely to benefit from access to existing employment opportunities at existing key employment areas and town centres as well as within Crawley and the Gatwick Diamond. It is noted, however, that the West of Billingshurst site is less well related to existing key employment areas and the railway station within Billingshurst, than the East of Billingshurst site, which is not included through this scenario.

**7.343** The new settlement at Mayfield would also be developed for 2,000 homes through this scenario. This site could provide a new long term focus for employment land with the scale of growth provided supporting new infrastructure provision to allow for economic growth. A level of self-containment may be achieved in the longer term at this new settlement. The remaining growth at small sites (2,500 dwellings) would be achieved broadly in line with the development hierarchy. Growth would mostly occur at the larger settlements with some smaller level of development occurring at less developed areas. Many new residents at small sites could therefore benefit from good access to existing employment opportunities and some rural employment growth may also be supported. Overall a mixed minor positive and minor negative effect is expected for Scenario 2d.

**7.344** Through Scenario 2e many of the sites included in Scenario 2d would be taken forward for development. Scenario 2e would, however, include the Kingsfold site and the new settlement site at Buck Barn. Much of the new development, through this scenario would be provided along the A24 and A264. Focusing large scale growth along these routes support the incorporation of substantial infrastructure improvements which could encourage employment growth at locations which also benefit from nearby access to the strategic road network. However, there is potential for congestion to occur along these routes which may reduce access to employment within reasonable travel times for residents in the area. It would also fail to make best use of the existing key employment areas in Southwater by limiting housing provision at this settlement.

**7.345** Including the Kingsfold site through this scenario would, in effect, result in the creation of a satellite settlement to Horsham town. While this village benefits from an existing key employment area, many residents would have to travel further

afield to access the wider range of employment opportunities at larger settlements. The same level of small site development as Scenario 2d (2,500 dwellings) would occur through Scenario 2e. It is expected that the majority of residents would benefit from nearby access to jobs at the larger settlements through this element of growth. However, some development could occur at smaller settlements where there is more limited access to jobs. Development here could support a limited level of new employment provision. Overall a mixed uncertain minor positive and minor negative effect is expected for Scenario 2e.

**7.346** Relatively large amounts of development would be delivered through Scenario 2f, towards the main town of Horsham, at the North Horsham densification site. However, no large scale development would occur at the town beyond this. Furthermore, development at the West of Kilnwood Vale site (350 dwellings) would be the only relatively large scale site towards Crawley. Compared to many of the other scenarios, Scenario 2f would provide notably lower levels of development at locations which benefit from nearby access to higher levels of existing jobs. Large scale sites would be delivered at Southwater and Billingshurst. These settlements sit directly below Horsham town in development hierarchy and provide access to local opportunities and existing key employment areas.

**7.347** By including new settlement sites at Buck Barn and Adversane this new scenario could deliver new high quality employment land. The scale of development at each site would likely support substantial new infrastructure provision which could ensure the viability of this new employment land. Residents at these sites would be less well related to existing employment opportunities and the new employment opportunities to be delivered at these sites would not be located in close proximity to existing residents. Scenario 2f is expected to result in a more dispersed distribution of development by including a high level of development at small sites. This element of the scenario is likely to mean a higher number of residents would be located in areas which do not provide convenient access to employment areas. Overall a mixed minor positive and significant negative effect is expected for Scenario 2f.

**7.348** Scenario 2g would allow for much of the new growth over the plan period at urban extensions. The majority of these are well related to the larger settlements, with the exception of site East of Kingsfold and the Ashington cluster. Of these two sites, the land East of Kingsfold is almost adjacent to a key employment site and the land at Ashington is within 1.5km of a key employment site but is unlikely to be accessible by active modes of transport given its presence along the A24. These sites would provide more limited access to employment opportunities than at the larger settlements.



**7.349** As this scenario would include a moderate level of growth at small sites (2,500 homes), it may allow for some growth at the smaller settlements and at more rural locations. However, much of this growth would be in line with the development hierarchy. This could support some level of rural employment growth, although this is likely to be constrained by the more limited nature of existing infrastructure at more rural locations which may be needed to support this type of development. Overall a mixed significant positive and minor negative effect is expected for Scenario 2g.

### Higher Growth Scenarios

**7.350** The Higher Growth Scenarios are both expected to support increased levels of employment growth in Horsham District. Growth is likely to be driven by increased local expenditure, access to a larger workforce and employment linked directly to opportunities in the construction supply chain. Providing the highest level of growth towards the large settlements as urban extensions is likely to provide new residents with immediate access to employment opportunities. All three High Growth Scenarios would respond positively to commuting patterns which have been established between the District and Crawley and the Gatwick Diamond by including sites for development towards the boundary with Crawley.

**7.351** Scenario 3a would include a high level of growth at the new settlement sites, which are expected to provide new high-quality employment space which will help to attract employment opportunities to the area and promote a degree of self-containment at these locations. However, self-containment may take some time to establish and the sites are not close to existing employment centres. By failing to include any new growth at small sites this scenario would be less likely to allow for a limited but appropriate level of employment growth at the smaller settlements. Overall a mixed significant positive and significant negative effect is expected for Scenario 3a.

**7.352** Scenario 3b would direct the majority of development to urban extensions at the main settlements in Horsham District and the urban edge of Crawley, which is where the main employment opportunities exist.

**7.353** However, it would also result in a very high level of growth (5,600 homes) being distributed at the small sites. This level of development is likely to result in a significant proportion of growth coming forward at smaller settlements and rural locations. The small sites may allow for some new employment growth, but when compared to that which is likely to be supported at large site options, these opportunities are likely to be more limited. The dispersed distribution of growth is unlikely to support the infrastructure improvements necessary to support the provision of a high number of new employment opportunities in the District. Therefore, while

some rural employment growth may be supported through Scenario 3b, it is also expected to result in a high number of residents having limited access to employment opportunities. A significant positive and significant negative effect is expected for this scenario.

**7.354** Scenario 3c includes all large scale urban extension and new settlement development sites. This includes the large site Horsham Golf and Fitness to the north of Southwater, which is also relatively well related to the main settlement of Horsham town. This scenario could therefore provide many new residents with good access to existing employment settlements at the larger settlements. It could also support the scale of growth which would allow for infrastructure improvements and the delivery of substantial new employment opportunities. This would include at the urban extensions to the larger settlements as well as at the new settlement sites where it may take longer to instil a degree of self-containment.

**7.355** The level of development at small sites through this option is higher than any other scenario. Therefore, while this option would provide a large proportion of residents with good access to existing employment and could encourage infrastructure provision, it would also result in the highest number of residents being located in less developed locations where there is reduced access to employment. A limited amount of employment growth at these type of locations may be promoted, however, the number and range of employment opportunities is likely to be limited meaning many resident would have to travel longer distances for work. A mixed significant positive and significant negative effect is expected for Scenario 3c.

### Preferred Strategy

**7.356** The Preferred Strategy would deliver much of the new development at urban extension sites at the larger settlements and at small sites (2,500 dwellings) to be broadly in line with the development hierarchy. Delivering large scale growth by Crawley at the West of Ifield as well as the West of Kilnwood Vale site would align positively with existing commuting patterns in the plan area. The West of Kilnwood Vale site is also relatively well related to the Faygate railway station (1km to the west). This could support access to employment opportunities further afield. Large scale growth would also occur at East of Billingshurst and West of Southwater where there is access to existing key employment areas. The East of Billingshurst site is also well related to the railway station within the settlement. The strategy would not include a new strategic scale urban extension site at Horsham town, however, residents at the North Horsham densification site and small scale development sites at the settlement would have good access to the high number of job opportunities at this location. In all it is expected that the majority of new residents at small sites across the District would have good



access to jobs at the larger existing settlements given that this element of growth would be provided to be broadly in line with the development hierarchy. There could be some limited support for new employment in rural locations, however, it is noted that some residents may lack more immediate access to jobs at these less developed locations.

**7.357** The new settlement site at Buck Barn is likely to provide more limited access to existing employment. However, this site will deliver new employment land and will provide a long term focus for infrastructure provision. It is expected that a degree of self-containment could be achieved here and this would reduce the need for out-commuting from this location. Overall a mixed significant positive and minor negative effect is expected for the Preferred Strategy.

## Conclusions

**7.358** A summary of the likely sustainability effects for all the growth scenario options against all the SA objectives is provided in **Table 7.2** below.

Chapter 7  
Appraisal of growth scenario options

SA of the Horsham District Local Plan (Regulation 19)  
July 2021

**Table 7.2 Summary of likely sustainability effects of the growth scenario options considered for the Horsham District Local Plan**

Growth Scenarios SA objectives	Lower Growth Scenarios				Medium growth scenarios							Higher growth scenarios			Preferred Strategy
	Scenario 1a	Scenario 1b	Scenario 1c	Scenario 1d	Scenario 2a	Scenario 2b	Scenario 2c	Scenario 2d	Scenario 2e	Scenario 2f	Scenario 2g	Scenario 3a	Scenario 3b	Scenario 3c	
1: Housing	+/-	+/-?	+	++/-	++	++	++	++	++	++/-	++	+++?	+++?	++	++
2: Access to services and facilities	+/-	--/+	--/+?	--/+	++/-	++/-	++/-	++/-	++/--	--/+	++/--	--/+	--/+	++/--	++/-
3: Inclusive communities	++/-	--/+	+/-	--/+	+/-	+/-	+/-	+/-	--/+	--/+	--/+	--/+	--	--	+/-?
4: Crime	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5: Health	++/-	++/--	--/+?	--/+	++/--	++/--	++/--	++/--	--/+	--/+	--/+	--/+	--	--/+	++/--
6: Biodiversity and geodiversity	--?	--?	--?	--?	--?	--?	--?	--?	--/+?	--?	--/+?	--?	--?	--?	--?
7: Landscapes and townscapes	--?	-?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
8: Historic environment	--?	-?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
9: Efficient land use	+/-	-	+/-	--	--/+	--/+	--/+	--/+	--/+	--	--	--	--	--	--/+
10: Natural resources	-?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?	--?
11: Water resources	-?	-?	--?	-?	--?	-?	-?	--?	--?	--?	--?	--?	--?	--?	--?
12: Flooding	-?	--?	--?	--?	--?	--?	--?	--?	--?	-?	--?	--?	--?	--?	--?
13: Transport	++/-?	--/+	++/-	--	++/-?	++/-?	++/-?	++/-	++/--?	--	--/+?	--/+?	--?	--/+?	++/-?
14: Air Quality	++/-	--/+	++/-	--	++/--	++/-	++/--	++/-	--/+	--/+	--/+	--/+	--	--	++/--
15: Climate change	++/-	--/+	++/-	--/+	++/-	++/-	++/-	++/-	+/-	--/+	++/--	--/+	--	--/+	++/-
16: Economic growth	+/-	--/+	++/-	--/+	+/-	+/-	+/-	+/-	+/-?	--/+	++/-	++/--	++/--	++/-	++/-
17: Access to employment	++/-	+/-	++/-	--/+	++/-	++/-	++/-	+/-	+/-?	--/+	++/-	++/--	++/--	++/--	++/-

**7.359** Some broad conclusions can be drawn from the SA work undertaken for the growth scenario options. Although the higher quantum of growth scenarios (3a to 3c) would do most to meet the housing and employment needs not only of Horsham District but also the unmet needs of neighbouring authorities, these are also the scenarios that are most likely to result in significant environmental effects. The significant negative effects identified for Scenario 3c are expected to be particularly strong given the very high level of development that would be delivered. Conversely, the lower growth scenarios (1a to 1d) would reduce the likelihood of significant environmental effects but will make only a modest contribution to providing homes and jobs for the unmet needs of neighbouring authorities, some of which are highly constrained environmentally too. The medium growth scenarios (2a to 2g) represent a balance between the two. The Preferred Strategy broadly aligns the level of development to be provided through the medium growth scenarios. This approach builds on the wide range of scenarios tested which allow for the delivery of medium level of housing.

**7.360** Of the lower growth scenarios, Scenario 1a and Scenario 1c, which relies solely on urban extensions and small sites, perform much more strongly than Scenario 1b and Scenario 1d, which rely on new settlements and a variable number of new sites. Scenario 1a and Scenario 1c perform similarly to each other. While Scenario 1c would direct development to areas which benefit from sustainable transport links, Scenario 1a would deliver development in line with the development hierarchy which is likely to secure many benefits in terms of access to services and facilities and employment opportunities as well as many of the sustainable transport links that Scenario 1c would provide access to. Scenario 1d performs most poorly out all of the growth scenarios given that it would deliver a high proportion of development at small sites and so could lead to a wider distribution of development, meaning that a larger number of residents would be in less developed areas where services and facilities are less accessible.

**7.361** For the higher growth scenarios, there is little to choose between Scenario 3a and Scenario 3b. Both scenarios rely heavily on urban extensions, with Scenario 3a also allocating new settlements to deliver high growth, and Scenario 3b including a very high number of small sites. Although they adopt different distributional approaches, the overall effects are not dissimilar, with both performing less well in environmental terms, particularly Scenario 3b, than other scenarios. While Scenario 3c includes the highest level of development of all scenarios considered, this scenario performs slightly better than Scenario 3a and 3b in terms of access to services and facilities and employment, as well as reducing the need to travel in the plan area. It is expected that the very high level of development to be delivered through this

scenario would help to offset adverse effects relating to these issues, given the higher level of infrastructure provision which might be secured.

**7.362** Across all of the SA objectives, with the exception of Scenario 1a, the medium growth scenarios perform strongest. Of the medium growth scenarios, Scenarios 2a, 2b, 2c and 2d perform strongest. Scenarios 2a, 2b and 2c represent a more balanced and diverse approach to the strategy for growth in the plan area. Scenario 2d presents a variation of this approach, though the removal of the East of Billingshurst site and the inclusion of the West of Billingshurst, with the components of the overall strategy remaining much the same. These four scenarios reduce reliance on too many new settlement site options or just urban extension sites to provide the majority of the homes in the plan area. Instead, large sites which are well related to the larger existing settlements and one new settlement site are included. These scenarios also allow for a level of development at small sites which would support growth broadly in line with the development hierarchy. This contrasts with the approach of Scenario 2f which includes a very high number of small sites. Although Scenarios 2g relies primarily on urban extensions and small sites, it does not perform as well overall as Scenarios 2a, 2b, 2c and 2d. Scenario 2e also performs less favourably than these options. The inclusion of the Kingsfold site in both Scenario 2f and 2g, at which residents would be mostly reliant on travel to Horsham town for access to many services and facilities, partly accounts for the less favourable performance of these scenarios.

**7.363** In all, the approach of Scenarios 2a, 2b, 2c and 2d is likely to support substantial new service provision at new larger sites while also making good use of the existing service offer within the existing larger settlements. It would also allow for some support of existing service provision at the smaller settlements through the inclusion of a number of small sites to be broadly in line with the development hierarchy. A new settlement in the plan area, included in these scenarios, could provide a new long term focus for housing development while also supporting improved service provision.

**7.364** The difference between the effects recorded for Scenarios 2a, 2b, 2c and 2d are marginal. The variations between these scenarios primarily relate to the new settlement location that forms part of each scenario. The differences for Scenario 2d also reflect the inclusion of the alternative Billingshurst site and the removal of the Kilnwood Vale and Ashington cluster sites. In respect of the varying effects relating to the new settlement site options, Scenario 2c (which includes Buck Barn) is likely to have less of a landscape impact than the other three scenarios. However, development at the Buck Barn site could contribute to further air pollution within the Cowfold AQMA via the A272, as could the North of Henfield (Mayfield) site through Scenarios 2a and 2d, given its

connection to these locations via the B2116 and A281. The Water Cycle Study has identified that the capacity to treat wastewater from a new settlement at the North of Henfield (Mayfield) site is currently particularly constrained.

**7.365** The differences in effects between Scenarios 2a, 2b and 2c also reflect the more isolated location of the developable area of the Buck Barn site in relation to nearby larger settlements and existing services and facilities when compared the sites at to Adversane and North East of Henfield (Mayfield). The high number of homes (7,000 dwellings) included at the North East of Henfield (Mayfield) site in the long term is considered most likely to support a higher level of self-containment.

**7.366** The Preferred Strategy in effect most looks like a hybrid of Scenarios 2c and 2d. It includes the East of Billingshurst and Buck Barn large sites which are set out for development through Scenario 2c. However, the most poorly performing large urban extension site at the Ashington cluster have been removed, reflecting the approach of Scenario 2d. The medium level of housing growth would still meet local need as well as some of the needs of nearby local authorities. While the West of Kilnwood Vale site performs poorly compared to many of the other sites, this partly reflects its smaller size and the limited potential for it to support new service provision. This would be ameliorated partly by the services planned for delivery at the existing Kilnwood Vale strategic allocation. The inclusion of the development of the West of Kilnwood Vale site, alongside the West of Ifield site towards Crawley, responds positively to the economic realities and commuting patterns of the area. However, it is noted that the development of the West of Kilnwood Vale site as an extension to a recently built out strategic allocation may disrupt the less established community networks at this location. Furthermore, additional development towards the Crawley boundary could have further implications for water resources and transport considering existing pressures in this area.

**7.367** The Preferred Strategy (which is most similar to Scenarios 2a, 2b, 2c and 2d) could result in substantial new service provision at new larger sites and could also provide a larger proportion of development by the existing larger settlements where there is a strong service and job offer. A level of development is allowed for at smaller sites which could be achieved in line with the development hierarchy, which will help to prevent the stagnation of existing services in rural areas and smaller settlements. While no new strategic urban extension sites are included at Horsham town, the densification of the North Horsham site and the inclusion of a number of small sites at this settlement would make good use of the existing service provision and job offer here. Providing a more modest level of development at the settlement could also limit the potential for additional congestion within the District's main town. Furthermore, the strategy does not

include a disproportionately high level of development at Ashington, which might otherwise result in a high level of out commuting from this smaller settlement. The development of the Buck Barn new settlement site will allow for a new long term focus for housing development and service provision to achieve a degree of self-containment.

## Chapter 8

# Sustainability Appraisal of the Regulation 19 Local Plan

### Introduction

**8.1** This chapter presents the findings of the SA of the Regulation 19 version of the Horsham District Local Plan 2021-2038.

**8.2** The chapter starts with a summary description of the structure and content of the Local Plan. It then goes on to present the findings of the appraisal of the components of the Local Plan, starting with the spatial vision and spatial objectives, and then the policies and site allocations in the Local Plan.

**8.3** The policies have been grouped together by topic area and reflect the order of the relevant chapters in the Local Plan. For each group of policies, a summary of the likely sustainability effects is presented. The corresponding chapter of the SA Report for the Regulation 18 version of Local Plan included recommendations for how the policies might be strengthened to better meet the SA objectives. These recommendations are now presented in **Chapter 9** of this report alongside details of how the Council has responded to them in terms of updates to policy wording.

**8.4** Where a policy could have specific effects which require more in-depth consideration (for example policies which address issues which do not sit readily with any other group of policies), standalone appraisal work is included. Given the large number of policies subject to appraisal, the description of effects is mostly limited to positive or negative effects identified. Where negligible effects have been identified, the reasoning for these effects have not been explained. The exception to this is where the SA objective for which a negligible effect is identified overlaps with the theme of the policy and therefore further explanation is needed.

### Structure and content of the Local Plan

**8.5** The Regulation 19 version of the Horsham District Local Plan 2021-2038 sets out a spatial vision and ten objectives up to the end of the plan period.

**8.6** To support the achievement of this vision the plan includes a number of topic-based and development management style policies. The policies fall under the overarching headings of:

- Growth and change.
- Economic development.



- Housing.
- Conserving and enhancing the natural environment.
- Development quality, design and heritage.
- Climate change and flooding.
- Infrastructure, transport and healthy communities.
- Housing allocations.

**8.7** These are set out to help ensure that development in the plan area is delivered to ensure the most positive outcomes for the population in terms potential social and economic impacts. They also allow for development to be provided in a manner which secures the protection and enhancement of the natural and historic environment and responds appropriately to the assets and constraints of the District.

**8.8** The Government standard methodology calculation for Horsham District is calculated as 897 dwellings per annum (equivalent to a minimum of 15,249 homes between 2021 and 2038). Taking into account the unmet needs of the surrounding local authority areas and Horsham District's relationships with the North West Sussex and Coastal Housing Market Areas the Council considers it appropriate to supply an additional 200 homes per annum towards meeting the unmet needs of other areas. In total, the plan makes provision for at least 18,700 homes over the plan period, at an average delivery rate of 1,100 homes per year.

**8.9** The spatial strategy to meet this housing delivery target, includes large scale urban extension sites at East of Billingshurst, Rookwood (at Horsham town), West of Ifield and West of Southwater. These sites will provide residents with access to existing services and facilities and jobs at the higher tier settlements and the scale of growth could support further provisions of this nature to benefit existing residents. The urban extension at Ifield, by Crawley, builds positively on the position of the District within the Gatwick Diamond and responds to the importance of that area for local employment.

**8.10** A new settlement is to be delivered at the Buck Barn site to the south of Southwater. The Local Plan states that this provides an opportunity to secure the scale of growth,

employment and service provision to instil a degree of self-containment and could help to rebalance the existing pattern of out commuting from the District. The remainder of the development over the plan period would be provided as small site allocations at the Small Towns and Larger Villages, Medium Villages and Smaller Villages identified in the development hierarchy. This element of growth is expected to help main the viability of existing centres and services as well as supporting some limited level of new service provision at the smaller settlements of the District.

## Spatial vision and spatial objectives

**8.11** This section presents the SA findings for the spatial vision and spatial objectives presented in the Local Plan document.

**8.12** The Local Plan sets out an aspirational Spatial Vision for the District in 2038:

"A place where people from all backgrounds can choose to live and work, with access to high quality jobs, services and facilities that are close to home, in a low carbon economy and high quality natural environment."

**8.13** Supporting the high level Vision is a description of what Horsham will be like in 2038 with respect to:

- The economy.
- Horsham town.
- The rural areas.
- Housing.
- The natural environment and District character.
- Environmental quality and climate change.
- Transport infrastructure.
- Community services and facilities.

**8.14** To achieve the Vision, ten Spatial Objectives are set out as shown in **Table 8.1**.

**Table 8.1 Spatial objectives in the Horsham District Local Plan**

Objectives	
1	Ensure that future development in the District is based on sustainable development principles that strike the correct balance between economic, social and environmental priorities and deliver thriving communities with a strong sense of place.
2	To meet employment needs and create opportunities to foster economic growth and regeneration, including a low carbon economy. Employment growth will provide high-quality jobs that maintain high employment levels in the District and help reduce commuting distances and facilitate and promote innovation in business with support for technological upgrades and change, including full-fibre broadband.

Objectives	
3	To protect and promote the economic viability and vitality of Horsham town, the smaller market towns and the rural centres and promote development which is appropriate within the existing hierarchy and diversity of settlements in the District, including the appropriate re-use of brownfield land.
4	To recognise and promote the role of Horsham town as the primary focus for the community and businesses whilst preserving the unique ambience that contributes to the District's attractiveness. The smaller market towns will be recognised as secondary hubs, and encouraged to meet local needs and act as a focus for a range of activities, including employment, retail, leisure and recreation.
5	Provide a range of housing developments across the District that: deliver the target number of new homes; respect the scale of existing places; and deliver a range of housing sizes and types to meet the needs of young people, families and older people and includes the provision of a range of affordable housing.
6	Brings forward development that is supported by the provision of necessary infrastructure, accessible community services and open spaces that meet local and wider District requirements.
7	To safeguard and enhance the character and built heritage of the settlements in and adjoining the District, and ensure that the distinct character of these settlements are retained and enhanced and amenity is protected.
8	Identify and preserve the unique landscape character and the contribution that this makes to the setting of rural villages and towns in and adjoining the District whilst ensuring that new development minimises the impact on the countryside.
9	To safeguard and enhance the environmental quality of the District, maintaining and enhancing ecosystem services, and delivering biodiversity net gain and building the nature recovery network. Development will minimise any impact on environmental quality including air, soil, water quality and the risk of flooding.
10	Ensure that new development minimises carbon emissions, and contributes to local and national net zero targets of 2030 and 2050 respectively. There will be adaptation to the changes to the climate, and reductions in climate emissions including through measures such as renewable, low carbon and decentralised energy.

**8.15** As shown in the **Table 8.2** below, it is expected that the Council's approach to addressing the identified priority issues for the District is likely to have mostly positive (and in many cases significant positive) effects in relation to the SA objectives.

**Table 8.2 Summary of SA findings for the Spatial Vision and Spatial Objectives of the Local Plan**

SA objective	Spatial Vision	Spatial Objective 1	Spatial Objective 2	Spatial Objective 3	Spatial Objective 4	Spatial Objective 5	Spatial Objective 6	Spatial Objective 7	Spatial Objective 8	Spatial Objective 9	Spatial Objective 10
SA1: Housing	+	0	0	0	0	++	0	0	0	0	0
SA2: Access to services and facilities	+	+	0	+	++	0	++	0	0	0	0
SA3: Inclusive communities	+	+	0	+	+	++	++	0	0	0	0
SA4: Crime	0	0	0	0	0	0	0	0	0	0	0
SA5: Health and wellbeing	+	0	+	+	+	0	++	0	0	0	0

SA objective	Spatial Vision	Spatial Objective 1	Spatial Objective 2	Spatial Objective 3	Spatial Objective 4	Spatial Objective 5	Spatial Objective 6	Spatial Objective 7	Spatial Objective 8	Spatial Objective 9	Spatial Objective 10
SA6: Biodiversity and geodiversity	+	+	0	0	0	0	0	0	0	++	0
SA7: Landscape	+	+	0	+	++	0	0	++	++	0	0
SA8: Historic environment	+	+	0	0	0	0	0	++	++	0	0
SA9: Efficient land use	0	0	0	++	0	0	0	0	0	++	0
SA10: Natural resources	0	0	0	0	0	0	0	0	0	0	0
SA11: Water resources	+	+	0	0	0	0	0	0	0	++	0
SA12: Flooding	+	0	0	0	0	0	0	0	0	++	0
SA13: Transport	+	0	++	+	+	0	0	0	0	0	0
SA14: Air quality	+	+	++	+	+	0	0	0	0	++	++
SA15: Climate change	+	+	++	+	+	0	0	0	0	0	++
SA16: Economic growth	+	+	++	++	++	0	0	0	0	0	0
SA17: Access to employment opportunities	+	+	++	++	++	0	0	0	0	0	0

### Summary of SA findings for the Spatial Vision

**8.16** As shown in **Table 8.2** above, minor positive effects are expected for most of the SA objectives in relation to the Spatial Vision. This reflects the vision's overarching and aspirational nature which presents Horsham as a desirable place to live and work at the end of the plan period.

**8.17** The Spatial Vision states that the delivery of new housing will provide homes that meet the needs of the community, including a range of different groups. Housing in the District will be affordable for local people. New housing provision is to be supported by sufficient community facilities and services. Therefore, minor positive effects are expected in

relation to **SA objective 1: housing**, and **SA objective 2: access to services and facilities**.

**8.18** The Spatial Vision sets the District out as one where communities are inclusive and vibrant with supporting investment in leisure and community facilities, such as green spaces. These improvements support healthy lifestyles and contribute to a high quality of life and wellbeing in Horsham. As such, minor positive effects are also expected in relation to **SA objective 3: inclusive communities** and **SA objective 5: health and wellbeing**.

**8.19** In relation to the natural and built environment, the Spatial Vision recognises the rich heritage and high-quality of the natural environment and its contribution to the identity of

the District. The Vision presents a scenario where Horsham's ecological resources have been enhanced and contribute to the wider nature recovery network. These improvements have also contributed to the historical and cultural character of the built environment, green spaces, and valued landscapes within the District. As such, minor positive effects are likely in relation to **SA objective 6: biodiversity and geodiversity**, **SA objective 7: landscape**, and **SA objective 8: historic environment**.

**8.20** The Vision outlines the ways in which development in the District will respond to climate change and how the environmental quality of the area is to be maintained and enhanced. Enhancements relating to environmental quality in the District are taken to include water and air quality, although these are not explicitly mentioned. The Vision states that by 2036, development within the District will be designed to ensure energy efficiency and adaptability to the impacts of climate change, as well as to mitigate its effects. The Spatial Vision sets out that sustainable modes of transport, including walking, cycling and public services are promoted in the District. Transport networks are designed to accommodate the transition to electric vehicles and other changes in technology. Therefore, minor positive effects are expected in relation to **SA objective 11: water resources**, **SA objective 12: flooding**, **SA objective 13: transport**, **SA objective 14: air quality**, and **SA objective 15: climate change**.

**8.21** Horsham District is presented as an area in which a diverse, resilient and flexible range of business premises is achieved and new and existing employment land is retained and added to. High quality jobs are to be provided to match housing growth and to allow for employment opportunities in close proximity to residences. The Spatial Vision also recognises the importance of Horsham town as a hub for employment and key services in the District, and states that high quality mixed-use development and accessibility will be maintained. Therefore, minor positive effects are expected in relation to **SA objective 16: economic growth** and **SA objective 17: access to employment opportunities**.

**8.22** Due to the Vision's broad content and generalised aspirations, significant positive effects are not anticipated in relation to the SA objectives. The Local Plan's more detailed and specified policies will support the outcome of this Vision and contribute to sustainable development within the District.

### Summary of SA findings for the Spatial Objectives

**8.23** Table 8.2 above, also shows that a high number of negligible effects have been identified in relation to the 11 spatial objectives. The pattern of effects reflects the approach of many of the spatial objectives which address a specific topic area. Significant positive effects have been identified

where the aim of the spatial objective directly aligns with that of the SA objective.

### Spatial Objective 1

**8.24** Spatial Objective 1 is less focussed in nature than the other spatial objectives included. It aims to ensure that development within the District is sustainable by achieving a balance between economic, social and environmental priorities. New development should place a focus on the delivery of thriving communities that retain a strong sense of place. It is noted that the policy could have impacts in relation to a number of topic areas, however, it does not directly address any one specific topic area. As such, no significant effects are identified for this spatial objective.

**8.25** It is expected that ensuring the incorporation of social priorities and supporting the delivery of thriving communities with a strong sense of place would result in new development which promotes community cohesion and social integration. This is likely to involve the delivery of a suitable level of new services over the plan period and therefore minor positive effects are expected in relation to **SA objective 2: access to services and facilities** and **SA objective 3: inclusive communities**.

**8.26** The delivery of new development to incorporate appropriate environmental priorities is likely to help ensure protection of the built and natural environments in the District as well as local environmental quality. This is likely to include protection of water resources and air quality. As such minor positive effects are also expected in relation to **SA objective 6: biodiversity and geodiversity**, **SA objective 7: landscape**, **SA objective 8: historic environment**, **SA objective 11: water resources**, **SA objective 14: air quality** and **SA objective 15: climate change**.

**8.27** Supporting development which is considerate of economic priorities as well as those relating to social and environmental issues in the District is likely to help ensure appropriate amounts of economic growth occur over the plan period. This type of growth is likely to provide a high number of residents with access to suitable employment opportunities. Minor positive effects are therefore also expected in relation to **SA objective 16: economic growth** and **SA objective 17: access to employment opportunities**.

### Spatial Objective 2

**8.28** Spatial Objective 2 aims to create and maintain the provision of employment opportunities and promote economic growth within the District. It also addresses the need to reduce commuting distances in Horsham and transition to a low carbon economy with benefits expected in terms of air quality and carbon emissions. Therefore, this spatial objective is likely to produce significant positive effects in relation to **SA**

**objective 14: air quality, SA objective 15: climate change, SA objective 16: economic growth and SA objective 17: access to employment opportunities.**

**8.29** Reducing the need for commuters to travel longer distances may also help to encourage modal shift and therefore a significant positive effect is expected in relation to **SA objective 13: transport**. As shorter journey times to residents' places of work may help to promote modal shift and the uptake of more sustainable and healthier modes of transport, further benefits may result in terms of air quality and carbon emissions. A minor positive effect is therefore also expected in relation to **SA objective 5: health and wellbeing**.

### Spatial Objective 3

**8.30** Spatial Objective 3 addresses development within Horsham town and other settlements and seeks to protect and promote the economic viability and vitality of these areas. Development should be provided as to be appropriate within the existing settlement hierarchy. This approach could have benefits in terms of supporting job provision and may indirectly help to support service provision which is likely result in more inclusive communities in Horsham District. Service provision may also help to reduce the need to travel from the more rural locations of the District.

**8.31** Providing residents with easy access to jobs and services could also promote the use of more sustainable and active modes of transport. This spatial objective also seeks to promote the appropriate redevelopment of brownfield land, which may help to promote the enhancement of character in the plan area. Therefore, this Spatial Objective is likely to have significant positive effects in relation to **SA objective 9: efficient land use, SA objective 16: economic growth and SA objective 17: access to employment opportunities**. Minor positive effects are also expected in relation to **SA objective 2: access to services and facilities, SA objective 3: inclusive communities, SA objective 5: health and wellbeing, SA objective 7: landscape, SA objective 13: transport, SA objective 14: air quality and SA objective 15: climate change**.

### Spatial Objective 4

**8.32** Spatial Objective 4 addresses the role of Horsham town as an economic and social hub within the District, as well as the role of the smaller market towns as secondary hubs which will be supported to become a focus for employment, leisure and recreational activities. The objective also addresses the need to preserve the role and attractiveness of Horsham town and the District's smaller settlements which is likely to help preserve important elements of townscape at these locations. Therefore, significant positive effects are expected in relation to **SA objective 2: access to services and facilities, SA**

**objective 7: landscape, SA objective 16: economic growth and SA objective 17: access to employment opportunities.**

**8.33** As this spatial objective promotes the role of Horsham town and the market towns to meet local people's needs a minor positive effect is also expected in relation to **SA objective 3: inclusive communities**. It is also expected that allowing for appropriate levels of service provision at the settlements of the District will help to reduce the need for residents to travel by private vehicle. A minor positive effect is expected in relation to **SA objective 13: transport**. This type of approach may help to encourage journeys by healthier and more sustainable modes of travel and therefore minor positive effects are also expected in relation to **SA objective 5: health and wellbeing** as well as **SA objective 14: air quality and SA objective 15: climate change**.

### Spatial Objective 5

**8.34** Spatial Objective 5 seeks to support the delivery of a range of affordable housing development in the District which represents a range of housing sizes and types. Therefore, significant positive effects are likely in relation to **SA objective 1: housing**.

**8.35** As the range of housing provided should meet the needs of specific groups of the community, including families, young, and older people a significant positive effect is also expected in relation to **SA objective 3: inclusive communities**.

### Spatial Objective 6

**8.36** Spatial Objective 6 addresses the provision of necessary infrastructure, open spaces, and community services that are required to support new and growing communities. These types of provisions are also to be made to promote health and wellbeing in the District. As such, this Spatial Objective is likely to have significant positive effects in relation to **SA objective 2: access to services and facilities, SA objective 3: inclusive communities, and SA objective 5: health and wellbeing**.

**8.37** It is likely that supporting the provision of accessible services in a manner which meets local needs will help to reduce the need to travel in Horsham District, with associated benefits resulting in terms of air quality and carbon emissions. As such, minor positive effects are expected in relation to **SA objective 13: transport, SA objective 14: air quality and SA objective 15: climate change**.

### Spatial Objective 7

**8.38** Spatial Objective 7 addresses the protection and potential enhancement of the amenity and character of Horsham's built environment and heritage assets. This includes retaining the distinctiveness of settlements in and



adjoining the District. Therefore, this spatial objective is expected to have significant positive effects in relation to **SA objective 7: landscape** and **SA objective 8: historic environment**.

### Spatial Objective 8

**8.39** Spatial Objective 8 provides support for the preservation of the District's unique landscapes and the contribution they make to the of Horsham's rural villages and towns. New development should minimise its impact on the countryside in and adjoining the District. As such, this spatial objective is likely to have significant positive effects in relation to **SA objective 7: landscape** and **SA objective 8: historic environment**.

### Spatial Objective 9

**8.40** Spatial Objective 9 addresses the maintenance and enhancement of the District's ecosystem services and nature recovery network. This includes delivering biodiversity net gains and minimising any impacts on environmental quality. A significant positive effect is therefore expected in relation to **SA objective 6: biodiversity**.

**8.41** Spatial Objective 9 also addresses the need for new development to minimise the risk of flooding, as well as impacts relating to air, water and quality in the District. Therefore, this spatial objective is also likely to have significant positive effects in relation to **SA objective 6: biodiversity and geodiversity, SA objective 11: water resources, SA objective 12: flooding** and **SA objective 14: air quality**. Spatial Objective 9 also seeks to minimise adverse impacts in relation to soil quality which may help to reduce development on higher value agricultural land and may also help limit the potential for soil contamination. A significant positive effect is also expected in relation to **SA objective 9: efficient land use**.

### Spatial Objective 10

**8.42** Spatial Objective 10 addresses the need for the District to ensure there is adaptation to climate change and supports development which minimises carbon emissions. New development should also contribute to local and national net zero targets of 2030 and 2050, respectively. This includes acknowledging the transition towards more sustainable energy supplies that are renewable, low carbon, and decentralised. Therefore, significant positive effects are likely in relation to **SA objective 14: air quality** and **SA objective 15: climate change**.

## SA findings for Policies 1 to 5 in the Local Plan (Policies for Growth and Change)

**8.43** This section presents the appraisal of:

- Policy 1: Sustainable Development
- Policy 2: Development Hierarchy
- Policy 3: Settlement Expansion
- Policy 4: Horsham Town
- Policy 5: Broadbridge Heath Quadrant

**8.44** Policies 1 to 4 in Chapter 4 (Policies for Growth and Change) of the Local Plan set out the approach of the Council in relation to how development proposals in Horsham District will be considered within the context of delivering sustainable growth.

**8.45** They address overarching issues relating to the development hierarchy and settlement expansion and preserving the role of Horsham town within the District.

**8.46** Policy 5: Broadbridge Heath Quadrant focuses on the redevelopment opportunity area at the Broadbridge Heath Quadrant to the west of the A24. Considering the range of proposals for the Opportunity Area the effects expected for this policy have been summarised separately.

**8.47** The potential sustainability effects of Policies 1 to 5 are shown in the table below with a summary provided below the table.

**8.48** It should be noted that, although this part of the Regulation 19 Local Plan sets out the Development Hierarchy, the approach to settlement expansion, and to the development of Horsham town, it does not specify how much development will take place, or specific sites for development. These issues are addressed through the appraisal of Strategic Policy 6: New Employment and Strategic Policy 14: Housing Provision and as well as the large and small site options (see later in this chapter as well as, **Chapter 5** and **Chapter 6** of this report).

**8.49** This section of the Regulation 19 Local Plan does, though, set out a specific policy for the Broadbridge Heath Quadrant Opportunity Area.

## Chapter 8

### Sustainability Appraisal of the Regulation 19 Local Plan

SA of the Horsham District Local Plan (Regulation 19)

July 2021

**Table 8.3 Summary of SA findings for Policies 1 to 5 in the 'Policies for Growth and Change' chapter of the Local Plan**

SA objective	Strategic Policy 1: Sustainable Development	Strategic Policy 2: Development Hierarchy	Strategic Policy 3: Settlement Expansion	Strategic Policy 4: Horsham Town	Strategic Policy 5: Broadbridge Heath Quadrant
SA1: Housing	+	+	++	+	+
SA2: Access to services and facilities	0	++/-	++/-	++	++
SA3: Inclusive communities	0	++	+	+	+
SA4: Crime	0	0	0	0	+?
SA5: Health and wellbeing	0	+/-	+/-	++	++/-
SA6: Biodiversity and geodiversity	0	0	0	+	+?
SA7: Landscape	0	+	+	+	+?
SA8: Historic environment	0	+	+	+	+/-?
SA9: Efficient land use	0	++	0	0	+
SA10: Natural resources	0	0	0	0	0
SA11: Water resources	0	0	0	+	0
SA12: Flooding	0	0	0	+	0
SA13: Transport	0	+/-	+/-	++	++/-
SA14: Air quality	0	+/-	+/-	+	+/-
SA15: Climate change	0	+/-	+/-	+	+/-
SA16: Economic growth	+	0	+	++	++
SA17: Access to employment opportunities	0	+/-	++/-	++	++/-

### Summary of SA findings for Policies 1 to 4

**8.50** Policy 1: Sustainable Development sets out the Council's overarching approach to achieving sustainable development in the District and seeks to ensure that the Plan is ultimately compliant with the NPPF. The policy would ensure that development in the District can be approved wherever possible, unless material considerations indicate otherwise.

**8.51** The policy is likely to help ensure housing need in the District is met. As the policy is described as a 'model policy' that provides broad guidance for the approval of development in the District, the positive effect expected in relation to **SA objective 1: housing** is likely to be minor. Policies 2: Development Hierarchy and 4: Horsham Town would support appropriate level of housing development within the defined built-up area boundaries in the District. Policy 3 allows for development outside of the built-up area boundaries to support settlement growth in order to meet identified local housing needs and therefore the positive effect expected in relation to SA objective 1 is likely to be significant.

**8.52** Policies 2 to 4 sets out the development hierarchy and the Council's overarching approach to delivering new development within and as expansions to settlements in Horsham. It is recognised through Policy 2 that development should be of a scale and nature to maintain settlement roles in terms of service provision.

**8.53** Policies 3: Settlement Expansion and 4: Horsham Town seek to ensure that development is responsive to the settlement function, and at Horsham town specifically it should contribute to service provision at this location. These policies should support existing town and village centres and development commensurate with the services and facilities at these locations. Benefits are likely to result in terms of allowing for more inclusive communities in the District.

**8.54** As such, significant positive effects are expected in relation to **SA objective 2: access to services and facilities** and positive effects are expected in relation to **SA objective 3: inclusive communities** for Policies 2 to 4. The positive effects expected for Policies 2: Development Hierarchy and 3: Settlement Expansion in relation to SA objective 2 are combined with minor negative effects. These policies would allow for some residential development at smaller secondary settlements where service provision is likely to be limited. For Policy 2 the positive effect expected in relation to SA objective 3 is likely to be significant as it reflects the specific role settlements play in the District as well as community cohesiveness.

**8.55** As Policies 2 to 4 would help to direct most development to ensure access to an appropriate level of services and facilities, journey distances residents are required to take are likely to be minimised. Active modes of transport may be used

more frequently. Therefore, positive effects are also expected for these three policies in relation to **SA objective 5: health and wellbeing**. As Policy 2: Development Hierarchy would allow some development at secondary settlements some residents will have more limited access to local healthcare. Allowing for the expansion of settlements in Horsham District could result in similar effects for some residents and therefore a minor negative effect is also expected in combination for Policy 3: Settlement Expansion in relation to SA objective 5. The positive effect for Policy 4: Horsham Town is likely to be significant given that the criteria for development within Horsham town include the enhancement or enlargement of green spaces and supporting travel by active modes.

**8.56** The provision of an enhanced network of green spaces will contribute to biodiversity net gain in Horsham town. As such a minor positive effect is expected in relation to **SA objective 6: biodiversity and geodiversity** for Policy 4.

**8.57** The landscape character of the wider countryside and townscape and character of existing settlements (including the smaller secondary settlements) is protected through Policies 2 to 4. This is to be achieved by allowing for appropriate levels of development within the settlement boundaries, as well as the requirement for consideration of the scale and nature of development in relation to existing the settlement character (Policy 2) and allowing for development where it is contained within an existing defensible boundary and landscape and townscape character features are maintained and enhanced (Policy 3). Policy 4: Horsham Town specifically addresses the maintenance of the characteristics of Horsham town. Therefore, a minor positive effect is expected for Policies 2 to 4 in relation to **SA objective 7: landscape**.

**8.58** Policy 2: Development Hierarchy states that development at smaller secondary settlements should be considerate of the characteristics of the settlements, and Policy 3: Settlement Expansion requires the landscape and townscape character features to be maintained and enhanced. This should help to protect the historic environment. A minor positive effect is therefore expected in relation to **SA objective 8: historic environment** for Policies 2 and 3. Policy 4: Horsham Town directly recognises the unique and historic characteristics of Horsham town, and the need for development to be considerate of these issues and therefore a minor positive effect is also expected for this policy in relation to SA objective 8.

**8.59** It is expected that the protection of open spaces at Horsham town could have benefits relating to the safe infiltration of surface water. Green infrastructure can also help to remove contaminants from runoff. As such, minor positive effects are expected for Policy 4 in relation to **SA objective 11: water resources** and **SA objective 12: flooding**.

**8.60** The focus of appropriate development at previously developed land within the settlement boundaries through Policy 2: Development Hierarchy is likely to help achieve a more efficient use of land in Horsham District. Therefore, a significant positive effect is expected for this policy in relation to **SA objective 9: efficient land use**.

**8.61** It is expected that Policies 2 to 4 would all help to reduce the need to travel in Horsham District by allowing for a distribution of growth which supports accessibility to a range of services and employment opportunities. Positive effects are therefore expected for these three policies in relation to **SA objective 13: transport**. The positive effect expected for Policy 4: Horsham Town is likely to be significant as it maintains the role of Horsham town as the primary centre. This policy should help to reduce the need to travel by private vehicle given the strong sustainable transport offer at this location. The policy also requires that development at this location should promote excellent pedestrian, cycling, bus, rail and vehicle accessibility for residents.

**8.62** As Policies 2: Development Hierarchy and 3: Settlement Expansion would support some new development at locations which are not as accessible to existing services and facilities (at the smaller secondary settlements or is beyond the current settlement edge of existing settlements) minor negative effects are expected in combination in relation to SA objective 13.

**8.63** Minor positive effects are also identified in relation to **SA objective 14: air quality** and **SA objective 15: climate change** for these three policies. It is likely that reducing the need to travel and issues of congestion in Horsham would have benefits in relation to air quality and carbon emissions. Given that Policies 2 and 3 could support some development which provides lower levels of access to services and facilities, minor negative effects are expected in combination for SA objectives 14 and 15.

**8.64** In addition to helping support housing delivery in Horsham District, Policy 1: Sustainable Development should help to drive economic development in cases where local planning policy might be silent in relation to specific applications. Policy 3: Settlement Expansion is supportive of some employment growth at settlements across the District in order to meet identified local employment needs, which will allow for some level of economic growth. Minor positive effects are therefore expected in relation to **SA objective 16: economic growth** for these policies. As Policy 4: Horsham Town would support development which allows Horsham town to retain its important role within the District, Gatwick Diamond and the wider south east economies, the positive effect expected in relation to this SA objective is likely to be significant.

**8.65** Policy 2: Development Hierarchy requires development proposals to be of a scale and nature that can retain the

settlement character and role. This is likely to mean more substantial development projects are located at larger settlements which provide access to a wider range of employment opportunities. A significant positive effect is expected in relation to **SA objective 17: access to employment opportunities**. The positive effects expected in relation to this SA objective for Policies 3 and 4 are also likely to be significant. Policy 3: Settlement Expansion is supportive of growth of settlements across the District to meet identified local employment needs. At Horsham within the built-up area, Policy 4: Horsham Town is supportive of development where it would contribute to a wide range of employment. This policy is expected to be of particular benefit in terms of accessibility of employment opportunities in the wider-District context.

**8.66** Minor negative effects are expected in combination for Policies 2 and 3 in relation to SA objective 17. These policies could support some growth at locations where employment opportunities will be less accessible for residents. This would include new development at smaller secondary settlements and also beyond the existing settlement edge where settlements are to be expanded.

### Summary of SA findings for Policy 5

**8.67** Policy 5: Broadbridge Heath Quadrant provides for Broadbridge Heath Quadrant Opportunity Area to deliver a mix of alternative uses, thereby supporting its role as a successful out of town retail location. The Broadbridge Heath Quadrant lies to the west of Horsham town centre and is separated from the town centre by the A24.

**8.68** New uses at the site could potentially include new service provision including retail, leisure and convenience eating places, which will be within walking distance of residents in Broadbridge Heath and Horsham. While retail uses are likely to take up much of the land at the site, new residential development is also supported. A minor positive effect is expected in relation to **SA objective 1: housing**.

**8.69** The policy seeks to ensure that development at Broadbridge Heath Quadrant should enhance and complement the primacy and future offer of Horsham town centre. A significant positive effect is therefore expected in relation to **SA objective 2: access to services and facilities**.

**8.70** The policy supports redevelopment of previously developed land at the Broadbridge Heath Quadrant, which may contribute to regeneration in the District. There is also potential for the new facilities to assist the integration of the new communities of Wickhurst Green and Highwood Village into the area. As such, a minor positive effect is expected for the policy in relation to **SA objective 3: inclusive communities** and **SA objective 9: efficient land use**.

**8.71** There is a requirement in the policy for the Broadbridge Heath Quadrant to be enhanced as an attractive and well laid out setting with high quality architectural and landscape design. A minor positive effect is expected in relation to **SA objective 7: landscape**.

**8.72** In terms of impacts on heritage, there are multiple Listed Buildings (including Old Post Cottages and Mulberry Place) within 500m to the north of the site. However, there is existing development and the Broadbridge Way dual carriageway between the site and these heritage assets which may reduce the potential for intervisibility and disturbance to their setting. As such, the negative effect expected in relation to **SA objective 8: historic environment** is minor. Given that the site is brownfield, the development of the site to be attractive and well laid out with high quality architectural and landscape design may provide opportunities to improve the setting of these heritage assets. Therefore, the minor negative effect expected in relation to SA objective 8 is combined with a minor positive effect. As impacts relating to landscape and the setting of heritage assets will be influenced by the specific design of any new development these effects are uncertain.

**8.73** Development supported at the site is to be accessible by active travel links (both within and around the site) that may result in increased uptake of exercise amongst residents. New leisure uses as well as the incorporation of green infrastructure are provided for. As such, a significant positive effect is expected for the policy in relation to **SA objective 5: health and wellbeing**. However, the redevelopment of the site could result in the loss of existing outdoor sports facilities at the south of the site meaning an uncertain significant negative effect is expected in combination.

**8.74** The Broadbridge Heath Quadrant is within the Broadbridge Heath built-up area boundary and furthermore is not in close proximity to any biodiversity designations. The delivery of green infrastructure as part of development is also likely to help strengthen ecological networks in the area. Therefore, a minor positive effect is expected for the policy in relation to **SA objective 6: biodiversity and geodiversity**.

**8.75** The site proposals are required by the policy to maximise accessibility through alternative modes. Additionally, the site's close proximity to the built-up areas of Broadbridge Heath and Horsham could increase the potential for residents to travel to the site by more sustainable modes of transport. A significant positive effect is expected for the site in relation to **SA objective 13: transport**. The promotion of sustainable travel options may also yield positive impacts in terms of minimising the contribution of the new development to air pollution and carbon emissions. Additionally, schemes are required by the policy to utilise best practice in renewable or low carbon energy. A minor positive effect is expected for the policy in relation to **SA objective 14: air quality** and **SA objective 15:**

**climate change**. However, development at this location is also required by the policy to maintain and enhance accessibility by car which may reduce the potential for modal shift. Therefore, the positive effects expected in relation to SA objectives 13, 14 and 15 are likely to be combined with minor negative effects.

**8.76** A significant positive effect is expected for the policy in relation to **SA objective 16: economic growth** as the site is to provide a range of new uses which could allow for local economic investment. New proposals at the site should also support the vitality and vibrancy of Horsham town as a whole. The site is to be accessible by numerous public transport and active travel links as well as by good road connections. The site would also support some new job provision which would be accessible to the new homes provided as part of the mix of uses. New residents would also be provided with good access to job opportunities within Broadbridge Heath and Horsham town. A significant positive effect is therefore also expected in relation to **SA objective 17: access to employment opportunities**. As current employment uses at the site might be disrupted as redevelopment of this land occurs a minor negative effect is expected in combination for this policy.

## SA findings for Policies 6 to 13 in the Local Plan (Economic Development)

**8.77** This section presents the appraisal of:

- Policy 6: New Employment
- Policy 7: Enhancing Existing Employment
- Policy 8: Rural Economic Development
- Policy 9: Conversion of Agricultural and Rural Buildings to Residential Uses
- Policy 10: Equestrian Development
- Policy 11: Tourism Facilities and Visitor Accommodation
- Policy 12: Retail Hierarchy and Town Centre First Principles
- Policy 13: Town Centre Uses

**8.78** Policies 6 to 13 in Chapter 5 (Economic Development) of the Local Plan address issues relating to business development and sustainable economic growth in the District. They set out the approach of the Council in relation to promoting employment growth and encouraging investment in Horsham.

**8.79** Appraisal work for Policies 6: Economic Growth and 7: Employment Development has been presented separately at the start of this section given that they relate to the allocation of specific sites to support employment growth and the safeguarding of specific existing employment areas. The



detailed appraisal work for the individual sites included for allocation through Policy 6 has been presented alongside the appraisal of other small sites options considered for the Local Plan Review in the **Appendix E** of this report. Policy 7 includes a list of Key Employment Area to be protected for business, manufacturing, storage and distribution uses (B1, B2 and B8 Use Classes). As such these areas are not new allocations for employment. The appraisal of sites has not been undertaken separately but instead is incorporated in the appraisal of Policy 7. The appraisal has focussed on the principle of protecting employment uses with consideration for the location of the Key Employment Areas and their relationships with existing settlements and sensitive receptors.

**8.80** The potential sustainability effects of Policies 6 to 13 are shown in the table below with a summary provided below the table.

**8.81** Policies 12: Retail Hierarchy and Sequential Approach and 13: Town Centre Uses are presented in a separate section of Chapter 5 of the Local Plan and focus specifically on retail development in the District. The summary of potential sustainability effects has therefore been presented in a separate sub-section of this chapter.

**Table 8.4 Summary of SA findings for Policies 6 to 13 in the 'Economic Development' chapter of the Local Plan**

SA objective	Strategic Policy 6: New Employment	Strategic Policy 7: Enhancing Existing Employment	Policy 8: Rural Economic Development	Policy 9: Conversion of Agricultural and Rural Buildings to Residential Uses	Policy 10: Equestrian Development	Strategic Policy 11: Tourism Facilities and Visitor Accommodation	Strategic Policy 12: Retail Hierarchy and Town Centre First Principles	Strategic Policy 13: Town Centre Uses
SA1: Housing	0	0	0	+	0	0	0	+
SA2: Access to services and facilities	++	+/-	0	0	0	+	++	++
SA3: Inclusive communities	+	+	+	0	0	+	++	++
SA4: Crime	0?	0?	0	0	0	0	0	0
SA5: Health and wellbeing	+	+/-	+/-	0	0	0	+	+
SA6: Biodiversity and geodiversity	--?	-?	+	+	0	0	0	0
SA7: Landscape	--?	+/-?	+	+	+	+	+	+
SA8: Historic environment	--?	+/-?	+	+	+	+	+	+
SA9: Efficient land use	--	+	0	+	+	+	0	0
SA10: Natural resources	-?	-?	0	0	0	0	0	+
SA11: Water resources	0	0	0	0	0	0	0	0

SA objective	Strategic Policy 6: New Employment	Strategic Policy 7: Enhancing Existing Employment	Policy 8: Rural Economic Development	Policy 9: Conversion of Agricultural and Rural Buildings to Residential Uses	Policy 10: Equestrian Development	Strategic Policy 11: Tourism Facilities and Visitor Accommodation	Strategic Policy 12: Retail Hierarchy and Town Centre First Principles	Strategic Policy 13: Town Centre Uses
SA12: Flooding	-	0	0	0	0	0	0	0
SA13: Transport	+/-	+	-	0	0	+	+	+
SA14: Air quality	+/-	+/-	-	0	0	+	+	+
SA15: Climate change	+/-	+	-	0	0	+	+	+
SA16: Economic growth	++	++	++	0	+	++	++	++
SA17: Access to employment opportunities	++	++	++	0	0	+	+	+

### Summary of SA findings for Policy 6

**8.82** The majority of the sites proposed<sup>37</sup> for allocation in Policy 6: New Employment are located in close proximity to the built-up areas of the District and therefore have good access to a wide range of services and facilities within walking distance. As such, a significant positive effect is expected for the policy in relation to **SA objective 2: services and facilities**. The West of Graylands Estate is not located within close distance to the existing built-up areas of any settlements in the District. However, this site is in close proximity to the North of Horsham strategic development which is allocated in HDPF and is currently being built out. This development is to incorporate a local centre with will provide a mix of uses. The West of Graylands Estate site is also close to Warnham train station which could provide site users with sustainable access to services and facilities further afield. It is noted that the Use Classes Order places former B1 uses into Use Class E with other town centre uses. This could allow for some change of use from former B1 uses to services and facilities at the Graylands Estate and other employment sites, however it is unlikely that changes of use alone would deliver the range of services to be sustainable.

**8.83** The delivery of employment development in the District may help to reduce social deprivation through the provision of

new job opportunities. The policy also supports the expansion of higher education facilities related to research and development and employment training, which is likely to provide a higher number of residents with access to services in the District, thereby supporting local social integration. As such, a minor positive effect is expected for Policy 6: New Employment in relation to **SA objective 3: inclusive communities**.

**8.84** A minor positive effect is expected for Policy 6: New Employment in relation to **SA objective 5: health and wellbeing**. All four sites would provide a good level of access to existing healthcare facilities or areas/features which promote physical activities. The West of Graylands Estate site is currently some distance from existing the settlements to the north of Horsham town. However, the close proximity of the North of Horsham strategic development, which is to incorporate new healthcare facilities, means that site users are likely to benefit from nearby access to infrastructure which promotes health and wellbeing.

**8.85** The sites being considered for employment allocation through Policy 6: New Employment may result in adverse impacts on biodiversity through proximity to local designations or their location within SSSI Impact Risk Zones (IRZs). One site within the west of the District (Broomers Hill Business

<sup>37</sup> Policy 6: New Employment proposes the allocation of employment land at the proposed strategic site allocations as well as at sites Land South of Star Road Industrial Estate, Partridge Green; Land to the West of Graylands Estate,

Langhurstwood Road; Horsham; Land at Broomers Hill Business Park, Pulborough; and Land South West of Hop Oast Roundabout. These four sites were appraised as site options SA063; SA363; SA385; and SA703, respectively.

Park) also lies within the bat sustenance zone declared in relation to the Mens Special Area of Conservation (SAC). Considered cumulatively it is expected that the employment allocations could have a significant negative effect in relation to **SA objective 6: biodiversity and geodiversity**. The effect is uncertain as appropriate mitigation may avoid or reduce adverse effects.

**8.86** Similarly, due to the proximity of the proposed sites to heritage assets there is potential for development to result in adverse impacts on their setting. Therefore, a significant negative effect is identified for Policy 6: New Employment in relation to **SA objective 8: historic environment**. The effect is uncertain as it is dependent on the exact scale, design and layout of the new development. Significant negative effects are also expected for Policy 6 in relation to **SA objective 7: landscape** due to the low landscape capacity of the proposed sites for large-scale employment development. The effect is uncertain as any landscape harm will depend in part on design of any development which results at these sites, which is not yet known.

**8.87** The delivery of the employment site allocations will result in a large amount of greenfield land take. Considering the distribution of the employment sites for allocation this is likely to include substantial areas of grade 3 agricultural soils. Only site West of Graylands Estate falls on land which is of Grade 4 agricultural value or lower. As such, a significant negative effect is expected for Policy 6: New Employment in relation to **SA objective 9: efficient land use** for Policy 6. This, however, should be considered in the context that Policy 7 safeguards existing Key Employment Areas which are brownfield.

**8.88** A large proportion of the District is also covered by Mineral Safeguarding Areas (MSAs), within which the majority of the employment sites are located. As such, a minor negative effect is expected for Policy 6: New Employment in relation to **SA objective 10: natural resources**. The effect is uncertain as there may be potential to extract mineral resources prior to development or for development to be delivered in a manner which avoids sterilisation of the mineral resources.

**8.89** All of the employment site allocations in Policy 6: New Employment are located entirely on greenfield land. Therefore, there is potential for development to result in an increased flood risk given that likely proliferation of impermeable surfaces, although use of SuDs is likely to help mitigate this. As such, a minor negative effect is expected for Policy 6 in relation to **SA objective 12: flooding**.

**8.90** It is expected that supporting new employment opportunities in the plan area would help to ensure a level of self-containment is achieved as new housing growth occurs. The policy also supports proposals for green industries in the

Borough. Minor positive effects are expected for Policy 6: New Employment in relation to **SA objective 13: transport** and **SA objective 15: climate change**. The effect also reflects the proximity of the employment sites to sustainable travel options, which would allow employees to access work using sustainable travel modes rather than by private car. The policy also directs Grade A offices to town centre sites and where these are not available development will be supported close to public transport hubs. Regardless of the location of employment sites in relation to sustainable transport links, it is likely that some employees will choose to travel by private vehicle. Therefore, the minor positive effects recorded in relation to SA objectives 13 and 15 are combined with a minor negative effect.

**8.91** The proposed employment sites are not in locations that will contribute to increased traffic through AQMAs in the District. As such, given the increased potential for use of active and public modes of transport to access employment sites and offices, a minor positive effect is expected in relation to **SA objective 14: air quality** for Policy 8. However, a minor negative effect is expected in combination given the potential for travel to work generally to contribute to air pollution in the plan area.

**8.92** A significant positive effect is expected for Policy 6 in relation to **SA objective 16: economic growth**. Each site would deliver between 3,000sqm and 9,500sqm of B uses in the District to support local economic growth.

**8.93** Policy 6 is supportive of a range of unit sizes which is likely to support large and small business growth. Economic performance is likely to be supported by the requirement in the policy for developments to provide appropriate ICT infrastructure. As such, a significant positive effect is identified for the policy in relation to **SA objective 17: access to employment opportunities**. The policy allows for employment development where residents might access them by sustainable modes of transport. Furthermore, most of the employment allocations are well related to settlements higher in the development hierarchy. While the West of Graylands Estate site is not currently in close proximity to existing development within a higher tier settlement, the site is within 700m of Warnham railway station and it is expected that many employees could access this site by train. Furthermore, once the North of Horsham strategic site (allocated in adopted HDPF) is built out, the West of Graylands Estate site will be in close proximity to development which comprises an extension to existing developed area of Horsham Town.

### Summary of SA findings for Policy 7

**8.94** The Key Employment Areas set out in Policy 7: Enhancing Existing Employment are mostly located within the built-up areas of the larger settlements. As such, the

expansion of floorspace in these areas will provide new employees with access to a range of services and facilities at break times and before and after working hours. As such, a minor positive effect is expected for the Policy in relation to **SA objective 2: access to services and facilities**.

**8.95** However, some sites listed as Key Employment Areas in the policy are less well related to the built-up area boundaries of the District's settlements. This includes sites at Spring Copse Business Park, Oakendene Industrial Estate, Henfield Business Park, Wiston Business Park and Rock Business Park. These locations are less likely to provide employees with a good level of access to services and facilities. Therefore, a minor negative effect is expected in combination in relation to SA objective 2.

**8.96** The support the policy provides for compatible redevelopment within Key Employment Areas may contribute to regeneration of the District. Furthermore, supporting employment opportunities in the District may help to address issues of social deprivation in the plan area. As such, a minor positive effect is expected for the policy in relation to **SA objective 3: inclusive communities**.

**8.97** Mixed effects (minor positive and minor negative) are expected for the policy in relation to **SA objective 5: health and wellbeing**. The distribution of the Key Employment Areas having varying levels of access to health supporting infrastructure including health centres, open spaces, sports facilities and active travel links. The policy is also supportive of proposals for indoor leisure uses where they would not prejudice the operation of surrounding employment uses. This could support new development which would provide local people space to partake in physical activities.

**8.98** The policy supports some development of key employment areas where the loss of employment floorspace is not significant and the development supports the integrity of the site. Redevelopment of other employment sites will also be supported where the site is no longer viable or needed for employment uses. As such, the policy could allow for some change in on site activities and travel patterns. Furthermore, the expansion of existing employment premises and sites are also supported by the policy. Policy 7: Enhancing Existing Employment is therefore supportive of some development which could result in adverse impacts upon sensitive environmental receptors. A number of the Key Employment Areas are located within the bat sustenance zone declared in relation to the Mens SAC, in the west of the District. A number of Local Wildlife Sites also lie in close proximity to Key Employment Areas, including Middle Barn Farm Meadow by Station Approach, Southwater Country Park Complex by Southwater Business Park and Brockhurst Wood and Gill and Morris's Wood by Broadlands Business Park. Therefore, a minor negative effect is expected in relation to **SA objective**

**6: biodiversity and geodiversity**. The effect is uncertain as appropriate mitigation might be achieved through the specific design of proposals.

**8.99** Similarly, a minor negative effect is also expected in relation to **SA objective 8: historic environment** as a number of Key Employment Areas are located in close proximity to heritage assets, whose setting could be adversely impacted by any redevelopment and intensification of uses at these locations. This includes the Richmond Road Conservation Area which is in close proximity to Key Employment Areas at Foundry Lane and Nightingale Road. The effect is uncertain as it is dependent upon the design and layout of any development that comes forward. Given that the policy is supportive of regeneration which might help to enhance the attractiveness of the District which could achieve benefits for the settings of heritage assets, a minor positive effect is expected in combination.

**8.100** The policy supports appropriate redevelopment within Key Employment Areas which may have positive impacts upon improving the character of the built environment in settlements. The policy also requires that any expansion of existing premises or sites should be in keeping with the existing scale of provision and it can be demonstrated that improvements will be made to the attractiveness of the District as a location. Therefore, a minor positive effect is expected for Policy 7: Enhancing Existing Employment in relation to **SA objective 7: landscape**.

**8.101** A minor negative effect is expected in combination in relation to SA objective 7 as there are some employment sites outside of settlement boundaries where redevelopment may have adverse impacts upon the landscape setting. Many of these areas at the edge of the larger settlements have been assessed as having limited landscape capacity to accommodate new development. The effect is uncertain as it will depend in part on design of new development, which is not yet known.

**8.102** The support the policy provides for the redevelopment of employment sites in appropriate circumstances is likely to help promote an efficient use of land in Horsham District. However, as the policy also supports the expansion of existing employment sites this could result in development occurring on greenfield land. A mixed minor positive and minor negative effect is therefore expected in relation to **SA objective 9: efficient land use** for Policy 7: Enhancing Existing Employment.

**8.103** A minor negative effect is expected for the Policy in relation to **SA objective 10: natural resources**. Much of the District is covered by Mineral Safeguarding Areas. The potential expansion of Key Employment Areas may result in a loss of access to or sterilisation of some of finite reserves of the District. The effect is uncertain as there may be potential

to extract mineral resources prior to any development or any development could be carried out in a manner that still allows mineral extraction to take place.

**8.104** The Key Employment Areas are largely within built-up areas where the widest range of services and facilities are accessible. Many of these locations also provide access to strong sustainable transport links, including railway stations. The preservation and expansion of these sites may therefore contribute to travel by more sustainable modes. As these sites have been identified to help provide sufficient local employment opportunities to meet the needs of the District it is likely that their protection will help to contribute to a degree of self-containment in the area. This may help to reduce the need to travel longer distances. Therefore, a minor positive effect is expected in relation to **SA objective 13: transport, SA objective 14: air quality** and **SA objective 15: climate change** given the potential reduced reliance on travel by private vehicle and associated benefits relating to air quality and carbon emissions.

**8.105** However, the Key Employment Area Oakendene Industrial Estate lies to the east of Cowfold and is located along the A272 which leads to the Cowfold AQMA. Allowing for continued and potentially intensified employment uses at the site may aggravate existing air quality issues at this location. A minor negative effect is therefore expected in combination in relation to SA objective 14.

**8.106** The safeguarding of existing Key Employment Areas in the District will provide appropriate space for local business development and job creation. The policy requires that any redevelopment within Key Employment Areas must not result in an overall loss of employment space, unless it is demonstrated that the loss would be mitigated by a significant upgrade of the retained employment floorspace. Sites which have become economically unviable may be replaced by more appropriate uses such as small business, social enterprises or green industries which may contribute to a sustainable local economy. As such, a significant positive effect is expected for Policy 7: Enhancing Existing Employment in relation to **SA objective 16: economic growth**.

**8.107** A significant positive effect is also expected for this policy in relation to **SA objective 17: access to employment opportunities**. The majority of the Key Employment Areas are well related to the larger settlements meaning that there will be opportunities for access via sustainable transport. The policy is also supportive of new employment sites in line with the spatial strategy for Horsham District and the settlement hierarchy. It is therefore expected that any new employment sites are likely to be supported at the larger settlements where they will be accessible to a high number of residents.

## Summary of SA findings for Policies 8 to 11

**8.108** Policies 8: Rural Economic Development, 9: Conversion of Agricultural and Rural Buildings to Commercial, Community or Residential Uses, 10: Equestrian Development and 11: Tourism Facilities and Visitor Accommodation seek to address the viability of the rural economy and development which might contribute to this element of the District's economic growth. However, Policy 9 is supportive of development to convert redundant agricultural and forestry buildings to residential use where certain criteria are met. As such, this policy is supportive of some development that could contribute to meeting rural housing need in Horsham District. Therefore, a minor positive effect is expected in relation to **SA objective 1: housing** for Policy 9.

**8.109** Policy 8: Rural Economic Development sets out that proposals outside of built-up area should generate social benefits for local communities. Economic development at these locations should sustain productive social and economic activity. As such, a minor positive effect is expected for this policy in relation to **SA objective 3: inclusive communities**. A minor positive effect is also expected in relation to SA objective 3: inclusive communities as well as **SA objective 2: services and facilities** for Policy 11: Tourism Facilities and Visitor Accommodation given that it is supportive of development which would retain or enhance visitor and tourist existing facilities. This could include support for the protection and enhancement of facilities which have also have some community use and support social integration at more rural locations. This positive effect is also reflective of the important role tourism plays for the rural economy in Horsham and the contribution these types of jobs continue to make to the viability of these parts of the District.

**8.110** A minor positive effect is expected for Policy 8: Rural Economic Development in relation to **SA objective 5: health and wellbeing**. The policy states that rural enterprise developments should promote recreation and enjoyment of the countryside, which could result increased uptake of physical activities at these locations. Considering the more limited access to healthcare facilities from rural sites, which employees might otherwise make use of during breaks and before and after work, a minor negative effect is expected in combination in relation to SA objective 5.

**8.111** A minor positive effect is also expected for this policy in relation to **SA objective 6: biodiversity and geodiversity**. The policy does not require a specific level of economic development in the countryside where presently undisturbed ecological networks may be present. The policy requires that rural development should demonstrate a net increase in biodiversity in and around sites. Furthermore, proposals for development in countryside locations should be demonstrated to be appropriate to the location and contribute to the



sustainable custodianship of the countryside. Policy 9: Conversion of Agricultural and Rural Buildings to Residential Uses is also likely to result in a minor positive effect in relation to SA objective 6 as it includes support for proposals that will enhance biodiversity in and around sites for the conversion of agricultural or rural buildings.

**8.112** Horsham District is predominantly rural in character and therefore there is potential for any development outside of settlement boundaries to disturb its existing character and distinctiveness. However, Policy 8 does not identify any specific land for development for rural economic growth and no assumptions can be made in terms of development occurring within areas which might have reduced landscape capacity to accommodate development. Furthermore, the policy specifically requires that proposals must demonstrate that they will not adversely affect the character and visual amenity of the countryside. Development should also contribute to the sustainable custodianship of the countryside. Policies 9 and 10 contain similar requirements stating that development should be appropriate in terms of its siting, form and scale in relation to the immediate and wider landscape. The potential impacts of tourism development on the District are considered through Policy 11: Tourism Facilities and Visitor Accommodation which requires that development proposals should be sensitively designed to avoid harm to townscape or landscape character. Minor positive effects are therefore expected for Policies 8 to 11 in relation to **SA objective 7: landscape**.

**8.113** It is expected that requirements for proposals to consider the existing character of an area as well as the potential for impacts relating to siting and scale could have additional benefits in terms of limiting effects relating to the setting of heritage assets. As such, minor positive effects are expected for all of the policies in relation to **SA objective 8: historic environment**. In the case of Policy 11, the minor positive effect may be strengthened as a requirement is included for proposals to reinforce local distinctiveness through the retention of heritage assets, which includes the return of historic property to active use.

**8.114** Policies 9, 10 and 11 are expected to help promote the re-use of existing buildings in the District where the necessary criteria are met. As such, minor positive effects are expected for these policies in relation to **SA objective 9: efficient land use**.

**8.115** Minor negative effects are expected for Policy 8 in relation to **SA objective 13: transport**, **SA objective 14: air quality** and **SA objective 15 climate change**. The policy includes a requirement that proposals must demonstrate that car parking requirements can be satisfactorily accommodated. Whilst this may provide a level of convenience and help to protect residential amenity in the area, it may encourage

private car travel to employment sites in rural areas. This has the potential to also result in adverse impacts in terms of air quality and increased carbon emissions in rural areas. The parking standards included in the Local Plan through Policy 42 would help to offset these adverse effects given that they require the provision of adequate parking and infrastructure for electric car charging which could help to reduce dependency on fossil fuel powered vehicles. Conversely, a minor positive effect is expected for Policy 11 in relation to SA objective 13, SA objective 14 and SA objective 15 as this policy is supportive of development which increases the accessibility of the District's tourist facilities by sustainable modes of transport.

**8.116** The District's rural economy is supported by each of the policies in question. Policy 8 provides the most direct support for rural economic growth including diverse and sustainable farming and other rural enterprises. This policy also directly seeks to support the generation of local employment opportunities. Given the rural character of the District, this type of economic growth and employment generation is considered particularly important and therefore significant positive effects are expected for this policy in relation to **SA objective 16: economic growth** and **SA objective 17: access to employment opportunities**.

**8.117** Policies 10 and 11 are expected to support rural economic growth through support for equestrian development (Policy 10) and improvement of the District's tourism offer (Policy 11). As such, a positive effect is also expected for these policies in relation to SA objective 16. The positive effect expected for Policy 11: Tourism Facilities and Visitor is also likely to be significant. The significant positive is reflective of the projected growth of the tourist economy by 3.8% per annum by 2025. Policy 11 is expected to help improve the District's offer in this area to secure benefits from the projected level of growth.

**8.118** For Policy 11 a minor positive effect is also expected in relation to SA objective 17. Given the contribution tourism makes to the local economy, supporting its long term growth is likely to provide diverse employment opportunities to a wide range of local people.

### Summary of SA findings for Policies 12 to 13

**8.119** Policies 12: Retail Hierarchy and Town Centre First Principles and 13: Town Centre Uses seek to encourage retail development and town centre uses within defined town or village centre boundaries in the District, with the aim of delivering activities and uses which support their economic prosperity and vitality. There is to be a particular focus on Horsham town centre Within Primary Frontages there is to be a focus on retail function which is to be balanced with flexibility within the wider Main Shopping Area.

**8.120** While neither policy directly supports the delivery of substantial new housing in the District, Policy 13 is supportive of changes of use to residential in town and village centres where a Class E use is no longer viable and further criteria are met. As such, the policy may support a small amount of residential development to complement retail uses at town and village centre locations in the District. A minor positive effect is expected for this policy in relation to **SA objective 1: housing**.

**8.121** Both policies are supportive of development to provide town centre uses within defined town and village centres. These areas are the most accessible to residents in the District and therefore continuing this approach to the management of the town and village centres is likely to promote access to service provision. This will include new community uses which are likely to help support social integration.

**8.122** The adoption of a town centre approach is also likely to provide residents with improved spaces where positive and informal social interactions can take place. As such, Policies 12: Retail Hierarchy and Town Centre First Principles and 13: Town Centre Uses are likely to have significant positive effects in relation to **SA objective 2: access to services and facilities** and **SA objective 3: inclusive communities**.

**8.123** By directing town centre uses and retail development to focused locations which are accessible to a high number of residents, these policies will help to reduce the need to travel by private vehicle in the District. Reduced travel times to services and facilities are likely to encourage the uptake of journeys made by active modes of transport. Therefore, both policies are expected to have a minor positive effect in relation to **SA objective 5: health and wellbeing**.

**8.124** Both policies set out an approach which is likely to help protect and enhance the character and diversity of existing retail centres. Helping to ensure that footfall to these areas is maintained will contribute to the vitality of the District's centres to the benefit of local character. Policies 12: Retail Hierarchy and Town Centre First Principles and 13: Town Centre Uses are both expected to help protect the established townscapes of town centre locations and may also help to protect the setting of heritage assets at these locations. Minor positive effects are therefore expected for both policies in relation to **SA objective 7: landscape** and **SA objective 8: historic environment**.

**8.125** Policy 13: Town Centre Uses requires that development for the preparation and sale of ready to consume food and drink should be able to demonstrate means of storing and disposal of refuse. This element of the policy is likely to promote appropriate waste management systems, including increased potential for recycling and therefore a minor positive

effect is expected in relation to **SA objective 10: natural resources**.

**8.126** It is expected that protection of the town and village centres in the District will reduce the need for a high proportion of residents to travel longer distances on a regular basis. Retail and other services are accessible to a high number of residents at these locations and they also benefit from stronger sustainable transport links. As such, minor positive effects are expected for both policies in relation to **SA objective 13: transport**. Policy 13: Town Centre Uses is also supportive of small-scale convenience retail or service uses where there is a demonstrable need within the local community. This is likely to help limit the need for residents at these locations to need to travel longer distances on a regular basis.

**8.127** It is likely that associated benefits would result in terms of limiting any increase in air pollution and carbon emissions as new development is occupied and residents need to access essential services. Minor positive effects are therefore also expected in relation to **SA objective 14: air quality** and **SA objective 15: climate change**.

**8.128** Policies 12: Retail Hierarchy and Town Centre First Principles and 13: Town Centre Uses would also directly contribute to enhancing the productivity of Horsham's town and village centres and would promote them as areas of business development and investment. As such, these policies are likely to have a significant positive effect in relation to **SA objective 16: economic growth**. Policy 12 requires that proposals for edge or out-of-centre retail development schemes of 500m<sup>2</sup> or more should be accompanied by a full and detailed retail impact assessment. This is expected to help limit the potential for significant negative effects occurring in relation to the viability of centres locations in the plan area. Policy 13 also includes specific support for the evening economy of centres in the plan area, while also seeking to protect amenity of occupiers of these locations.

**8.129** Considering the contribution retail plays in terms of employment provision in Horsham both policies are also likely to have minor positive effects in relation to **SA objective 17: access to employment opportunities**. Helping to ensure the viability of town and village centres in the District is likely to support job creation at locations which are accessible to a high number of local people.

## SA findings for Policy 14 in the Local Plan (Housing Provision)

**8.130** Strategic Policy 14 sets the level of housing to be delivered through the Local Plan between 2021 and 2038. The policy also sets how housing development is to occur over the plan period (including agreed development commitments, windfall sites and the allocation of strategic and smaller scale sites). This approach follows consideration of three options for the appropriate levels of housing growth to be provided over the plan period that were included in the Regulation 18 Local Plan and appraised through the SA at that stage. The three options were:

- 1,000 homes per year.
- 1,200 homes per year.
- 1,400 homes per year.

**8.131** The SA work at the Regulation 19 stage has tested two additional higher delivery options (1,600 and 1,800 homes per year). These options reflect approaches that would deliver more homes in the District to make an additional contribution to the unmet housing needs of neighbouring local authority areas under the Duty to Cooperate.

**8.132** The summary of the appraisal of these options is presented earlier in this report in **Chapter 4** which includes the appraisal of the various growth scenarios considered.

**8.133** The actual delivery rate included in Policy 14 is for an average of 1,100 homes per year, which falls mid-way between the lowest and middle of the five options appraised for the quantum of growth to be delivered in the plan area. The

difference in either direction is 100 homes per annum, which equates to 1,700 homes in total over the plan period. This is 10% greater than the lowest option and just over 8% fewer than under the middle option. However, Policy 14 includes a distributional component that was not included in the quantum growth options, and therefore it is also important to consider how Policy 14 relates to the SA work carried out on growth scenario options at the Regulation 18 stage which has since been updated through the appraisal work in this SA report.

**8.134** At the Regulation 18 stage (See **Chapter 7**), the closest equivalent growth scenario option to Policy 14 was Growth Scenario Option 3c: medium growth new settlement plus settlement hierarchy (Buck Barn) (which has been re-presented as Growth Scenario Option 2c: medium growth new settlement plus settlement hierarchy (Buck Barn) in this SA Report when considering the additional growth options work undertaken for the Regulation 19 consultation). The additional growth options work undertaken for the Regulation 19 consultation presented in **Chapter 7** of this report also includes the appraisal of the preferred strategy without considering any of the further detail set out in Policy 14. This allows for a comparison of options for the strategy on level footing. The potential sustainability effects of Policy 14 are shown in the table below with a summary provided below that table.

**8.135** The detailed appraisal work for the individual strategic and smaller sites included for allocation has been presented in the **Appendix E** of this report.

**Table 8.5 Summary of SA findings for Policy 14 in the 'Housing' chapter of the Local Plan**

SA objective	Strategic Policy 14: Housing Provision
SA1: Housing	++
SA2: Access to services and facilities	++/-
SA3: Inclusive communities	+/-
SA4: Crime	0
SA5: Health and wellbeing	++/--
SA6: Biodiversity and geodiversity	--?

SA objective	Strategic Policy 14: Housing Provision
SA7: Landscape	--?
SA8: Historic environment	--?
SA9: Efficient land use	--/+
SA10: Natural resources	--?
SA11: Water resources	-?
SA12: Flooding	--?
SA13: Transport	++/-?
SA14: Air quality	++/--
SA15: Climate change	++/-
SA16: Economic growth	++/-
SA17: Access to employment opportunities	++/-

### Summary of SA findings for Policy 14

**8.136** Policy 14: Housing Provision would support the delivery of at least 18,700 homes over the plan period at an average delivery rate of 1,100 homes per annum. This figure is inclusive of approximately 8,063 homes which already have planning permission or are otherwise identified for development. The overall amount of housing planned for would provide enough homes to meet the need for the District in line with the standard methodology calculation. Overall a significant positive effect is expected in relation to **SA objective 1: housing**. The number of homes provided in the District would also contribute approximately 200 homes per annum towards meeting the unmet needs of Crawley Borough. The inclusion of the strategic allocation at Land West of Ifield would contribute effectively to the housing need of the Crawley within the North West Sussex Housing Market area, given the close relationship of the site to this area.

**8.137** The relatively high number of homes to be provided over the plan period will also support the delivery of an appropriate mix of homes (including affordable homes) to meet local needs. The inclusion of smaller site allocations and 10% of windfall sites at sites of less than 1ha is in line with the

NPPF requirement for this type of provision and could help achieve faster build out rates in the District.

**8.138** The relatively high level of development supported over the plan period is likely to support new service provision in the plan area. The inclusion of a number of large scale strategic sites is likely to be particularly supportive of new service provision. The majority of strategic sites are included as urban extensions where new residents will have relatively easy access to existing services and facilities at the larger settlements in the District or within the neighbouring authority area of Crawley. This is also the case for the West of Kilnwood Vale site which is to form an extension of the existing Kilnwood Vale strategic allocation. There is potential for some overburdening of existing services and facilities through this approach given the large amount of new growth to be provided, but this will depend on the timing of new service provision. This includes the potential effects of the delivery of an additional 500 homes within the existing Land North of Horsham allocation may stretch capacity limits at services and facilities within the north of the town. The exception to this is the new settlement to be created at Land at Buck Barn. The site is located within around 700m of the built-up area boundary of the nearest large settlement

(Southwater). However, it is around 2km from healthcare and education facilities within that settlement.

**8.139** The policy is supportive of some smaller scale growth at less developed settlements. Residents here may need to travel to access some services and facilities, however, this type of growth will also help to prevent the stagnation of existing rural service provision. Overall a mixed significant positive and minor negative effect is expected in relation to **SA objective 2: services and facilities**.

**8.140** The scale of growth to be provided could result in effects relating to the disruption of existing community networks and implications for local placemaking. This could particularly be the case where large scale new urban extensions are proposed (Land at East Billingshurst, West of Ifield and West of Southwater). The scale of growth to be provided at each settlement is proportionate to the existing settlement size which should help to limit the magnitude of adverse impacts effected. While the scale of development at the West of Kilnwood Vale site is to be more limited, the amount of housing to be provided (350 homes) is still likely to have implications for existing community networks. The site would form an extension to the existing Kilnwood Vale strategic allocation at which community networks may be more vulnerable to new development when compared to the other larger settlements in the District given the status of the site as an ongoing housing development.

**8.141** The delivery of a new settlement (Land at Buck Barn) will result in particular challenges given that placemaking will be undertaken 'from scratch'. It is expected that the new service provision supported by the scale of development set out through Policy 14: Housing Provision could help to support the successful integration of new communities in the District and therefore the minor negative effect expected in relation to **SA objective 3: inclusive communities** is combined with a minor positive effect. The support this policy is likely to provide for the delivery of a mix of homes to meet the needs of a range of local people could strengthen this positive effect.

**8.142** The location of the majority of new housing development in the District is outside of areas within the most deprived in England. The exception to this are the sites to the west of Broadbridge Heath which could help promote regeneration with or in close proximity to the area surrounding Slinfold. This area is within the 30% most deprived areas in England. Development close to Crawley (at West of Ifield and West of Kilnwood Vale, respectively) could also help to address deprivation within that settlement, parts of which fall within the 30%, 20% and 10% most deprived communities in England.

**8.143** Policy 14: Housing Provision will influence the distribution of housing growth in the District, but not the design of new development which comes forward, which is addressed

by other policies in the Local Plan. It is likely that design measures will most influence the prevalence of crime and anti-social behaviour as well as the feeling of safety for residents. Therefore, a negligible effect is expected for this policy in relation to **SA objective 4: crime**.

**8.144** By supporting a large proportion of new development as extensions of the larger settlements within and adjoining the District, a high number of new residents will be at locations where healthcare services and facilities which support physical activities can be easily accessed. This would include the existing commitments of the plan at strategic sites and the new strategic sites. Large scale development in this manner as well as where a new settlement would arise (Land at Buck Barn) will also support new services which could help to deliver long term improvements in public health. Similarly, the additional 500 homes within the existing Land North of Horsham allocation are well placed to provide residents access to healthcare services and facilities within Horsham Town. A significant positive effect is therefore expected in relation to **SA objective 5: health and wellbeing**. It is noted that access to such services and facilities for residents at Buck Barn will be most influenced by the timing of new service provision given that this settlement is not within walking distance of existing healthcare facilities.

**8.145** Including 2,200 homes as smaller scale allocations would include a number at more rural locations where existing healthcare services are not easily accessible. Furthermore, windfall developments (which account for 1,875 homes over the plan period) may come forward at locations which are less well related to the larger settlements of the plan area. Therefore, the policy could result in some residents having limited access to these types of facilities. A significant negative effect is therefore expected in combination for SA objective 5.

**8.146** The scale of development supported over the plan period is likely to have impacts in relation to biodiversity and geodiversity as well as the landscape setting and the settings of heritage assets in the plan area. These effects are likely given the scale of greenfield land take required to achieve the delivery of 18,700 homes as well as the infrastructure required to support that growth.

**8.147** As new development is occupied increased noise, air and light pollution may affect designated sites as well as other important habitats in the District. This includes the potential for impacts on the Mens SAC to the west. A bat sustenance zone has been designated around this site where impacts on bat flight paths might result as development occurs. This area extends as far east as Ashington, Southwater and Broadbridge Heath. It takes in the strategic scale sites at Billingshurst and Southwater. Furthermore, the development



of smaller scale sites to the south west of the District have the potential to have adverse impacts on the Arun Valley SPA.

**8.148** In relation to the international sites, the HRA (Habitats Regulations Assessment) for the Horsham Local Plan<sup>38</sup> concluded at the screening stage that likely significant effects could arise on Arun Valley SPA/Ramsar site (from changes in water quality, changes in water levels and flows and loss of functionally-linked land), Ebernoe Common SAC and The Mens SAC (from loss of functionally linked land) and, for The Mens SAC, atmospheric nitrogen deposition. An Appropriate Assessment was therefore carried out, which resulted in a number of recommendations being made to ensure that the Local Plan does not result in an adverse effect on the integrity of an internationally designated site either in combination or in isolation.

**8.149** Development at Buck Barn also has the potential to impact on the emerging Nature Recovery Network which links to the nearby Knepp Estate rewilding project. It is recognised that new development is likely to provide opportunities to incorporate green infrastructure and other measures to help mitigate any adverse impacts. However, overall, an uncertain significant negative effect is expected for Policy 14 in relation to **SA objective 6: biodiversity and geodiversity**.

**8.150** Policy 14: Housing Provision would not result in any development within the South Downs National Park or the High Weald AONB. The development of smaller scale sites at the south east of Horsham town, at Lower Beeding, and at Small Dole as well as the West of Kilnwood Vale site would be in close proximity to one of these designations. There is potential for adverse impacts on the respective settings of the National Park and AONB, as a result. The existing permitted strategic site at Kilnwood Vale is also in close proximity to the AONB.

**8.151** The delivery of strategic sites which would result in extensions to the settlements of Southwater, as well as at Ifield includes some land which has been assessed as having no/low capacity for large scale housing development from a landscape perspective. The delivery of 350 homes at the West Kilnwood Vale site also takes in land which has been assessed as having no/low capacity for medium scale housing development. Furthermore, the delivery of 2,200 homes at smaller scale sites will include the development of sites at smaller settlements where the established character is likely to be more susceptible to change. Overall a significant negative effect is expected in relation to **SA objective 7: landscape and townscape**. The effect is uncertain given that the design of new development may provide opportunities to achieve mitigation and enhancement.

**8.152** Many of the heritage assets in the District are located within the larger settlements. Therefore, the provision of a significant amount of development as extensions to these larger settlements, or as densification to an existing allocation in the case of North of Horsham, has the potential for adverse impacts in relation to the historic environment. Through the inclusion of a relatively high level of development (2,200 homes) at smaller sites also, this policy could have implications across a high number of locations.

**8.153** Through the inclusion of the strategic sites at Buck Barn and Ifield there is potential for adverse impacts on the settings of the Conservation Area at Ifield as well as Registered Parks and Gardens at Knepp Castle and Warnham Court. Overall, a significant negative effect is expected in relation to **SA objective 8: historic environment**. The design of the new development to be provided over the plan period may provide opportunities to secure improvements in relation to the settings of heritage assets as well as mitigation. Therefore, the negative effect is uncertain.

**8.154** The District is predominantly rural in character and there is a limited supply of brownfield land. It is therefore expected that the relatively high level of development over the plan period would result in a large amount of greenfield land being developed. Policy 14: Housing Provision includes the North Horsham site where densification of an existing allocation would result. This policy would also include the delivery of several urban extension strategic sites which could further support the re-use of brownfield land but is also likely to result in the use of a large area of greenfield land. The densification of the North of Horsham allocation with a further 500 homes makes the best use of the land within the site, but the allocation of the original site resulted in the loss of greenfield land. Furthermore, several of the strategic sites (including East of Billingshurst, West of Southwater and Buck Barn) as well as the West of Kilnwood Vale site include Grade 3 agricultural soils. A significant negative effect is therefore expected in relation to **SA objective 9: efficient land use**. The effect is uncertain given that it is unknown whether the soils in question are of Grade 3a or 3b quality.

**8.155** Beyond the built up areas much of the District is covered by MSAs. Within these areas development has the potential to result in loss of access to or sterilisation of finite mineral resources. The relatively high level of development set out through Policy 14: Housing Provision is likely to strengthen the adverse effect which would result. Therefore, a significant negative effect is expected in relation to **SA objective 10: natural resources**.

<sup>38</sup> Aecom on behalf of Horsham District Council (2021) Horsham Local Plan Habitats Regulations Assessment

**8.156** None of the strategic sites set out for development through Policy 14 fall within SPZs which might otherwise result in detrimental impacts in terms of local water quality. Some of the smaller sites at Thakeham and West Chilington which would allow for a modest level of development, however, do lie within these areas.

**8.157** The relatively high level of development set out through Policy 14 is likely to result in pressures resulting on wastewater infrastructure. Information from the bodies responsible for wastewater in the area and the Water Cycle Study<sup>39</sup> indicate this is likely to be the case for development at towards Crawley (the Ifield strategic site and West of Kilnwood Vale site) and the East of Billingshurst strategic site. Overall an uncertain minor negative effect is expected in relation to **SA objective 11: water resources**. Given that impacts relating to wastewater will be partly dependent upon the findings of site specific assessments and that there may be potential to achieve mitigation through the delivery of new or upgraded wastewater infrastructure, the effect is uncertain.

**8.158** Several of the strategic sites included for allocation through Policy 14 fall include areas of higher flood risk. These are Ifield and Buck Barn. However, these areas are small areas of the total land within each site land. It is likely the development of each site could be delivered to avoid the areas of higher flood risk. The relatively high level of greenfield land take required to support the level of development set out through Policy 14 is, however, likely to result in substantial increases in impermeable surfaces with implications for local flood risk. It is expected that planning policy (in line with national requirements) will require new development to mitigate potential flood risk associated with local runoff through the incorporation of SuDS. In some areas there is potential that these requirements would help to improve local flooding issues. An uncertain minor negative effect is expected in relation to **SA objective 12: flooding**.

**8.159** The distribution of housing development set out through Policy 14 is likely to result in a high number of new residents benefiting from access to existing services and facilities as well as sustainable transport links. This would be achieved by focussing a high proportion of development at the larger settlements through existing commitments, urban extensions and smaller sites. Many of these sites would provide development at settlements (including at Billingshurst, Kilnwood Vale close to Faygate and Ifield at Crawley town) where rail services can be accessed.

**8.160** Additionally, the policy includes densification of the North of Horsham allocation with a further 500 homes. Through these elements of the distribution of development,

the policy would respond positively to existing commuting patterns and in terms of delivering housing development to important employment areas for residents in Horsham District.

**8.161** Allocating some development (a total of 2,200 homes) at smaller sites including some development at the more rural locations would help to support rural services. However, residents at these locations are also likely to need to travel longer distances to access certain services and facilities. The inclusion of the new settlement site at Buck Barn could deliver new service provision and sustainable transport links in the long term, however, there is potential for new residents to be required to travel longer distances in the short term in particular. A mixed significant positive and minor negative effect is therefore expected in relation to **SA objective 13: transport**. The overall effect is uncertain given the difficulties in predicting the uptake of sustainable modes of transport amongst residents.

**8.162** Impacts of new development on air quality in the District will be greatly influenced by the need for residents to travel and the ability to promote modal shift. The relatively high level of housing development required by Policy 14 over the plan period is likely to result in a substantial increase in the number of journeys being made in the plan area. The strategic sites provided as extensions to the larger settlements in the District are likely to support new service provision and would also provide new residents with nearby access to existing provisions. This type of development is also likely to support the extension of existing public transport services. Development in this manner at Billingshurst, and Ifield as well as at the non-strategic site at West of Kilnwood Vale would provide nearby access to a railway station.

**8.163** The strategic site at Ifield by Crawley would provide residents with a good level of access to services as well as sustainable transport links and employment opportunities. The latter point is perhaps most important given the role Crawley plays for residents in terms of job opportunities. Development towards the edge of Crawley (at Ifield and West of Kilnwood Vale) could lead to increased traffic within the Hazelwick AQMA within Crawley and therefore may aggravate existing air quality issues here. Similarly, the additional 500 homes within the north of Horsham site would provide residents with good access to employment and services and facilities within Horsham town, but would also result in increased traffic on key routes into the town.

**8.164** The inclusion of the new settlement at Buck Barn is likely to support new service provision. However, the ability to reduce the need for residents to travel is likely to depend on the phasing of new service provision. The site is relatively well

<sup>39</sup> JBA Consulting on behalf of Crawley Borough Council, Mid Sussex District Council, Horsham District Council and Reigate and Banstead Borough Council (2020) Gatwick Sub Region Water Cycle Study

related to Southwater but some essential services such as education and healthcare are approximately 2km away within that settlement. Development at Buck Barn also has the potential to increase traffic within the Cowfold AQMA along the A272 which could intensify existing air pollution at this location. A mixed significant positive and significant negative effect is expected in relation to **SA objective 14: air quality**.

**8.165** The potential to promote modal shift and reduce travel by private vehicle is also likely to greatly influence CO<sub>2</sub> emissions in the plan area. This will also be influenced by the ability to incorporate renewable/low energy schemes. At larger developments it is considered that these types of provisions will be most viable. The inclusion of large scale extensions to existing settlements and a new settlement at Buck Barn could provide opportunities to incorporate these types of schemes. The densification of the North of Horsham allocation (which will provide an additional 500 homes) may also make this type of scheme more viable. New service provision and sustainable transport links could also help to limit greenhouse gas emissions. Therefore, a significant positive effect is expected in relation to **SA objective 15: climate change**. The high number of new homes to be delivered is likely to increase the overall level of emissions however, as new homes are occupied. The provision of some of 2,200 homes at smaller sites, including some at the smaller settlements in the District, could support some level of rural service provision. However, it is less likely to help limit the need for residents to travel longer distances on a regular basis. Therefore, the significant positive effect is likely to be combined with a minor negative effect.

**8.166** Providing a relatively high level of development over the plan period is likely to support the long term economic growth of the District. Benefits are likely to stem from an increased workforce and growth in the building sector and related supply chains as well as increased expenditure for businesses and at retail centres.

**8.167** Through the inclusion of housing development at strategic sites in close proximity to the more important economic centres (most notably Horsham town and Crawley), Policy 14: Housing Provision would respond to the economic realities of the area. While Horsham town would not accommodate new strategic growth, it would still accommodate a sizeable level of housing growth through smaller site allocations and the densification of the existing North of Horsham allocation. Strategic sites could also support new employment land. Providing development at smaller sites, some of which are at the more rural settlements, is considered less likely to support the future growth of the local economy. Many of these settlements are likely to lack access to infrastructure which would support higher level of economic growth, such as access to the strategic road network. Overall, a mixed significant positive and minor negative effect is

expected for the Policy 14 in relation to **SA objective 16: economic growth**.

**8.168** The town of Horsham and the adjoining area of Crawley (including parts of the Gatwick Diamond) play an important role for employment in the plan area. Many of the other settlements in the plan area see a regular outflow of commuters. By providing a proportion of the new development as urban extension strategic sites or as small sites which are well related to Horsham town or Crawley, Policy 14: Housing Provision would provide a high number of new residents with nearby access to employment opportunities. Many of these locations also benefit from public transport links by which residents could access employment further afield.

**8.169** The inclusion of strategic development which could support some new employment land could also help to provide new employment opportunities nearby to redress existing imbalances. The new settlement at Buck Barn is in close proximity to an existing key employment area and also provides an opportunity to incorporate new high quality employment land. However, if only 2,100 homes are to be delivered over the plan period at the site, there is likely to be a limit to the level of self-containment that can be achieved until the new settlement is fully built out.

**8.170** The 2,200 new homes to be provided at smaller sites includes a high number at the larger settlements. However, it also includes some at the more rural locations where key employment areas and existing public transport links are less accessible. A mixed significant positive and minor negative effect is therefore expected in relation to **SA objective 17: access to employment opportunities**.

## SA findings for Policies 15 to 23 in the Local Plan (Housing)

**8.171** This section presents the appraisal of:

- Policy 15: Meeting Local Housing Needs
- Policy 16: Affordable housing
- Policy 17: Improving Housing Standards in the District
- Policy 18: Rural Exception Homes
- Policy 19: Retirement Housing and Specialist Care
- Policy 20: Gypsies and Travellers
- Policy 21: Rural Workers' Accommodation
- Policy 22: Replacement Dwellings and House Extensions in the Countryside
- Policy 23: Ancillary Accommodation

**8.172** Policies 15 to 23 in Chapter 6 (Housing) have been included as part of the Local Plan Review to help address issues relating to housing provision in the District.

**8.173** This includes helping to deliver an affordable housing stock and appropriate mix of housing types and tenures to meet local requirements, as well as providing housing

development which is of an appropriate standard and that which will meet the needs of specific groups in the District.

**8.174** The potential sustainability effects of Policies 15 to 23 are shown in the table below with a summary provided below the table.

**Table 8.6 Summary of SA findings for Policies 15 to 23 in the 'Housing' chapter of the Local Plan**

SA objective	Strategic Policy 15 - Meeting Local Housing Needs	Strategic Policy 16 - Affordable Housing	Policy 17- Improving Housing Standards in the District	Policy 18 - Rural Exception Homes	Policy 19 - Retirement Housing and Specialist Care	Policy 20 – Gypsies and Travellers	Policy 21 - Rural Workers' Accommodation	Policy 22 - Replacement Dwellings and House Extensions in the Countryside	Policy 23 - Ancillary Accommodation
SA1: Housing	++	++/-?	++	++	++	++	+	++	+
SA2: Access to services and facilities	0	0	0	+/-	+	+/-	-	0	0
SA3: Inclusive communities	+	+	+	+	++	++	+	0	+
SA4: Crime	0	0	0	0	0	0	0	0	0
SA5: Health and wellbeing	0	0	+	0	+	+/-	0	0	0
SA6: Biodiversity and geodiversity	0	0	0	0	0	-?	0	+	0
SA7: Landscape	+	0	+	+/-	0	--/+?	+	+	+
SA8: Historic environment	+	0	+	+/-	0	+/-?	+	+	+
SA9: Efficient land use	0	0	0	-	0	+/-	+	+	+
SA10: Natural resources	0	0	0	0	0	--/+	0	0	0
SA11: Water resources	0	0	0	0	0	+/-	0	0	0
SA12: Flooding	0	0	+	0	0	+/-	0	0	0
SA13: Transport	0	0	0	+/-	+	+/-	-	0	0

SA objective	Strategic Policy 15 - Meeting Local Housing Needs	Strategic Policy 16 - Affordable Housing	Policy 17- Improving Housing Standards in the District	Policy 18 - Rural Exception Homes	Policy 19 - Retirement Housing and Specialist Care	Policy 20 – Gypsies and Travellers	Policy 21 - Rural Workers' Accommodation	Policy 22 - Replacement Dwellings and House Extensions in the Countryside	Policy 23 - Ancillary Accommodation
SA14: Air quality	0	0	0	+/-	+	+/-	-	0	0
SA15: Climate change	0	0	0	+/-	+	+/-	-	0	0
SA16: Economic growth	0	0	0	0	0	0	++	0	0
SA17: Access to employment opportunities	0	0	0	+/-	0	--/+	++	0	0

### Summary of SA findings for Policies 15 to 23

**8.175** It is expected that all policies will have a positive effect in relation to **SA objective 1: housing** given their focus on this topic area. These policies should help to achieve an appropriate proportion of affordable homes at more sizeable development schemes (Policy 16: Affordable Housing), as well as a mix of housing sizes and types to best meet local requirements (Policy 15: Meeting Local Housing Needs). Policy 15 is likely to help meet local demands for self-build or custom-build serviced plots in the District. Policy 16 supports the delivery of affordable homes on site in the first place, with off-site provision or financial contributions to be sought where this is not possible. The delivery of affordable homes should be split between social rented and/or affordable rented properties (70%), First Homes (25%) and other intermediate or shared ownership (5%). These policies are also expected to help ensure that the development of both open market and affordable housing is of a high quality (Policy 17: Improving Housing Standards in the District) both in terms of internal space standards, adaptability and accessibility.

**8.176** Policies 18: Rural Exception Homes and 19: Retirement Housing and Specialist Care address the provision of housing to meet needs of the rural population as well as older people and people in need of additional care. Policy 20: Gypsies and

Travellers safeguards existing sites and allocates new sites<sup>40</sup> (the detailed appraisal of these sites is presented in **Appendix E** of this report) for this type of use. Policies 21: Rural Workers' Accommodation, 22: Replacement Dwellings and House Extensions in the Countryside and to 23: Ancillary Accommodation address the provision of housing for rural workers, replacement dwellings and extensions in the countryside and residential annexes.

**8.177** Significant positive effects have been recorded for the majority of these policies, the exception being Policies 21: Rural Workers' Accommodation and 23: Ancillary Accommodation. It is expected that these policies would make a more modest contribution to meeting local housing needs and achieving a high quality of local stock. In the case of Policy 21 the policy criteria set out are likely to be applied less frequently as they relate to more specialist types of housing. Therefore, minor positive effects are recorded for these two policies in relation to SA objective 1. The significant positive effect expected for Policy 16: Affordable Housing is combined with an uncertain negative effect. The affordable housing targets included have been informed by Local Plan Viability Assessment. The SHMA indicates an affordable housing need of 503 units per year between 2019-39. It is clear that the targets included in this policy would not provide the required number of homes to address this need. This emphasises the

<sup>40</sup> Policy 20: Gypsy and Travellers allocates sites for Gypsy and Traveller accommodation at the proposed strategic site allocations as well as at proposed site allocations Southview, The Haven, Slinfold; Lane Top, Nutbourne Road, Pulborough; Hill Farm Lane and Stane Street, Pulborough; Northside Farm Rusper Road Ifield; Sussex Topiary Naldretts Lane Rudgwick; Plot 3 Bramblefield Crays Lane Thakeham; and Girder Bridge, Gay Street Lane, North

Heath. These seven sites were appraised as site options GA002; GA004; GA007; GA008; GA009; GA010; and GA015, respectively. The appraisal of the strategic site options has incorporated the delivery of Gypsy and Traveller accommodation where provision of this type was considered as part of proposals for the site. The appraisal of the large site options is presented in Appendix D and Chapter 5.



need for a policy that maximises supply of affordable homes whilst still being deliverable.

**8.178** It is expected that where housing is provided at more rural locations access to services and facilities will be limited. Therefore, a minor negative effect is expected in relation to **SA objective 2: access to services and facilities**, for Policies 18: Rural Exception Homes and 21: Rural Workers' Accommodation.

**8.179** Policy 18: Rural Exception Homes allows for some residential development at more rural locations which could support rural service use and prevent its stagnation. The policy is also supportive of development which is adjacent to or well-related to Secondary Settlements or higher where some access to services is likely. A minor positive effect is therefore expected in combination for this SA objective. Furthermore, Policy 18 also supports the delivery of housing for those whose work provides important services for rural communities. Policy 19: Retirement Housing and Specialist Care is expected to have a minor positive effect alone in relation to SA objective 2 given that it would require retirement housing and specialist care housing to be accessible to services and facilities by foot or public transport.

**8.180** Through Policy 20, new Gypsy and Traveller accommodation should have reasonable access to local services and community facilities. Therefore, a minor positive effect is expected in relation to SA objective 2. The sites set out for allocation through Policy 20: Gypsies and Travellers are mostly well related to larger settlements and/or existing services and facilities including education. The more notable exceptions to this are the sites in closest proximity to North Heath by Pulborough, Rusper, Slinfold, and Rudgwick and Bucks Green which are not close to the built up area boundary of these settlements. The new development at Bucks Barn would also not provide immediate access to existing services and facilities, but all strategic allocation sites are expected to provide new services and facilities in the longer term. Therefore, the minor positive effect recorded for Policy 20 in relation to SA objective 2 is combined with a minor negative effect.

**8.181** As supported by a number of policies in Chapter 6 of the Local Plan, delivering an appropriate mix and standard of housing development which would meet the needs of a wide section of the community is expected to help support social inclusion in the District. It is also likely to help address the needs of a growing and ageing population. This would include helping to improve access to the housing market for people on lower incomes (Policy 16: Affordable Housing) and meeting specific needs to help create more sustainable and balanced communities (Policy 15: Meeting Local Housing Needs). Policy 16 also includes the important requirement that

affordable homes should be integrated throughout a development and be of visually indistinguishable design which should further help to promote social inclusion where this type of development is provided.

**8.182** Ensuring that new development is adaptable and accessible for a wide range of users including wheelchair users (Policy 17: Improving Housing Standards in the District) and including policy to help meet the need for more affordable homes for rural communities (Policy 18: Rural Exception Homes) and those with additional care needs (Policy 19: Retirement Housing and Specialist Care) is expected to make the District a better place to live for these groups of people. A positive effect is therefore expected for Policies 16, 17, 18, 19 and 20 in relation to **SA objective 3: inclusive communities**. The increasing proportion of older people in the District means that Policy 19: Retirement Housing and Specialist Care will be of particular importance in terms of meeting the needs of the District. Policy 20: Gypsies and Travellers would directly help to meet the needs of a potentially vulnerable group in the plan area. The positive effect for these policies is likely to be significant. Policy 21: Rural Workers' Accommodation will help support access for some key workers to the housing market when they may be excluded from it by conventional means. A minor positive effect is therefore recorded for this policy in relation to SA objective 3.

**8.183** Policy 23: Ancillary Accommodation addresses the provision of appropriate development which might provide accommodation for a dependant or elderly family member. The provision of this type of development is likely to help ensure development in the District is supportive of families with older members or members with disabilities, where they wish to provide care for them at home. Therefore, a minor positive effect is also expected in relation to SA objective 3 for Policy 23.

**8.184** Positive effects are also expected for Policies 17: Improving Housing Standards in the District and 19: Retirement Housing and Specialist Care in relation to **SA objective 5: health and wellbeing**. Policies 17 and 19 are expected to help meet the specific housing needs of residents who have additional care requirements and who might otherwise be vulnerable without these types of provisions. This includes the provision of homes at sites providing 20 or more units to meet the Optional Standards for Wheelchair User dwellings as set out through Policy 17.

**8.185** Through Policy 20 it is required that residents at Gypsy and Traveller sites should benefit from access to healthcare facilities. A minor positive effect is therefore expected for the policy in relation to SA objective 5. This positive effect is combined with a minor negative effect given that some of the allocated sites (most notably those close to North Heath by

Pulborough, West Chiltington Village and Common, Rusper, Slinfold, Rudgwick and Bucks Green) are less well related to existing areas of open space and healthcare facilities which might otherwise support health and wellbeing of residents at these locations. A similar issue is likely to arise at the Buck Barn strategic site, although residents here would benefit from new provisions in the longer term.

**8.186** Policy 22: Replacement Dwellings and House Extensions in the Countryside is likely to have a minor positive effect in relation to SA objective 6: **biodiversity and geodiversity**. The policy requires that replacement buildings and extensions in the countryside should consider the need for ecological investigation to achieve biodiversity net gain where deemed appropriate.

**8.187** A number of the sites set out for allocation or continued use through Policy 20: Gypsies and Travellers are in close proximity to local biodiversity sites or lie within the bat sustenance zone. This includes the sites close to North Heath by Pulborough, to the east of Pulborough and Codmore Hill, Slinfold, Rudgwick and Bucks Green and Thakeham. Therefore, a minor negative effect is recorded for Policy 20 in relation to SA objective 6. The effect is uncertain given that mitigation of potential effects at these sites might be mitigated through appropriate design measures.

**8.188** Policy 15: Meeting Local Housing Needs states that housing mix should be considerate of factors such as the established character of a given area. Policy 17: Improving Housing Standards in the District states that exceptions to meeting the policy's requirements may exist where there are heritage constraints or issues relating to topography. It is expected that these elements of Policies 15 and 17 might help to prevent adverse impacts upon the established character (including landscape and townscape) as well as elements which contribute positively to the built historic environment.

**8.189** By allowing for some development at more rural locations, where the lower level of existing development contributes to existing character and setting, Policy 18: Rural Exception Homes could result in some detrimental impacts on landscape or the historic environment. The policy requires that this type of development should demonstrate good design and have regard to local character, which is likely to help limit the potential for these types of adverse effects. Therefore, a minor positive effect is expected in relation to **SA objective 7: landscape** and **SA objective 8: historic environment** for Policies 15, 17 and 18. For Policy 18 the positive effect is expected in combination with a negative effect. While this policy addresses housing in more rural locations which could have adverse impacts in relation to landscape and heritage at presently undisturbed locations, it does not allocate any

specific sites for development. The negative effect is therefore recorded as minor.

**8.190** Policy 20: Gypsies and Travellers is expected to help ensure that Gypsy and Traveller sites achieve a suitable layout with high quality boundary treatment and landscaping to limit significant adverse impacts on visual amenity. Therefore, this policy is expected to have a minor positive effect in relation to SA objectives 7 and 8. As some of the sites set out for allocation have no/low or low-moderate landscape capacity for residential development, the minor positive effect for SA objective 7: landscape is recorded with an uncertain significant negative effect. This includes the sites in close proximity to Pulborough (including the site at North Heath) and Codmore Hill, West Chiltington Village and Common and Thakeham. The potential for more substantial impacts on heritage assets or archaeology were only identified through the heritage impact assessment work undertaken by the Council for one site (Pulborough and Codmore Hill). Therefore, the minor positive effect recorded for Policy 20 in relation to SA objective 8: historic environment is combined with an uncertain minor negative effect. The uncertainty recorded in relation to landscape and the historic environment reflects the potential for appropriate design to mitigate the potential adverse effects. Furthermore, given that many of these sites are on brownfield land there may be opportunities to enhance the existing landscape and settings of heritage assets.

**8.191** Policies 21: Rural Workers' Accommodation, 22: Replacement Dwellings and House Extensions in the Countryside and 23: Ancillary Accommodation are also expected to have minor positive effects in relation to SA objectives 7 and 8. Rural accommodation for workers is to be well related to existing buildings on site and should be designed to be appropriate to local rural character and landscape. Furthermore, replacement dwellings in the countryside should be in keeping with the scale and character of the existing dwelling and surrounding area. Policy 23 requires that ancillary accommodation be of an appearance that is sympathetic to the surrounding area. These requirements are likely to help preserve established landscape character and the settings of features of importance for cultural heritage in Horsham District.

**8.192** Allowing for development of rural exception sites is likely to involve the development of some areas of greenfield land considering the less developed nature of these areas. Therefore, a minor negative effect is expected for Policy 18: Rural Exception Homes in relation to **SA objective 9: efficient land use**. The majority of the sites set out for allocation through Policy 20: Gypsies and Travellers are brownfield land. Some greenfield land which contains higher value agricultural soils is included for allocation at the site in

closest proximity to West Chiltington Village and Common. Furthermore, the sites included as part of strategic sites would also be almost entirely greenfield. Therefore, an overall mixed minor positive and minor negative effect is recorded for Policy 20 in relation to SA objective 9.

**8.193** As Policy 21: Rural Worker's Accommodation only supports new development for rural worker's accommodation where the development cannot be provided by redeveloping an existing building on the site, a minor positive effect is expected in relation to SA objective 9. Minor positive effects are also expected for Policies 21: Rural Workers' Accommodation, 22: Replacement Dwellings and House Extensions in the Countryside and 23: Ancillary Accommodation in relation to SA objective 9. Requiring that options for adaptation of existing buildings are considered in the first place in relation to accommodation for rural workers is likely to promote the re-use of existing buildings. Furthermore, allowing for the extension of rural properties and sympathetically designed annexes is likely to make best use of the existing housing stock in the District.

**8.194** Policy 20: Gypsies and Travellers requires proposals for Gypsy and Traveller accommodation to include provisions for waste disposal which may help to promote the achievement of the waste hierarchy. Therefore, a minor positive effect is expected for this policy in relation to **SA objective 10: natural resources**. As most of sites set out for allocation through this policy lie within MSAs, their development could result in sterilisation of or loss of access to finite mineral resources in the plan area. The minor positive effect recorded for this policy in relation to SA objective 10 is therefore combined with a significant negative effect.

**8.195** Policy 17: Improving Housing Standards in the District states that exceptions to meeting the policy's requirements may exist where there is vulnerability to flooding. This element of Policy 17 may limit the housing of people with accessibility issues in areas of higher flood risk. Therefore, a minor positive is expected for Policy 17 in relation to **SA objective 12: flooding**. Given that Policy 20: Gypsies and Travellers requires that proposals benefit from supply of water and infrastructure for sewerage and drainage, a minor positive effect is expected in relation to **SA objective 11: water resources**, as well as SA objective 12. Of the sites allocated through Policy 20, the site by Thakeham lies within an SPZ which could have implications for water quality and therefore the minor positive effect expected in relation to SA objective 11 is combined with a minor negative effect. The inclusion of sites allocated on greenfield land (most notably the sites included at the strategic allocations and the site by West Chiltington Village and Common) could increase the area of impermeable surfaces and contribute to increased flood risk in

the plan area. Therefore, the minor positive effect expected for Policy 20 in relation to SA objective 12: flooding is combined with a minor negative effect.

**8.196** Allowing for some level of development at rural exception sites as well as rural workers accommodation is likely to provide some level of housing growth at locations where services and facilities are less accessible. While the development of rural exception sites could help to support some new service provision this is likely to occur in the longer term. Furthermore, residents are still likely to need to travel by private vehicle on a more regular basis in comparison to residents within the larger settlements. Minor negative effects are therefore expected for Policies 18: Rural Exception Homes and 21: Rural Workers' Accommodation in relation to **SA objective 13: transport**. For Policy 18 the minor negative effect is expected in combination with a minor positive effect. The policy is also supportive of development at locations adjacent, or well related Secondary Settlements or higher. From these locations there is likely to be better access to services and facilities which could reduce the need for new residents to travel longer distances.

**8.197** Given the potential for varying levels of travel in the District to increase air pollution and contributions to climate change, minor negative effects are expected for both policies in relation to **SA objective 14: air quality** and **SA objective 15: climate change**. The minor negative effect expected for Policies 18: Rural Exception Homes and 20: Gypsies and Travellers is part of an overall mixed effect. Policy 19: Retirement Housing and Specialist Care is expected to have a minor positive effect alone in relation to SA objectives 13, 14 and 15. The policy would require retirement housing and specialist care housing to be accessible to services and facilities by foot or public transport which is likely to reduce the need to travel by private vehicle in Horsham District.

**8.198** Allowing for new development for Gypsy and Traveller accommodation could increase the number of car journeys being made regularly in the plan area. Therefore, a minor negative effect is expected in relation to SA objectives 13, 14 and 15 for Policy 20: Gypsies and Travellers. The negative effect is expected in combination with a minor positive effect given that the policy is supportive of sites which are well related to services and facilities as well as sustainable transport links such as bus stops. Sites provided alongside the strategic allocation sites are likely to benefit for new service provision and sustainable transport links in the longer term considering the overall scale of development supported and the site specific policy requirements for these allocations.

**8.199** While all policies in Chapter 6 relate mostly to new housing provision in the District, it is likely that Policy 21: Rural Workers' Accommodation would help to maintain viability of

some rural businesses in Horsham. This benefit is likely to be achieved given that the policy allows workers to live close to where their place of employment where it is deemed necessary. It is expected that this policy could help to maintain the rural economy in the District and also ensure that more remote employment opportunities remain accessible to employees, where justified. These developments should be kept in use for accommodation for rural workers unless it can be demonstrated that the use is no longer required, which should further help to protect the viability of rural businesses in Horsham District. A significant positive effect is expected for this policy in relation to **SA objective 16: economic growth** and **SA objective 17: access to employment opportunities**.

**8.200** Policy 18: Rural Exception Homes supports exception housing schemes in a number of circumstances, including where new residents would be unable to take up an offer of a job in the parish without this type of provision. A minor positive effect is expected for this policy in relation to SA objective 17. The effect is expected in combination with a minor negative effect given that in general it is expected that residents located in more rural areas would have reduced access to employment opportunities.

**8.201** The sites allocated for Gypsy and Traveller accommodation are mostly poorly related to existing key employment areas and the larger settlements in the plan area. The sites by West Chiltington Village and Common and Rusper perform particularly poorly in terms of access to key employment areas, with the site by Slinfold performing more favourably. Sites allocated as part of the larger strategic sites would have access to the new employment land provided in the longer term these locations. Overall a mixed minor positive and significant negative effect is expected for Policy 20: Gypsy and Travellers in relation to SA objective 17: access to employment opportunities.

## SA findings for Policies 24 to 31 in the Local Plan (Conserving and Enhancing the Natural Environment)

**8.202** This section presented the appraisal of:

- Policy 24: Environmental Protection
- Policy 25: Air Quality
- Policy 26: The Natural Environment and Landscape Character
- Policy 27: Countryside Protection
- Policy 28: Settlement Coalescence
- Policy 29: Protected Landscapes

- Policy 30: Strategic Policy: Green Infrastructure and Biodiversity

- Policy 31: Local Green Space

**8.203** Policies 24 to 31 in Chapter 7 (Conserving and Enhancing the Natural Environment) of the Local Plan have been included to help address issues relating to the natural environment in the District and its protection.

**8.204** The policies set out the approach of the Council in relation to preserving and, where possible, enhancing the environmental quality of the District, including air, soil and water quality.

**8.205** Policies have also been included to protect existing landscape character, including that within the countryside and the protected landscape areas within the District.

**8.206** This section of the Local Plan also includes consideration for the designation of Green Belt in Horsham District. This option was presented as a reasonable alternative for appraisal at the Regulation 18 stage and the findings for this option are now re-presented.

**8.207** The enhancement of the existing network of green infrastructure and achieving biodiversity is also supported through policy in this chapter, as is the protection of local green and open spaces.

**8.208** The potential sustainability effects of Policies 24 to 31 are described below.

Table 8.7 Summary of SA findings for the 'Conserving and Enhancing the Natural Environment' chapter of the Local Plan

SA objective	Strategic Policy 24: Environmental Protection	Policy 25: Air Quality	Strategic Policy 26: The Natural Environment and Landscape Character	Strategic Policy 27: Countryside Protection	Policy 28: Settlement Coalescence	Policy 29: Protected Landscapes	Strategic Policy 30: Green Infrastructure and Biodiversity	Policy 31 Local Greenspace	Consideration of potential Green Belt designation in the District
SA1: Housing	0	0	+	+	-?	-?	0	0	-?
SA2: Access to services and facilities	0	0	+	+	0	0	0	0	+/-?
SA3: Inclusive communities	0	0	+	+	0	0	0	+	+/-?
SA4: Crime	0	0	0	0	0	0	0	0	0
SA5: Health and wellbeing	+	+	0	+	0	+	+	+	+/-?
SA6: Biodiversity and geodiversity	++	++	++	++	++	++	++	++	++
SA7: Landscape	+	+	++	++	++	++?	+	+	++
SA8: Historic environment	0	0	+	+	+	+	0	+	+
SA9: Efficient land use	++	0	+	+	0	0	0	0	+
SA10: Natural resources	0	0	0	+	0	0	0	0	0
SA11: Water resources	++	0	+	0	0	0	++	0	0
SA12: Flooding	+	0	++	+	+	+	+	+	+
SA13: Transport	0	++	0	+	+	0	+	0	+/-?
SA14: Air quality	++	++	+	+	+	0	+	0	+/-?
SA15: Climate change	++	++	+	+	+	0	++	0	+/-?
SA16: Economic growth	0	0	+	+	-?	+/-	0	0	-?



SA objective	Strategic Policy 24: Environmental Protection	Policy 25: Air Quality	Strategic Policy 26: The Natural Environment and Landscape Character	Strategic Policy 27: Countryside Protection	Policy 28: Settlement Coalescence	Policy 29: Protected Landscapes	Strategic Policy 30: Green Infrastructure and Biodiversity	Policy 31 Local Greenspace	Consideration of potential Green Belt designation in the District
SA17: Access to employment opportunities	0	0	0	0	0	0	0	0	+/-?

### Summary of SA findings for Policies 24 to 31

**8.209** Policies 28: Settlement Coalescence and 29: Protected Landscapes contain restrictive criteria that have the potential to prevent new development and the supply of housing in the District. The designation of Green Belt within the District would also limit the type and scale of development (likely to include larger housing developments) which is acceptable within that part of the District. As such, these policies are expected to have a minor negative effect in relation to **SA objective 1: housing**. These effects are uncertain given it is likely that housing need for the District could be met at other locations.

**8.210** Policies 26: The Natural Environment and Landscape Character and 27: Countryside Protection recognise that new development may be necessary to allow for the sustainable growth of rural communities. This may include limited housing development, including rural housing exception sites. Therefore, these policies are likely to have minor positive effects in relation to SA objective 1: housing.

**8.211** Allowing for some level of rural development to ensure rural areas are sustainable in the long term is likely to support some level of essential service provision at these locations. Ensuring that rural residents have access to some services and facilities is likely to have further benefits in relation to promoting social integration and addressing some issues of deprivation. Therefore, Policies 26: The Natural Environment and Landscape Character and 27: Countryside Protection are expected to have minor positive effects in relation to **SA objective 2: access to services and facilities** and **SA objective 3: inclusive facilities**.

**8.212** Policy 31: Local Green Space would protect green areas of particular importance to local communities. As the policy responds to the specific needs of local people a minor positive effect is expected in relation to SA objective 3.

**8.213** Designating land within the District as Green Belt could result in a more compact urban form where residents have good access to services and facilities. However, in the long

term as new large scale development sites are required to meet housing needs, this type of approach would provide less flexibility in terms of responding to local needs. It could result in development 'jumping' the Green Belt to areas which are less sustainable in terms of access to existing services. As such an uncertain mixed minor positive and minor negative effect is expected in relation to SA objectives 2 and 3 for the designation of new Green Belt land.

**8.214** Policies 24: Environmental Protection and Policy 25: Air Quality address the protection of environmental quality in the District, including noise, air and odour. Policy 25 also seeks to promote travel by cycling and walking. Therefore, a minor positive effect is expected for both policies in relation to **SA objective 5: health and wellbeing**.

**8.215** Policies 27: Countryside Protection, 29: Protected Landscapes, 30: Green Infrastructure and Biodiversity and 31: Local Green Space address the protection of existing and provision of new multifunctional open and green spaces. This includes the open countryside and important protected landscapes which also provide local people opportunities for recreation and physical activities. These policies are therefore likely to encourage healthier lifestyle choices in the District. As such, these policies are also likely to have minor positive effects in relation to SA objective 5.

**8.216** Designating new Green Belt land in the District would provide further protection for areas which could act to allow residents access to recreational opportunities. If development were to 'jump' the Green Belt, however, some residents might be provided with reduced access to healthcare facilities and therefore an overall mixed minor positive and minor negative effect is expected in relation to SA objective 5.

**8.217** Policies 24 to 31 seek to conserve, enhance and connect designated biodiversity and geodiversity assets within the District, as well as areas (such as the countryside, protected landscape areas, Local Green Spaces and the potential Green Belt designation) which provide habitat space.

**8.218** Policy 30: Green Infrastructure and Biodiversity should help to protect and enhance the District's network of green infrastructure and the Nature Recovery Network as well as supporting development which contributes positively to natural capital. It seeks to ensure that development proposals result in at least 10% net gains to biodiversity and to demonstrate that existing biodiversity is protected and enhanced. The supporting text of the policy sets out that proposals which take in core sites within the Nature Recovery Network will, in many cases, be required to retain those sites for nature conservation purposes. Policy 25: Air Quality seeks to ensure that development includes the preservation and enhancement of green infrastructure in order to help offset the impacts of adverse air quality. Furthermore, the policy recognises the direct effects poor air quality has on natural habitats and biodiversity and seeks to ensure that proposals take into account habitats or biodiversity designations that are sensitive to changes in air quality. This could have added benefits in relation to the integrity of habitats. Significant positive effects are therefore expected for Policies 24 to 31 in relation to **SA objective 6: biodiversity and geodiversity**.

**8.219** Policies 26: The Natural Environment and Landscape Character, 27: Countryside Protection, 28: Settlement Coalescence, and 29: Protected Landscapes directly seek to protect and enhance the character of distinct landscapes and townscapes within the District. New development will be required to be appropriately designed and integrated into its local setting and maintain a sense of identity by preventing the coalescence of settlements and preventing erosion of Horsham's rural countryside. This includes the requirement for development to be considerate of the setting of the AONB and National Park, where relevant. Development should also have regard for impacts on designated 'International Dark Sky Reserves'. Designating Green Belt in the District could have benefits by providing more stringent protection of the open countryside in line with national policy.

**8.220** Therefore, a significant positive effect is likely in relation to **SA objective 7: landscape** for these four policies as well as the potential for the Green Belt designation in Horsham. However, Policy 29: Protected Landscapes notes the possibility that major proposals demonstrated to be in the public interest could come forward and small-scale development that aids the social and economic well-being of the AONB could also come forward within such protected landscape areas. These types of developments will only be permitted where the scheme is compatible with the purpose of the designation. As such, the significant positive effect recorded for this is uncertain.

**8.221** Policy 25: Air Quality and Policy 30: Green Infrastructure and Biodiversity support the preservation and enhancement of green infrastructure which should contribute to local landscape character. Policy 31: Local Greenspace

seeks to protect and enhance local green spaces which could make similar contributions. Minor positive effects are therefore expected in relation to SA objective 7 for these three policies.

**8.222** Policies 26: The Natural Environment and Landscape Character, 27: Countryside Protection, and 29: Protected Landscapes address the requirement to conserve and enhance the landscape and townscape character within the District. This would take account of areas identified as being of landscape importance, including key features and characteristics of the area. As a result, of the policies in this chapter of the Local Plan, these three policies are most likely to protect the setting of District's heritage assets. Therefore, minor positive effects are likely in relation to **SA objective 8: historic environment**.

**8.223** Preventing the coalescence of settlements in the plan area (potentially through the designation of a new Green Belt) is also likely to help protect established character. The protection of Local Green Spaces in Horsham District may also have benefits in terms of the settings of heritage assets given that these areas may be designated for their historic significance. As such minor positive effects are also expected for these two policies and the potential designation of Green Belt land in Horsham in relation to SA objective 8.

**8.224** Policies 24: Environmental Protection, 26: The Natural Environment and Landscape Character and 27: Countryside Protection are supportive of the redevelopment of land that has been previously developed. For Policies 26 and 27 this type of development is limited to that which helps to sustain social and economic needs of rural communities as well as uses such as equestrian, business or tourism use. A positive effect is therefore expected for both policies in relation to **SA objective 9: efficient land use**. The positive effect expected in relation to 26 is likely to be significant as it is also supportive of the remediation of contaminated land.

**8.225** Policy 27: Countryside Protection is supportive of development for the extraction of minerals outside of the built-up area boundaries in certain circumstances. Therefore, a minor positive effect is expected for this policy in relation to **SA objective 10: natural resources**.

**8.226** Policies 24: Environmental Protection and 30: Green Infrastructure and Biodiversity directly address the requirement for new development within Horsham District to avoid and minimise impacts on the District's water resources and seek to ensure that the District's good water quality is maintained. Therefore, these policies are likely to have a significant positive effect in relation to **SA objective 11: water resources**.

**8.227** Policy 26: The Natural Environment and Landscape Character requires maintenance of the SuDS at developments which is likely to help limit the potential for high levels of

surface water run off to result and carry pollutants into local water bodies. A minor positive effect is therefore expected in relation to SA objective 11 for this policy.

**8.228** As this policy directly addresses the provision and maintenance of SuDS a significant positive effect is expected in relation to **SA objective 12: flooding**. Policy 24: Environmental Protection states that development proposals must ensure surface water flooding is managed correctly in order to prevent contaminated run-off.

**8.229** Policies 27: Countryside Protection, 28: Settlement Coalescence, 29: Protected Landscapes, 30: Green Infrastructure and Biodiversity and 31: Local Green Space will help to maintain undeveloped areas of the District in the open countryside, protected important landscapes, the green infrastructure network and Local Green Spaces where surface water is more likely to achieve safe infiltration. As such, these policies are likely to have minor positive effects in relation to SA objective 12: flooding. A similar effect is expected if Green Belt land were to be designated in Horsham District.

**8.230** Policy 25 seeks to minimise traffic generation and congestion in Horsham by supporting public access to sustainable transport provision and enhancing the District's networks for cycling and walking. Therefore, this policy is likely to have a significant positive effect in relation to **SA objective 13: transport**.

**8.231** By allowing for some limited amount of development in countryside locations to maintain the sustainability of these locations, Policy 27: Countryside Protection could help to limit the need to travel from these locations. Policy 28: Settlement Coalescence would prevent development which could lead to settlement coalescence unless it can be demonstrated that amongst other things it would not lead to increased traffic movements. As such minor positive effects are expected for these two policies in relation to SA objective 13.

**8.232** Designating a Green Belt in Horsham could lead to development being delivered in a more compact form and a reduced need to travel in the area. However, if development were to 'jump' the Green Belt some residents would need to travel longer distances more regularly. The minor positive effect expected for SA objective 13 in relation to designating a Green Belt in Horsham is therefore combined with a minor negative effect.

**8.233** It is expected that supporting green infrastructure in the District could help support some new routes for walking and cycling and therefore a minor positive effect is also expected for Policy 30: Green Infrastructure and Biodiversity in relation to this SA objective.

**8.234** The District has a strongly rural character and there is an important link between the need for residents to travel (by private vehicle in particular) and air quality and carbon

emissions. As such, similar effects are expected for these four policies and the potential designation of a Green Belt in Horsham in relation to **SA objective 14: air quality** and **SA objective 15: climate change**. The positive effect recorded for Policy 30 is likely to be significant considering the potential for woodland and the other green infrastructure assets that this policy would protect and potentially enhance, to act as carbon sinks.

**8.235** Policy 24: Environmental Protection includes criteria for development to consider the protection of human health and the environment in relation to air pollution and greenhouse gas emissions. As such, the policy directly addresses these issues and a significant positive effect is expected in relation to SA objectives 14 and 15. Policy 25: Air Quality is also expected to have a significant positive effect in relation to these SA objectives. This policy directly seeks to ensure that development in the plan area is provided to address the effect air quality can have in terms of human health and climate change. It is supportive of development proposals which minimise traffic generation and adverse impacts relating to air quality issues on residential amenity. It is also supportive of schemes which contribute to the implementation of local Air Quality Action Plans.

**8.236** Policy 26: The Natural Environment and Landscape Character recognises that planting schemes within new developments will contribute towards maintaining the character of settlements and separation between settlements. This type of provision would have a benefit in relation to air quality and climate change. Therefore, minor positive effects are expected in relation to SA objectives 14 and 15.

**8.237** Policies 26: The Natural Environment and Landscape Character and 27: Countryside Protection recognise that the redevelopment of brownfield sites is required to sustain social and economic needs, particularly in rural communities. These policies also provide support for proposals for development associated with business and tourism on previously developed land. As such, these policies are likely to have minor positive effects in relation to **SA objective 16: economic growth**.

**8.238** Policy 29: Protected Landscapes would limit the potential for development which affects the setting of the High Weald AONB or the South Downs National Park. While this would limit the potential for economic growth in these areas, the protection of areas which have potential to contribute to the District's economy in terms of their value for tourism and recreation, is seen as particularly important. A mixed minor positive and minor negative effect is therefore also expected for this policy in relation to SA objective 16.

**8.239** Policy 28: Settlement Coalescence and the designation of a Green Belt in Horsham would potentially make many urban extension sites unsuitable for economic growth. As such a minor negative effect is expected for these policies in

relation to SA objective 16. As economic growth required over the plan period is likely to be met at other locations, the negative effects recorded are uncertain.

**8.240** It is also considered likely that the designation of a Green Belt in Horsham could promote a high level of access to employment opportunities where a more compact settlement form would result. However, development may be required to 'jump' the Green Belt in the longer term. This may result in some residents with a more limited level of access to employment opportunities and therefore an uncertain mixed minor positive and minor negative effect is expected in relation to **SA objective 17: access to employment opportunities**.

### SA findings for Policies 32 to 35 in the Local Plan (Development Quality, Design and Heritage)

**8.241** This section presents the appraisal of:

- Policy 32: Development Quality

- Policy 33: Development Principles
- Policy 34: Heritage Assets and Managing change in the Historic Environment
- Policy 35: Shop Fronts and Advertisements

**8.242** Policies 32 to 35 in Chapter 8 (Development Quality, Design and Heritage) of the Local Plan have been included to help address issues relating to development quality (including the preservation of rural character), protecting heritage assets and their setting and criteria for the provision of shop fronts and advertisements.

**8.243** The potential sustainability effects of Policies 32 to 35 are shown in the table below with a summary provided below the table.

Table 8.8 Summary of SA findings for the 'Development Quality, Design and Heritage' chapter of the Local Plan

SA objective	Strategic Policy 32: Development Quality	Strategic Policy 33: Development Principles	Strategic Policy 34: Heritage Assets and Managing Change within the Historic Environment	Policy 35: Shop Fronts and Advertisements
SA1: Housing	+	+	0	0
SA2: Access to services and facilities	0	0	0	0
SA3: Inclusive communities	+	+	0	+
SA4: Crime	+	+	0	0
SA5: Health and wellbeing	+	+	0	0
SA6: Biodiversity and geodiversity	+	+	+	0
SA7: Landscape	++	++	++	++
SA8: Historic environment	++	+	++	++
SA9: Efficient land use	+	++	0	0

SA objective	Strategic Policy 32: Development Quality	Strategic Policy 33: Development Principles	Strategic Policy 34: Heritage Assets and Managing Change within the Historic Environment	Policy 35: Shop Fronts and Advertisements
SA10: Natural resources	0	0	0	0
SA11: Water resources	+	0	0	0
SA12: Flooding	+	+	0	0
SA13: Transport	+	+	0	0
SA14: Air quality	+	+	0	0
SA15: Climate change	+	+	0	0
SA16: Economic growth	+	+	0	+
SA17: Access to employment opportunities	0	0	0	0

### Summary of SA findings for Policy 32 to 35

**8.244** Minor positive effects are expected for Policies 32: Development Quality and 33: Development Principles in relation to **SA objective 1: housing** due to the potential for these policies to contribute to the delivery of sustainable and decent housing in the District. This includes the provision of development which achieves inclusive design and high standards of building materials.

**8.245** Minor positive effects are also expected for both policies in relation to **SA objective 3: inclusive communities**. The requirements for building design to be adaptable (Policy 32) and provide a good level of amenity for all existing and future occupants (Policy 33) is likely to ensure new development is acceptable to a wide range of users. Policy 35: Shops Fronts and Advertisements seeks to ensure that adverts should not impair on pedestrian or highway safety including in respect to people with disabilities. Therefore, a minor positive effect is expected in relation to this SA objective for this policy also.

**8.246** Given that Policies 32 and 33 are supportive of development that contribute to a safe environment, minor positive effects are expected in relation to **SA objective 4: crime**.

**8.247** Policy 32: Development Quality includes a requirement to contribute to and enhance green and blue infrastructure and retain natural features such as trees, hedgerows and watercourses. Similarly, Policy 33: Development Principles also includes a requirement to preserve natural features and also requires that any loss of such features caused by development should provide adequate mitigation or compensation. The contribution green infrastructure makes to general wellbeing is well documented and therefore minor positive effects are expected for Policies 32 and 33 in relation to **SA objective 5: health and wellbeing**.

**8.248** These features are also likely to contribute to habitat provision and connectivity in the District. As such, minor positive effects are also expected for both of the policies in relation to **SA objective 6: biodiversity and geodiversity**. Policy 34: Heritage Assets and Managing Change in the Historic Environment requires development to preserve locally distinctive features including trees. These features can play an important role in terms of local biodiversity and therefore a minor positive effect is also expected in relation to SA objective 6 for this policy.

**8.249** All policies included in Chapter 8 of the Local Plan aim to help promote the conservation and enhancement of the



District's character and distinctiveness. For Policies 32: Development Quality and 33: Development Principles, this includes the retention of distinctive features which contribute to landscape, townscape and established character. Policy 32 also specifically requires housing proposals within the High Weald Area of Outstanding Natural Beauty to have regard to High Weald Housing Design Guide. As such, significant positive effects are expected for both the policies in relation to **SA objective 7: landscape and townscapes**.

**8.250** As the Policy 34: Heritage Assets and Managing Change in the Historic Environment requires development to make a positive contribution to the character and distinctiveness of the area a significant positive effect is also expected in relation to SA objective 7. Policy 35: Shop Fronts and Advertisements is likely to have a similar significant positive effect in the context of the shopping areas of Horsham District by requiring that advertisements do not have a detrimental impact on the surrounding townscape and landscape.

**8.251** Policy 34: Heritage Assets and Managing Change within the Historic Environment requires development to ensure that due consideration has been given to the significance and context of heritage assets. This is to include archaeological investigations, recording and reporting above and below ground. Furthermore, developments should reflect Historic England's best practice guidance and Conservation Area Appraisal and Plans. A significant positive effect is expected for this policy in relation to **SA objective 8: historic environment**.

**8.252** A significant positive effect is also expected for Policies 32: Development Quality and 35: Shop Fronts and Advertisements in relation to this SA objective as they require that development responds positively to locally distinctive characters and heritage. In the case of Policy 35 this relates specifically to shop frontages in the District but may include the sympathetic restoration of features of architectural or historic interest. The positive effect expected in relation to SA objective 8 for Policy 33: Development Principles is likely to be minor given that requiring that new development be locally distinctive in character is likely to help protect the setting of nearby heritage assets.

**8.253** A significant positive effect is expected for Policy 33 in relation to **SA objective 9: efficient land use**. The development principles set out through this policy include the efficient use of land and prioritisation of use of previously developed land and buildings. The positive effect expected for Policy 32: Development Quality in relation to SA objective 7 is likely to be minor. This policy requires that efficient land use be promoted in development proposals but does not specifically refer to the use of previously developed land.

**8.254** Policy 32: Development Quality also states that existing watercourses should be retained at the site as development is delivered. As such, a minor positive effect is expected for this policy in relation to **SA objective 11: water resources**.

**8.255** A minor positive effect is expected for Policy 32: Development Quality and 33: Development Principles in relation to **SA objective 12: flooding**. For the former, the requirements to preserve and enhance green infrastructure may contribute to mitigation of flood risk by supporting surface water infiltration. For the latter, the requirement for buildings to be constructed so that they are adaptable to climate change may ensure that they are resilient to future increases in flood risk.

**8.256** The support Policy 32: Development Quality provides for green infrastructure provision at new development could include the delivery of new sustainable transport routes. These types of provision could be complemented by Policy 33: Development Principles, which requires that proposals for development should demonstrate that they will not cause unacceptable harm to the amenity of existing and future residents through traffic generation. This policy also states priority is to be given to pedestrian, cyclist and public transport over private vehicles. As such, minor positive effects are expected for both policies in relation to **SA objective 13: transport**.

**8.257** Limiting the need to travel by private car in and prioritising pedestrian, cyclists and public transport in Horsham District may also have benefits in terms of minimising adverse impacts on air quality and the contribution residents make in terms of climate change. Minor positive effects are therefore expected for these two policies in relation to **SA objective 14: air quality** and **SA objective 15: climate change**. Protecting and enhancing green infrastructure may also have the potential to mitigate air pollution and carbon emissions through sequestration of harmful particulates and carbon emissions.

**8.258** By promoting high quality design in developments, Policies 32: Development Quality and 33: Development Principles may help support increased potential for investment in the area. As such, a minor positive effect is expected for both policies in relation to **SA objective 16: economic growth**. A similar minor positive effect is expected for Policy 35: Shops Fronts and Advertisements given that it is likely to help protect the vibrancy of the District's shopping areas.

## SA findings for Policies 36 to 39 in the Local Plan (Climate Change and Flooding)

**8.259** This section presents the appraisal of:

- Policy 36: Climate Change

- Policy 37: Appropriate Energy Use
- Policy 38: Sustainable Design and Construction
- Policy 39: Flooding

**8.260** Policies 36 to 39 in Chapter 9 (Climate Change and Flooding) of the Local Plan have been included to help address issues relating to mitigation of, and adaptation to, climate change in the District.

**8.261** This includes the policy approach of the Council in relation to renewable and low energy, sustainable design and construction and mitigating flood risk in light of climate change.

**8.262** The potential sustainability effects of Policies 36 to 39 are shown in the table below with a summary provided below the table.

**Table 8.9 Summary of SA findings for the 'Climate Change and Flooding' chapter of the Local Plan**

SA objective	Strategic Policy 36: Climate Change	Strategic Policy 37: Appropriate Energy Use	Policy 38: Sustainable Design and Construction	Strategic Policy 39: Flooding
SA1: Housing	+	0	0	0
SA2: Access to services and facilities	0	0	0	0
SA3: Inclusive communities	0	0	+	0
SA4: Crime	0	0	0	0
SA5: Health and wellbeing	+	0	0	0
SA6: Biodiversity and geodiversity	+	0	0	+
SA7: Landscape	+	+	0	0
SA8: Historic environment	0	0	+	0
SA9: Efficient land use	+	0	0	0
SA10: Natural resources	+	0	+	0
SA11: Water resources	+	0	++	+
SA12: Flooding	++	0	0	++
SA13: Transport	+	0	0	0
SA14: Air quality	+	0	0	0

SA objective	Strategic Policy 36: Climate Change	Strategic Policy 37: Appropriate Energy Use	Policy 38: Sustainable Design and Construction	Strategic Policy 39: Flooding
SA15: Climate change	++	++	++	+
SA16: Economic growth	0	+	0	0
SA17: Access to employment opportunities	0	0	0	0

### Summary of SA findings for Policy 36 to 39

**8.263** While the policies in Chapter 9 do not relate directly to the delivery of housing to meet local needs, Policy 36: Climate Change includes requirements for energy efficiency standards in new homes to exceed standard Building Regulations. These requirements will contribute to the delivery of a higher quality housing stock. As such, a minor positive effect is expected for Policy 36 in relation to **SA objective 1: housing**.

**8.264** It is likely that helping to ensure that development is suitable for future adaptation should mean that it is suitable for a wide range of users. Therefore, a minor positive effect is expected for Policy 38: Sustainable Design and Construction in relation to **SA objective 3: inclusive communities**.

**8.265** Similarly, whilst Policy 36: Climate Change is designed to directly address public health in Horsham District, it includes requirements for development to maximise opportunities to encourage walking and cycling, which may increase uptake of exercise amongst residents in the District. As such, a minor positive effect is expected for this policy in relation to **SA objective 5: health and wellbeing**.

**8.266** The potential for climate change to be mitigated through green infrastructure provision is included as part of Policy 36: Climate Change. As well as contributing to carbon reduction targets, there is potential for increased green infrastructure provision to enhance ecological networks and provide opportunities for people in the District to come into contact with nature. Policy 39: Flooding also supports development incorporating SuDS which considers green infrastructure, local ecological resources and biodiversity. This includes support for SuDS to make a contribution towards environmental net gain. As such, a minor positive effect is expected for these policies in relation to **SA objective 6: biodiversity and geodiversity**.

**8.267** Policy 39: Flooding includes a requirement for development that, when determining the suitability of SuDS, the vulnerability and importance of local ecological resources should be considered. As such, a minor positive effect is also expected for Policy 40 in relation to SA objective 6.

**8.268** Changes to the District's landscape may be influenced by the impacts of climate change and Policy 36: Climate Change requires major development to respond positively to this issue. Therefore, a minor positive effect is expected for this policy in relation to **SA objective 7: landscape**. There is also potential for renewable energy schemes (such as large scale wind farms) to impact upon landscape character in the District. The supporting text for Policy 37: Appropriate Energy Use requires renewable energy proposals to take the impact that they may have on protected landscapes into consideration. A minor positive effect is also expected for Policy 37 in relation to SA objective 7.

**8.269** A minor positive effect is expected for Policy 38: Sustainable Design and Construction in relation to **SA objective 8: historic environment**. This policy seeks to ensure development involving the retrofitting of existing heritage assets will not result in detriment or harm.

**8.270** Through Policy 36: Climate Change development which retains and reuses existing buildings, components and materials onsite is to be supported. Therefore, a minor positive effect is expected for this policy in relation to **SA objective 9: efficient land use**.

**8.271** Policies 36: Climate Change and 38: Sustainable Design and Construction are supportive of measures which would promote the achievement of the waste hierarchy in the District. This includes measures to help reduce the amount of biodegradable waste going to landfill and providing storage for refuse and recyclable materials. Minor positive effects are

therefore expected for both policies in relation to **SA objective 10: natural resources**.

**8.272** Policy 38: Sustainable Design and Construction is likely to help promote the efficient use of water resources in the plan area given the requirement for new non-residential development to achieve an 'Excellent' BREEAM standard which should include a specific focus on water efficiency. Furthermore, the policy requires that residential development achieves a water efficiency rate of 100 litres/person/day, with schemes above 200 homes expected to achieve 80 litres/person/day. Therefore, a significant positive is expected for this policy in relation to **SA objective 11: water resources**. A minor positive effect is expected for Policy 36: Climate Change in relation to SA objective 11 as it will make a contribution to conserving the District's water resources through an overarching requirement that development should include measures which promote the conservation of water. A minor positive effect is also expected for Policy 39: Flooding in relation to this SA objective. The policy requires consideration for any potential impacts on water quality in SuDS design for new developments.

**8.273** To address increased flood risk related to climate change, Policy 36: Climate Change sets out that green infrastructure and SuDS provision should be included in new developments to reduce surface water runoff. Therefore, a significant positive effect is expected for the policy in relation to **SA objective 12: flooding**. A significant positive effect is also expected in relation to SA objective 12 for Policy 39: Flooding as it includes a comprehensive approach to addressing flood risk in the District. The potential for flood risk is to be considered during the layout and design of development sites and flood zone 3b is avoided for all development except for water-compatible uses and essential infrastructure. The policy also requires that development will not result in a net loss of flood storage capacity.

**8.274** Policy 36: Climate Change is likely to make contributions to mitigating climate change through the requirement that new development should help to reduce the need to travel. Alternative modes of transport should be encouraged at new development. This requirement is likely to have benefits in terms of potentially reducing congestion as well as minimising adverse impacts relating to air quality in the District. A minor positive effect is expected for **SA objective 13: transport** and **SA objective 14: air quality**.

**8.275** Policy 36: Climate Change sets out energy efficiency improvement requirements for new development, which aim to reduce energy used in construction and during operation of buildings. Sustainability Statements will be required for new development proposals to demonstrate how proposals will be adapted to and mitigate the effects of climate change. The overarching approach of Policy 36 is likely to be supported

through more specific requirements set out in Policy 38: Sustainable Design and Construction. Policy 38 requires that new 'non-domestic floorspace must achieve a minimum standard of BREEAM 'Excellent'. Non-residential developments will be required to meet higher levels of energy efficiency through this approach. Policy 38 also sets out an overarching objective in relation to encouraging the use of decentralised, renewable or low carbon energy supply systems

**8.276** Support for stand-alone renewable energy schemes is set out through Policy 37: Appropriate Energy Use. The Policy also sets out an energy hierarchy that places an emphasis on district heating networks, and it is expected that these types of measures will help to limit the District's contributions to carbon emissions. As such, significant positive effects are expected for Policies 36, 37 and 38 in relation to **SA objective 15: climate change** given their strong relationship to measures which directly help to minimise carbon emissions. A minor positive effect is expected for Policy 39: Flooding in relation to SA objective 15 given that it will help to address the changes in flood risk resulting from climate change.

**8.277** Policy 37: Appropriate Energy Use includes support for stand-alone renewable energy schemes as well as initiatives which seek to deliver renewable and low carbon energy that meets need, or is led, by the local community. There is potential for this support to increase investment potential in the District in the low-carbon energy sector. Therefore, a minor positive effect is expected for the policy in relation to **SA objective 16: economic growth**.

## SA findings for Policies 40 to 45 in the Local Plan (Infrastructure, Transport and Healthy Communities)

**8.278** This section presents the appraisal of:

- Policy 40: Infrastructure Provision
- Policy 41: Sustainable Transport
- Policy 42: Parking
- Policy 43: Gatwick Airport Safeguarding
- Policy 44: Inclusive Communities, Health and Wellbeing
- Policy 45: Community Facilities and Uses

**8.279** Policies 40 to 45 in Chapter 10 (Infrastructure, Transport and Healthy Communities) of the Local Plan seek to address issues relating to infrastructure provision to support new development in the District, including the provision of transport and community facilities.

**8.280** Requirements for new green infrastructure and open spaces are also addressed through these policies.

**8.281** The potential sustainability effects of Policies 40 to 45 are shown in the table below with a summary provided below the table.

**Table 8.10 Summary of SA findings for the 'Infrastructure, Transport and Healthy Communities' chapter of the Local Plan**

SA objective	Strategic Policy 40: Infrastructure Provision	Strategic Policy 41: Sustainable Transport	Policy 42: Parking	Policy 43: Gatwick Airport Safeguarding	Strategic Policy 44: Inclusive Communities, Health and Wellbeing	Policy 45: Community Facilities, Leisure and Recreation
SA1: Housing	+	0	0	+/-	+	0
SA2: Access to services and facilities	++	++	+	0	++	++
SA3: Inclusive communities	++	++	+	0	++	++
SA4: Crime	+	0	+	0	+	+
SA5: Health and wellbeing	++	+	+/-	-?	++	++
SA6: Biodiversity and geodiversity	0	0	0	-?	0	+
SA7: Landscape	0	0	0	-?	0	+
SA8: Historic environment	0	0	0	-?	0	0
SA9: Efficient land use	0	0	0	0	0	0
SA10: Natural resources	0	0	0	0	0	0
SA11: Water resources	+	0	0	0	0	0
SA12: Flooding	0	0	0	0	0	0
SA13: Transport	+	++	+/-	-	+	+
SA14: Air quality	+	++	+/-	-	+	+
SA15: Climate change	+	++	+/-	-	+	+
SA16: Economic growth	0	++	+	++	+	0
SA17: Access to employment opportunities	0	++	++	+	++	0



## Summary of SA findings for Policies 40 to 45

**8.282** Policies 40: Infrastructure Provision, 41: Sustainable Transport, 42: Parking, 43: Gatwick Airport Safeguarding, 44: Inclusive Communities, Health and Wellbeing and 45: Community Facilities, Leisure and Recreation in the Local Plan set out the approach of the Council in relation to delivering the necessary infrastructure and local services to support the needs of new and existing communities in the District.

**8.283** Policy 40: Infrastructure Provision seeks to ensure that the amenity of local residents is not adversely affected through undue pressures on local infrastructure. Considering that the policy would help to protect residential amenity in the plan area, a minor positive effect is expected in relation to **SA objective 1: housing**.

**8.284** Policy 43: Gatwick Airport Safeguarding safeguards land for the potential expansion of the airport, by preventing development that is considered incompatible with this expansion. It also restricts development that is considered a hazard to aircraft safety. While this may prevent some residential development, the policy also states that residential extensions will normally be acceptable. Therefore, a mixed minor positive and minor negative effect is expected in relation to SA objective 1.

**8.285** As Policy 44: Inclusive Communities, Health and Wellbeing seeks to ensure that housing development meets the specific needs of an ageing population a minor positive effect is also expected for this policy in relation to SA objective 1.

**8.286** In addition to Policy 40: Infrastructure Provision, Policy 41: Sustainable Transport is expected to be of particular benefit in terms of accessing services and facilities for those residents without access to a private car. Policy 44: Inclusive Communities is expected to ensure that the infrastructure requirements of all members of the community, including those with disabilities, rural workers, and minority groups, are addressed. This policy will be of particular importance in terms of supporting the needs of local community groups and achieving social integration. Furthermore, Policy 45: Community Facilities, Leisure and Recreation seeks to ensure a sufficient provision of community facilities such as areas of amenity green space, sport and recreational facilities, and is expected to facilitate community cohesion and integration through appropriate development. As such, all of these policies are likely to have significant positive effects in relation to **SA objectives 2: access to services and facilities**.

**8.287** The provision of new services and facilities to meet local requirements is likely to help promote social integration and community cohesion and therefore these policies are also likely to have a significant positive effect in relation to **SA**

**objective 3: inclusive communities**. The positive effect expected for Policy 42: Parking in relation to SA objective 2 and SA objective 3 is likely to be minor, as benefits relating to the accessibility of essential services would only be felt by the section of the community which benefits from access to a private car.

**8.288** Strategic Policy 40: Infrastructure Provision would help to achieve upgrades to infrastructure in line with the Infrastructure Delivery Plan which specifically references policing and crime prevention. Therefore, this policy could help to limit the potential for crime in the plan area and a minor positive effect is expected in relation to **SA objective 4: crime**. Policy 42: Parking seeks to ensure that parking development within the District, particularly in town centres, promotes good urban design, and is safe and secure for car and cycle users. As such, the policy is expected to have a minor positive effect in relation to SA objective 4. As Policy 44: Inclusive Communities requires that development is designed to achieve healthy, inclusive and safe places, it is likely to help to create environments within which a higher number of residents feel secure and therefore a minor positive effect is expected in relation to SA objective 4 for this policy also.

**8.289** A minor positive effect is also expected for Policy 45: Community Facilities, Leisure and Recreation in relation to this SA objective given that it includes a requirement for lighting proposals to be designed to help reduce crime in the area.

**8.290** Policies 40: Infrastructure Provision, 44: Inclusive Communities, and 45: Community Facilities, Leisure and Recreation are expected to have the most direct beneficial impacts relating to public health and wellbeing in the District. These policies seek to ensure that infrastructure necessary to support development over the plan period is provided. This includes infrastructure secured via Planning Obligations and Community Infrastructure Levy, as set out through Policy 40. Policy 44 requires the delivery of development to support healthy, inclusive and safe places and Policy 45 supports the provision of community facilities, including open space to meet the identified needs of the District. As such, these policies are expected to promote and encourage healthier lifestyles and are likely to have significant positive effects in relation to **SA objective 5: health and wellbeing**.

**8.291** Policies 41: Sustainable Transport and 42: Parking support the delivery of infrastructure which will support uptake of travel by active modes and therefore a minor positive effect is expected in relation to SA objective 5. For Policy 42, the minor positive effect is expected to be combined by a minor negative effect given that improving parking in town centres may reduce the potential to achieve modal shift in Horsham District. An uncertain minor negative effect is also expected for Policy 43: Gatwick Airport Safeguarding. Safeguarding land which could support a potential additional runway at Gatwick

Airport, could result in an expansion of the noise buffer in the District within which human health might be adversely impacted upon.

**8.292** The potential for the future expansion of the airport to be extended could have impacts in relation to biodiversity, through habitat loss, fragmentation or disturbance. As such, an uncertain minor negative effect is also expected of this policy in relation to **SA objective 6: biodiversity and geodiversity**. Increased activities associated with the airport (including accommodating increased flight numbers) could also disturbed the existing character of the area and its surroundings. This could include the settings of nearby heritage assets. Therefore, an uncertain minor negative effect is expected for Policy 43 in relation to SA objectives 7: **landscape** and 8: **historic environment**.

**8.293** Policy 45: Community Facilities, Leisure and Recreation includes a requirement for community facilities to be of a scale and intensity of use to avoid impacts on nearby habitats. This policy also states that community facilities should include lighting proposals that limit the potential for light pollution. Furthermore, such facilities should be located within a defined built-up area boundary unless it can be demonstrated that an alternative location is the only practicable option. In these circumstances the site is required to be suitable and well-related to an existing settlement. The approach of the policy is therefore not expected to result in a high level of development occurring at more rural, potentially presently undisturbed and more sensitive locations in terms of ecological and landscape value. A minor positive effect is therefore expected for this policy in relation to SA objectives 6: biodiversity and geodiversity and 7: landscape.

**8.294** Policy 40: Infrastructure Provision requires the delivery of infrastructure in a timely manner to meet the needs of new development, which will include water treatment facilities. The policy is therefore expected to help protect the quality of water resources used by residents in Horsham as growth occurs over the plan period. A minor positive effect is expected for this policy in relation to SA objective 11: **water resources**.

**8.295** Supporting a degree of self-containment by requiring an appropriate level of service provision to meet the needs of new development is likely to be promoted through Policies 40: Infrastructure Provision, 44: Inclusive Communities, and 45: Community Facilities, Leisure and Recreation. This approach is likely to have benefits in terms of reducing the need to travel regularly in the plan area. Policies 44: Inclusive Communities and 45: Community Facilities, Leisure and Recreation are also supportive of access by walking, cycling and public transport where practical. Given that reduced need to travel by private car in the District is likely to help to limit air pollution and carbon emissions, minor positive effects are expected for Policies 40, 44 and 45 in relation to **SA objective 13:**

**transport, SA objective 14: air quality and SA objective 15: climate change**. Policy 41: Sustainable Transport is directly supportive of development that reduces the distance people need to travel regularly as well as development that would provide innovative sustainable transport interventions in Horsham District. Therefore, the positive effect expected for this policy in relation to SA objective 13, SA objective 14 and SA objective 15 is likely to be significant.

**8.296** Policy 42: Parking is supportive of sustainable and low carbon modes of transport and electric charging facilities, but by strengthening parking facilities in town centres could limit the potential to promote modal shift over the plan period. As such, the minor positive effect expected for this policy in relation to SA objective 13, SA objective 14 and SA objective 15 is combined with a minor negative effect.

**8.297** It is likely that Policy 43 would support long term expansion of Gatwick Airport, potentially resulting in a higher number of people travelling by private car to this location. Higher levels of transport related emissions are also likely to occur as a result of an increased number of flights occurring in the area. Minor negative effects are therefore expected for Policy 43 in relation to SA objective 13, SA objective 14 and SA objective 15.

**8.298** Policy 42: Parking is also likely to support economic investment and growth in Horsham by requiring that adequate additional car parking facilities are provided, including at employment sites and in town centres. Policy 43: Gatwick Airport Safeguarding safeguards land to allow for the future expansion of the airport which is likely to benefit the wider economy in the area. Policy 44: Inclusive Communities, Health and Wellbeing seeks to ensure that development proposals meet the needs of workers in the more rural areas of the District and therefore supports sustainable growth of Horsham's rural economy. Policy 41: Sustainable Transport seeks to ensure that all new homes include provision for suitable home-working conditions which will support flexible-working practices in the District.

**8.299** As such, Policies 41: Sustainable Transport, 42: Parking, 43: Gatwick Airport Safeguarding and 44: Inclusive Communities, Health and Wellbeing are likely to have positive effects in relation to **SA objective 16: economic growth**. Considering the importance of Gatwick Airport to the local economy the positive effect is likely to be significant for Policy 43. The importance of home-working in light of the recent coronavirus pandemic means the positive effect is also likely to be significant for Policy 41: Sustainable Transport.

**8.300** Policies 41 and 42 are likely to help ensure that employment opportunities in the plan area are accessible by sustainable modes of transport, including access to public transport services as well as private vehicle. Policy 42 would deliver these types of benefits for residents at more rural

locations, in particular, considering the dependency of this section of the community on travel by private vehicle.

**8.301** As such, significant positive effects are expected for Policies 41: Sustainable Transport and 42: Parking in relation to **SA objective 17: access to employment opportunities**. It is expected that helping to support one of the key drivers for the wider economy (Gatwick Airport) will improve the accessibility of jobs for many residents and therefore a minor positive effect is expected for Policy 43: Gatwick Airport Safeguarding in relation to SA objective 17.

### SA findings for policies allocating strategic sites

**8.302** This section presents the appraisal of the policies which allocate strategic sites to meet the needs of the District. In the tables below, the first column for each site allocation reflects the appraisal of that site without any mitigation which might be required through the specific policy which allocates that site (i.e. a 'policy off' appraisal). Where mitigation has been included in the site allocation policy and in the overarching Strategic Policy HA1: Strategic Site Development Principles, this is reflected in the adjacent column of the appraisal matrices for each site. Given that Strategic Policy HA1 applies the development principles which will guide the development of the proposed strategic site allocations in the Local Plan, this policy has been appraised as part of the appraisal of each of these individual sites.

**8.303** The policy off appraisal of the strategic sites and more detailed justification for the effects recorded is provided in **Appendix D**. The text below each table sets out where there is potential for cumulative effects with other development proposed in the Local Plan. It also details where the policy of most and direct relevance in terms of potentially mitigating negative effects and strengthening positive effects of development at the site. The appraisal of the small site allocations for each settlement also details potential cumulative effects of allocating the sites at the settlements in question.

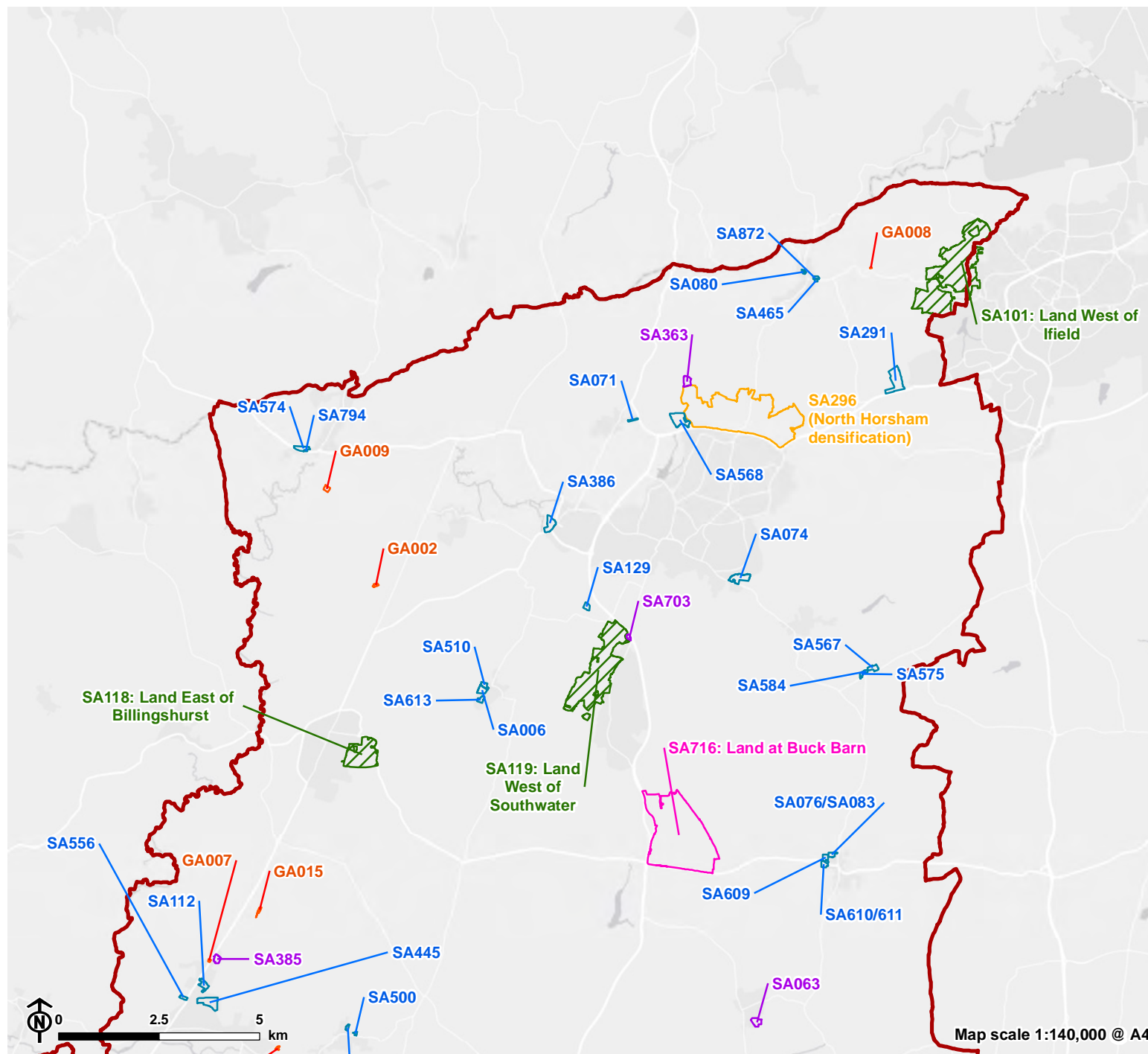
**8.304** It should be noted that, in addition to the allocations set out in the policies in the Local Plan, there are approximately 8,063 homes that already have planning consent or are earmarked for development. These are primarily located at Horsham, Billingshurst, Southwater and the existing Kilnwood Vale allocation site. The development proposed in the Local Plan could combine with existing development and the commitments to strengthen any effects identified by the SA in these locations.

**8.305** Where significant negative effects are still expected in spite of the policies which allocate the sites and the overarching strategic site development principles policy, other

policies in the Local Plan which could help to achieve mitigation have been highlighted.

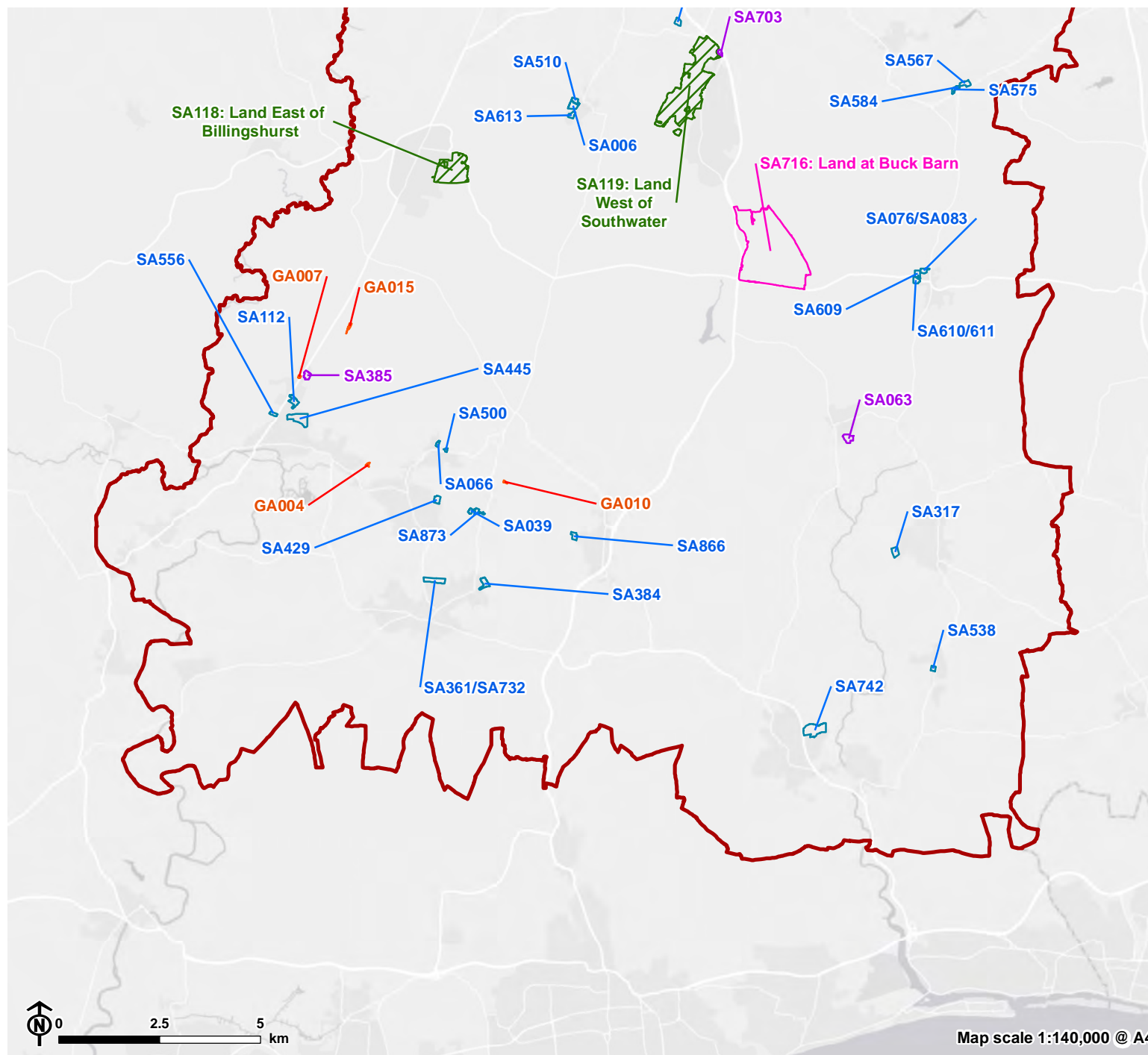
**8.306** The location of each strategic site proposed for allocation is presented across **Figures 8.1** and **8.2** below. These figures also present the location of the small sites proposed for allocation at the towns and villages as well as the employment sites and Gypsy and Traveller sites proposed for allocation in the Regulation 19 Local Plan.

Figure 8.1: Sites proposed for allocation in Regulation 19 Local Plan (North)



- Horsham district boundary
  - Employment sites
  - Gypsy and traveller sites
  - Small sites (residential led)
  - Density of existing site allocation
- Strategic Sites**
- New Settlements
  - Urban Extensions

Figure 8.2: Site proposed for allocation in Regulation 19 Local Plan (South)



- Horsham district boundary
- Employment sites
- Gypsy and traveller sites
- Small sites (residential led)
- Densification of existing site allocation
- Strategic Sites**
  - New Settlements
  - Urban Extensions



### Strategic Policy HA2: West of Crawley Area of Search and Land West of Ifield

**8.307** Policy HA2 allocates the Land West of Ifield Strategic Site for at least 3,250 homes over the plan period. This allocation is considered to have the potential to form part of any wider development of 10,000 homes which would include land to the west within a wider area of search. However, the deliverability of a 10,000 scheme site in the period up to 2038 is not demonstratable at this time and any future allocation of

this scale would have to be identified as part of a future local plan review. This site is appraised 'policy off' as site SA101.

**8.308** The appraisal focuses on the delivery of 3,250 homes within the plan period along with the associated employment, services, facilities and mitigation requirements as set out in Policy HA2 that will be needed to support 3,250 homes when fully built out, rather than the potential for a larger expansion to 10,000 homes which will be considered in the next Local Plan review.

**Table 8.11 Summary of SA findings for the West of Crawley Area of Search and Land West of Ifield Strategic Site (considering mitigation through site allocation policy)**

SA objective	Site SA101	Site considering mitigation in Policies HA1 and HA2
SA1: Housing	++	++
SA2: Access to services and facilities	++?	++?
SA3: Inclusive communities	+	+
SA4: Crime	0?	0?
SA5: Health and wellbeing	++/--?	++/--?
SA6: Biodiversity and geodiversity	--?	++/--?
SA7: Landscape	--?	--/+?
SA8: Historic environment	--?	--/+?
SA9: Efficient land use	-	-
SA10: Natural resources	--?	--?
SA11: Water resources	-?	+/-?
SA12: Flooding	-?	+/-?
SA13: Transport	++/-?	++/-
SA14: Air quality	++/--?	++/--?
SA15: Climate change	+/-?	++/-?
SA16: Economic growth	++	++

SA objective	Site SA101	Site considering mitigation in Policies HA1 and HA2
SA17: Access to employment opportunities	++	++

**8.309**Policy HA2 allocates the Land West of Ifield for a total of at least 3,250 homes over the plan period. An area of search for a new urban extension of up to 10,000 new homes in the longer term has been promoted to the Council; however as the deliverability of this scheme up to 2038 cannot be demonstrated, it will be necessary to consider this wider parcel of land as part of a subsequent Local Plan Review. It is expected that many of the effects identified through the policy-off site appraisal work would continue to apply, although some more strongly positive effects are expected in relation to some of the SA objectives where mitigation would be required through Policy HA1: Strategic Site Development Principles and Policy HA2: West of Crawley Area of Search and Land West of Ifield.

**8.310**Policy HA1 requires that development at strategic sites delivers a high quality of development that provides a range of housing types and tenures, including for older and younger people as well as self-build homes. Policy HA2 requires that the site is developed to include 35% as affordable housing, together with the provision of a permanent Gypsy and Traveller site of 15 pitches. These requirements are likely to help strengthen the significant positive effect already recorded in relation to **SA objective 1: housing**.

**8.311**The development of strategic sites is required by Policy HA1 to provide necessary services and facilities to help create a successful community. Furthermore, Policy HA2 requires that development of the site delivers a new community hub which will include a library, community centre, and potentially café and/or public house and indoor sports facilities, a shop, and a café facility. Land is to be provided to meet the needs for education in line with minimum standards as advised by the Local Education Authority. Furthermore land, buildings and/or contributions are also to be provided for the delivery of local healthcare facilities. This requirement is expected to help strengthen the existing access to services and facilities. The site is well related to Crawley and provisions within the settlement and therefore the uncertain significant positive effect expected in relation to **SA objective 2: services and facilities** is likely to be strengthened.

**8.312**The site does not lie within an area of higher deprivation. However, the requirements of Policy HA1 and Policy HA2 for new service provision and to support the creation of a

successful community are likely to help to promote the integration of the site within the wider settlement area. Overall an uncertain minor positive effect in relation to **SA objective 3: social inclusion** remains.

**8.313**The site is within walking distance of Crawley where healthcare facilities as well as multiple outdoor recreation facilities are located. However, Ifield Golf Club lies within the site boundaries and this facility would be lost to development. Policy HA1 requires the incorporation of green infrastructure as part of the development at strategic sites. The requirements of Policy HA2 to provide new open space as well as local healthcare facilities are likely to help strengthen the significant positive effect already identified for the site in relation to **SA objective 5: health and wellbeing**. The policy furthermore requires that no noise sensitive uses are delivered at the site within areas considered to be exposed to aircraft noise level which is above 60bB<sub>LAeq, 16hr</sub>. This is expected to help mitigate the adverse effects of noise associated with the nearby Gatwick Airport. However, the loss of the existing golf course at the site would not be fully mitigated. Therefore, while the significant positive effect expected is likely to be strengthened, it is still combined with an uncertain significant negative effect relation to SA objective 5.

**8.314**Policy HA1 requires that the development of strategic sites achieve a minimum of 10% biodiversity net gain and avoids impacts on biodiversity through good design. Through Policy HA2 there is specific requirement to incorporate a Biodiversity Gain Plan for the site and that Ifield Brook Meadows Local Wildlife Site and ancient woodlands at Ifield Mill Stream, Hyde Hill, The Grove and Ifield Wood are conserved and enhanced. Furthermore, a biodiverse River Mole Linear Park is to be delivered to ensure the riparian ecosystems along the River Mole corridor are protected. The development of the site still has some potential to have adverse impacts on local wildlife site and ancient woodland within the site as a result of habitat disturbance and/or the effects of noise/air/light pollution associated with the development. Overall, considering the requirements of these policies, which include the delivery of a new park within which biodiversity is to be protected, a mixed uncertain significant positive and significant negative effect is now expected in relation to **SA objective 6: biodiversity and geodiversity**.

**8.315**The site contains some land which has no/low landscape capacity for large scale residential development as well as more sizeable areas of land with low-moderate and high-moderate landscape capacity for large scale housing development. Policy HA1 requires the development of strategic sites to be landscape-led and to incorporate landscape buffers to minimise impacts on the open countryside where appropriate. Policy HA2 requires that the design and layout of the scheme should be reflective of the landscape and townscape context. The policy requires that particular attention is given to views from Hyde Hill and also to maintain the sense of separation between Crawley and Horsham. The effect in relation to **SA objective 7: landscape and townscape** is therefore upgraded from an uncertain significant negative to a mixed uncertain minor positive and significant negative effect.

**8.316**The heritage impact assessment work undertaken by the Council identified that Old Pound Cottage Grade II Listed Building is particularly sensitive to development at the site. While Policy HA2 does not include specific reference to this heritage asset, it requires all designated and non-designated heritage assets and their settings to be preserved and enhanced, including that of Ifield Conservation Area and Ifield Court. The policy also requires the pattern of development to enhance identified heritage features, and historic field patterns as far as possible and this is expected to protect the established character of the area. The effect in relation to **SA objective 8: historic environment** is therefore upgraded from an uncertain significant negative effect to a mixed uncertain minor positive and significant negative effect.

**8.317**The site was appraised as likely to have adverse impacts in terms of the capacity of the wastewater network when considering information from Thames Water. Policy HA1 is likely to help mitigate this effect by requiring that strategic sites deliver new infrastructure necessary, including for water supplies and wastewater treatment. The requirements of Policy HA2 for development to be informed by liaison with water treatment utilities companies, to ensure that a new or expanded wastewater treatment works are provided, is likely to help further mitigate these effects. Therefore, the uncertain minor negative effect expected in relation to **SA objective 11: water resources** is upgraded to a mixed uncertain minor positive and minor negative effect.

**8.318**The site includes a substantial area of greenfield land and there are some areas of higher flood risk present. Development of the site would result in a proliferation of impermeable surfaces in the plan area which could have impacts in terms of local flood risk. Policy HA2, however, requires that a comprehensive surface water drainage and flood risk strategy be agreed for the site to demonstrate that the potential for flood events in the area would be decreased through development. Therefore, the uncertain minor negative

effect recorded in relation to **SA objective 12: flooding** is amended to an uncertain mixed minor positive and minor negative effect.

**8.319**The provision of new services and facilities at the site as part of the development is likely to have further benefits of limiting the need for residents to travel longer distances on a regular basis. This includes the creation of a '15 minute neighbourhood' through the criteria set out in Policy HA2. Policy HA1 requires that the design of strategic sites be set out to prioritise pedestrian and cycling opportunities. Policy HA2 contains similar requirements specific to the site, requiring that a walking and cycling strategy is provided to ensure that alternative modes of transport have priority over motorised vehicles. This policy also requires the incorporation of Fastway bus lanes, the extension of the Crawley Fastway bus rapid transit network and support for electric vehicles. These requirements are likely to help strengthen the significant positive effects already identified as part of mixed effect in relation to **SA objective 13: transport** and **SA objective 14: air quality**. The requirement set out in Policy HA2 for an Air Quality Strategy to be agreed with the Council for the development to help limit impacts on the Hazelwick AQMA, will further help to strengthen this positive effect.

**8.320**Policy HA1 requires the development of strategic sites to contribute to the achievement of zero carbon to include the provision of alternative sources of energy. This approach is supported by Policy HA2 which requires maximum use of onsite renewable energy technologies and from 2025 that all homes are designed as net-zero carbon. Therefore, the minor positive effect already identified as part of an overall mixed effect in relation to **SA objective 15: climate change** is upgraded to a significant positive effect. It should be noted that the high number of new homes to be delivered and associated carbon emissions resulting from activities such as travel account for the negative effects expected in combination for SA objectives 13, 14 and 15.

**8.321**The site lies in close proximity to Crawley which forms part of the wider Gatwick Diamond and provides important employment opportunities for the population of Horsham. Policy HA1 requires that strategic sites should be developed to meet the principle of one new job per home. Policy HA2 sets out site specific policy which will develop the employment role of the site and secure a degree of self-containment. It requires the delivery of 9,000sqm B2/B8 and former B1 uses. The significant positive effects expected in relation to **SA objective 16: economic growth** and **SA objective 17: employment** are therefore likely to be strengthened.

#### Cumulative effects

**8.322**The Land West of Ifield Strategic Site should be considered in the context of the existing strategic allocation at

Kilnwood Vale and the West of Kilnwood Vale allocation site (Policy HA13) which are also well related to Crawley. While this site would be accessed by a separate road along the A264, users of both sites could increase traffic within the Hazelwick AQMA to the detriment of local air quality. Furthermore, considered cumulatively, the sites may contribute to the erosion of separation between Horsham town and Crawley, although it is noted that there is still a large area of undeveloped land between these settlements. The large size of the settlement of Crawley means that the area of land required for both developments might be accommodated without having significant adverse impacts in terms of its existing character, however, much of the land to be developed has no/low landscape capacity to accommodate new development.

#### Mitigation in other policies in the Local Plan

**8.323** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 25: Air Quality.
- Strategic Policy 27: The Natural Environment and Landscape Character.

- Strategic Policy 30: Green Infrastructure and Biodiversity.
- Policy 34: Heritage Assets and Managing Change within the Historic Environment.
- Strategic Policy 44: Inclusive Communities, Health and Wellbeing.

**8.324** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the site lies within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

#### Strategic Policy HA3: Land West of Southwater

**8.325** Policy HA3 allocates the Land West of Southwater for at least 1,200 homes over the plan period. This site is appraised 'policy off' as site SA119.

**Table 8.12 Summary of SA findings for the Land West of Southwater Strategic Site (considering mitigation through site allocation policy)**

SA objective	Site SA119	Site considering mitigation in Policies HA1 and HA3
SA1: Housing	++?	++
SA2: Access to services and facilities	++?	++?
SA3: Inclusive communities	+?	+?
SA4: Crime	0?	0?
SA5: Health and wellbeing	++/-?	++/-?
SA6: Biodiversity and geodiversity	--?	--/+?
SA7: Landscape	--?	--/+?
SA8: Historic environment	--?	--/+?
SA9: Efficient land use	--?	--?

SA objective	Site SA119	Site considering mitigation in Policies HA1 and HA3
SA10: Natural resources	--?	--?
SA11: Water resources	0	0
SA12: Flooding	-?	-?
SA13: Transport	++/-?	++/-?
SA14: Air quality	++/-?	++/-?
SA15: Climate change	+/-?	++/-?
SA16: Economic growth	++	++
SA17: Access to employment opportunities	+/-?	++/-?



**8.326**Policy HA3 allocates the Land West of Southwater Strategic Site for a total of at least 1,200 homes over the plan period. It is expected that many of the effects identified through the policy off site appraisal work would continue to apply, although some more strongly positive effects are expected in relation to some of the SA objectives where mitigation would be required through Policy HA1: Strategic Site Development Principles and Policy HA3: Land West of Southwater.

**8.327**Policy HA1 requires that development at strategic sites delivers a high quality of development that provides a range of housing types and tenures, including for older and younger people as well as self-build homes. Policy HA3 requires that the site be developed to include 35% as affordable housing, together with the provision of a permanent Gypsy and Traveller site of five pitches. These requirements are likely to help strengthen the significant positive effect already recorded in relation to **SA objective 1: housing**. The effect is also no longer uncertain given the specific requirement for affordable housing on site.

**8.328**The development of strategic sites is required by Policy HA1 to provide necessary services and facilities to help create a successful community. Furthermore, Policy HA3 requires that a new community hub including leisure, sports facilities and retail is provided which will facilitate social interaction. Land is also to be provided to meet the needs for education in line with minimum standards as advised by the Local Education Authority which will assist in improving sustainable access to services and facilities for new residents at the site. The uncertain significant positive effect expected in relation to **SA objective 2: services and facilities** is likely to be strengthened given that existing services and facilities in Stroudwater (including healthcare and education facilities) will remain accessible from the site. The uncertainty still applicable to the effect recorded reflects the potential for existing facilities to become overburdened as this relatively large development is occupied.

**8.329**The site does not lie within an area of higher deprivation. However, the requirements of Policy HA1 and Policy HA3 for new service provision and to support social inclusion and integration are likely to help to promote the integration of the site within the wider settlement area. Overall an uncertain minor positive effect in relation to **SA objective 3: social inclusion** remains.

**8.330**There is a healthcare centre to the south east of the site within Southwater as well as multiple public outdoor open spaces, recreation facilities and playgrounds. These are within a suitable walking distance of the site. Policy HA1 requires the incorporation of green infrastructure as part of the development at strategic sites. The requirements of Policy HA3 to provide informal open space, sport and recreation provision in accordance with standards and the respective

recommendations in the Open Space, Sport & Recreation Review 2020 are likely to help strengthen the significant positive effect already identified for the site in relation to **SA objective 5: health and wellbeing**. However, the presence of the A24 which borders the site to the north, still has the potential to adversely affect the health of new residents as a result of noise and light pollution. Therefore, the uncertain minor negative effect expected in relation to SA objective 5 remains as part of an overall mixed effect.

**8.331**Policy HA1 and HA3 requires the development of the site to achieve a minimum of 10% biodiversity net gain and avoids impacts on biodiversity through good design. Through Policy HA3 there is specific requirement to protect the Courtland Wood ancient woodland and Smith's Copse Local Wildlife Site and enhance its setting. Despite the requirement for biodiversity net gain, there is still potential for development on the site to adversely impact the biodiversity value of habitats in the area through fragmentation and/or disturbance. There is also potential for increased levels of air/noise/light pollution and/or recreational pressures as the new development is constructed and occupied. The policy does not address the potential for the development to have impacts in relation to Mens SAC, although the site lies within the bat sustenance associated within that designation. Overall, the uncertain significant negative effect is upgraded and now mixed with a minor positive effect in relation to **SA objective 6: biodiversity and geodiversity**.

**8.332**Whilst land immediately adjacent to the urban edge of Southwater has been identified as having moderate landscape capacity for large-scale residential development, land in the western half of the site has been identified as having no/low landscape capacity for that type of development. Policy HA1 requires the development of strategic sites to be landscaped, responding to and complementing positive landscape characteristics and qualities of the site and surrounding area. Policy HA3 requires identified landscape features to be enhanced, including preserving the tranquil character of the Downs Link and identifying important key views within the development towards open countryside. The effect in relation to **SA objective 7: landscape and townscape** is therefore upgraded from an uncertain significant negative to a mixed uncertain minor positive and significant negative effect.

**8.333**The heritage impact assessment work undertaken by the Council has indicated that thirteen Listed Buildings, including the Grade II\* Listed Great House Farmhouse are particularly sensitive to development at the site. Policy HA3 requires existing heritage assets and their settings to be recognised and respected, particularly the Great House Farm. The policy outlines that the masterplan for the site should include consideration of a sustainable future use for Great House Farm that is compatible with the desire to preserve the special interest of the listed building. Policy HA3 also requires the pattern of development to enhance identified heritage

features, and preserve the elements of the heritage assets and their settings that are significant in illustrating their historic and architectural interest. While the policy does not specifically reference all heritage assets at which a high sensitivity and high magnitude of effects were identified through the heritage impact assessment work, the requirements included are expected to help preserve the established character of the area and the respective settings of heritage assets. The effect in relation to **SA objective 8: historic environment** is therefore upgraded from an uncertain significant negative effect to a mixed uncertain minor positive and significant negative effect.

**8.334** The provision of new services and facilities at the site as part of the development is likely to have further benefits of limiting the need for residents to travel longer distances on a regular basis. Policy HA1 requires that the design of strategic sites be set out to prioritise pedestrian and cycling opportunities. Policy HA3 contains similar requirements specific to the site, requiring that a comprehensive transport strategy be put in place to support all modes of sustainable transport. This includes a walking and cycling strategy and exploring options with Metrobus to provide a direct service between the development and Christ's Hospital station. Furthermore, a route for cyclists and pedestrians to be provided to link Southwater and Horsham town. These requirements are likely to help strengthen the significant positive effects already identified as part of mixed effect in relation to **SA objective 13: transport** and **SA objective 14: air quality**.

**8.335** Policy HA1 requires the development of strategic sites to contribute to the achievement of zero carbon to include the provision of alternative sources of energy. Therefore, the minor positive effect already identified as part of an overall mixed effect in relation to **SA objective 15: climate change** is upgraded to a significant positive effect.

**8.336** The site is located at Southwater where current residents typically commute to other destinations to access jobs. Policy HA1 requires that strategic sites should be developed to meet the principle of one new job per home. Policy HA3 specifically requires that 18,000sqm of employment floorspace is provided within the site. Policy HA3 requires development to include a new footway to Christ's Hospital and to explore options with Metrobus to provide a direct service between the development and the train station. This would enhance access to a variety of employment opportunities for future residents. These requirements could strengthen the significant positive effect already expected in relation to **SA objective 16: economic growth** for the site. A significant positive effect is also expected in relation to **SA objective 17: employment**. This is combined with an uncertain minor negative effect given the potential for existing commuting patterns at the settlement to remain prevalent to

some extent in spite of the new employment land to be delivered.

#### Cumulative effects

**8.337** Development at Land West of Southwater should be considered in the context of the employment allocation at Hop Oast roundabout and small residential site allocation at Christ's Hospital. In combination, these sites could contribute to increased traffic around the Hop Oast roundabout junction of the A24, although improvements to junctions are required by Policy HA3 which could help to alleviate transport issues which might otherwise result.

**8.338** Cumulatively, the sites may contribute to the erosion of the separation between Horsham town and Southwater, although it is noted that there is still a relatively large area of undeveloped land between these settlements. The development of this greenfield site directly to the north of Southwater could also have impacts in terms of its established character. While Southwater is one of the larger settlements in the District after Horsham town, the development would substantially increase the size of the settlement.

#### Mitigation in other policies in the Local Plan

**8.339** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 27: The Natural Environment and Landscape Character.
- Strategic Policy 31: Green Infrastructure and Biodiversity.
- Policy 34: Heritage Assets and Managing Change within the Historic Environment.

**8.340** While a significant negative effect was not identified individually for this site in relation to transport, there is potential for significant negative effects in combination with sites in the surrounding area. Strategic Policy 41: Sustainable Transport would help to achieve mitigation in this regard.

**8.341** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the site lies within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.342** The site will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA**

**objective 9: efficient land use** might be mitigated through other policies.

#### Strategic Policy HA4: Land East of Billingshurst

**8.343**Policy HA4 allocates the Land East of Billingshurst (Little Daux) Strategic Site for at least 650 homes over the plan period. This site is appraised 'policy off' as site SA118.

**Table 8.13 Summary of SA findings for the Land East of Billingshurst (Little Daux) Strategic Site (considering mitigation through site allocation policy)**

SA objective	Site SA118	Site considering mitigation in Policies HA1 and HA4
SA1: Housing	++	++
SA2: Access to services and facilities	+/-?	++/-?
SA3: Inclusive communities	+	+
SA4: Crime	0?	0?
SA5: Health and wellbeing	++/-?	++/-?
SA6: Biodiversity and geodiversity	--?	--/+?
SA7: Landscape	-?	+/-?
SA8: Historic environment	--?	--/+?
SA9: Efficient land use	--?	--?
SA10: Natural resources	--?	--?
SA11: Water resources	-?	+/-?
SA12: Flooding	-?	-?
SA13: Transport	++/-?	++/-?
SA14: Air quality	++/-?	++/-?
SA15: Climate change	+/-?	++/-?
SA16: Economic growth	++	++
SA17: Access to employment opportunities	+/-?	++/-?

**8.344**Policy HA4 allocates the Land East of Billingshurst (Little Daux) Strategic Site for a total of at least 650 homes. It is expected that many of the effects identified through the policy-off site appraisal work would continue to apply, although some more strongly positive effects are expected in relation to some of the SA objectives where mitigation would be required through Policy HA1: Strategic Site Development Principles and Policy HA4: Land East of Billingshurst.

**8.345**Policy HA1 requires that development at strategic sites delivers a high quality of development that provides a range of housing types and tenures, including for older and younger people as well as self-build homes. Policy HA4 requires that the site be developed to include 35% as affordable housing, together with the provision of a permanent Gypsy and Traveller site. These requirements are likely to help strengthen the significant positive effect already recorded in relation to **SA objective 1: housing**.

**8.346**The development of strategic sites is required by Policy HA1 to provide necessary services and facilities to help create a successful community. Furthermore, Policy HA4 requires that development of the site delivers a new community hall, a shop, and a café facility, and be designed to facilitate social inclusion and integration. Land is to be provided to meet the needs for education in line with minimum standards as advised by the Local Education Authority. This requirement is expected to help limit the potential for adverse impacts identified for the site in terms of access to education facilities. Therefore, the mixed uncertain minor positive and minor negative effect expected in relation to **SA objective 2: services and facilities** is upgraded to an uncertain mixed significant positive and minor negative effect. This effect also reflects the potential for earlier occupiers of the site to lack access to this new infrastructure depending the precise timing of its delivery.

**8.347**The site does not lie within an area of higher deprivation, however, the requirements of Policy HA1 and Policy HA4 for new service provision and to support social inclusion and integration are likely to help to promote the integration of the site within the wider settlement area. Overall an uncertain minor positive effect in relation to **SA objective 3: social inclusion** remains.

**8.348**The site is within walking distance of a health centre in Billingshurst as well as multiple outdoor recreation facilities. Policy HA1 requires the incorporation of green infrastructure as part of the development at strategic sites. The requirements of Policy HA4 to provide new open space and sport and recreation facilities are likely to help strengthen the significant positive effect already identified for the site in relation to **SA objective 5: health and wellbeing**. While the policy requires that the border of the north east fields should be protected from development, there is no specific

requirement to incorporate measures which would limit the potential for effects from noise, air and light pollution associated with the A272 and railway line at the site boundary. Therefore, the minor negative effect expected in relation to SA objective 5 remains as part of an overall mixed effect.

**8.349**Policy HA1 requires that the development of strategic sites achieve a minimum of 10% biodiversity net gain and avoids impacts on biodiversity through good design. Through Policy HA4 there is specific requirement to avoid impacts upon the foraging of bats associated with The Mens SAC and to conserve and enhance Wilden's Meadow Local Wildlife Site within the site. Land within the site boundary surrounds the Widen Meadow Local Wildlife Site to the north, south and west and this accounts for the significant negative effect recorded for the site through the policy off appraisal work. The development of the site still has some potential to have adverse impacts on Rosier Wood Local Wildlife Site and the area of Ancient Woodland which are approximately 400m to the south although separated from the boundary by the railway line. Overall a minor positive effect is now expected as part of an overall mixed effect alongside a significant negative effect in relation to **SA objective 6: biodiversity and geodiversity**.

**8.350**The site mostly contains land which has moderate landscape capacity for large scale residential development. Policy HA1 requires the development of strategic sites to be landscape-led and to incorporate landscape buffers to minimise impacts on the open countryside where appropriate. Policy HA4 requires that the design and layout of the scheme should minimise any adverse landscape impacts with particular consideration for the north-eastern field. The effect in relation to **SA objective 7: landscape and townscape** is therefore upgraded from an uncertain minor negative to a mixed uncertain minor positive and minor negative effect.

**8.351**The heritage impact work undertaken by the Council indicates that three Grade II Listed Buildings are particularly sensitive to development at the site. Policy HA4 requires existing heritage assets and their settings to be recognised and respected, particularly two of the three Listed Buildings highlighted through the heritage impact work; Little Daux Farmhouse and Rosier Farmhouse. The policy also requires the pattern of development to enhance identified heritage features, and preserve the elements of the heritage assets and their settings that are significant in illustrating their historic and architectural interest, which is likely to provide further protection for the established character of the area. The policy does not require development to respond to the setting of Grade II Listed Great Daux Farmhouse which was also identified through the heritage impact work as have high sensitivity to change and potentially being subject to a high magnitude of adverse effects through development. The effect in relation to **SA objective 8: historic environment** is

therefore upgraded from an uncertain significant negative effect to a mixed uncertain minor positive and significant negative effect.

**8.352**The site was appraised as likely to have adverse impacts in terms of the capacity of the wastewater network when considering information from Southern Water. Policy HA1 is likely to help mitigate this effect by requiring that strategic sites deliver new infrastructure necessary, including for water supplies and wastewater treatment. Therefore, the uncertain minor negative effect expected in relation to **SA objective 11: water resources** is upgraded to a mixed uncertain minor positive and minor negative effect.

**8.353**The provision of new services and facilities at the site as part of the development is likely to have further benefits of limiting the need for residents to travel longer distances on a regular basis. Policy HA1 requires that the design of strategic sites be set out to prioritise pedestrian and cycling opportunities. Policy HA4 contains similar requirements specific to the site, requiring that a comprehensive transport strategy be put in place to support all modes of sustainable transport. These requirements are likely to help strengthen the significant positive effects already identified as part of mixed effect in relation to **SA objective 13: transport** and **SA objective 14: air quality**. Policy HA1 requires the development of strategic sites to contribute to the achievement of zero carbon to include the provision of alternative sources of energy. Therefore, the minor positive effect already identified as part of an overall mixed effect in relation to **SA objective 15: climate change** is upgraded to a significant positive effect. It should be noted that the high number of new homes to be delivered and associated carbon emissions resulting from activities such as travel account for the negative effects expected in combination for SA objectives 13, 14 and 15.

**8.354**The site was appraised as having potential to be developed to contribute to the expansion of the Rosier Business Park area which is adjacent to the site. Policy HA4 specifically requires that 2,200sqm B2/B8 and former B1 uses is be delivered at the site. Policy HA1 furthermore requires that strategic sites should be developed to meet the principle of one new job per home. This requirement is expected to help ensure new residents have access to some nearby employment opportunities. The significant positive effects expected in relation to **SA objective 16: economic growth** is likely to be strengthened while the minor positive effect expected in relation to **SA objective 17: employment** is upgraded to a significant positive effect. The overall effect expected in relation to SA objective 17 is still mixed given the existing commuting patterns for the area which see a high number of residents travel out of the area for work.

## Cumulative effects

**8.355**Only the Land East of Billingshurst (Little Daux) Strategic Site is allocated for housing at the settlement of Billingshurst. Therefore, cumulative effects on the settlement of Billingshurst above and beyond those identified for the site itself are not expected.

## Mitigation in other policies in the Local Plan

**8.356**The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 30: Green Infrastructure and Biodiversity.
- Policy 34: Heritage Assets and Managing Change within the Historic Environment.

**8.357**Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the site lies within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.358**The site will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

## Strategic Policy HA5: Land at Buck Barn

**8.359**Policy HA5 allocates the Land at Buck Barn for 2,100 homes over the plan period with a total of 3,500 homes to be delivered in the long term. This site is appraised 'policy off' as site SA716.



**Table 8.14 Summary of SA findings for the Land at Buck Barn Strategic Site (considering mitigation through site allocation policy)**

SA objective	Site SA716	Site considering mitigation in Policies HA1 and HA5
SA1: Housing	++	++
SA2: Access to services and facilities	++/--?	++/--?
SA3: Inclusive communities	0	+?
SA4: Crime	0?	0?
SA5: Health and wellbeing	++/-?	++/-?
SA6: Biodiversity and geodiversity	--/+?	--/+?
SA7: Landscape	-?	+/-?
SA8: Historic environment	--?	--/+?
SA9: Efficient land use	--?	--?
SA10: Natural resources	--?	--?
SA11: Water resources	0	0
SA12: Flooding	-?	+/-
SA13: Transport	--/+?	++/--?
SA14: Air quality	--/+?	++/--?
SA15: Climate change	++/--?	++/--?
SA16: Economic growth	++?	++?
SA17: Access to employment opportunities	--/+	++/--

**8.360**Policy HA5 allocates the Land at Buck Barn Strategic Site for at least 2,100 homes over the plan period with a total of 3,500 homes potentially to be delivered in the long term. It is expected that many of the effects identified through the policy off site appraisal work would continue to apply, although some more strongly positive effects are expected in relation to

some of the SA objectives where mitigation would be required through Policy HA1: Strategic Site Development Principles and Policy HA5: Land at Buck Barn.

**8.361**Policy HA1 requires that development at strategic sites delivers a high quality of development that provides a range of

housing types and tenures, including for older and younger people as well as self-build homes. Policy HA5 requires that the site be developed to include 35% of homes as affordable housing, together with the provision of a permanent Gypsy and Traveller site of 15 pitches. These requirements are likely to help strengthen the significant positive effect already recorded in relation to **SA objective 1: housing**.

**8.362**The development of strategic sites is required by Policy HA1 to provide necessary services and facilities to help create a successful community. Furthermore, Policy HA5 requires that development of the site delivers commercial uses. Land is to be provided to meet the needs for education in line with minimum standards as advised by the Local Education Authority. Land is also to be safeguarded for future healthcare provision. This requirement is expected to help address the adverse effect identified in relation to site in terms of access to education and healthcare facilities given the relative remoteness of the site from existing facilities. The provision of healthcare facilities may only occur in the longer term given that land is not safeguarded in perpetuity. Considering the mitigation set out in Policy HA1 and HA5 the significant positive effect expected as part of the overall mixed effect in relation to **SA objective 2: services and facilities** is likely to be strengthened.

**8.363**The site does not lie within an area of higher deprivation. However, the requirements of Policy HA1 and Policy HA5 for new service provision and to provide a mix of uses which will meet the needs of a range of residents are likely to help to promote the integration of the site within the wider area. These requirements are likely to help address the potential issues relating to placemaking which could arise where a new settlement is delivered 'from scratch'. Overall an uncertain minor positive effect in relation to **SA objective 3: social inclusion** remains.

**8.364**The site is not within walking distance of existing healthcare facilities but would link to the existing PROW network. Policy HA1 requires the incorporation of green infrastructure as part of the development at strategic sites. The requirements of Policy HA5 to provide open space, sport and recreation facilities to meet local needs are likely to help strengthen the significant positive effect already identified for the site in relation to **SA objective 5: health and wellbeing**. The policy also requires that land be safeguarded for healthcare provision at the site. Part of the western edge of the site abuts the A24 meaning there is potential for noise/light/air pollution to affect residents. Furthermore, the site lacks nearby access to existing healthcare facilities and earlier occupiers of the site could have limited access to these types of facilities. Therefore, the minor negative effect expected in relation to SA objective 5 remains as part of an overall mixed effect.

**8.365**Policy HA1 requires that the development of strategic sites achieve a minimum of 10% biodiversity net gain and avoids impacts on biodiversity through good design. Through Policy HA5 there is specific requirement to protect and enhance the areas of ancient woodland and the Downs Link, Nutham Wood and Greatsteeds farm Meadow Local Wildlife Site adjacent to and within the site. There is also a requirement to ensure the protection and enhancement of the riparian ecosystem along Blake's Gill. The development should be supported by an Ecology and Green Infrastructure Strategy. Despite these requirements there is still some potential for impacts relating to habitat fragmentation, disturbance or pollution associated with development to affect the nearby designations and other habitats. Of particular note is the site's close proximity to the Knepp Estate Rewilding project to the south and west. The supporting text to Policy HA5 notes that potential links to the Knepp Estate rewilding scheme should be investigated but, in the first instance, it will be important to ensure that development at Buck Barn does not disturb or compromise the successful achievement of the rewilding objectives of the Knepp Estate. Overall, a mixed uncertain minor positive and significant negative effect is expected in relation to **SA objective 6: biodiversity and geodiversity**.

**8.366**The site contains land which has moderate to moderate high-capacity landscape capacity for large scale residential development. Policy HA1 requires the development of strategic sites to be landscape-led and to incorporate landscape buffers to minimise impacts on the open countryside where appropriate. Policy HA5 requires that development should enhance identified landscape features, with particular consideration for the setting of the Downs Link and the historic field patterns. The effect in relation to **SA objective 7: landscape and townscape** is therefore upgraded from an uncertain minor negative to a mixed uncertain minor positive and minor negative effect.

**8.367**As per the heritage impact work undertaken by the Council, there are four Grade II Listed Buildings which are particularly sensitive to development at the site. Policy HA5 requires all designated and non-designated heritage assets and their settings to be preserved and enhanced. Specific reference is included to the four Listed Buildings identified through the heritage impact work as having potential to be adversely affected by development; 8 Bar Lane, Tuckmans Farmhouse, Little Tuckmans and Old Cottage. The policy requires the pattern of development to enhance identified heritage features, including historic field patterns and historic ponds, which is likely to provide further protection for the established character of the area. Considering the requirements of the site specific policy, the effect in relation to **SA objective 8: historic environment** is therefore upgraded

from an uncertain significant negative effect to a mixed uncertain minor positive and significant negative effect.

**8.368**The provision of new services and facilities at the site as part of the development is likely to have further benefits of limiting the need for residents to travel longer distances on a regular basis. Policy HA1 requires that the design of strategic sites be set out to prioritise pedestrian and cycling opportunities. Policy HA5 contains similar requirements specific to the site, requiring that a comprehensive transport strategy be put in place to support all modes of sustainable transport. A bus strategy should all be delivered to support the development of the site and the policy also identifies highways schemes which should be delivered to mitigate traffic impacts.

**8.369**These requirements are likely to help strengthen the significant positive effects already identified as part of mixed effect in relation to **SA objective 13: transport**. This site does not provide nearby access to a railway station. Given that it is not close to any other settlements, and that it is well located on the strategic road network, development here could generate considerable traffic, despite the sustainable transport strategy. Therefore, a significant negative effect is still recorded in combination. The significant negative effect expected as part of a mixed effect in relation to **SA objective 14: air quality**, is also still applicable. However, a significant positive effect is now recorded in combination given that Policy HA5 specifically requires that an Air Quality Strategy is agreed with the Council to mitigate potential impacts on the Cowfold AQMA.

**8.370**Policy HA1 requires the development of strategic sites to contribute to the achievement of zero carbon to include the provision of alternative sources of energy. Furthermore, Policy HA5 requires that from 2025 homes are designed as net-zero carbon. Therefore, the minor positive effect already identified as part of an overall mixed effect in relation to **SA objective 15: climate change** is upgraded to a significant positive effect. It should be noted that the high number of new homes to be delivered and associated carbon emissions and air pollution resulting from activities such as travel account for the negative effects expected in combination for SA objectives 13, 14 and 15.

**8.371**The site was appraised as having potential to deliver new employment land as part of its development. Policy HA5 specifically requires a total of 30,000sqm of employment floorspace is provided at the site. Policy HA1 furthermore requires that strategic sites should be developed to meet the principle of one new job per home. While the site is not within close proximity of Horsham town this requirement is expected to help ensure new residents have access to some nearby employment opportunities. The significant positive and minor positive effects expected respectively in relation to **SA objective 16: economic growth** and **SA objective 17:**

**employment** are therefore strengthened by the requirements set out in the policy. The overall effect expected in relation to SA objective 17 is still mixed with a significant negative effect expected in combination given that the site is not within close proximity to any existing key employment areas or Horsham town which also allows access to a high number of jobs in the District.

#### Cumulative effects

**8.372**The site is being delivered as a new settlement in its own right and therefore there are no sites allocated in close proximity. However, sites allocated at Cowfold could act cumulatively with the Buck Barn site to contribute to increased levels of traffic within Cowfold and the AQMA there. The requirement of Policy HA5 for development to address potential impacts on air quality in relation to the AQMA is expected to help mitigate these potential effects.

#### Mitigation in other policies in the Local Plan

**8.373**The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 6: New Employment.
- Strategic Policy 25: Air Quality.
- Strategic Policy 30: Green Infrastructure and Biodiversity.
- Strategic Policy 36: Climate Change.
- Policy 34: Heritage Assets and Managing Change within the Historic Environment.
- Strategic Policy 40: Infrastructure Provision.
- Strategic Policy 41: Sustainable Transport

**8.374**Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the site lies within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.375**The site will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

## SA findings for policies allocating small sites in and around the towns and villages

**8.376** This section presents the appraisal of the policies which allocate small sites at the towns and villages of the plan area. The first column for each site allocation reflects the appraisal of that site without any mitigation which might be required through the specific policy which allocates that site (i.e. a 'policy off' appraisal). Where the Reg 19 Local Plan sets out sites for allocation, mitigation has been included and this has been reflected in the final columns of the appraisal matrices for each site. Further detail of the appraisal of the sites at each settlement are provided in **Appendix E**. The text below each table sets out details of where the policy could potentially mitigate negative effects and strengthen positive effects of development at the site.

**8.377** This text also details potential cumulative effects of allocating the sites at the settlements in question. Where significant negative effects are still expected in spite of the policies which allocate the sites at each settlement, other policies in the Local Plan which could help to achieve mitigation has been highlighted.

### Policy HA6: Ashington Housing Allocations

**8.378** Policy HA6 allocates the following sites at Ashington:

- ASN1: Land east of Mousdell Close, 2.24 hectares (75 homes) (appraised as site option SA866 through the SA).

**Table 8.15 Summary of SA findings for Ashington housing allocation policy**

SA objective	Site SA866	Site considering mitigation in Policy HA6 (ASN1)
SA1: Housing	++	++
SA2: Access to services and facilities	+?	+?
SA3: Inclusive communities	0	0
SA4: Crime	0?	0?
SA5: Health and wellbeing	+	+
SA6: Biodiversity and geodiversity	-?	-?
SA7: Landscape	--?	--?
SA8: Historic environment	0?	0?
SA9: Efficient land use	-	-
SA10: Natural resources	--?	--?
SA11: Water resources	0	0
SA12: Flooding	-	-
SA13: Transport	+	+
SA14: Air quality	0	0

SA objective	Site SA866	Site considering mitigation in Policy HA6 (ASN1)
SA15: Climate change	+	+
SA16: Economic growth	0	0
SA17: Access to employment opportunities	+	+



**8.379** Policy HA6 allocates site ASN1 at Ashington for a total of at least 75 homes. It is expected that the majority of effects identified through the policy off site appraisal work would continue to apply, although some more strongly positive effects are expected in relation to a small number of the SA objectives.

**8.380** Although Policy HA6 supports connectivity from site ASN1 to key local amenities and services and their enhancement through improvements to local pedestrian and cycling networks, these requirements are not considered to change the appraisal score for this site. The uncertain minor positive effect recorded in relation to **SA objective 2: access to services and facilities** for the site already reflects the relatively good level of access from the site to services and facilities within the village, including the primary school in Ashington.

**8.381** The policy requires that development of site ASN1 has no adverse effect on the integrity of the Arun Valley SPA / Ramsar site and that it is supported by a HRA and a wintering bird survey. However, site ASN1 is within the bat sustenance zone associated within the Mens SAC which could have adverse impacts on local habitats. Therefore, the uncertain minor negative effect identified in relation to SA objective 6: **biodiversity and geodiversity** remains applicable.

#### Cumulative effects

**8.382** There are no small site or strategic allocations within Ashington or the immediate surrounding area which might otherwise give rise to cumulative effects in combination with the delivery of ASN1. The development of the site allocated at Ashington would result in a moderate increase in the existing developed area of the settlement to take in an area of currently undeveloped land to the west. As identified through the individual site appraisal work, much of this land has been assessed as having low-moderate capacity for medium scale housing development. It is expected that the development could have implications in terms of the established character of the settlement and the surrounding landscape.

**8.383** It is noted that the made Ashington Neighbourhood Plan allocates land at Chanctonbury Nursery for the development of approximately 75 dwellings. This land has also been assessed as having low-moderate capacity for medium scale housing development. Considering the level of development at the sites allocated through the Local Plan and Neighbourhood Plan together, there is potential for more substantial impacts on the established character of the settlement as well as the existing landscape setting. It is, however, also noted that much of the land at the Chanctonbury Nursery site lies on brownfield land meaning that new development could also provide opportunities to enhance the existing landscape character. Policies in the Ashington Neighbourhood Plan have

been considered separately through the SEA work for that plan.

#### Mitigation in other policies in the Local Plan

**8.384** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 26: The Natural Environment and Landscape Character.

**8.385** The appraisal above has focussed on the requirement explicitly set out in Policy HA6 given that the Ashington Neighbourhood Plan will have been subject to separate appraisal through the SEA for that plan. However, the policies of that plan are likely to help limit impacts relating to local character as the allocation is developed.

**8.386** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that both sites lie within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

#### Policy HA7: Barns Green Housing Allocations

**8.387** Policy HA7 allocates the following sites:

- BGR1: Land South of Smugglers Lane, 3.3 hectares (50 homes) (appraised as site option SA006)
- BGR2: Land South of Muntham Drive, 1.85 hectares (25 homes) (appraised as site option SA510)
- BGR3: Land at Slaughterford Farm (Sumners Pond), 1.5 hectares (30 homes) (appraised as site option SA613)

Table 8.16 Summary of SA findings for Barns Green housing allocation policy

SA objective	Site SA006	Site considering mitigation in Policy HA7 (BGR1)	Site SA510	Site considering mitigation in Policy HA7 (BGR2)	Site SA613	Site considering mitigation in Policy HA7 (BGR3)
SA1: Housing	++	++	++	++	++	++
SA2: Access to services and facilities	+?	+?	+?	+?	+?	+?
SA3: Inclusive communities	0	0	0	0	+	+
SA4: Crime	0?	0?	0?	0?	0?	0?
SA5: Health and wellbeing	+	+	+	+	--/+	--/+
SA6: Biodiversity and geodiversity	-?	-?	-?	-?	-?	-?
SA7: Landscape	--?	--?	--?	--?	-?	-?
SA8: Historic environment	--?	--/+?	--?	--?	--?	--?
SA9: Efficient land use	-	-	--?	--?	+	+
SA10: Natural resources	--?	--?	--?	--?	--?	--?
SA11: Water resources	0	0	0	0	0	0
SA12: Flooding	-	-	-	-	0	0
SA13: Transport	+	+	+	+	+	+
SA14: Air quality	0	0	0	0	0	0
SA15: Climate change	+	+	+	+	+	+
SA16: Economic growth	0	0	0	0	0	+
SA17: Access to employment opportunities	--	--	--	--	--	--/+

**8.388** Policy HA7 allocates sites BGR1, BGR2 and BGR3 at Barns Green for a total of at least 105 homes. The majority of effects identified through the policy off site appraisal work are expected to continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.389** In relation to sites BGR1 and BGR2, Policy HA7 includes requirements that any housing layout includes an appropriate buffer from the adjacent areas of Ancient Woodland, which is likely to reduce the potential for adverse impacts. However, the minor negative effects identified in relation to **SA objective 6: biodiversity and geodiversity** were also identified on the basis that the sites lie within the Bat Sustainance Zone. Therefore, there is no change to the effects identified for both sites.

**8.390** Policy HA7 also requires that development of site BGR1, ensures that appropriate regard is had to the adjacent Grade II Listed Buildings. The appraisal of this site noted the potential for development to have significant effects in relation to these heritage assets. The close proximity of the site to these features means that development is likely to have some impact with regards to their settings. However, the requirement for the design of development to respond positively means that the uncertain significant negative effect recorded in relation to **SA objective 8: historic environment** is now combined with a minor positive effect.

**8.391** Policy HA7 indicates that delivery of BGR3 will include seven new employment units amounting to around 500m<sup>2</sup> of floorspace. As such, the negligible effect expected for the site in relation to **SA objective 16: economic growth** in the policy off appraisal is therefore upgraded to a minor positive effect.

**8.392** The job creation from this type of development is likely to be minimal but could still help to improve access to employment opportunities for residents in the immediate area. Therefore, a minor positive effect is now recorded in combination with the significant negative effect in relation to **SA objective 17: access to employment opportunities** for site BGR3.

#### Cumulative effects

**8.393** The development of the three sites allocated at Barns Green would result in a significant increase in development to the west of the settlement. An increase of this size to the settlement boundary could have implications for the established character of Barns Green as well as that of the surrounding landscape. Sites BGR1 and BGR2 are located on land that has been assessed as having low-moderate landscape capacity for medium scale housing development. The relatively limited capacity for housing growth at these sites could increase the potential for adverse effects of this nature.

#### Mitigation in other policies in the Local Plan

**8.394** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 6: New Employment.
- Strategic Policy 26: The Natural Environment and Landscape Character.
- Policy 34: Heritage Assets and Managing Change in the Historic Environment.
- Strategic Policy 44: Inclusive Communities, Health and Wellbeing.

**8.395** The policy requires that the development of site BRG3 complies with the policies of the Made Itchingfield Neighbourhood Plan. The appraisal above has focussed on the requirement explicitly set out in Policy HA7 given that the Itchingfield Neighbourhood Plan will have been subject to separate appraisal through the SEA for that plan. However, the policies of that plan are likely to help limit impacts relating to local character as the allocation is developed.

**8.396** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the sites lie within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.397** Site BGR2 will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

#### Policy HA8: Broadbridge Heath Housing Allocations

**8.398** Policy HA8 allocates the following sites at Broadbridge Heath:

- BRH1: South of Lower Broadbridge Farm (Slinfold Parish), 6.3 hectares (150 homes) (appraised as site option SA386 through the SA)
- BRH2: Land at Wellcross Farm (Itchingfield Parish), 8.1 hectares (140 homes) (appraised as site option SA622 through the SA)

Table 8.17 Summary of SA findings for Broadbridge Heath housing allocation policy

SA objective	Site SA386	Site considering mitigation in Policy HA8 (BRH1)	Site SA622	Site considering mitigation in Policy HA8 (BRH2)
SA1: Housing	++	++	++	++
SA2: Access to services and facilities	++/-?	++/-?	++	++
SA3: Inclusive communities	+	+	+	+
SA4: Crime	0?	0?	0?	0?
SA5: Health and wellbeing	+	+	+	+
SA6: Biodiversity and geodiversity	-?	-?	-?	-?
SA7: Landscape	-?	-?	--?	--/+?
SA8: Historic environment	--?	--/+?	-?	-?
SA9: Efficient land use	--?	--?	-	-
SA10: Natural resources	--?	--?	--?	--?
SA11: Water resources	0	0	0	0
SA12: Flooding	-	-	-	-
SA13: Transport	+	+	+	+
SA14: Air quality	0	0	0	0
SA15: Climate change	+	+	+	+
SA16: Economic growth	+	+	+	+
SA17: Access to employment opportunities	+	+	+	+

**8.399** Policy HA8 allocates sites BRH1 and BRH2 Broadbridge Heath to the south west of Broadbridge Heath, within Slinfold Parish and Itchingfield Parish respectively. The allocations will deliver at least 290 homes. At site BR2, development will exclusively be for Use Class C2 residential accommodation in the form of specialised housing for older people. It is expected that the majority of effects identified through the policy off site appraisal work would continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.400** Policy HA8 requires that the layout of site BRH1 is required to minimise noise impacts from adjoining uses, which may be of benefit to the health and wellbeing of residents in

the new development. The development of the site is also required to provide new formal and informal open space, sport and recreation facilities to meet the needs of the community. However, a minor positive effect was already identified for site BRH1 in the policy off appraisal in relation to **SA objective 5: health** due to the site's close proximity to existing open space facilities. The effect also reflected the lack of nearby access to a healthcare facility. The mitigation set out in Policy HA8 is not expected to result in a change to the minor positive effect already identified.

**8.401** Policy HA8 is also committed to retaining the mature and semi-mature tree belts within and bounding the site, which will be of benefit to minimising impact on the natural

environment as development of the site occurs. However, the minor negative effect identified in the site appraisal for BRH1 (SA386) in relation to **SA objective 6: biodiversity and geodiversity** reflected the location of the site within the Bat Sustenance Zone. Therefore, no change is identified in relation to the effect already recorded.

**8.402** With regards to site BRH2, Policy HA8 requires that development takes account of the existing rural character and mitigates any harm to the landscape character. This site was identified through the Council's landscape capacity assessment as having no/low landscape capacity for medium scale housing development. Given the limited landscape capacity of the site to accommodate new development, its development is likely to have some implications with regards to the area's established character, regardless of mitigation measures undertaken. These measures are likely to help protect some elements of this established local character, however, and therefore the uncertain significant negative effect recorded in relation to **SA objective 7: landscapes and townscape** is now combined with a minor positive effect.

**8.403** Policy HA8 also requires that development of site BRH1, ensures that appropriate regard is had to the adjacent Grade II Listed Buildings. The appraisal of this site noted the potential for development to have significant effects in relation to these heritage assets. The close proximity of the site to these features means that development is likely to have some impact with regards to their settings. However, the requirement for the design of development to respond positively means that the uncertain significant negative effect recorded in relation to **SA objective 8: historic environment** is now combined with a minor positive effect.

#### Cumulative effects

**8.404** Although Broadbridge Heath is adjacent to Horsham town, the development of sites BRH1 and BRH2 would result in a substantial increase in development at the village of Broadbridge Heath towards its western and south western edges. The existing settlement boundary to the west is currently formed by the A281. While it is noted that A281 is not a dual carriageway it still serves as a relatively defensible boundary from the existing residential development towards the open countryside to the west. It is further noted that some industrial development has already occurred to the west of the A281. The development of site BRH1 would breach the course of the A281 with potential implications for the established character of the settlement as well as that of the surrounding landscape. Some of this land has between no/low and low-moderate landscape capacity for medium scale housing development. The relatively limited capacity for housing growth could increase the potential for adverse effects of this nature.

**8.405** While there are no strategic allocations included at Horsham town, the densification of the North Horsham site within 4km to north east of site BRH1 and BRH2 has potential to act in combination to have negative impacts on traffic in the area. Congestion on key routes into Horsham may result given that these sites could increase traffic along the A24 and A264 which serve the town to the west and north, respectively. Current commuting patterns from Broadbeidge Heath to Horsham town are likely to strengthen the potential for these types of adverse effects.

#### Mitigation in other policies in the Local Plan

**8.406** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 27: The Natural Environment and Landscape Character.
- Policy 34: Heritage Assets and Managing Change in the Historic Environment.

**8.407** While a significant negative effect was not identified individually for these sites in relation to transport, there is potential for significant negative effects in combination with sites in the surrounding area. Strategic Policy 41: Sustainable Transport would help to achieve mitigation in this regard.

**8.408** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the sites lie within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.409** Site BRH1 will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

#### Policy HA9: Christ's Hospital Housing Allocation

**8.410** Policy HA9 allocates the following site at Christ's Hospital:

- CH1: Land at The Warren, 5.7 hectares (20 homes) (appraised as site option SA129 through the SA)



Table 8.18 Summary of SA findings for Christ's Hospital housing allocation policy

SA objective	Site SA129	Site considering mitigation in Policy HA9 (CH1)
SA1: Housing	++	++
SA2: Access to services and facilities	++?	++?
SA3: Inclusive communities	0	0
SA4: Crime	0?	0?
SA5: Health and wellbeing	+	+
SA6: Biodiversity and geodiversity	-?	-?
SA7: Landscape	--?	--?
SA8: Historic environment	0?	0?
SA9: Efficient land use	-	-
SA10: Natural resources	--?	--?
SA11: Water resources	0	0
SA12: Flooding	-	-
SA13: Transport	++	++
SA14: Air quality	0	0
SA15: Climate change	++	++
SA16: Economic growth	0	0
SA17: Access to employment opportunities	++	++

**8.411** Policy HA9 allocates site CH1 at Christ's Hospital for a total of at least 20 homes. It is expected that all the effects identified through the policy off site appraisal work would continue to apply.

**8.412** The policy requires that existing rights of way within and adjacent to the site are maintained or adequately replaced. This will help to ensure that there is pedestrian access to the surrounding countryside and services and facilities within the settlement of Christ's Hospital for residents in the new development. A significant positive effect was identified already for the site in relation to **SA objective 2: access to services and facilities** given the close proximity of the site to the built-up area of the Main Town of Horsham to the north. Therefore, no change is expected as a result of the requirements of Policy HA9.

**8.413** Policy HA9 also requires that the delivery of allocation CH1 is carefully sited and designed so as to avoid any impacts on protected trees in the area. This includes a requirement to provide an appropriate buffer from the area of ancient woodland which is adjacent to the site. Whilst this mitigation may minimise the potential for adverse impacts in relation to the natural environment, the minor negative effect identified through the policy off appraisal for the site in relation to **SA objective 6: biodiversity and geodiversity** still applies given that the site is located within the Bat Sustenance Zone.

#### Cumulative effects

**8.414** The delivery of site CH1 alone does not represent a significant increase in existing development to the north of the settlement of Christ's Hospital when the existing settlement boundary is considered in combination with the existing grounds of Christ's Hospital school. However, the allocation lies in an area assessed as having low-moderate landscape capacity for medium scale housing development. As such, development could have implications for the established character of the settlement as well as that of the surrounding landscape. The development of the site could also contribute to coalescence between Horsham town and Christ's Hospital, although it is recognised that the presence of the existing ancient woodland to the north of Christ's Hospital and the A24 would still lie between the settlements.

**8.415** As well as impacts on landscape character, the allocation may contribute to increased traffic in the area. This

is particularly likely to be the case when considered in combination with the at the urban extension allocation to the West of Southwater which lies within 600m of the site also along the A24.

#### Mitigation in other policies in the Local Plan

**8.416** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 26: The Natural Environment and Landscape Character.

**8.417** While a significant negative effect was not identified individually for this site in relation to transport, there is potential for significant negative effects in combination with sites in the surrounding area. Strategic Policy 41: Sustainable Transport would help to achieve mitigation in this regard.

**8.418** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the site lies within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

#### Policy HA10: Cowfold Housing Allocations

**8.419** Policy HA10 allocates the following sites at Cowfold:

- CW1: Land at Brook Hill & Cowfold Glebe, 4.8 hectares (35 homes) (appraised as site option SA076/SA083 through the SA)
- CW2: Field West of Cowfold, North of A272, 2.9 hectares (35 homes) (appraised as site option SA609 through the SA)
- CW3: Fields West of Cowfold, South of A272/Field West of Cowfold, South of A272, West of Little Potters, 5.4 hectares (35 homes) (appraised as site option SA610/SA611 through the SA)

Table 8.19 Summary of SA findings for Cowfold housing allocation policy

SA objective	Site SA076/ SA083	Site considering mitigation in Policy HA10 (CW1)	Site SA609	Site considering mitigation in Policy HA10 (CW2)	Site SA610/ SA611	Site considering mitigation in Policy HA10 (CW3)
SA1: Housing	++	++	++	++	++	++
SA2: Access to services and facilities	+?	+?	+?	+?	+?	+?
SA3: Inclusive communities	0	0	0	0	0	0
SA4: Crime	0?	0?	0?	0?	0?	0?
SA5: Health and wellbeing	++	++	++	++	++	++
SA6: Biodiversity and geodiversity	0?	0?	0?	0?	0?	0?
SA7: Landscape	--?	--/+?	--?	--/+?	-?	+/-?
SA8: Historic environment	--?	--?	--?	--?	--?	--/+?
SA9: Efficient land use	--?	--?	--?	--?	--?	--?
SA10: Natural resources	--?	--?	--?	--?	--?	--?
SA11: Water resources	0	0	0	0	0	0
SA12: Flooding	-	-	-	-	-	-
SA13: Transport	+	+	+	+	+	+
SA14: Air quality	--	--/+	--	--/+	--	--/+
SA15: Climate change	+	+	+	+	+	+
SA16: Economic growth	0	0	0	0	0	0
SA17: Access to employment opportunities	+	+	+	+	+	+

**8.420** Policy HA10 allocates sites CW1, CW2 and CW3 to the north, northwest and west of Cowfold respectively for a total of at least 105 homes. It is expected that the majority of effects identified through the policy off site appraisal work would continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.421** For sites CW1 and CW3, Policy HA10 requires that both allocations deliver public open space in line with the Open Space, Sport & Recreation Review 2020. Whilst this may further enhance resident's access to open space in the area, the sites already received significant positive effects in relation to **SA objective 5: health** given that they are in close proximity to existing public open space as well as healthcare facilities in Cowfold. Therefore, no change to the effect recorded in relation to this SA objective is expected.

**8.422** Policy HA10 requires that the three allocations must provide a robust soft landscape buffer in order to minimise impacts on the existing landscape character of the area. Furthermore, in relation to site CW1, Policy HA10 requires that the development is sited carefully in order to prevent negative impacts to the High Weald AONB.

**8.423** These sites were identified through the Council's landscape capacity assessment as having low-moderate or moderate landscape capacity for medium scale housing development. Given the relatively limited landscape capacity of the site to accommodate new development and the relatively close proximity of the AONB to the north, the development of these sites are likely to have some implications with regards to the area's established character, regardless of mitigation measures undertaken. However, the requirements of the policy are likely to help protect some elements of this established local character. The uncertain significant negative effect identified for sites CW1 and CW2 in relation to **SA objective 7: landscapes and townscapes** in the policy off appraisal is therefore combined with a minor positive effect for these sites. The uncertain minor negative effect identified for site CW3 in relation to this SA objective is combined with a minor positive effect.

**8.424** Policy HA10 also requires that development of site CW3, is supported by an appropriate archaeological investigation and that its design and layout should preserve or enhance the character of Cowfold Conservation Area. The appraisal of this site noted the potential for development to have significant effects in relation to the Conservation Area as well as Grade II Listed Building Potters Cottage. The policy addresses the preservation and enhancement of the Conservation Area but not the Listed Building. The uncertain significant negative effect recorded in relation to **SA objective 8: historic environment** is now combined with a minor positive effect.

**8.425** In the policy off appraisal, a significant negative effect was identified for all three of the sites in relation to **SA**

**objective 14: air quality** due to their proximity to an AQMA along the A272 through Cowfold. Policy HA10 requires that any development proposals for allocations CW1, CW2 and CW3 must be accompanied by an Air Quality Impact Assessment and Emissions Mitigation Assessment. This is likely to help address the potential for the developments to contribute to worsening of the already poor air quality status around the road. As such, the significant negative effect identified for the sites in relation to SA objective 14 is now combined with a minor positive effect.

#### Cumulative effects

**8.426** The Buck Barn strategic allocation lies within 3km to the west of the site along the A272. The delivery of the allocations at Cowfold and this strategic allocation are likely to result in increased traffic along the A272 and therefore potentially further decreased air quality within the Cowfold AQMA.

**8.427** The development of the three sites allocated at Cowfold would result in a significant increase in development to the west of the settlement. An increase of this size to the settlement boundary could have implications for the established character of Cowfold as well as that of the surrounding landscape. Sites CW1 and CW2 are located on land that has been assessed as having low-moderate capacity for medium scale housing development. The relatively limited capacity for housing growth at these sites could increase the potential for adverse effects of this nature.

#### Mitigation in other policies in the Local Plan

**8.428** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 25: Air Quality.
- Strategic Policy 26: The Natural Environment and Landscape Character.
- Policy 29: Protected Landscapes.
- Policy 34: Heritage Assets and Managing Change in the Historic Environment.

**8.429** While a significant negative effect was not identified individually for these sites in relation to transport, there is potential for significant negative effects in combination with sites in the surrounding area. Strategic Policy 41: Sustainable Transport would help to achieve mitigation in this regard.

**8.430** The policy requires that the development of sites CW1 and CW3 comply with the policies of the Made Cowfold Neighbourhood Plan. The appraisal above has focussed on the requirement explicitly set out in Policy HA10 given that the Cowfold Neighbourhood Plan will have been subject to separate appraisal through the SEA for that plan. However, the policies of that plan are likely to help limit impacts relating to local character as the allocations are developed.

**8.431** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the sites lie within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.432** These sites will involve the development of a relatively large area of greenfield land and higher value agricultural soils

regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

#### Policy HA11: Henfield Housing Allocations

**8.433** Policy HA11 allocates the following site at Henfield:

- HNF1: Land at Sandgate Nurseries, 3.8 hectares (55 homes) (appraised as site option SA317 through the SA)

**Table 8.20 Summary of SA findings for Henfield housing allocation policy**

SA objective	Site SA317	Site considering mitigation in Policy HA11 (HNF1)
SA1: Housing	++	++
SA2: Access to services and facilities	++/-?	++/-?
SA3: Inclusive communities	0	0
SA4: Crime	0?	0?
SA5: Health and wellbeing	+	+
SA6: Biodiversity and geodiversity	--?	--?
SA7: Landscape	--?	--/+?
SA8: Historic environment	--?	--/+?
SA9: Efficient land use	--?	--?
SA10: Natural resources	--	--
SA11: Water resources	0	0
SA12: Flooding	-	-
SA13: Transport	+	+
SA14: Air quality	0	0
SA15: Climate change	+	+
SA16: Economic growth	0	0



SA objective	Site SA317	Site considering mitigation in Policy HA11 (HNF1)
SA17: Access to employment opportunities	-	-

**8.434** Policy HA11 allocates site HNF1 at Henfield for at least 55 homes. It is expected that the majority of effects identified through the policy off site appraisal work would continue to apply. However, some positive effects are identified as a result of mitigation in Policy HA11.

**8.435** Policy HA11 requires that the development of allocation HNF1 maintains and enhances connectivity to the village centre via active modes of transport. This will help to ensure that there is access to the facilities within the settlement of Henfield for residents in the new development. A significant positive effect was already identified for this site in relation to **SA objective 2: access to services and facilities** given the close proximity of the site to the built-up area of the Small Town/Larger Village of Henfield. This effect was combined with an uncertain minor negative effect as it is not in close proximity to an existing primary or secondary school. The policy does not address this issue and therefore no change is expected as a result of the requirements of Policy HA11.

**8.436** A requirement is set out in Policy HA11 for site HNF1 to be developed in line with a landscape-led masterplan which is to promote a high-quality of design for the site. The site was identified through the Council's landscape capacity assessment as having low-moderate landscape capacity for medium scale housing development. Given the limited landscape capacity of the site to accommodate new development, development is likely to have some implications with regards to the area's established character, regardless of mitigation measures undertaken. These measures are likely to help protect some elements of this established local character, however, and therefore the uncertain significant negative effect recorded in relation to **SA objective 7: landscapes and townscapes** is now combined with a minor positive effect.

**8.437** Policy HA11 also requires that the development of site HNF1 has regard to the setting of the nearby Grade II listed Dears Farmhouse. The appraisal of the site noted the potential for development to have significant effects in relation to the setting of this heritage asset. The close proximity of the site to the identified heritage assets means that development is likely to have some impact with regards to their settings. However, the requirement for the design of development to respond positively means that the uncertain significant negative effect recorded in relation to **SA objective 8: historic environment** is now combined with a minor positive effect.

### Cumulative effects

**8.438** Henfield is a village in its own right and a sizeable centre in context of the District. The development of site HNF1 would result in a modest extension of the settlement boundary to the south west. This could have some limited implications for the established character of Henfield as well as that of the surrounding landscape. Much of the land surrounding the south western edge of the settlement has been assessed as having low-moderate capacity for medium scale housing development. The relatively limited capacity for housing growth could increase the potential for adverse effects of this nature.

**8.439** The potential for these effects may be increased when considered alongside the sites allocated for development through the made Henfield Neighbourhood Plan. These are sites at North of Parsonage Farm, East of Wantley Hill, West of Backsettton and South of the Bowls Club. Much of the land on which these sites lie has been assessed as having low-moderate or no/low landscape capacity for medium scale housing development. Considered together with the sites allocated through the Neighbourhood Plan, the development of site HNF1 could also increase the potential for congestion through the settlement of Henfield. All sites allocated in the Local Plan and the Neighbourhood Plan either connect directly to the A281 through the settlement or to roads which feed into this part of the strategic route network. Policies in the Henfield Neighbourhood Plan have been considered separately through the SEA work for that plan.

### Mitigation in other policies in the Local Plan

**8.440** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 26: The Natural Environment and Landscape Character.
- Strategic Policy 30: Green Infrastructure and Biodiversity.
- Policy 34: Heritage Assets and Managing Change in the Historic Environment.

**8.441** While a significant negative effect was not identified individually for the site in relation to transport, there is potential for significant negative effects in combination with sites in the

surrounding area allocated through the Neighbourhood Plan. Strategic Policy 41: Sustainable Transport would help to achieve mitigation in this regard.

**8.442** The policies of the made Henfield Neighbourhood Plan will also help to mitigate adverse impacts in relation to landscape character and the settings of heritage assets in the area.

**8.443** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the site lies within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.444** The site will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

#### Policy HA12: Horsham Housing Allocations

**8.445** Policy HA12 allocates the following sites at Horsham:

- HOR1: Land at Hornbrook Farm, 10.45 hectares (100 homes) (appraised as site option SA074 through the SA)
- HOR2: land at Mercer Road, 14.3 hectares (300 homes) (appraised as site option SA568 through the SA)

**Table 8.21 Summary of SA findings for Horsham town housing allocation policy**

SA objective	Site SA074	Site considering mitigation in Policy HA12 (HOR1)	Site SA568	Site considering mitigation in Policy HA12 (HOR2)
SA1: Housing	++	++	++	++
SA2: Access to services and facilities	++?	++?	++/-?	++/-?
SA3: Inclusive communities	0	0	0	0
SA4: Crime	0?	0?	0?	0?
SA5: Health and wellbeing	+	+	+	+
SA6: Biodiversity and geodiversity	--?	--?	-?	0?
SA7: Landscape	--?	--/+?	0?	0?
SA8: Historic environment	-?	-?	0?	0?
SA9: Efficient land use	-	-	--?	--?
SA10: Natural resources	0	0	--?	--?
SA11: Water resources	0	0	0	0
SA12: Flooding	-	-	-	-
SA13: Transport	++	++	++	++
SA14: Air quality	0	0	--	--

SA objective	Site SA074	Site considering mitigation in Policy HA12 (HOR1)	Site SA568	Site considering mitigation in Policy HA12 (HOR2)
SA15: Climate change	++	++	++	++
SA16: Economic growth	0	0	0	0
SA17: Access to employment opportunities	++	++	++	++

**8.446** Policy HA12 allocates sites HOR1 and HOR2 to the southeast and north of Horsham respectively for the provision of at least 400 homes. The majority of the effects identified through the policy off site appraisal are expected to continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.447** The policy requires that the development of site HOR2 is provided to support temporary means of safe transport to Horsham Town across the A264 until connections to be incorporated as part of the North of Horsham development are completed. The A264 currently acts to sever the site from the settlement of Horsham Town. This requirement will therefore help to ensure that there is access to the facilities within the settlement of Horsham for residents in the new development. A significant positive effect was identified already for site HOR2 in relation to **SA objective 2: access to services and facilities** given the close proximity of the site to the built-up area of the Main Town of Horsham. This effect was combined with an uncertain minor negative effect the site as it is not in close proximity to an existing primary or secondary school. The policy does not address this issue and therefore no change is expected as a result of the requirements of Policy HA12.

**8.448** Policy HA12 requires that site HOR2 is designed to ensure that residents are not subject to any harmful impacts from neighbouring uses. This would include potential noise and light pollution from the A264 to the south and the employment site allocation to the north of Mercer Road. This requirement is likely to benefit the health and wellbeing of residents in the new development. The development of the site is also required to provide new public open space and children's recreation space to meet the needs of the community. However, a minor positive effect was already identified for the site in the policy off appraisal in relation to **SA objective 5: health** due to the site's close proximity to existing open space facilities. The effect also reflected the lack of nearby access to a healthcare facility. The mitigation set out in Policy HA12 is not expected to result in a change to the minor positive effect already identified.

**8.449** The policy requires that the development of site HOR2 has regard for the ancient woodland to the north. Therefore, the uncertain minor negative effect identified for the site in relation to SA objective 6: **biodiversity and geodiversity** is updated to a negligible effect. The effect remains uncertain given that undesignated biodiversity assets or habitats may be affected by the development of this site.

**8.450** Site HOR1 is adjacent to the High Weald AONB and therefore has been assessed as having no/low landscape capacity for medium scale housing development. The site was therefore identified as having a significant negative effect in relation to **SA objective 7: landscapes and townscapes**.

Policy HA12 requires that development proposals appropriately consider the setting of the AONB and undertake Landscape and Visual Impact Assessment. As such, a minor positive effect is also expected as part of an overall mixed effect in relation to SA objective 7 for site HOR1.

**8.451** In relation to HOR2, Policy HA12 requires that development proposals are designed to avoid adverse impacts on residents from neighbouring uses. Whilst this measure is not likely to alter the overall effects identified for the site, it is likely to make some contribution to maintaining residents' health and wellbeing.

### Cumulative effects

**8.452** Site HOR2 lies adjacent to the previously allocated strategic site North of Horsham, which is to accommodate a total of 2,750 homes. The development of the site to the north of the settlement could result in increased volumes of traffic along the A264 given that the allocated sites in question connect directly to this road or to routes which feed into it.

**8.453** The combined impact of the delivery of the North of Horsham site as well as the delivery of site HOR1 to the southeast of Horsham town is likely to result in implications for the established townscape as well as the landscape character of the surroundings of the town. Site HOR001 lies on land which has more limited capacity for development than site HOR002. In all, however, Horsham Town is already relatively large in size meaning that developments of an appropriate design and smaller scale may have more limited impacts in terms of established character. More substantial changes relating to townscape and character will relate to the large scale strategic sites at North of Horsham.

### Mitigation in other policies in the Local Plan

**8.454** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 25: Air Quality.
- Strategic Policy 27: The Natural Environment and Landscape Character.
- Strategic Policy 28: Countryside Protection.
- Policy 29: Protected Landscapes.

**8.455** While a significant negative effect was not identified individually for these sites in relation to transport, there is potential for significant negative effects in combination with sites in the surrounding area. Strategic Policy 41: Sustainable Transport would help to achieve mitigation in this regard.

**8.456** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that both site HOR2 lies within a MSA. Mitigation of effects are

likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.457** Site HOR2 will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that

the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

#### Policy HA13: West of Kilnwood Vale

**8.458** Policy HA13 allocates the following site as an extension to the existing Kilnwood Vale allocation:

- WKV1: Land West of Kilnwood Vale, 15.6 hectares (350 homes) (appraised as site option SA291 through the SA).

Table 8.22 Summary of SA findings for West of Kilnwood Vale housing allocation policy

SA objective	Site SA291	Site considering mitigation in Policy HA13(WKV1)
SA1: Housing	+	+
SA2: Access to services and facilities	+/-?	++/-?
SA3: Inclusive communities	0	0
SA4: Crime	0?	0?
SA5: Health and wellbeing	+/-?	+/-?
SA6: Biodiversity and geodiversity	--?	--/+?
SA7: Landscape	--?	--/+?
SA8: Historic environment	-?	-?
SA9: Efficient land use	--?	--?
SA10: Natural resources	--?	--?
SA11: Water resources	-?	-?
SA12: Flooding	-?	-?
SA13: Transport	++/-?	++/-?
SA14: Air quality	++/--?	++/--?
SA15: Climate change	+/-?	+/-?
SA16: Economic growth	+	+



SA objective	Site SA291	Site considering mitigation in Policy HA13(WKV1)
SA17: Access to employment opportunities	+	+

**8.459** Policy HA13 allocates site WKV1 to the southwest of Crawley for a total of at least 350 homes. It is expected that the majority of the effects identified during the policy off appraisal would continue to apply. However, more positive effects are expected in relation to some of the SA objectives.

**8.460** The policy requires that development at the site does not commence until local services and amenities are delivered at the adjacent existing Kilnwood Vale strategic allocation. This approach is expected to help ensure residents have a good level of access to services and facilities. Therefore, a significant positive effect is recorded for the site in relation to **SA objective 2: services and facilities**. This is combined with a minor negative effect given the distance from the site to the wider range of services and facilities within Crawley.

**8.461** Policy HA13 requires that an agreed landscape buffer is provided in order to minimise landscape impacts of the delivery of the site. This approach is to have particular regard to limiting the potential coalescence of Horsham and Crawley. A minor positive effect is therefore identified for the site in relation to **SA objective 7: landscapes and townscapes**. The positive effect is recorded in combination with the significant negative effect previously identified during the policy off appraisal. This negative effect was previously identified given the sites' location in an area assessed as having no/low landscape capacity for medium scale residential development.

**8.462** It is required through Policy HA13 that development proposals at the site should provide continuation of the Kilnwood Vale green and blue infrastructure. This may offer potential for habitat creation, potentially mitigating some of the negative impacts of the site on biodiversity. Therefore, a minor positive effect is identified for the site in relation to **SA objective 6: biodiversity and geodiversity**. The positive effect is recorded in combination with the significant negative effect previously identified during the policy off appraisal. This negative effect was previously identified given the relatively close proximity of House Copse SSSI to the north and the location of part of the site within the IRZ for Buchan Hill Ponds SSSI which identified residential development as a potential risk. The effect also reflects the close proximity of Kilnwood Copse Local Wildlife Site and areas of ancient woodland to the site.

**8.463** Policy HA13 requires proposals to address any noise impacts arising from the delivery of the site and to provide cycling and walking routes to the adjacent Kilnwood Vale Strategic allocation. These measures are likely to mitigate some adverse impacts on resident's wellbeing and provide sustainable transport links respectively. However, there are no changes to the effects previously identified in relation to **SA objective 5: health** and **SA objective 13: transport**.

### Cumulative effects

**8.464** The site (WKV1) will deliver a relatively high level of development and will be delivered to form an extension of the existing Kilnwood Vale strategic allocation, which lies adjacent. As such, there is potential for cumulative effects on the landscape setting around Crawley, particularly as the sites lies within in an area assessed as having no/low landscape capacity for development. The site is also considered in combination with the West of Ifield site allocation to the west of the Crawley. The large size of the existing settlement of Crawley means there is reduced potential for its setting to be adversely affected by the scale of development which is expected to result. Considered cumulatively, the sites may also contribute to the erosion of separation between Horsham town and Crawley, although it is noted that there is still a large area of undeveloped land between these settlements. Furthermore, the policy is specifically set out to try to address this issue through the requirement for the development to incorporate a landscape buffer.

**8.465** The delivery of both sites alongside the existing Kilnwood Vale allocation may also have cumulative impacts in relation to increased volumes of traffic on key routes into Crawley. While the West of Ifield site is accessible by a distinct part of the road network, travel to and from Crawley from these sites is likely to increase traffic within the Hazelwick AQMA which is likely to intensify existing air quality issues at this location.

### Mitigation in other policies in the Local Plan

**8.466** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 25: Air Quality.
- Strategic Policy 26: The Natural Environment and Landscape Character.
- Strategic Policy 27: Countryside Protection.

**8.467** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the site (WKV1) lies within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.468** This site will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA**

**objective 9: efficient land use** might be mitigated through other policies.

**Policy HA14: Lower Beeding Housing Allocations**

**8.469** Policy HA14 allocates the following sites:

- LWB1 – Land at Glayde Farm, West of Church Lane, 2.7 hectares (30 homes) (appraised as site option SA567 through the SA)

- LWB2 – Land North of Sandygate Lane, 1.1 hectares (20 homes) (appraised as site option SA575 through the SA)
- LWB3 – Land at Trinity Cottage (Land South of Church Farm House), 0.5 hectares (7 homes) (appraised as site option SA584 through the SA)

**Table 8.23 Summary of SA findings for Lower Beeding housing allocation policy**

SA objective	Site SA567	Site considering mitigation in Policy HA14 (LWB1)	Site SA575	Site considering mitigation in Policy HA14 (LWB2)	Site SA584	Site considering mitigation in Policy HA14 (LWB3)
SA1: Housing	++	++	++	++	+	+
SA2: Access to services and facilities	+?	+?	+?	+?	+?	+?
SA3: Inclusive communities	0	0	0	0	0	0
SA4: Crime	0?	0?	0?	0?	0?	0?
SA5: Health and wellbeing	+	+	+	+	+	+
SA6: Biodiversity and geodiversity	-?	-?	-?	-?	-?	-?
SA7: Landscape	--?	--/+?	--?	--?	--?	--?
SA8: Historic environment	-?	+/-?	-?	+/-?	--?	--/+?
SA9: Efficient land use	--?	--?	--?	--?	--?	--?
SA10: Natural resources	0	0	0	0	0	0
SA11: Water resources	0	0	0	0	0	0
SA12: Flooding	-	-	-	-	-	-
SA13: Transport	+	+	+	+	+	+
SA14: Air quality	0	0	0	0	0	0
SA15: Climate change	+	+	+	+	+	+
SA16: Economic growth	0	0	0	0	0	0
SA17: Access to employment opportunities	--	--	--	--	--	--

**8.470** Policy HA14 allocates sites LWB1, LWB2 and LWB3 to the north of Lower Beeding for a total of at least 57 homes. It is expected that the majority of effects identified through the policy off site appraisal would continue to apply. However, some positive effects are identified as a result of mitigation present in Policy HA14.

**8.471** Policy HA14 requires that the development of allocations LWB1, LWB2 and LWB3 comply with site specific policies which are set out in the Made Lower Beeding Neighbourhood Plan. This plan includes requirements for development proposals to incorporate design that responds positively to and enhances the prevailing character of surroundings. However, the updated effects for the sites set out below, consider only the requirements explicitly set out in the text of Policy HA14. The effects of the policies in the Lower Beeding Neighbourhood Plan will have been considered separately through the SEA work for that plan.

**8.472** The policy also requires that the development of site LWB1 is sited and designed to prevent negative impacts to the High Weald AONB. The site was identified through the Council's landscape capacity assessment as having low-moderate landscape capacity for small scale housing development. Given the limited landscape capacity of the site to accommodate new development, development is likely to have some implications with regards to the area's established character, regardless of mitigation measures undertaken. These measures are likely to help protect some elements of this established local character, however, and therefore the uncertain significant negative effect recorded in relation to **SA objective 7: landscapes and townscape** is now combined with a minor positive effect.

**8.473** Policy HA14 also requires that development of sites LWB1, LWB2 and LWB3 have regard to the setting of Grade II Listed Building Holy Trinity Church. The appraisal of these sites noted the potential for development to have significant effects in relation Holy Trinity Church, as well as Grade II Listed Lower Beeding War Memorial and The Plough Inn. For sites LWB1 and LWB2 the magnitude of the effects expected were noted to be low meaning the negative effect recorded in relation to **SA objective 8: historic environment** was minor. The close proximity of the sites to the identified heritage assets means that development is likely to have some impact with regards to their respective settings. Furthermore, the policy is not set out to protect the settings of Lower Beeding War Memorial and The Plough Inn. The requirement of the policy to protect the setting of the Holy Trinity Church, means that the uncertain significant negative effect recorded in relation to SA objective 8: historic environment for site LWB3 is now combined with a minor positive effect. The uncertain minor negative effect recorded for site LWB1 and LWB2 is also now combined with a minor positive effect.

### Cumulative effects

**8.474** The delivery of sites LWB1, LWB2 and LWB3 at Lower Beeding would result in a substantial increase to the settlement boundary of the settlement when considered in combination. Furthermore, the allocations are in an area assessed as having low-moderate landscape capacity for small scale housing development. As such, development could have implications for the established character of the settlement as well as that of the surrounding landscape. The development of the sites alongside the other small scale development sites, such those for housing and employment to the south west of Horsham at the A261, could result in incremental changes to the setting of the AONB.

### Mitigation in other policies in the Local Plan

**8.475** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 6: New Employment.
- Strategic Policy 26: The Natural Environment and Landscape Character.
- Policy 29: Protected Landscapes.
- Policy 34: Heritage Assets and Managing Change in the Historic Environment.

**8.476** These sites will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

### Policy HA15: Pulborough Housing Allocations

**8.477** Policy HA15 allocates the following sites:

- PLB1: Land at Greendene, 3.7 hectares (60 homes) (appraised as site option SA112 through the SA)
- PLB2: Land at New Place Farm, 17 hectares (170 homes) (appraised as site option SA445 through the SA)
- PLB3: Land at Highfields, 1 hectare (25 dwellings) (appraised as site option SA556 through the SA)

Table 8.24 Summary of SA findings for Pulborough housing allocation policy

SA objective	Site SA112	Site considering mitigation in Policy HA115 (PLB1)	Site SA445	Site considering mitigation in Policy HA15 (PLB2)	Site SA556	Site considering mitigation in Policy HA15 (PLB3)
SA1: Housing	++	++	++	++	++	++
SA2: Access to services and facilities	++/-?	++/-?	++?	++?	++?	++?
SA3: Inclusive communities	0	0	0	0	0	0
SA4: Crime	0?	0?	0?	0?	0?	0?
SA5: Health and wellbeing	+	+	++	++	++	++
SA6: Biodiversity and geodiversity	--?	--?	--?	--?	--?	--?
SA7: Landscape	--?	--/+?	--?	--/+?	--?	--/+?
SA8: Historic environment	-?	-?	--?	--/+?	-?	-?
SA9: Efficient land use	-	-	--?	--?	--?	--?
SA10: Natural resources	--?	--?	--?	--?	--?	--?
SA11: Water resources	0	0	0	0	0	0
SA12: Flooding	-	-	-	-	-	-
SA13: Transport	++	++	++	++	++	++
SA14: Air quality	0	0	0	0	0	0
SA15: Climate change	++	++	++	++	++	++
SA16: Economic growth	0	0	0	0	0	0
SA17: Access to employment opportunities	+	+	--/+	--/+	+	+

**8.478** Policy HA15 allocates sites PLB1, PLB2 and PLB3 to the north of Pulborough for a total of at least 225 homes. The majority of effects identified through the policy off site appraisal work are expected to continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.479** The settlement of Pulborough lies within the Bat Sustenance Zone. This has partially contributed to the negative effects identified for the sites in relation to **SA objective 6: biodiversity and geodiversity**, through the policy off appraisal. Policy HA15 requires that sites PLB2 and PLB3 comply with site specific policies set out in the Made Pulborough Neighbourhood Plan, which includes bat related mitigation. Policy 2 (PLB2) and Policy 3 (PLB3) of the



Pulborough Neighbourhood Plan include a requirement that any development proposals at the site must identify and retain key features that are important for bats as well as identifying the impacts of development and its lighting on important routes used by bats. Development at the site is also required by these policies to be supported by a full ecological and biological survey. The appraisal of Policy HA15, however, does not reflect the requirements of the policy contained in the Pulborough Neighbourhood Plan, given that this policy will have been appraised separately through the SEA work for that plan.

**8.480** Furthermore, the sites lie within an IRZ identified in relation to the Upper Arun SSSI. While the policy requires development to have no adverse effects on the Arun Valley SPA / Ramsar site, it does not set out any requirement relating to impacts on the Upper Arun designated site. Therefore, there is no change to the uncertain significant negative effects identified for the sites in relation to SA objective 6: biodiversity and geodiversity.

**8.481** Policy HA15 requires that the development of sites PLB1, PLB2 and PLB3 respects the setting of the surrounding countryside as well as the setting of the AONB. A minor positive effect is therefore expected for all of the sites in relation to **SA objective 7: landscapes and townscapes**. This forms part of an overall mixed effect as the sites had been identified as having an uncertain significant negative effect in relation to this SA objective given their assessed landscape capacity of no/low landscape or low-moderate for small or medium housing development.

**8.482** The site specific policy for site PLB2 does not require development to consider the setting of Grade II Listed Building New Place Manor and the archway and garden wall at New Place Manor to south east of the house which the heritage impact work suggested could be subject to a high magnitude of change as a result of development. It does require that development at the site is supported by a full archaeological assessment which could have benefits in terms of understanding the cultural significance of the site. The uncertain significant negative effect recorded though the policy off appraisal work for site PLB2 in relation to **SA objective 8: historic environment** is therefore now combined with a minor positive effect.

#### Cumulative effects

**8.483** Much of the land around Pulborough has been assessed as having no/low landscape capacity or low-moderate capacity for housing development. The delivery of the three sites to the north of the Pulborough constitutes a relatively significant increase in the size of the settlement. Therefore, there are implications for the established character of the settlement and the surrounding countryside. The sites

may also result in increased congestion along the A29 which these sites lie on or are connected to indirectly.

#### Mitigation in other policies in the Local Plan

**8.484** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 26: The Natural Environment and Landscape Character.
- Policy 29: Protected Landscapes.
- Strategic Policy 30: Green Infrastructure and Biodiversity.
- Policy 34: Heritage Assets and Managing Change in the Historic Environment.

**8.485** As noted earlier in this section the policies of the Henfield Neighbourhood Plan will also help to mitigate adverse impacts in relation to bat habitats and flying routes, landscape character and the settings of heritage assets in the area.

**8.486** While a significant negative effect was not identified individually for these sites in relation to transport, there is potential for significant negative effects in combination with sites in the surrounding area. Strategic Policy 41: Sustainable Transport would help to achieve mitigation in this regard.

**8.487** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that these sites lie within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.488** Two of these sites will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

#### Policy HA16: Rudgwick and Bucks Green Housing Allocations

**8.489** Policy HA16 allocates the following sites:

- RD1: Land North of Guildford Road, 4.9 hectares (60 homes) (appraised as site option SA574 through the SA)
- RD2: The Former Pig Farm, 0.31 hectares (6 homes) (appraised as site option SA794 through the SA)

Table 8.25 Summary of SA findings for Rudgwick and Bucks Green housing allocation policy

SA objective	Site SA574	Site considering mitigation in Policy HA16 (RD1)	Site SA794	Site considering mitigation in Policy HA16 (RD2)
SA1: Housing	++	++	+	+
SA2: Access to services and facilities	+?	+?	+?	+?
SA3: Inclusive communities	0	0	0	0
SA4: Crime	0?	0?	0?	0?
SA5: Health and wellbeing	++	++	++	++
SA6: Biodiversity and geodiversity	-?	-?	-?	-?
SA7: Landscape	--?	--/+?	--?	--?
SA8: Historic environment	0?	0?	-?	-?
SA9: Efficient land use	--?	--?	--?	--?
SA10: Natural resources	--?	--?	--?	--?
SA11: Water resources	0	0	0	0
SA12: Flooding	-	-	-	-
SA13: Transport	+	+	+	+
SA14: Air quality	0	0	0	0
SA15: Climate change	+	+	+	+
SA16: Economic growth	0	0	0	0
SA17: Access to employment opportunities	--	--	--	--

**8.490** Policy HA16 allocates sites RD1 and RD2 to the south west of Rudgwick and Bucks Green for a total of at least 66 homes. The majority of effects identified through the policy off site appraisal work are expected to continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.491** Policy HA16 requires development at site RD1 to be limited to the southern part of the site with an agreed landscape treatment to be put in place to in the northern part of the site to minimise landscape impacts. As such, a minor positive effect is expected for this site in relation to **SA objective 7: landscapes and townscapes**. This effect forms part of an overall mixed effect, given that the policy off appraisal reflected the assessment of the site as having low-

moderate landscape capacity for small scale housing development.

**8.492** The policy also requires that the development of site RD2 is delivered so as to avoid impacts on the operation of the adjacent bus stop. The policy off appraisal of this site in relation to **SA objective 13: transport** and **SA objective 15: climate change**, reflected the close proximity of the site to bus stops along Guildford Road and these effects remain unchanged.

#### Cumulative effects

**8.493** The development of the two sites at Rudgwick and Bucks represent a relatively modest extension of the settlement when it is considered as a whole. However, much of the land around Rudgwick and Bucks Green has been assessed as having low-moderate landscape capacity of housing development. Therefore, implications relating to the established character of the settlement and the surrounding countryside may result.

#### Mitigation in other policies in the Local Plan

**8.494** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 6: New Employment.
- Strategic Policy 26: The Natural Environment and Landscape Character.

**8.495** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that both sites lie within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.496** These sites will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to SA objective 9: **efficient land use** might be mitigated through other policies.

#### Policy HA17: Rusper Housing Allocations

**8.497** Policy HA17 allocates the following sites:

- RS1: Land at Rusper Glebe, 0.6 hectares (12 homes) (appraised as site option SA080 through the SA)
- RS2: Land at East Street, 0.4 hectares (6 homes) (appraised as site option SA465 through the SA)
- RS3: Land north of East Street, 0.9 hectares (20 homes) (appraised as site option SA872 through the SA)

Table 8.26 Summary of SA findings for Rusper housing allocation policy

SA objective	Site SA080	Site considering mitigation in Policy HA17 (RS1)	Site SA465	Site considering mitigation in Policy HA17 (RS2)	Site SA872	Site considering mitigation in Policy HA17 (RS3)
SA1: Housing	++	++	+	+	++	++
SA2: Access to services and facilities	+?	+?	+?	+?	+?	+?
SA3: Inclusive communities	0	0	0	0	0	0
SA4: Crime	0?	0?	0?	0?	0?	0?
SA5: Health and wellbeing	+	+	+	+	+	+
SA6: Biodiversity and geodiversity	-?	-?	-?	-?	-?	-?
SA7: Landscape	--?	--?	--?	--?	--?	--?

SA objective	Site SA080	Site considering mitigation in Policy HA17 (RS1)	Site SA465	Site considering mitigation in Policy HA17 (RS2)	Site SA872	Site considering mitigation in Policy HA17 (RS3)
SA8: Historic environment	--?	--/+?	--?	--/+?	--?	--/+?
SA9: Efficient land use	-	-	-	-	-	-
SA10: Natural resources	--?	--?	--?	--?	--?	--?
SA11: Water resources	0	0	0	0	0	0
SA12: Flooding	-	-	-	-	-	-
SA13: Transport	+	+	+	+	+	+
SA14: Air quality	0	0	0	0	0	0
SA15: Climate change	+	+	+	+	+	+
SA16: Economic growth	0	0	0	0	0	0
SA17: Access to employment opportunities	--	--	--	--	--	--

**8.498** Policy HA17 allocates sites RS1, RS2 and RS3 for a total of at least 38 homes to the north and north east of Rusper. The majority of effects identified through the policy off site appraisal work are expected to continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.499** Policy HA17 includes a requirement that development proposals for sites RS1, RS2 and RS3 must demonstrate that they will not be exposed to unacceptable levels of noise emitted from overhead planes on the flight path to and from Gatwick Airport. The policy off appraisal did not reflect the potential for noise pollution from overhead planes to affect the amenity of site users, given that all sites fall outside of the Gatwick Airport noise contour. No change is expected to the minor positive effect recorded for the sites in relation to **SA objective 5: health**. However, it is expected that the policy requirement may contribute to ensuring that residents are not subject to long term impacts of being exposed to excessive noise pollution and the adverse impacts relating to health and well-being which may result.

**8.500** The policy off appraisal of sites RS1, RS2 and RS3 noted the potential for development to have significant effects in relation to the Rusper Conservation Area. Policy HA17 requires development of these sites to protect the setting and

character of this heritage asset. For site RS1 significant effects were also recorded in relation to a number of other heritage assets (Grade I Listed Building Parish Church of St Mary Magdalene and Grade II Listed Buildings Rusper War Memorial and Ghyll Manor Cottage), the majority of which Policy HA17 requires development of the site to have regard for. The exception to this is Grade II Listed Buildings Rusper War Memorial which is located within 90m of site RS1. All sites appraised are either adjacent to or within the Conservation Area and in close proximity to the heritage assets noted. The mitigation set out in the policy in relation to each site is likely to help limit the potential for significant effects although there is still some risk given their close proximity. Therefore, the uncertain significant negative effect is now recorded in combination with a minor positive effect in relation to **SA objective 8: historic environment** for each site.

#### Cumulative effects

**8.501** The allocation sites set out at Rusper are relatively small. However, the surroundings of the settlement have been assessed as having no/low or low-moderate landscape capacity for small and medium scale housing development. Therefore, the delivery of all three sites could, in combination,

have implications on the existing character of the settlement and its landscape setting.

#### Mitigation in other policies in the Local Plan

**8.502** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 6: New Employment.
- Strategic Policy 26: The Natural Environment and Landscape Character.
- Policy 34: Heritage Assets and Managing Change in the Historic Environment.

**8.503** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that

both sites lie within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

#### Policy HA18: Small Dole Housing Allocations

**8.504** Policy HA18 allocates the following site:

- SMD1: Land west of Shoreham Road [Henfield], 5.5 hectares (40 homes) (appraised as site option SA538 through the SA)

**Table 8.27 Summary of SA findings for Small Dole housing allocation policy**

SA objective	Site SA689	Site considering in mitigation in Policy HA18 (SMD1)
SA1: Housing	++	++
SA2: Access to services and facilities	-?	-?
SA3: Inclusive communities	0	0
SA4: Crime	0?	0?
SA5: Health and wellbeing	+	+
SA6: Biodiversity and geodiversity	--?	--?
SA7: Landscape	-?	+/-?
SA8: Historic environment	0?	0?
SA9: Efficient land use	--?	--?
SA10: Natural resources	--?	--?
SA11: Water resources	0	0
SA12: Flooding	-	+/-
SA13: Transport	+	+
SA14: Air quality	0	0



SA objective	Site SA689	Site considering mitigation in Policy HA18 (SMD1)
SA15: Climate change	+	+
SA16: Economic growth	0	0
SA17: Access to employment opportunities	+	+

**8.505** Policy HA18 allocates site SMD1 to the west of Small Dole for a total of 40 homes. It is expected that the majority of effects identified through the policy off appraisal would continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.506** Policy HA18 also requires the development of site SMD1 to deliver a significant proportion of site as public open space and areas for recreation use. The minor positive effect expected for this in relation to **SA objective 5: health** for the policy off appraisal, however, is still applicable. This is because there are no nearby GP surgeries.

**8.507** It is also outlined in Policy HA18 that proposals for the development site SMD1 are required to be designed to take account of the rural character around the site and mitigate against any harm to the landscape character. As such, a minor positive effect is identified for the site in relation to **SA objective 7: landscapes and townscapes**. This forms part of an overall mixed effect for the site given that an uncertain minor negative effect through the policy off appraisal was identified as the area has been assessed as having moderate landscape capacity for small scale housing development.

**8.508** The policy off appraisal identified the potential for increased flood risk through the development of the site given that it lies on greenfield land. The requirement of Policy HA18 for site SMD1 to incorporate SuDS along the southern boundary of the site is likely to help mitigate flood risk as the site is developed. As such, the minor negative effect identified in relation to **SA objective 12: flooding** is updated to a mixed minor positive and minor negative effect for this site.

#### Cumulative effects

**8.509** The land around Small Dole has been assessed as having moderate landscape capacity for small scale housing development. The moderate size of site SMD1 means that its delivery could have limited implications for the existing character of the settlement and its setting. The location of the site in close proximity to the South Downs National Park could contribute to incremental changes to its setting. Development at Small Dole, along with the allocations at the nearby

settlements of Steyning and Upper Beeding have been sited so that existing development lies between those sites and the National Park. However, considered cumulatively there is still potential for an increased level of urbanisation to impact the setting of the National Park.

**8.510** The potential for these effects may be increased when considered alongside the Oxcroft Farm site which is allocated for development through the made Upper Beeding Parish Neighbourhood Plan. This site is also in relatively close proximity to the South Downs National Park. Policies in the Upper Beeding Parish Neighbourhood Plan have been considered separately through the SEA work for that plan.

#### Mitigation in other policies in the Local Plan

**8.511** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 30: Green Infrastructure and Biodiversity.

**8.512** While significant negative effects have not been identified for this site individually in relation to landscape character and setting of the National Park, there is potential for these types of impacts when considering the site alongside others in the surrounding area. Strategic Policy 26: The Natural Environment and Landscape Character and Strategic Policy 29: Protected Landscapes are expected to help mitigate these impacts.

**8.513** The policies of the made Upper Beeding Parish Neighbourhood Plan will also be applicable to the development of the Oxcroft Farm site which will provide further mitigation.

**8.514** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that the site lies within a MSA. Mitigation of effects is likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior

extraction could occur or there is overriding need for that development.

**8.515** This site will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA**

**objective 9: efficient land use** might be mitigated through other policies.

#### Policy HA19: Steyning Housing Allocation

**8.516** Policy HA19 allocates the following site:

- STE1: Land at Glebe Farm, 14 hectares (240 homes). (appraised as site option SA742 through the SA)

**Table 8.28 Summary of SA findings for Steyning housing allocation policy**

SA objective	Site SA742	Site considering mitigation in Policy HA19 (STE1)
SA1: Housing	++	++
SA2: Access to services and facilities	++	++
SA3: Inclusive communities	0	0
SA4: Crime	0?	0?
SA5: Health and wellbeing	++	++
SA6: Biodiversity and geodiversity	--?	--?
SA7: Landscape	-?	+/-?
SA8: Historic environment	--?	--?
SA9: Efficient land use	--?	--?
SA10: Natural resources	0	0
SA11: Water resources	0	0
SA12: Flooding	-	-
SA13: Transport	+	+
SA14: Air quality	0	0
SA15: Climate change	+	+
SA16: Economic growth	0	0
SA17: Access to employment opportunities	--	--

**8.517** Policy HA19 allocates site STE1 to the northeast of Steyning for a total of at least 240 homes. It is expected that the majority of the effects identified during the policy off appraisal would continue to apply. However, increased

positive effects are expected in relation to some of the SA objectives.

**8.518** Policy HA19 supports the development of site STE1 where connectivity to Steyning Village centre via pedestrian and cycling networks is improved. These requirements will not change the significant positive effect already recorded in relation to **SA objective 2: access to services and facilities** for this site. The effect already recorded reflects the close proximity of the site to existing services and facilities within the village as well as to the secondary school.

**8.519** Policy HA19 requires that development proposals at site STE1 are landscape-led, with the design of the site to be informed by a landscape and visual impact assessment. The development of the site should also protect key views to and from the South Downs National Park and all other elements of landscape character. As such, a minor positive effect is therefore expected for STE1 in relation to **SA objective 7: landscapes and townscapes**. This forms part of an overall mixed effect as an uncertain minor negative effect was identified for the site through the policy off appraisal due to its location within in an area assessed as having moderate landscape capacity for medium scale housing development.

#### Cumulative effects

**8.520** There are no small site or strategic allocations within Steyning or the immediate surrounding area which might otherwise give rise to cumulative effects in combination with the delivery of STE1. Sites at the nearby village of Upper Beeding are located on that settlement's the north eastern edge. This limits the potential for sites at that settlement to act cumulatively with site STE1 to contribute to coalescence between Steyning and Upper Beeding. Separation between the two settlements is provided by the River Adur and surrounding open fields, which would remain undeveloped.

**8.521** However, the location of the site in close proximity to the South Downs National Park could contribute to incremental changes to its setting. Development at Steyning, along with the allocations at the nearby settlements of Small Dole and Upper Beeding have been sited so that existing development lies between those sites and the National Park. However, considered cumulatively there is still potential for an

increased level of urbanisation to impact the setting of the National Park.

#### Mitigation in other policies in the Local Plan

**8.522** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 6: New Employment.
- Strategic Policy 30: Green Infrastructure and Biodiversity.
- Policy 34: Heritage Assets and Managing change in the Historic Environment.

**8.523** While significant negative effects have not been identified for this site individually in relation to landscape character and setting of the National Park, there is potential for these types of impacts when considering the sites alongside others in the surrounding area. Strategic Policy 26: The Natural Environment and Landscape Character and Strategic Policy 29: Protected Landscapes are expected to help mitigate these impacts.

**8.524** This site will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

#### Policy HA20: Storrington Village Housing Allocations

**8.525** Policy HA20 allocates the following sites:

- STO1: Land to the north of Melton Drive, 4.7 hectares and Land South of Northlands Lane, 6 hectares (70 homes) (appraised as site option SA361/SA732 through the SA)
- STO2: Land at Rock Road [Thakeham parish], 3.66 hectares (75 homes) (appraised as site option SA384 through the SA)

Table 8.29 Summary of SA findings for Storrington Village housing allocation policy

SA objective	Site SA361/ SA732	Site considering mitigation in Policy HA20 (STO1)	Site SA384	Site considering mitigation in Policy HA20 (STO2)
SA1: Housing	++	++	++	++

SA objective	Site SA361/SA732	Site considering mitigation in Policy HA20 (STO1)	Site SA384	Site considering mitigation in Policy HA20 (STO2)
SA2: Access to services and facilities	++?	++?	++?	++?
SA3: Inclusive communities	0	0	0	0
SA4: Crime	0?	0?	0?	0?
SA5: Health and wellbeing	++	++	++	++
SA6: Biodiversity and geodiversity	--?	--?	--?	--?
SA7: Landscape	--?	--/+?	--?	--/+?
SA8: Historic environment	--?	--/+?	-?	+/-?
SA9: Efficient land use	--?	--?	-	-
SA10: Natural resources	--?	--?	--?	--?
SA11: Water resources	0	0	0	0
SA12: Flooding	-	-	-	-
SA13: Transport	+	+	+	+
SA14: Air quality	--	--/+	--	--/+
SA15: Climate change	+	+	+	+
SA16: Economic growth	0	0	0	0
SA17: Access to employment opportunities	+	+	+	+

**8.526** Policy HA20 allocates sites STO1 and STO2 to the north of Storrington for a total of at least 145 homes. The majority of the effects identified during the policy off appraisal are expected to continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.527** The policy requires development at both sites to have no adverse impact on the Arun Valley SPA / Ramsar site and to be supported by a HRA and a wintering bird survey. However, adverse impacts have been identified for both sites given that they lie within the SSSI IRZ for Sullington Warren. Given that the policy does not set out a requirement to

address potential impacts relating to this biodiversity site, the uncertain significant negative effect remains applicable for both sites.

**8.528** A positive effect is identified for sites STO1 and STO2 in relation to **SA objective 7: landscapes and townscapes** as a result of mitigation set out in Policy HA20. The sites are required by the policy to have regard to the setting of the South Downs National Park. In the case of site STO1, the development of the site is to be delivered in line with a landscape-led masterplan, which is to minimise coalescence between Storrington and West Chilington village. The effects identified form part of an overall mixed effect overall. The sites

had previously been recorded as having an uncertain significant negative effects in relation to this SA objective given that they lie in an area assessed as having no/low or low-moderate landscape capacity for medium scale housing development.

**8.529** Policy HA20 also requires that development of site STO1 ensures that appropriate regard is had to the setting of West Wantley Farmhouse (Grade II\* Listed) and East Wantley Farm (Grade II Listed). The development of site STO2 is to be delivered to have regard for Grade II Listed Building Penfolds. The appraisal of these sites noted the potential for development to have significant or potentially significant effects in relation to these heritage assets. The close proximity of the sites to these features means that development is likely to have some impact with regards to their respective settings. However, the requirement for the design of development to respond positively means that the uncertain negative effects recorded in relation to **SA objective 8: historic environment** are now combined with a minor positive effect.

**8.530** There is an AQMA along the A283 to the south of the allocated sites in the centre of Storrington. The potential for the delivery of the sites to result in increased traffic through this area means that a significant negative effect is identified in relation to **SA objective 14: air quality**. Policy HA20 requires that any development at Storrington must include an Air Quality Impact Assessment and Emissions Mitigation Assessment. This is likely to help address the potential for decreased air quality in Storrington and within the AQMA. Therefore, the significant negative effect identified is updated to a mixed minor positive and significant negative effect for both sites.

#### Cumulative effects

**8.531** In the context of the District, Storrington is a relatively large settlement. While its location at the edge of the South Downs National Park means that there is potential for new development to have impacts relating to the National Park's setting, the sites are located at the northern edge of Storrington, away from the National Park boundary. The relatively large size of the site and positioning of the sites away from the National Park, means that potential impacts relating to setting and local character may be more limited.

**8.532** It is, however, noted that much of the land to the north of the settlement has been assessed as having no/low or low-

moderate landscape capacity for medium scale housing development.

#### Mitigation in other policies in the Local Plan

**8.533** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 26: The Natural Environment and Landscape Character.
- Strategic Policy 25: Air Quality
- Policy 29: Protected Landscapes.
- Strategic Policy 30: Green Infrastructure and Biodiversity.
- Policy 34: Heritage Assets and Managing Change in the Historic Environment.

**8.534** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that both sites lie within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.535** Site STO1 will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

#### Policy HA21: Thakeham (The Street and High Bar Lane) Housing Allocations

**8.536** Policy HA21 allocates the following sites:

- TH1 – Land North of High Bar Lane, 0.9 hectares (25 homes) (appraised as site option SA039 through the SA)
- TH2 – Land West of Stream House, 1.9 hectares (40 homes) (appraised as site option SA873 through the SA)



Table 8.30 Summary of SA findings for Thakeham housing allocation policy

SA objective	Site SA039	Site considering mitigation in Policy HA21 (TH1)	Site SA873	Site considering mitigation in Policy HA21 (TH2)
SA1: Housing	++	++	++	++
SA2: Access to services and facilities	+/-?	+/-?	+/-?	+/-?
SA3: Inclusive communities	0	0	0	0
SA4: Crime	0?	0?	0?	0?
SA5: Health and wellbeing	+	+	+	+
SA6: Biodiversity and geodiversity	-?	-?	-?	-?
SA7: Landscape	?	?	?	?
SA8: Historic environment	0?	0?	0?	0?
SA9: Efficient land use	--	--	--	--
SA10: Natural resources	-?	-?	-?	-?
SA11: Water resources	-	-	-	-
SA12: Flooding	-	-	-	-
SA13: Transport	+	+	+	+
SA14: Air quality	0	0	0	0
SA15: Climate change	+	+	+	+
SA16: Economic growth	0	0	0	0
SA17: Access to employment opportunities	+	+	+	+

**8.537** Policy HA21 allocates sites TH1 and TH2 to the north of Thakeham for a total of at least 65 homes. Considering the mitigation set out through Policy HA21, all effects identified through the policy off appraisal of the sites are expected to continue to apply.

**8.538** For site TH2, Policy HA21 requires development to be supported by a Noise Impact Assessment, which is likely to be of benefit to the wellbeing of future residents. However, there is no increase to the minor positive effect identified for the

policy off appraisal of the site in relation to **SA objective 5: health**. This effect is reflective of lack of access from the site to a nearby existing healthcare facility.

**8.539** In relation to site TH1, Policy HA21 requires hedgerows on site to be preserved and enhanced, which is likely to be of some benefit to maintaining biodiversity within the site. However, this aspect of the policy is not likely to contribute substantially to the mitigation of the negative effect identified for the site considering its location within the Bat Sustenance

Zone. Therefore, the uncertain minor negative effect expected for the site in relation to **SA objective 6: biodiversity and geodiversity** will continue to apply.

#### Cumulative effects

**8.540** Thakeham is a relatively small settlement and the delivery of two sites at the settlement could potentially affect its established character and the setting of the surrounding countryside. However, these sites are adequately sited away from the Thakeham Conservation Area to the north east to minimise the potential for adverse impacts on this designation. The landscape capacity of some of the land to the west of the settlement has not been subject to landscape capacity work. The allocation of sites within this portion of land would have unknown implications in terms of landscape setting. There are no small site or strategic site allocations within Thakeham which might otherwise give rise to cumulative effects in combination with the delivery of TH1 and TH2.

#### Mitigation in other policies in the Local Plan

**8.541** The following other policies in the Local Plan may help to mitigate the remaining significant negative and uncertain effects identified:

- Strategic Policy 26: The Natural Environment and Landscape Character.

**8.542** These sites will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to SA objective 9: **efficient land** use might be mitigated through other policies.

#### Policy HA22: Warnham Housing Allocation

**8.543** Policy HA22 allocates the following site:

- WRN1: Land South of Bell Road, 1.4ha, (20 homes) (appraised as site option SA071 through the SA)

Table 8.31 Summary of SA findings for Warnham housing allocation policy

SA objective	Site SA071	Site considering mitigation in Policy HA22 (WRN1)
SA1: Housing	++	++
SA2: Access to services and facilities	+?	+?
SA3: Inclusive communities	0	0
SA4: Crime	0?	0?
SA5: Health and wellbeing	+	+
SA6: Biodiversity and geodiversity	0?	0?
SA7: Landscape	--?	--/+?
SA8: Historic environment	0?	0?
SA9: Efficient land use	--?	--?
SA10: Natural resources	--?	--?
SA11: Water resources	0	0

SA objective	Site SA071	Site considering mitigation in Policy HA22 (WRN1)
SA12: Flooding	-	-
SA13: Transport	++	++
SA14: Air quality	0	0
SA15: Climate change	++	++
SA16: Economic growth	0	0
SA17: Access to employment opportunities	+	+

**8.544** Policy HA22 allocates site WRN1 to the north east of Warnham for a total of at least 20 homes. The majority of the effects identified through the policy off appraisal work are expected to continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.545** In relation to **SA objective 7: landscapes and townscapes**, a minor positive effect is now expected in combination with the significant negative effect previously identified due to the site's location in an area assessed as having no/low landscape capacity for small scale housing development. This minor positive is due to the requirement of Policy HA22 for development at the site to be laid out and designed to be sympathetic to local character and the prevailing linear urban form on Bell Road.

#### Cumulative effects

**8.546** Although the site is relatively small at 20 dwellings, the site lies within an area assessed as having no/low landscape capacity. The site also lies in close proximity to the existing strategic site allocation to the North of Horsham for 2,750 homes and the new strategic site allocation at Rookwood is to the south east. The cumulative effect of delivering these sites in combination could increase the overall landscape impacts to the north of Horsham Town and towards Warnham. There are also likely to be implications for transport in the area through the delivery of these sites, with increased congestion on key routes (most notably the A24 and A264) into Horsham potentially arising, although the contribution to congestion from the site allocated at WRN1 at Warnham is likely to be relatively small.

#### Mitigation in other policies in the Local Plan

**8.547** The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 26: The Natural Environment and Landscape Character.

**8.548** While a significant negative effect was not identified individually for these sites in relation to transport, there is potential for significant negative effects in combination with sites in the surrounding area. Strategic Policy 41: Sustainable Transport would help to achieve mitigation in this regard.

**8.549** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that both sites lie within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.550** This site will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.

#### Policy HA23: West Chiltington and West Chiltington Common Housing Allocations

**8.551** Policy HA23 allocates the following sites:

- WCH1 – Land at Hatches Estate, 0.89 hectares (15 homes) (appraised as site option SA066 through the SA)
- WCH2 – Land West of Smock Alley, South of Little Haglands, 1.3 hectares (15 homes) (appraised as site option SA429 through the SA)
- WCH3 – Land East of Hatches House, 0.5 hectares (6 homes) (appraised as site option SA500 through the SA)

**Table 8.32 Summary of SA findings for West Chilington and West Chilington Common housing allocation policy**

SA objective	Site SA066	Site considering mitigation in Policy HA23 (WCH1)	Site SA429	Site considering mitigation in Policy HA23 (WCH2)	SA500	Site considering mitigation in Policy HA23 (WCH3)
SA1: Housing	++	++	++	++	+	+
SA2: Access to services and facilities	+?	+?	+/-?	+/-?	+?	+?
SA3: Inclusive communities	0	0	0	0	0	0
SA4: Crime	0?	0?	0?	0?	0?	0?
SA5: Health and wellbeing	+	+	-	-	+	+
SA6: Biodiversity and geodiversity	0?	+?	0?	+?	0?	+?
SA7: Landscape	-?	-?	--?	--/+?	-?	-/+?
SA8: Historic environment	--?	--/+?	-?	-?	-?	+/-?
SA9: Efficient land use	--?	--?	--?	--?	--?	--?
SA10: Natural resources	--?	--?	-?	-?	--?	--?
SA11: Water resources	0	0	-	-	-	-
SA12: Flooding	-	-	-	-	-	-
SA13: Transport	+	+	-	-	+	+
SA14: Air quality	0	0	0	0	0	0
SA15: Climate change	+	+	-	-	+	+
SA16: Economic growth	0	0	0	0	0	0
SA17: Access to employment opportunities	--	--	+	+	-	-

**8.552** Policy HA23 allocates sites WCH1, WCH2 and WCH3 to the north of West Chiltington (WCH1 and WCH3) and north east of West Chiltington Common (WCH2) for a total of at least 36 homes. It is expected that the majority of the effects identified during the policy off appraisal would continue to apply. However, increased positive effects are expected in relation to some of the SA objectives.

**8.553** In relation to sites WCH1, WCH2 and WCH3 Policy HA23 requires that the development proposals consider trees within or near to the site. This is likely to have benefits in terms of preserving features which contribute to biodiversity in the area and therefore a minor positive effect is identified for the sites in relation to **SA objective 6: biodiversity and geodiversity**.

**8.554** Policy HA23 requires that any development proposals for site WCH2 are sympathetic to the character of the area. The policy also requires that development proposals for site WCH3 protect the rural character and rural approach to the settlement. These measures may help to reduce some of the landscape impacts arising from the development. A minor positive effect is therefore identified for both sites in relation to **SA objective 7: landscapes and townscape**s. The positive effect is recorded in combination with the significant negative effect and minor negative effect respectively for sites WCH2 and WCH3. These negative effects were previously identified given the sites' location in areas assessed as having no/low and moderate-high landscape capacity for residential development.

**8.555** The policy off appraisal of site WCH1 noted the potential for adverse effects to result in relation to Grade II Listed Building Newhouse Farmhouse (Tumblestones) and West Chiltington Conservation Area. The policy off appraisal of site WCH3 noted the potential for adverse effects to result in relation to Grade II Listed Buildings Naldretts Farmhouse and Barn at Naldretts Farm. The policy requires that impacts relating to these heritage assets are mitigated. The close proximity of the sites to these heritage assets (both sites are within 50m of the closest assets) and their sensitivity to change (as identified through the Council's heritage impact assessment work) means that some adverse impacts may still result through any new development. The uncertain significant negative effect recorded for site WCH1 and the uncertain minor negative effect recorded for site WCH3 in relation to **SA objective 8: historic environment** is now combined with a minor positive effect.

#### Cumulative effects

**8.556** West Chiltington and West Chiltington Common considered together comprise a medium village in the District. West Chiltington is a smaller settlement in its own right and much of the south west of the village falls within West

Chiltington Conservation Area. Site WCH1, lies in particularly close proximity to the Conservation Area and considered cumulatively alongside site WCH3 there is potential for adverse impacts on the setting of this heritage asset. While the smaller size of West Chiltington may make its established character vulnerable to change the level of development proposed (21 homes) at the settlement is relatively small. Furthermore, the land at which sites WCH1 and WCH3 lie is identified as having moderate-high landscape capacity for residential development.

**8.557** The relatively low level of development to be provided at West Chiltington and West Chiltington Common is less likely to result in increased levels of traffic through the settlement.

**8.558** There are no strategic allocations or other small site allocations which are likely to be functionally to West Chiltington and West Chiltington Common which might otherwise give rise to further cumulative effects in combination with the delivery of sites WCH1, WCH2 and WCH3.

#### Mitigation in other policies in the Local Plan

The following other policies in the Local Plan may help to mitigate the remaining significant negative effects identified:

- Strategic Policy 26: The Natural Environment and Landscape Character.
- Strategic Policy 27: Countryside Protection.
- Policy 34: Heritage Assets and Managing Change in the Historic Environment.

**8.559** Significant negative effects may also result in relation to sterilisation or loss of access to mineral resources given that two sites (WCH1 and WCH3) lie within a MSA. Mitigation of effects are likely to be achieved through the West Sussex Joint Minerals Local Plan. The minerals plan contains policy to safeguard existing mineral extraction sites and restricts non-mineral development within MSAs unless no sterilisation would result, prior extraction could occur or there is overriding need for that development.

**8.560** These sites will involve the development of a relatively large area of greenfield land and higher value agricultural soils regardless of mitigation which might be achieved through other policies in the Local Plan. Therefore, it is unlikely that the significant negative effect identified in relation to **SA objective 9: efficient land use** might be mitigated through other policies.



## Chapter 9

### Cumulative Effects

#### Introduction

**9.1** The cumulative effects assessment is undertaken in two parts. The first part considers the cumulative effects of the policies in the Local Plan Review document taken as a whole on each of the SA objectives. A summary of the likely sustainability effects of the policies in the document is presented in **Table 9.1** later in this section.

**9.2** The second part of the cumulative effects assessment considers the potential for in-combination effects with development proposals in the Local Plans prepared by neighbouring authorities.

#### Cumulative effects of policies in the Local Plan

##### SA objective 1: To provide affordable, sustainable and decent housing to meet local needs

**9.3** The Local Plan requires the delivery of 1,100 homes per year between 2021 and 2038. As such, Policy 14: Housing Provision would require the delivery of at least enough homes to meet the objectively assessed 'local housing need' as based on the Government's Standard Methodology (897 dwelling per annum). The higher level of housing to be provided would also contribute to the unmet housing need in neighbouring authorities in the North West Sussex under the 'Duty to Cooperate'. The relatively high number of homes could also help to improve the affordability of local housing.

**9.4** In accordance with Policy 16: Affordable Housing, developments of 10 dwellings or more and those over 0.5 hectares in size are to be supported where they include an appropriate proportion of affordable homes. Thresholds for affordable housing are to be based on the outcomes of viability work. A mix of housing, including appropriate sizes and types, will also be provided in accordance with Policy 15: Meeting Local Housing Needs to meet the needs of the District's communities.

**9.5** Homes will be required by Policy 17: Improving Housing Standards in the District, to meet the Nationally Described Space Standards (or any subsequent Government update) for internal floor areas and storage space. They should also meet the Optional Standards for Accessible and Adaptable dwellings. This requirement is likely to deliver a housing stock

which can be adaptable to better meet the needs of specific groups, including older people and people with disabilities.

**9.6** Of the sites allocated for development, the larger strategic sites are expected to make a more positive contribution to housing affordability in the District. The large strategic site at Ifield (Policy HA2) and the West of Kilnwood Vale site (Policy HA13) could contribute to the unmet housing need in Crawley.

**9.7** Overall, a **cumulative significant positive effect** is expected in relation to housing.

**SA objective 2: To maintain and improve access to centres of services and facilities including health centres and education**

**9.8** The development hierarchy set out through Policy 2: Development Hierarchy is likely to direct much of the growth over the plan period towards the built-up areas of the larger settlements in the plan area. Horsham town and the supporting small towns and villages provide access to the greatest number of services and facilities. Policy 4: Horsham Town is expected to help protect the role of Horsham town as the primary economic and cultural centre in the District. Considering its accessibility to a high number of residents (including by public transport) it is likely that this policy will benefit a large proportion of the local population in terms of access to services and facilities.

**9.9** Policy 12: Town Centre Hierarchy sets out the Local Plan's commitment to adopting a Town Centre first approach whereby town centre uses (including retail, leisure and entertainment) are primarily to be located within the main shopping areas and is to be of an appropriate scale. This policy is expected to help protect the viability of the town centres in the District. Ensuring support for successfully functioning town centres and service provision in accessible locations, particularly by public transport, will be of benefit to a high number of residents within the District.

**9.10** Policies 40: Infrastructure Provision and 45: Community Facilities, Leisure and Recreation provide the most direct support for the delivery of new infrastructure, service provision and community facilities to support growth in the District. Policy 40 provides scope for infrastructure provision to be secured by Planning Obligations and Community Infrastructure Levy.

**9.11** Providing a relatively high number of new homes over the plan period (1,100 homes per annum, as set out through Policy 14: Housing Provision) could potentially result in existing services and facilities becoming overburdened. Of the sites set out for allocation, many are large and would form urban extensions (i.e. sites West of Ifield, West of Southwater and East of Billingshurst as allocated by Policies HA2 to HA4) to the larger settlements in the plan area and the surrounding

areas. Or, in the case of North of Horsham, Policy 14 sets out to deliver an additional 500 homes through densification of the existing allocation. These are the settlements which provide the best access to existing services and facilities. The site at Buck Barn (Policy HA5) is to be delivered as a new settlement. At these locations, the provision of a large amount of development, alongside new services and facilities may instil a degree of self-containment.

**9.12** Strategic Policy HA1: Strategic Site Development Principles of the Local Plan will be of particular importance in relation to large sites which do not provide immediate access to services and facilities. The policy requires that new proposals for strategic scale development should deliver the necessary services and facilities that contribute to the development of a successful community.

**9.13** Of the small sites allocated, only a small number are located at the settlements classed as Smaller Villages in the Development Hierarchy which have more limited access to services and facilities. These are at Christ's Hospital (site CH1), Lower Beeding (sites LWB1, LWB2 and LWB3), Rusper (sites RS1, RS2 and RS3) and Small Dole (site SMD1). Delivering new development at these locations could help to ensure the viability of the limited existing service provision at these locations, but could also result in some residents having limited access to essential services and facilities.

**9.14** Overall a **cumulative significant positive and minor negative effect** is expected in relation to access to access to services and facilities.

**SA objective 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity**

**9.15** The Local Plan includes policies which seek to ensure that development meets the long-term needs of a range of occupiers and users and to ensure that development is accessible to all members of the community. Development is also required by Policy 44: Inclusive Communities, Health and Wellbeing to meet the needs of older people and people with disabilities.

**9.16** Policy 45: Community Facilities, Leisure and Recreation directly addresses the provision of new or improved community facilities which will help assist the integration of new development while also helping to prevent issues relating to social deprivation. Furthermore, the plan is likely to support the provision of a mix of homes which meet the needs of and are adaptable to a range of local people, as required by Policies 15: Meeting Local Housing Needs and 17: Improving Housing Standards in the District will help to promote community cohesion in the plan area.

**9.17** Where large sites have been included as urban extensions to the larger settlements in and surrounding the

plan area (i.e. sites West of Ifield, West of Southwater and East of Billingshurst as allocated by Policies HA2 to HA4, respectively), residents will benefit from access to existing services and facilities. Large scale development at these locations has more limited potential to disrupt existing community networks considering their more established nature, although impacts may result in terms of overburdening existing services. The West of Kilnwood Vale site (Policy HA13) is to be provided as an extension of the existing Kinwood Vale strategic allocation which is to incorporate new services and facilities. However, it is acknowledged that as a development site which is currently underway, community networks at the existing strategic allocation may be more vulnerable to change than those at the more established settlements of the plan area. The site at Buck Barn (Policy HA5) is to be delivered as a new settlement and is considered less likely to benefit from immediate access to services and facilities given its more isolated location. All large sites include proposals for new service provision; however these will take time to 'bed-in' and the high level of infrastructure provision required from scratch at the new settlement may mean that lead times are longer.

**9.18** Considering the proportion of overall growth to be provided at large sites, Strategic Policy HA1: Strategic Site Development Principles will be of particular relevance in terms of mitigating potential effects. This policy states that mixed-use communities should be delivered to provide a range of housing types and tenures. Services and facilities necessary to ensure a successful community should also be incorporated at strategic developments.

**9.19** Overall a **cumulative significant positive and minor negative effect** is expected in relation to community cohesion.

**SA objective 4: To support the creation of safe communities in which levels of crime, anti-social behaviour and disorder and the fear of crime are reduced**

**9.20** The majority of the policies in the Local Plan will not have a direct effect in relation to the occurrence and perception of crime and safety in the District. Furthermore, it is not expected that any of the specific site options allocated through the Local Plan would help to address or result in further issues of this nature.

**9.21** However, benefits in relation to improved safety of development in the plan area might be promoted through Policy 32: Development Quality which requires that development is provided to ensure the creation of safe and adaptable environments in Horsham District. Policy 33: Development Principles sets out the development principles for new proposals in the District. These include a requirement for measures which reduce actual or perceived opportunities

for crime or antisocial behaviour. Benefits in relation to promoting the safety of residents are also likely to be achieved through Policy 44: Inclusive Communities, Health and Wellbeing which states that design should create healthy, inclusive and safe places. Furthermore, lighting proposals relating to new or improved community facilities are required by Policy 45: Community Facilities, Leisure and Recreation to help reduce crime at these locations.

**9.22** Overall a **cumulative minor positive effect** is expected in relation to crime and safety.

**SA objective 5: To improve public health and wellbeing and reduce health inequalities**

**9.23** Policies 36: Climate Change and 41: Sustainable Transport support patterns of development which would help to encourage travel by walking and cycling. As such, levels of day-to-day activity among residents may be increased, benefitting public health. The provision of improved and protection of existing green infrastructure in the District (Policy 30: Green Infrastructure and Biodiversity) will also help to encourage active forms of recreation.

**9.24** Policy 44: Inclusive Communities, Health and Wellbeing directly addresses the delivery of development in Horsham to support healthy lifestyles. This includes the protection and enhancement of existing community facilities, services and open spaces. The Local Plan (Policy 40: Infrastructure Provision) also requires that additional local infrastructure provision required to support new development (including healthcare) is to be secured by Planning Obligations/Community Infrastructure Levy. This policy is expected to help mitigate any increased demand on existing services and facilities as the local population grows. The provision of new or improved community facilities or services is supported directly through Policy 45: Community Facilities, Leisure and Recreation. This will include open spaces and recreation facilities.

**9.25** The population growth that will result from the residential development to be delivered through the Local Plan could put pressure on healthcare facilities such as existing GP surgeries. Impacts in terms of public health will also be influenced by accessibility to existing healthcare provisions as well as the potential for new residents to be influenced by sources of pollution, such as noise pollution with the noise contour associated with Gatwick Airport.

**9.26** Large sites to be delivered as urban extensions to the larger settlements (i.e. sites West of Ifield, West of Southwater and East of Billingshurst as allocated by Policies HA2 to HA4) will provide many new residents with access to existing healthcare facilities. It is noted that the development of land at West of Ifield could result in the loss of access to existing sport facilities. All large sites have the potential to include new

services and facilities. The good level of access to these provisions for residents at urban extension sites may encourage travel by more active modes which could benefit public health.

**9.27** Considering the large proportion of development to be delivered at large sites over the plan period, the principles for strategic development (Strategic Policy HA1: Strategic Site Development Principles) are likely to be particularly important in terms of support for the health of the population over the plan period. This policy requires proposals to deliver healthy communities and support healthy lifestyles. Services required are to be provided to support successful communities, and this is to include healthcare provisions.

**9.28** Of the sites allocated through the Local Plan only site WCH2 at West Chiltington and West Chiltington Common would not provide access to facilities which could benefit local health and wellbeing (i.e. an area of open space and/or a healthcare facility). Site BGR3 at Barn Greens would provide nearby access to an area of open space. However, development at the site could also result in the loss of an area of open space. It is considered unlikely that the scale of growth supported through the smaller sites allocated would provide the critical mass needed to support substantial new service provision to benefit health and wellbeing in these locations.

**9.29** Overall a **cumulative minor positive effect** is expected in relation to health and wellbeing.

**SA objective 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest**

**9.30** The relatively high amount of development proposed through the Local Plan could have detrimental effects in terms of designated biodiversity and geodiversity sites and the wider ecological networks in the District. This effect could result as much of the development is proposed on greenfield sites (although it is recognised that brownfield sites can still harbour valuable biodiversity, and furthermore that intensively cultivated greenfield sites may have limited ecological value) with associated effects likely to result as new homes are occupied.

**9.31** The development of new urban extension sites and the new settlement site would result in a particularly high amount of greenfield land take at individual locations. With the exception of site BGR3 at Barns Green, all small site allocations also lie on greenfield land. Adverse effects have also been identified where sites lie in close proximity to biodiversity sites or within Site of Special Scientific Interest

Impact Risk Zones (SSSI IRZs) which identified the specific type of development proposed as a potential risk. Many of the sites allocated lie within the bat sustenance zone associated with the Mens Special Area of Conservation (SAC) to the west of the District. All of the strategic sites allocated are expected to have adverse impacts in relation to biodiversity although the site specific policy included is expected to help limit the potential for adverse effects. Policy HA1: Strategic Site Development Principles requires masterplans for development to identify key areas of biodiversity enhancement and to demonstrate a minimum of 10% biodiversity net gain.

**9.32** In relation to the international sites, the HRA for the Horsham Local Plan<sup>41</sup> concluded at the screening stage that likely significant effects could arise on Arun Valley SPA/Ramsar site (from changes in water quality, changes in water levels and flows and loss of functionally-linked land), Ebernoe Common SAC and The Mens SAC (from loss of functionally linked land) and, for The Mens SAC, atmospheric nitrogen deposition. An Appropriate Assessment was therefore carried out, which resulted in a number of recommendations being made to ensure that the Local Plan does not result in an adverse effect on the integrity of an internationally designated site either in combination or in isolation.

**9.33** In all, the effects of new development on Horsham District's biodiversity and geodiversity are to some extent uncertain until detailed proposals for particular sites come forward at the planning application stage.

**9.34** The Local Plan seeks to ensure the protection and enhancement of biodiversity and geodiversity in the District, particularly through Policy 26: The Natural Environment and Landscape Character and 30: Green Infrastructure and Biodiversity. These policies require that the natural environment including designated landscapes, biodiversity sites and habitats are appropriately considered as part of the development process and that 10% biodiversity net gain is achieved at development sites. Furthermore, development should maintain and enhance green infrastructure, the Nature Recovery Network and natural capital.

**9.35** Overall a **cumulative uncertain minor positive and significant negative effect** is expected in relation to biodiversity and geodiversity.

**SA objective 7: To conserve and enhance the character and distinctiveness of the District's landscape and**

<sup>41</sup> Aecom on behalf of Horsham District Council (2021) Horsham Local Plan Habitats Regulations Assessment

### townscapes, maintaining and strengthening local distinctiveness and sense of place

**9.36** Much of the landscape in Horsham District is rural in nature. The settlement edges in many areas have no/low or low-moderate capacity to accommodate large scale development. The plan area also includes part of the High Weald AONB to the north east and provides setting for the South Downs National Park to the south. New development delivered through the plan has the potential to disrupt the existing rural character and affect the settings of designated landscapes. There is also potential for a degree of coalescence to occur where new development would occur between settlements in the District. The areas surrounding the settlements of Southwater and Horsham, and West Chiltington Common with West Chiltington Village have been noted to have potential sensitivities in this regard.

**9.37** The large-scale urban extensions at the larger settlements (i.e. sites West of Ifield, West of Southwater and East of Billingshurst, as allocated by Policies HA2 to HA4) as well as the new settlement site (Buck Barn, Policy HA5) would require large amounts of greenfield land take at these locations and could have adverse impacts on existing character. The site specific policies which allocate these strategic sites and Policy HA1: Strategic Site Development Principles require development to be landscape-led and to complement positive landscape characteristics of the area.

**9.38** A number of the small sites allocated are located within areas assessed as having no/low landscape capacity for medium scale development. This includes some of the sites at sites at Ashington, Barns Green, Broadbridge Heath, Christ's Hospital, Cowfold, Henfield, Horsham town, Lower Beeding, Pulborough, Rudgwick and Bucks Green, Rusper, Storrington, Warnham and West Chiltington and West Chiltington Common. Furthermore, in addition to lying on land with no/low landscape capacity for medium scale residential development, development of the West of Kilnwood Vale site (Policy HA13) has the potential to result in a degree of coalescence between Crawley and Horsham town. This is of particular relevance when considered cumulatively alongside the West of Ifield site. The West of Kilnwood Vale site also very close to the High Weald AONB.

**9.39** However, the Plan makes provision for mitigating the potential landscape-related impacts of new development, by seeking to protect the natural environment, limiting the potential for encroachment on the open countryside and the special character of this area as well as settlement coalescence. This is to be achieved through Policies 26: The Natural Environment and Landscape Character, 27: Countryside Protection and 28: Settlement Coalescence, respectively. Through Policy 29: Protected Landscapes, new development is also required to be respectful of the setting of

protected landscapes, including the High Weald AONB and the adjoining South Downs National Park. Policy 30: Green Infrastructure and Biodiversity which seeks to protect and enhance the green infrastructure network, will be of benefit in terms of landscape character in the District.

**9.40** The effects of new development on the landscape are to some extent uncertain until detailed proposals for the sites to be allocated come forward at the planning application stage.

**9.41** Overall a **cumulative uncertain minor positive and significant negative effect** is expected in relation to the landscape.

### SA objective 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment

**9.42** Delivering a relatively high level of development to support housing and economic growth over the plan period could adversely affect heritage assets and their settings. These effects are particularly likely given that a large proportion of the new development will be directed to previously undeveloped sites.

**9.43** The heritage impact assessment work undertaken by the Council indicates that the majority of the large sites allocated are expected to have significant negative effects in relation to the historic environment. The site specific policies which allocate these sites and Policy HA1: Strategic Site Development Principles include requirements which will help to mitigate the potential for these adverse impacts to occur in practice. For the site specific policies, this includes reference to specific heritage assets which might be particularly sensitive to new development.

**9.44** Some of the small sites allocated across Barns Green, Broadbridge Heath, Cowfold, Henfield, Lower Beeding, Pulborough, Rusper, Steyning, Storrington and West Chiltington and West Chiltington Common are also likely to have adverse effects in relation to the historic environment.

**9.45** The effects of new development supported through the Local Plan in relation to cultural heritage will also be influenced by the detailed proposals for particular sites which come forward at the planning application stage.

**9.46** The Local Plan includes the requirement for proposals to complement and respond to locally distinctive character and heritage of the District as part of its approach to achieving high quality development (Policy 32: Development Quality). Policy 34: Heritage Assets and Managing change in the Historic Environment directly addresses development which might affect heritage assets. Proposals of this nature are required by the policy to contribute to character and distinctiveness of the area. These policies could help to ensure to achieve enhancements as well as mitigation.



**9.47** While Policies 26: The Natural Environment and Landscape Character, 27: Countryside Protection, 28: Settlement Coalescence and 29: Protected Landscapes do not directly address protection of the built historic environment in Horsham District, the measures included would help to protect the landscape character, including the open rural character of the District and its designated landscapes. It is expected that these measures would also contribute to the protection of the settings of heritage assets.

**9.48** Overall a **cumulative uncertain minor positive and significant negative effect** is expected in relation to the historic environment.

**SA objective 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils**

**9.49** The Local Plan requires a relatively high level of growth over the plan period (1,100 homes per annum) relative to the adopted Local Plan. The rural character of the District means that the majority of the small and large sites allocated are located on greenfield land. This will result in the loss of large areas of previously undeveloped land and many of these areas comprise soils which are of Grade 3 or higher agricultural quality. The inclusion of an additional 500 homes within the existing Land North of Horsham allocation set out through Policy 14: Housing Provision would help to achieve more efficient use of land in the plan area through the promotion of higher densities at this location.

**9.50** The Local Plan's approach to environmental protection set out through Policy 24: Environmental Protection states that development proposals should address land contamination by promoting the appropriate re-use of sites and requiring the delivery of appropriate remediation. This policy could help to achieve an uplift in the condition of soils in the District. The Plan also requires development to make efficient use of land and to prioritise the use of previously developed land and buildings, through the development principles set out through Policy 33: Development Principles. However, considering the more undeveloped nature of Horsham District, the scope for this approach to development is relatively limited.

**9.51** Overall a **cumulative minor positive and significant negative effect** is expected in relation to the efficient land use.

**SA objective 10: To conserve natural resources, including mineral resources in the District**

**9.52** By requiring a relatively high amount of development over the plan period, the Local Plan (as set out through Policy 6: New Employment and Policy 14: Housing Provision, in particular) would result in the loss of access to large areas of greenfield land, including those which fall within Minerals

Safeguarding Areas (MSAs). Much of the land at the large sites allocated as urban extensions or new settlements (i.e. West of Ifield, West of Southwater, East of Billingshurst and Buck Barn, as set out through Policies HA2 to HA5) take in large areas of land within MSAs. The majority of the small sites allocated (with the exception of a number of sites at Horsham town, Lower Beeding and Steyning) also fall within or are located within close proximity to MSAs. As such, sterilisation or loss of access to these finite natural resources may result.

**9.53** Policy 36: Climate Change seeks to address climate change and is most likely to help promote waste minimisation in line with the waste hierarchy. Furthermore, Policy 38: Sustainable Design and Construction requires that development proposals minimise construction and demolition waste and utilise recycled and support grey water recycling.

**9.54** Overall a **cumulative minor positive and significant negative effect** is expected in relation to the conservation of natural resources including minerals.

**SA objective 11: To achieve sustainable water resource management and promote the quality of the District's waters**

**9.55** The relatively high level of development proposed set out through the Local Plan will inevitably result in an increase in demand for water abstraction and treatment. However, levels of per capita water consumption are unlikely to be affected. The development of sites also has the potential to result in water contamination during construction. However, it is assumed that construction management plans will help to mitigate the potential for such adverse impacts.

**9.56** The Gatwick Sub-Region Water Cycle reports that large scale development by Billingshurst and by Crawley (most notably the sites allocated at West of Ifield, East of Billingshurst and West of Kilnwood Vale, as set out through Policies HA2, HA4 and HA13, respectively) could have implications with regard to capacity at existing wastewater treatment works (WwTW) infrastructure. Most of the development sites allocated for development do not lie within Source Protection Zones (SPZs) in the plan area. For the small sites the exception to this are a small number of sites at West Chiltington Village and Common and at Thakeham.

**9.57** Sustainable design and construction requirements for developments in the District are provided through Policy 38: Sustainable Design and Construction. This includes the requirement for all residential development to achieve water efficiency rates of 100 litres per person per day. Development providing over 200 homes are expected to achieve water efficiency rates of 80 litres per person per day.

**9.58** The Local Plan also requires that development proposals must improve the environmental quality of any watercourses, groundwater and drinking water supplies, and prevent contaminated run-off to surface water. This is part of its approach to environmental protection which is set out through Policy 24: Environmental Protection. It is also expected that adopting an approach which seeks to protect and enhance the green infrastructure network in Horsham District could have further benefits in terms of securing high water quality. This approach is set out through Policy 30: Green Infrastructure and Biodiversity, which also states that development should retain and enhance existing freshwater features in the plan area.

**9.59** Overall a **cumulative minor positive and minor negative effect** is expected in relation to water resources.

#### SA objective 12: To manage and reduce the risk of flooding

**9.60** It is expected that the allocation of a large amount of greenfield land through the Local Plan could reduce the extent of permeable surfaces available for infiltration. The majority of large sites and small sites allocated are on greenfield land. Increased local flood risk may therefore result from surface water run-off, particularly during extreme rainfall events.

**9.61** It is noted that some of the larger allocated sites include areas of higher flood risk, although it is possible that built development could be avoided in those parts of the sites. This includes the site at Buck Barn (Policy HA5) which contains parts of tributaries of the River Adur, and West of Ifield (Policy HA2) which takes in parts of the River Mole and Ifield Brook.

**9.62** The Local Plan directly addresses flood risk through Policy 39: Flooding. This policy requires development to follow a sequential approach to flood risk management. The recommendations of the District's Strategic Flood Risk Assessment (SFRA) are also to be adhered to by proposals and developments should also incorporate sustainable drainage systems (SuDS) where there is a potential to increase flood risk. Measures seeking to protect and enhance the green infrastructure network (Policy 30: Green Infrastructure and Biodiversity) will also be of benefit to flood risk management.

**9.63** Overall a **cumulative mixed minor positive and minor negative effect** is expected in relation to flood risk.

#### SA objective 13: To reduce congestion and the need to travel by private vehicle in the District

**9.64** The Local Plan makes provision for improvements to the sustainable transport network to support new development. This includes through Policy 41: Sustainable Transport which sets out a commitment to develop an integrated community in

the District connected by sustainable transport. The policy supports development which prioritises and provides walking and cycling routes as well as better local bus and rail services. Furthermore, the development principles of the Local Plan (Policy 33: Development Principles) set out that, where relevant, development proposals should provide safe and visually attractive areas for the parking of vehicles and cycles. Policy 36: Climate Change supports patterns of development which reduce the need to travel, encourage walking and cycling and include good accessibility to public transport.

**9.65** Providing a relatively high level of growth over the plan period is likely to result in an increase in the number of journeys being made regularly, as residents are required to access services and facilities and job opportunities. Policy 2: Development Hierarchy sets out the development hierarchy for the plan area which supports growth within the built-up area of settlements. These areas have the greatest service offer as well as access to employment opportunities and public transport. It is expected that this approach could reduce the need to travel longer distances in Horsham District. The supporting text of the policy recognises the position of Crawley as a higher order settlement considered as a location for growth.

**9.66** Many of the strategic site allocations within the Local Plan will help to promote modal shift in the plan area. The sites at West of Ifield, West of Southwater and East of Billingshurst, as allocated by Policies HA2 to HA4, are well-related to the large settlements in the plan area (which provide stronger sustainable transport links). It is noted that the allocation of the large strategic site by Crawley, and the West of Kilnwood Vale site which is also well related to Crawley, could result in increased congestion in this area. However, this development is to be supported by a new Western Crawley Link Road which would help to mitigate these issues. Both sites (the West of Ifield site in particular) will provide relatively good access to the services and facilities, and sustainable transport services of Crawley.

**9.67** The Buck Barn site (as allocated through Policy HA5) is to be delivered as a new settlement and would be less favourably related to the existing larger settlements. Development at this location would also provide poor access to the existing railway stations in the District. It is noted, however, that the policy for this allocation requires a comprehensive transport strategy which should seek to promote active and public modes of transport. Furthermore, where sites are of a scale which supports substantial new service and job provision, the degree of self-containment achieved may limit the need for new residents to travel day-to-day.

**9.68** Strategic Policy HA1: Strategic Site Development Principles, which sets out principles for strategic scale

development, is expected to be of particular importance in this regard. It requires that development is designed to minimise the need to travel by car and facilitates other modes of sustainable transport. The policy also requires the delivery of the necessary services to contribute to a successful community as well as sufficient new employment opportunities at strategic sites.

**9.69** Many of the small sites allocated are also well related to existing sustainable transport links. However, some at the settlements of West Chiltington and West Chiltington Common do not provide immediate access to stronger bus services.

**9.70** Overall a **cumulative significant positive and minor negative effect** is expected in relation to transport.

**SA objective 14: To limit air pollution in the District and ensure lasting improvements in air quality**

**9.71** Policy 14: Housing Provision sets out that 1,100 homes are to be delivered per year over the plan period. Delivering a relatively high level of development over the plan period is likely to result in increased number of journeys being made as homes and businesses are occupied.

**9.72** Of the large site allocations, the strategic site West of Ifield (as allocated through Policy HA2) could lead to increased traffic within the Hazelwick AQMA, while development of the Buck Barn new settlement site (as allocated through Policy HA5) could lead to increased traffic within the Cowfold AQMA. The allocation of further development at the West of Kilnwood Vale site could also increase the number of journeys made regularly within the Hazelwick AQMA. As such, these allocations could have particularly adverse impacts in terms intensifying existing air quality issues in the District or nearby local authority areas.

**9.73** The allocations to be delivered in locations well related to Billingshurst, Crawley, Horsham town (including the 500 home densification of the North of Horsham allocation), and Southwater could provide residents with nearby access to existing services and facilities as well as employment opportunities, particularly where they are well related to important centres within the District and surrounding areas. Many of the urban extension sites would provide new residents with access to good sustainable transport links (including sites by Crawley, North Horsham and Billingshurst which would benefit from nearby access to a railway station).

**9.74** The new settlement site at Buck Barn is less well related to existing services and facilities, but a degree of self-containment could be instilled. This would be supported by the requirement of Policy HA5, which allocates the site, to include new employment land and other service and facilities such as healthcare and education. Policy HA1: Strategic Site Development Principles will be of particular importance to help

achieve self-containment at large site allocations. The policy states that this type of development should deliver the necessary services and facilities that contribute to the development of a successful community and should also provide enough employment land to meet the principle of one new job per home.

**9.75** Of the small sites allocated, a small number of those in Horsham Town, Cowfold and Storrington Village are expected to have the greatest potential to detrimentally impact upon air quality. These effects reflect the relationship of sites to Hazelwick AQMA, Cowfold AQMA and Horsham AQMA No1 at Storrington.

**9.76** The Local Plan also contains overarching policies which will help to address air quality issues as new development is delivered. Policy 24: Environmental Protection seeks to protect the environment of the plan area including air quality. Development is required to minimise air pollution and contribute to the implementation of local Air Quality Action Plans. Policies 33: Development Principles, 36: Climate Change and 41: Sustainable Transport set out an approach to development which is likely to help promote modal shift in the plan area. It is likely that helping to ensure that development is provided in a manner which promotes accessibility to community facilities or services by walking, cycling and public transport (Policy 45: Community Facilities, Leisure and Recreation) will also greatly help to encourage journeys to be made by sustainable modes which would limit the potential for increases in air pollution as new development occurs in the plan area.

**9.77** Overall a **cumulative minor positive and minor negative effect** is expected in relation to air quality.

**SA objective 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change**

**9.78** Providing a relatively high level of development of 1,100 homes per year over the plan period is expected to result in increased levels of carbon emissions. Emissions will result as new homes and businesses are occupied and require heat and power and also as residents travel to access services and employment opportunities.

**9.79** The Local Plan allocates much of the new growth as large sites which would act as urban extensions or new settlements. Urban extension sites (i.e. West of Ifield, West of Southwater and East of Billingshurst as allocated by Policies HA2 to HA4) could provide residents with nearby access to existing services and facilities as well as employment opportunities. The West of Kilnwood Vale site would perform similarly given that it would provide reasonable access to Crawley as well as the new services which are to be incorporated at the existing Kilnwood Vale strategic allocation. The potential to help reduce the need to travel regularly in the

plan area is particularly likely where sites are well related to important centres in and surrounding the District, including at Horsham town and Crawley. Strong sustainable transport links would also be accessible to many of the new residents at urban extension sites. This includes sites at West of Ifield, West of Kilnwood Vale, the North Horsham densification site and Billingshurst which would benefit from access to a nearby railway station.

**9.80** Existing services and facilities are less accessible from the new settlement site at Buck Barn. However, self-containment could be promoted at the site through Policy HA5 which allocates it. New housing at this site is required to be supported by the delivery of new employment land and services and facilities, including education and healthcare. Strategic Policy HA1: Strategic Site Development Principles will be of particular importance to help achieve self-containment at these large site allocations. Development at strategic sites is required by the policy to deliver the necessary services and facilities to allow for a successfully functioning community. Enough employment land should also be provided to meet the principle of one new job per home.

**9.81** The District's contribution to climate change will also be influenced by the potential to provide energy at new development by more sustainable means. Delivering development within the existing urban areas and at large site allocations may be more suitable in terms of connecting to combined heat and power (CHP) and district heating schemes. Strategic Policy HA1: Strategic Site Development Principles states that as well as minimising the need to travel, strategic development should contribute to the achievement of net zero carbon. This requirement is also included in the individual strategic site allocation Policies HA2 to HA5.

**9.82** The majority of the small sites allocated are well related to existing sustainable transport links. A small number of sites at West Chiltington Village and West Chiltington Common are noted to perform less favourably in this regard. The small scale of development supported, and the less developed nature of these areas, may also make the provision of infrastructure to support CHP and district heating less viable at these locations.

**9.83** The Local Plan sets out overarching policies which directly seek to limit carbon emissions at new developments. Policies 36: Climate Change and 37: Appropriate Energy Use most directly address climate change and switching to more sustainable energy sources in the District. Development is to be supported where it helps reduce energy use in the operation of buildings and allows for renewable and low carbon energy supply systems. Policy 36 specifically requires development to contribute to achieving net zero carbon emissions across the District by 2050. Furthermore,

development should seek to achieve zero and low carbon heating in line with the energy hierarchy set out by Policy 37.

**9.84** The promotion of modal shift at new development is supported through Policies 33: Development Principles, 36: Climate Change and 41: Sustainable Transport. The potential for carbon emissions should also be reduced by requiring that community facilities or services are accessible by walking, cycling and public transport as required by Policy 45: Community Facilities, Leisure and Recreation.

**9.85** Overall a **cumulative significant positive and minor negative effect** is expected in relation to climate change.

#### **SA objective 16: To facilitate a sustainable and growing economy**

**9.86** The Local Plan, through Policy 6: New Employment, seeks to support sustainable economic growth through the provision of sufficient employment land to meet the Council's identified requirements. Existing employment land in the plan area is to be protected through Policy 7: Enhancing Existing Employment. Securing the sustainable growth of the rural economy in Horsham is also supported through Policy 8: Rural Economic Development.

**9.87** All of the large urban extension and new settlement sites (as set out through Policies HA2 to HA5) include the delivery of new employment floorspace or businesses. The provision of this new high-quality floorspace has the potential to attract new businesses to the plan area. The sites allocated towards Crawley at West of Ifield and West of Kilnwood Vale (Policies HA2 and HA13) and Horsham town (including the North Horsham densification site) would respond most favourably to the economic realities and existing commuting patterns of the plan area, which currently see many residents travel to Horsham town and Crawley and the wider Gatwick Diamond area for job opportunities. At West of Ifield the more sizeable allocation of 3,250 homes over the plan period would be supported by the provision of 3,300 sqm of retail space and 2.0ha of employment floorspace.

**9.88** Strategic Policy HA1: Strategic Site Development Principles strengthens the role strategic development will play to support economic growth, by setting out the principle of one new job per home. Five employment sites are allocated through Policy 6: New Employment and these are likely to support investment and economic growth in the area. The allocation of an employment site at Partridge Green, which is not amongst the highest ranking settlements in the development hierarchy, is expected to help support some diversification of the rural economy.

**9.89** Horsham town is the main town and employment centre in the District. Policy 4: Horsham Town requires that development proposals meet local and business demands, as



well as supporting the wider economy including the Gatwick Diamond. The policy is expected to help maintain the economic importance of the settlement as part of the economy of the District. Gatwick Airport is also noted to play a key economic role in the District. As Policy 43: Gatwick Airport Safeguarding safeguards land for its potential expansion, it is considered particularly important for future economic growth in the District. Development in the District is required by Policy 32: Development Quality to be of a high quality and considerate of its economic context. This policy is expected to help ensure that employment generating uses are of a high quality, which is attractive to investors.

**9.90** Overall a **cumulative significant positive effect** is likely in relation to economic growth.

**SA objective 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District**

**9.91** Policies 6: New Employment and 7: Enhancing Existing Employment are set out to deliver sufficient employment land to meet the Council's identified requirements and to safeguard existing employment sites, including key employment areas. This approach is expected to help ensure that residents have access to nearby employment opportunities. Access to local rural employment opportunities is specifically addressed through Policy 8: Rural Economic Development.

**9.92** The most up to date evidence for the District shows that many residents commute to areas outside of the District, most notably towards Crawley and the London Boroughs. The allocation of the West of Ifield urban extension and the West of Kilnwood Vale site (Policies HA2 and HA13) will provide residents with access to existing employment opportunities and also responds to existing commuting patterns. Allowing for development at Horsham town (including through the densification of the North Horsham site) would provide residents with good access to the area which contains the highest concentration of employment opportunities in the District.

**9.93** Furthermore, many of the other urban extension site allocations would provide access to local employment opportunities and key employment areas within the settlements of Billingshurst and Southwater. The site specific allocation policies for the large sites (HA2 to HA5) also include the delivery of a substantial amount of employment and business land. This is to achieve the principle of one job per new home which is set out through Policy HA1: Strategic Site Development Principles. At the Buck Back new settlement site (Policy HA5) this type of approach could help to achieve a degree of self-containment.

**9.94** Four sites have also been allocated through the Local Plan for employment use only. These sites are mostly located

in close proximity to the larger settlements of the plan. This includes sites at or well related to Horsham town, Pulborough and Codmore Hill and Southwater. There are also employment sites at the Medium Village of Partridge Green which could help to support some economic growth at the less developed locations of the plan area. In all it is expected that a high number of residents would have access to the new employment sites allocated.

**9.95** Policy 4: Horsham Town requires that proposals promote the prosperity of Horsham town and provide of a wide range of employment. Considering the importance of this settlement for local employment and its accessible nature for many residents, this policy should help to ensure that many residents continue to benefit from access to employment opportunities at this location.

**9.96** However, the plan allocates some sites at the settlements of Barns Green, Lower Beeding, Rudgwick and Bucks Green, Rusper, Steyning and West Chiltington and West Chiltington Common. From some of the sites allocated at these settlements, residents are unlikely to be provided with immediate access to existing employment opportunities, most notably at key employment areas. They are also not well related to Horsham town, the main employment centre of the District.

**9.97** Overall, it is likely that the inclusion of sites which respond positively to the identified commuting patterns of the plan area, as well as supporting growth at areas which are accessible to a high number of residents, will help ensure access to employment opportunities for a high number of residents. Including a number of large sites which could provide high value employment space is also likely to help reduce the distance some residents need to travel to employment opportunities. The inclusion of some development at smaller settlements is expected, however, to provide some residents with limited access to employment opportunities.

**9.98** Overall a **cumulative significant positive and minor negative effect** is likely in relation to access to employment.



Table 9.1 Summary of effects of the policies in the Horsham District Local Plan

SA objectives	SA1: Housing	SA2: Access to services	SA3: Inclusive communities	SA4: Crime	SA5: Health and wellbeing	SA6: Biodiversity and geodiversity	SA7: Landscape	SA8: Historic environment	SA9: Efficient land use	SA10: Natural resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment
Policies																	
Policies for Growth and Change																	
Strategic Policy 1: Sustainable Development	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
Strategic Policy 2: Development Hierarchy	+	++/-	++	0	+/-	0	+	+	++	0	0	0	+/-	+/-	+/-	0	+/-
Strategic Policy 3: Settlement Expansion	++	++/-	+	0	+/-	0	+	+	0	0	0	0	+/-	+/-	+/-	+	++/-
Strategic Policy 4: Horsham Town	+	++	+	0	++	+	+	+	0	0	+	+	++	+	+	++	++
Strategic Policy 5: Broadbridge Heath Quadrant	+	++	+	++	++/-	++	++	++/-	+	0	0	0	++/-	+/-	+/-	++	++/-
Economic Development																	
Strategic Policy 6: New Employment <sup>42</sup>	0	++	+	0?	+	--?	--?	--?	--	-?	0	-	+/-	+/-	+/-	++	++
Strategic Policy 7: Enhancing Existing Employment	0	+/-	+	0?	+/-	-?	+/-?	+/-?	+	-?	0	0	+	+/-	+	++	++
Policy 8: Rural Economic Development	0	0	+	0	+/-	+	+	+	0	0	0	0	-	-	-	++	++
Policy 9: Conversion of Agricultural and Rural Buildings to Residential Uses	+	0	0	0	0	+	+	+	+	0	0	0	0	0	0	0	0
Policy 10: Equestrian Development	0	0	0	0	0	0	+	+	+	0	0	0	0	0	0	+	0
Strategic Policy 11: Tourism Facilities and Visitor Accommodation	0	+	+	0	0	0	+	+	+	0	0	0	+	+	+	++	+
Strategic Policy 12: Town Centre Hierarchy and Sequential Approach	0	++	++	0	+	0	+	+	0	0	0	0	+	+	+	++	+
Strategic Policy 13: Town Centre Uses	+	++	++	0	+	0	+	+	0	+	0	0	+	+	+	++	+
Housing																	

<sup>42</sup> Policy 6: New Employment proposes the allocation of employment land at the proposed strategic site allocations as well as at sites Land South of Star Road Industrial Estate, Partridge Green; Land to the West of Graylands Estate, Langhurstwood Road; Horsham; Land at Broomers Hill Business Park, Pulborough; and Land South West of Hop Oast Roundabout. These four sites were appraised as site options SA063; SA363; SA385; and SA703, respectively.

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Policies																	
Strategic Policy 14: Housing Provision	++	++/-	+/-	0	++/-	--?	--?	--?	--/+	--?	--?	--?	++/-?	++/-	++/-	++/-	++/-
Strategic Policy 15: Meeting Local Housing Needs	++	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0
Strategic Policy 16: Affordable Housing	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Policy 17: Improving Housing Standards in the District	++	0	+	0	+	0	+	+	0	0	0	+	0	0	0	0	0
Policy 18: Rural Exception Homes	++	+/-	+	0	0	0	+/-	+/-	-	0	0	0	+/-	+/-	+/-	0	+/-
Policy 19: Retirement Housing and Specialist Care	++	+	++	0	+	0	0	0	0	0	0	0	+	+	+	0	0
Policy 20: Gypsy and Travellers <sup>43</sup>	++	+/-	++	0	+/-	--?	--/+?	+/-?	+/-	--/+	+/-	+/-	+/-	+/-	+/-	0	--/+
Policy 21: Rural Workers' Accommodation	+	-	+	0	0	0	+	+	+	0	0	0	-	-	-	++	++
Policy 22: Replacement Dwellings and House Extensions in the Countryside	++	0	0	0	0	+	+	+	+	0	0	0	0	0	0	0	0
Policy 23: Ancillary Accommodation	+	0	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0
Conserving and Enhancing the Natural Environment																	
Strategic Policy 24: Environmental Protection	0	0	0	0	+	++	+	0	++	0	++	+	0	++	++	0	0
Policy 25: Air Quality	0	0	0	0	+	++	+	0	0	0	0	0	++	++	++	0	0
Strategic Policy 26: The Natural Environment and Landscape Character	+	+	+	0	0	++	++	+	+	0	+	++	0	+	+	+	0
Strategic Policy 27: Countryside Protection	+	+	+	0	+	++	++	+	+	+	0	+	+	+	+	+	0
Policy 28: Settlement Coalescence	--?	0	0	0	0	++	++	+	0	0	0	+	+	+	+	-	0

<sup>43</sup> Policy 20: Gypsy and Travellers proposes the allocation of sites for Gypsy and Traveller accommodation at the proposed strategic site allocations as well as at sites Southview, The Haven, Slinfold; Lane Top, Nutbourne Road, Pulborough; Hill Farm Lane and Stane Street, Pulborough; Northside Farm Ruser Road Ifield; Sussex Topiary Naldretts Lane Rudgwick; Plot 3 Bramblefield Crays Lane Thakeham; Girder Bridge, Gay Street Lane, North Heath. These seven sites were appraised as site options GA002; GA004; GA007; GA008; GA009; GA010; and GA015, respectively.

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Policies																	
Policy 29: Protected Landscapes	-?	0	0	0	+	++	++?	+	0	0	0	+	0	0	0	+/-	0
Strategic Policy 30: Green Infrastructure and Biodiversity	0	0	0	0	+	++	+	0	0	0	++	+	+	+	++	0	0
Policy 31: Local Greenspace	0	0	+	0	+	++	+	+	0	0	0	+	0	0	0	0	0
Development Quality, Design and Heritage																	
Strategic Policy 32: Development Quality	+	0	+	+	+	+	++	++	+	0	+	+	+	+	+	+	0
Strategic Policy 33: Development Principles	+	0	+	+	+	+	++	+	++	0	0	+	+	+	+	+	0
Policy 34: Heritage Assets and Managing Change within the Historic Environment	0	0	0	0	0	+	++	++	0	0	0	0	0	0	0	0	0
Policy 35: Shop Fronts and Advertisements	0	0	+	0	0	0	++	++	0	0	0	0	0	0	0	+	0
Climate Change and Flooding																	
Strategic Policy 36: Climate Change	+	0	0	0	+	+	+	0	+	+	+	++	+	+	++	0	0
Strategic Policy 37: Appropriate Energy Use	0	0	0	0	0	0	+	0	0	0	0	0	0	0	++	+	0
Policy 38: Sustainable Design and Construction	0	0	+	0	0	0	0	+	0	+	++	0	0	0	++	0	0
Strategic Policy 39: Flooding	0	0	0	0	0	+	0	0	0	0	+	++	0	0	+	0	0
Infrastructure, Transport and Healthy Communities																	
Strategic Policy 40: Infrastructure Provision	+	++	++	+	++	0	0	0	0	0	+	0	+	+	+	0	0
Strategic Policy 41: Sustainable Transport	0	++	++	0	+	0	0	0	0	0	0	0	++	++	++	++	++
Policy 42: Parking	0	+	+	+	+/-	0	0	0	0	0	0	0	+/-	+/-	+/-	+	++
Policy 43: Gatwick Airport Safeguarding	+/-	0	0	0	-?	-?	-?	-?	0	0	0	0	-	-	-	++	+
Strategic Policy 44: Inclusive Communities, Health and Wellbeing	+	++	++	+	++	0	0	0	0	0	0	0	+	+	+	+	++
Policy 45: Community Facilities, Leisure and Recreation	0	++	++	+	++	+	+	0	0	0	0	0	+	+	+	0	0

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Policies																	
Strategic Site Allocations																	
Strategic Policy HA2: West of Crawley Area of Search and Land West of Ifield (Site SA101)	++	++?	+	0?	++/--?	++/--?	--/+?	--/+?	-	--?	+/-?	+/-?	++/-	++/--?	++/-?	++	++
Strategic Policy HA3: Land West of Southwater (Site SA119)	++	++?	+	0?	++/-?	--/+?	--/+?	--/+?	--?	--?	0	-?	++/-?	++/-?	++/-?	++	++/-?
Strategic Policy HA4: Land East of Billingshurst (Site SA118)	++	++/-?	+	0?	++/-?	--/+?	+/-?	--/+?	--?	--?	+/-?	-?	++/-?	++/-?	++/-?	++	++/-?
Strategic Policy HA5: Land at Buck Barn (Site SA716)	++	++/--?	+	0?	++/-?	--/+?	+/-?	--/+?	--?	--?	0	+/-	++/--?	++/--?	++/--?	+++?	++/--
Settlement Site Allocations																	
Strategic Policy HA6: Ashington (Site ASN1 – originally appraised as SA866)	++	+	0	0?	+	-?	--?	0?	-	--?	0	-	+	0	+	0	+
Strategic Policy HA7: Barns Green (Site BGR1 – originally appraised as SA006)	++	+	0	0?	+	-?	--?	--/+?	-	--?	0	-	+	0	+	0	--
Strategic Policy HA7: Barns Green (Site BGR2 – originally appraised as SA510)	++	+	0	0?	+	-?	--?	--?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA7: Barns Green (Site BGR3 – originally appraised as SA613)	++	+	+	0?	--/+	-?	-?	--?	+	--?	0	0	+	0	+	+	--/+
Strategic Policy HA8: Broadbridge Heath (Site BRH1 – originally appraised as SA386)	++	++/-?	+	0?	+	-?	-?	--/+?	--?	--?	0	-	+	0	+	+	+
Strategic Policy HA8: Broadbridge Heath (Site BRH2 – originally appraised as SA622)	++	++	+	0?	+	-?	--/+?	0?	-	--?	0	-	+	0	+	+	+
Strategic Policy HA9: Christ's Hospital (Site CH1 – originally appraised as SA129)	++	++?	0	0?	+	-?	--?	0?	-	--?	0	-	++	0	++	0	++

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Policies																	
Strategic Policy HA10: Cowfold (Site CW1 – originally appraised as SA076/SA083)	++	++	0	0?	++	0?	--/+?	--?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA10: Cowfold (Site CW2 – originally appraised as SA609)	++	++	0	0?	++	0?	--/+?	--?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA10: Cowfold (Site CW3 – originally appraised as SA610/SA611)	++	++	0	0?	++	0?	+/-?	--/+?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA11: Henfield (Site HNF1 – originally appraised as SA317)	++	++/-?	0	0?	+	--?	--/+?	--/+?	--?	--	0	-	+	0	+	0	-
Strategic Policy HA12: Horsham (Site HOR1 – originally appraised as SA074)	++	++?	0	0?	+	--?	--/+?	-?	-	0	0	-	++	0	++	0	++
Strategic Policy HA12: Horsham (Site HOR2 – originally appraised as SA568)	++	++/-?	0	0?	+	0?	-?	0?	--?	--?	0	-	++	--	++	0	++
Strategic Policy HA13: West of Kilnwood Vale (Site WKV1 – originally assessed as SA291)	+	++/-?	0	0?	+/-?	--/+?	--/+?	-?	--?	--?	-?	-?	++/-?	++/-?	+/-?	+	+
Strategic Policy HA14: Lower Beeding (Site LWB1 – originally appraised as SA567)	++	++	0	0?	+	-?	--/+?	+/-?	--?	0	0	-	+	0	+	0	--
Strategic Policy HA14: Lower Beeding (Site LWB2 – originally appraised as SA575)	++	++	0	0?	+	-?	--?	+/-?	--?	0	0	-	+	0	+	0	--
Strategic Policy HA14: Lower Beeding (Site LWB3 – originally appraised as SA584)	+	++	0	0?	+	-?	--?	--/+?	--?	0	0	-	+	0	+	0	--
Strategic Policy HA15: Pulborough (Site PLB1 – originally appraised as SA112)	++	++/-?	0	0?	+	--?	--/+?	-?	-	--?	0	-	++	0	++	0	+
Strategic Policy HA15: Pulborough (Site PLB2 – originally appraised as SA445)	++	++?	0	0?	++	--?	--/+?	--?	--?	--?	0	-	++	0	++	0	--/+



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SA objectives																	
Policies	SA1: Housing	SA2: Access to services	SA3: Inclusive communities	SA4: Crime	SA5: Health and wellbeing	SA6: Biodiversity and geodiversity	SA7: Landscape	SA8: Historic environment	SA9: Efficient land use	SA10: Natural resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment
Strategic Policy HA15: Pulborough (Site PLB3 – originally appraised as SA556)	++	++?	0	0?	++	--?	--/+?	-?	--?	--?	0	-	++	0	++	0	+
Strategic Policy HA16: Rudgwick and Bucks Green (Site RD1 – originally appraised as SA574)	++	++?	0	0?	++	-?	--/+?	-?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA16: Rudgwick and Bucks Green (Site RD2 – originally appraised as SA794)	+	++?	0	0?	++	-?	--?	-?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA17: Rusper (Site RS1 – originally appraised as SA080)	++	++?	0	0?	+	-?	--?	--/+?	-	--?	0	-	+	0	+	0	--
Strategic Policy HA17: Rusper (Site RS2 – originally appraised as SA465)	+	++?	0	0?	+	-?	--?	--/+?	-	--?	0	-	+	0	+	0	--
Strategic Policy HA17: Rusper (Site RS3 – originally appraised as SA872)	++	++?	0	0?	+	-?	--?	--/+?	-	--?	0	-	+	0	+	0	--
Strategic Policy HA18: Small Dole (Site SMD1 – originally appraised as SA689)	++	-?	0	0?	+	--?	+/-?	0?	--?	--?	0	+/-	+	0	+	0	+
Strategic Policy HA19: Steyning (Site STE1 – originally appraised as SA742)	++	++	0	0?	++	--?	-?/+	--?	--?	0	0	-	+	0	+	0	--
Strategic Policy HA20: Storrington Village (Site STO1 – originally appraised as SA361/SA732)	++	++?	0	0?	++	--?	--/+?	--/+?	--?	--?	0	-	+	--/+	+	0	+
Strategic Policy HA20: Storrington Village (Site STO2 – originally appraised as SA384)	++	++?	0	0?	++	--?	--/+?	+/-?	-	--?	0	-	+	--/+	+	0	+
Strategic Policy HA21: Thakeham (Site TH1 – originally appraised as SA039)	++	+/-?	0	0?	+	-?	?	0?	--	-?	-	-	+	0	+	0	+

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SA objectives	SA1: Housing	SA2: Access to services	SA3: Inclusive communities	SA4: Crime	SA5: Health and wellbeing	SA6: Biodiversity and geodiversity	SA7: Landscape	SA8: Historic environment	SA9: Efficient land use	SA10: Natural resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment
Policies																	
Strategic Policy HA21: Thakeham (Site TH2 – originally appraised as SA873)	++	+/-?	0	0?	+	-?	?	0?	--	-?	-	-	+	0	+	0	+
Strategic Policy HA22: Warnham (Site WN1 – originally appraised as SA071)	++	+	0	0?	+	0?	--/+?	0?	--?	--?	0	-	++	0	++	0	+
Strategic Policy HA23: West Chiltington and West Chiltington Common (Site WCH1 – originally appraised as SA066)	++	+	0	0?	+	++	-?	--/+?	--?	--?	0	-	+	0	+	0	--
Strategic Policy HA23: West Chiltington and West Chiltington Common (Site WCH2 – originally appraised as SA429)	++	+/-?	0	0?	-	++	--/+?	-?	--?	-?	-	-	-	0	-	0	+
Strategic Policy HA23: West Chiltington and West Chiltington Common (Site WCH3 – originally appraised as SA500)	+	+	0	0?	+	++	-/+?	+/-?	--?	--?	-	-	+	0	+	0	-

## Cumulative effects of the Local Plan with other plans

**9.99** Development in Horsham District will not be delivered in isolation from those areas around it. The effect of delivering new development and supporting infrastructure will often be transmitted across administrative boundaries. As such it is important to consider the cumulative effects of delivering new development in Horsham with growth being proposed in neighbouring authority areas.

**9.100** Horsham is bordered by the following local authority areas for which the following Local Plan documents are currently adopted or are in preparation.

### Crawley

**9.101** To the north east, Crawley Borough Council has adopted the Crawley Borough Local Plan 2015 – 2030<sup>44</sup> which makes provision for the development of a minimum of 5,100 net dwellings and, also as a minimum, an additional 35ha of land for business uses. Crawley Borough Council has embarked on its Local Plan 2020 - 2035 review. Once adopted, this Local Plan will replace the Crawley Borough Local Plan 2015 – 2030. Consultation on the Submission Draft Crawley Borough Local Plan<sup>45</sup> was extended to run up to the end of June 2021. The document makes provision for the development of a minimum of 5,320 net dwellings in Crawley between 2021 and 2037. A total outstanding requirement for 24.1 hectares of new industrial land is identified for the Borough.

**9.102** The adopted Local Plan 2015 – 2030 identifies and allocates key housing sites in the Borough. The most substantial of these is Forge Wood (1,900 dwellings) at the eastern Borough boundary and the Town Centre Key Opportunity Sites (499 net dwellings). These sites have been carried forward as part of the Local 2020 - 2035 review. Forge Wood is included in the Local Plan 2020 – 2035 for 1,270 outstanding dwellings and the Town Centre Key Opportunity Sites are to provide 1,500 net dwellings.

**9.103** The relatively small area covered by the Borough means that any development within Crawley would be in close proximity to Horsham District. Providing development in Horsham District towards the boundary with Crawley has the potential to help contribute to unmet housing need in Crawley, and also be in close proximity to the jobs, services and facilities within Crawley. Development at this location in

Horsham District (as set out through Policy HA2: West of Crawley Area of Search and Land West of Ifield and Policy HA13: West of Kilnwood Vale) may result in increased local congestion as well as increased higher levels of traffic within the Hazelwick AQMA. Opportunities to upgrade the strategic road network (including a new Crawley Western Link Road) are likely to be supported by the allocation and development of the West of Ifield site, however, which could help mitigate increases in congestion.

### Mole Valley

**9.104** To the north, Mole Valley is currently undertaking work on the new Local Plan – Future Mole Valley (Local Plan 2018 - 2033) for which the Draft Local Plan (Regulation 18)<sup>46</sup> was consulted on between February and March 2020. The document sets out that at least 6,735 net additional homes are to be delivered over the plan period. The new Local Plan will replace the Core Strategy<sup>47</sup> which plans for at least 3,760 new dwellings up to 2026) and the Mole Valley Local Plan 2000<sup>48</sup>. The Regulation 19 stage of the Local Plan process is now expected to take place at the beginning of summer 2021.

**9.105** Much of the new development in Mole Valley is allocated at sites located within, or on the edge of, the main built up areas of Leatherhead, Dorking, Ashted, Bookham and Fetcham which would provide between 5 and 550 dwellings. These settlements are located more than 10km from the Horsham District boundaries meaning the potential for in-combination effects is limited. The Draft Local Plan also allocates land to significantly expand Beare Green (over 480 dwellings) and Hookwood (over 450 dwellings), both of which are within 5km of the Horsham District boundaries. Development at Beare Green could result in increased road users along the A24, however the Draft Mole Valley Local Plan safeguards land within Mole Valley for improvements to the A24 between Capel and the boundary with Horsham District, which could help mitigate this issue. Increases in air pollution along this road are likely to result in any case, although sites allocated in the north of Horsham District are limited to employment sites and those which are well related to the settlements of Horsham town and Warnham which could limit the volume of traffic expected.

<sup>44</sup> Crawley Borough Council (2015) the Crawley Borough Local Plan 2015 – 2030

<sup>45</sup> Crawley Borough Council (2021) DDraft Crawley Borough Local Plan 2021 – 2037 (For Submission Publication Consultation January – February 2021)

<sup>46</sup> Mole Valley District Council (2020) Future Mole Valley Consultation Draft Local Plan

<sup>47</sup> Mole Valley District Council (2009) Mole Valley Core Strategy

<sup>48</sup> Mole Valley District Council (2000) Mole Valley Local Plan 2000

## Waverley

**9.106** To the north-west, Waverley Local Plan Part 1: Strategic Policies and Sites<sup>49</sup> was adopted by the Council in February 2018. The Local Plan Part 1 sets out the spatial framework for delivering development which includes at least 11,210 net additional homes and 16,000 sq. m of new Use Classes B1a/b up to 2032. The Pre-submission document for the Local Plan Part 2: Site Allocations and Development Management Policies<sup>50</sup> was consulted upon up to January 2021 and contains policies that direct planning application decisions and identify sites for housing development.

**9.107** Strategic sites for development have been allocated through the Local Plan Part 1. Dunsfold Aerodrome New Settlement is allocated to provide 2,600 homes by 2032 as well as an expanded business park, while at Cranleigh sites are allocated to provide 250 new dwelling (Horsham Road) and 765 new dwellings (South of Elmbridge Road and the High Street) respectively. These allocations would be within 6km of the District boundary. The Dunsfold allocation is likely to present the greatest potential for increased travel, congestion and air pollution around the boundaries between these local authority areas. These effects are expected given the high level of development proposed and the delivery of new employment land which could benefit residents in Horsham District.

## Chichester

**9.108** To the west, Chichester District Council has adopted Chichester Local Plan: Key Policies 2014 - 2029<sup>51</sup> which sets out the delivery of 7,388 new homes and 16ha employment floorspace (B1 - B8 class) up to 2032. The Site Allocation Development Plan Document 2014-2029<sup>52</sup> for Chichester District sets out to deliver non-strategic residential and employment sites in the District. Chichester District Council is also currently undertaking work on the Chichester Local Plan Review 2035<sup>53</sup> for which the Preferred Approach consultation was undertaken from December 2018 to February 2019. The Preferred Approach Local Plan Review supports the delivery of 12,478 new homes and net additional 145,835 sq. m of new floorspace for uses in B Use Classes from April 2016 to March 2035.

**9.109** The adopted Local Plan supports only small scale development in the North of the Plan area which adjoins Horsham District to the west of Billingshurst. The smaller

settlements of Kirdford, Loxwood and Wisborough Green within this area of Chichester are to accommodate approximately 60 new homes each. The Local Plan review sees a similar approach to this area by supporting the retention of the rural character of existing villages. Loxwood is to develop its role as a larger village delivering 125 new homes between 2016 and 2035, with 25 new homes provided at Wisborough Green during the same period. Given the limited potential for development in the area of Chichester which adjoins Horsham District, it is considered unlikely that significant in-combination effects would result.

## Arun

**9.110** To the south west the Arun Local Plan 2011 - 2031<sup>54</sup> was adopted in July 2018. The Local Plan sets out a housing requirement of 20,000 new homes as well as a requirement for 74.5 ha of land to be allocated for employment up to 2031 in the District.

**9.111** The land covered by Arun District is separated from the Horsham District by the boundaries of the South Downs National Park. Land within Arun District is located within 8.5km of Horsham District at its closest point. Strategic housing allocation sites within Angmering are to deliver 800 homes and 200 homes to the north and south of the village. Commuting flows see more commuters travel to Horsham from Arun than in the opposite direction. Given the limited access through the South Downs National Park, which is provided by the route of the A24, there is some potential for increased congestion and air pollution to result along this route.

## Adur

**9.112** To the south east Adur Council adopted Adur Local Plan 2017<sup>55</sup> in December 2017 which sets out a housing delivery target of 3,718 homes for the period 2011 to 2032. During this period of time 41,000 square metres of land are allocated for appropriate employment uses in the District.

**9.113** The land which falls within Adur District is separated from the Horsham District by the boundaries of the South Downs National Park. However, land within the built-up area of Adur is within 5km of the Horsham District boundary at its closest point. Within Adur District 1,538 new homes are to be provided within the built-up area of Adur. 1,100 new homes are to be provided as part of the Shoreham Harbour

<sup>49</sup> Waverley Borough Council (2018) Waverley Borough Local Plan Part 1: Strategic Policies and Sites

<sup>50</sup> Waverley Borough Council (2020) Local Plan Part 2: Site Allocations and Development Management Policies (Pre-Submission Document)

<sup>51</sup> Chichester District Council (2015) Chichester Local Plan: Key Policies 2014 – 2029

<sup>52</sup> Chichester District Council (2019) Site Allocation Development Plan Document 2014 - 2029

<sup>53</sup> Chichester District Council (2018) Chichester Local Plan Review 2035 (Preferred Approach Consultation)

<sup>54</sup> Arun District Council (2018) Arun Local Plan 2011-2031

<sup>55</sup> Adur District Council (2017) Adur Local Plan 2017

Regeneration Area Western Arm, 600 new homes at New Monks Farm and 480 new homes at West Sompting.

**9.114** Only a small amount of development is set out within the area of Adur which is within closest proximity to the southern portion of Horsham District. Sites are allocated as part of the Horsham Local Plan Review around the settlements of Bramber and Upper Beeding and Steyning. In total the sites at Bramber and Upper Beeding and Steyning would provide 310 new homes in total on land around the A283 which provides important access through the South Downs National Park to Adur. As such further congestion and air pollution along this route may result, particularly considering that it is currently noted to suffer from some level of congestion during peak periods.

### Mid Sussex

**9.115** To the east Mid Sussex District Council adopted Mid Sussex District Plan 2014 – 2031<sup>56</sup> in March 2018 which sets out a minimum housing requirement of 16,390 homes. The Plan is also supportive of the delivery of an average of 543 jobs per year over the plan period.

**9.116** Much of the land allocated in the Mid Sussex District Plan to meet the development needs of the plan period lies in the eastern portion of the District in areas (such as Burgess Hill, East Grinstead, Hassocks, Copthorne, Crawley Down Scaynes Hill and Lindfield) which are not in close proximity to Horsham District. Hurstpierpoint and Pease Pottage are required to provide 359 new homes and 929 new homes respectively, up to 2031.

**9.117** The strategic allocation to the east of Pease Pottage would provide approximately 600 new homes within 1km of the District boundary within the AONB. There is potential for effects relating to congestion on the strategic road network to result given the scale of development at the West of Ifield site (Policy HA2). Impacts could also result in terms of air quality considering the proximity of the AQMA at Hazelwick within Crawley Borough. It is noted that the upgrading of the strategic road network (Crawley Western Relief Road) associated with the allocation of the West of Ifield site in this area within Horsham District could help to mitigate effects relating to local congestion.

### Brighton and Hove

**9.118** To the south east Brighton and Hove City Council adopted the Brighton and Hove City Plan Part One<sup>57</sup> in March

2016. The policies in that document replace a number of the policies in the adopted Brighton and Hove Local Plan (2005). Delivery of 13,200 new homes is to be achieved during the plan period 2010 to 2030. The Proposed Submission City Plan Part Two<sup>58</sup> which is to allocate additional development sites and to set out a detailed development management policy framework to support the implementation of the Part One Plan, was submitted to the Secretary of State for examination in May 2021.

**9.119** The largest site allocations set out in the plan area are at:

- Brighton Marina (1,940 homes and 2,000 sqm of new employment floorspace);
- The New England Quarter and London Road Area (1,130 homes and 20,000 sqm of new employment floorspace);
- The Lewes Road Area (875 homes and 15,600 sqm of new employment floorspace);
- The Toad's Hole Valley (700 homes and 25,000 sqm of new employment floorspace); and
- The Eastern Road and Edward Street are (515 new homes and 18,200 – 23,200 sqm of new employment floorspace).

**9.120** Of these site allocations the Toad's Hole Valley Area is in closest proximity to the Horsham District Local Plan area. This site is within 4.1km of the District boundary. This site lies within the City's built-up area boundary contained by the A27 but would involve a large amount of greenfield land take in an area which is in close proximity to the South Downs National Park. Considering the distance between the sites in the Brighton and Hove City area and Horsham District the potential for in-combination effects on the character of Horsham District and the South Downs National Park (given that areas of the National Park lie between the Brighton and Hove and Horsham District) are likely to be limited. Furthermore, allocations in the Horsham District Local Plan do not include any large sites towards the boundary of the National Park. Only small sites are being considered for allocation towards the south east of Horsham District, which is in closest proximity to Brighton and Hove. These are at the settlements of Steyning and Small Dole.

**9.121** The inclusion of new employment land in Brighton and Hove is likely to see the area remain an important commuting location for residents in Horsham District, particularly for those

<sup>56</sup> Mid Sussex District Council (2018) Mid Sussex District Plan 2014-2031

<sup>57</sup> Brighton and Hove City Council (2016) Brighton and Hove City Council City Plan Part One

<sup>58</sup> Brighton and Hove City Council (2020) Proposed Submission Brighton and Hove City Council City Plan Part Two



in the southern part of the District. While much of Brighton and Hove benefits from access to railway stations, residents in the south and south east of the Horsham do not benefit from easy access to such services. The potential to make use of more sustainable modes of transport to access new employment opportunities may therefore be limited. Much of Brighton and Hove is covered by the Brighton and Hove AQMA as well as smaller AQMAs at Shoreham and Southwick. The new employment opportunities provided in the south of the City area (including at the Brighton Marina and Eastern Road and Edward Street allocation sites) could see increased volumes of traffic within these AQMAs. As such, there is potential for existing air quality issues to be intensified within the AQMAs in the City.

### South Downs National Park

**9.122** The South Downs National Park Authority adopted the South Downs Local Plan in July 2019<sup>59</sup> and this provides planning policy for the land within the National Park. It covers the period 2014 to 2033 and sets a housing provision target of approximately 4,750 net additional homes. During this period of time the Local Plan makes provision for land for offices (5.3ha) industrial development (1.8ha) and small scale warehouses (3.2ha). The adopted Local Plan replaces the previously saved policies for the National Park in the Adur District Local Plan (1996)<sup>60</sup>, Arun District Local Plan (2003)<sup>61</sup>, Chichester District Local Plan First Review (1999)<sup>62</sup>, Mid Sussex Local Plan (2004)<sup>63</sup> and Horsham Core Strategy (2007)<sup>64</sup>.

**9.123** Only a limited amount of development is required over the plan period in the areas around Horsham District. Petworth is located approximately 6km from the District boundary and is accessible along the A272 from Billingshurst. A moderate

number of new homes (150) is to be provided at this settlement over the plan period. Shoreham Cement Works which is located to the south of Upper Beeding within 2km along the A283, is allocated for mixed use development with tourism, recreation and employment as well as residential use subordinate to the overall mix of use supported at this location. The site is currently identified as comprising unsightly uses which may detract from the character of the National Park.

**9.124** As such, it is expected that this allocation could help enhance the local landscape as well as providing employment uses for the residents in the south of the District. It may, however, result in increased traffic along the A283 at which congestion can be occur at peak travel times. Associated effects relating to air quality may also result at this location if vehicle numbers along the A283 were to increase.

### Mitigation

**9.125** The Local Plan would a relatively high level of development over the plan period. As this chapter describes, alongside many positive effects, a number of potential negative effects arising from this new development have been identified in relation to many of the SA objectives. The SEA Regulations advocate an approach that negative effects should be addressed in line with the mitigation hierarchy: avoid effects where possible, reduce the extent or magnitude of effects, then seek to mitigate any remaining effects.

**9.126** Table 9.2 summarises the key policies of the Local Plan which could mitigate the potential negative effects of delivering a high level of growth over the plan period in relation to each of the SA objectives.

**Table 9.2 Local Plan policies that would contribute to the mitigation of negative effects identified**

SA Objective	Mitigation provided by Local Plan policies
SA1: Housing	<p><b>Policy 14: Housing Provision</b> requires the delivery of a significant number of homes which would meet the objectively assessed need for the District and contribute to housing need in the surrounding local authority areas.</p> <p><b>Policies 15: Meeting Local Housing Needs, 16: Affordable Housing, and 17: Improving Housing Standards in the District</b> require that the housing stock delivered includes a viable proportion of affordable homes, a mix of housing sizes and types to meet the needs of the District's communities and is of a high standard including meeting requirements for internal floor areas and storage space.</p>
SA2: Access to services and facilities	<p><b>Policies 2: Development Hierarchy and 12: Town Centre Hierarchy and Sequential Approach</b> support the development hierarchy in the District and a town centre led approach</p>

<sup>59</sup> South Downs National Park Authority (2019) South Downs Local Plan 2014-33

<sup>60</sup> Adur District Council (1996) Adur District Local Plan

<sup>61</sup> Arun District Council (2003) Arun Local Plan 2003

<sup>62</sup> Chichester District Council (1999) Chichester District Local Plan First Review

<sup>63</sup> Mid Sussex District Council (2004) Mid Sussex Local Plan

<sup>64</sup> Horsham District Council (2007) Horsham Core Strategy

SA Objective	Mitigation provided by Local Plan policies
	<p>to development which is likely to ensure a high number of residents have access to services and facilities at these locations.</p> <p><b>Policy 40: Infrastructure Provision</b> and <b>45: Community Facilities, Leisure and Recreation</b> directly addresses the need for development to support the delivery of new infrastructure, service provision and community facilities (including health and schools) to support growth in the District. Policy 40 provides scope for infrastructure provision to be secured by Planning Obligations and Community Infrastructure Levy.</p> <p>Specific to strategic scale development, <b>Policy HA1: Strategic Site Development Principles</b> states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community.</p>
SA3: Inclusive Communities	<p><b>Policies 2: Development Hierarchy</b> and <b>12: Town Centre Hierarchy and Sequential Approach</b> support the development hierarchy in the District and a town centre lead approach to development which is likely to ensure a high number of residents have access to services and facilities at these locations.</p> <p><b>Policy 45: Community Facilities, Leisure and Recreation</b> directly addresses the need for the delivery of development to create socially inclusive and adaptable communities.</p> <p>Specific to strategic scale development, <b>Policy HA1: Strategic Site Development Principles</b> states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community.</p>
SA4: Crime	<p><b>Policy 32: Development Quality</b> requires that development is provided to functional, accessible, safe and adaptable environments in Horsham District.</p> <p><b>Policy 33: Development Principles</b> sets out the development principles for the District and includes a requirement for development to include measures to reduce actual or perceived opportunities for crime or antisocial behaviour.</p>
SA5: Health and wellbeing	<p><b>Policy 44: Inclusive Communities, Health and Wellbeing</b> directly addresses the delivery of development in Horsham to support healthy lifestyles and address health and wellbeing including the protection and enhancement of existing community facilities, services and open spaces.</p> <p><b>Policy 40: Infrastructure Provision</b> and <b>45: Community Facilities, Leisure and Recreation</b> directly addresses the need for development to support the delivery of new infrastructure, service provision and community facilities (including health and schools) to support growth in the District. Policy 40 provides scope for infrastructure provision to be secured by Planning Obligations and Community Infrastructure Levy.</p> <p><b>Policies 36: Climate Change</b> and <b>41: Sustainable Transport</b> are supportive of development and patterns of development which would help to encourage travel by walking and cycling, which could result in increased levels of physical activities among residents.</p> <p>Specific to strategic scale development, <b>Policy HA1: Strategic Site Development Principles</b> states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community.</p>
SA6: Biodiversity and geodiversity	<p><b>Policy 26: The Natural Environment and Landscape Character</b> protects the natural environment including protected landscapes and habitats from inappropriate development and is supportive of development which would maintain and enhance the green infrastructure network and the Nature Recovery Network.</p> <p><b>Policy 30: Green Infrastructure and Biodiversity</b> requires that designated sites and habitats are appropriately considered as part of the development process and a minimum of 10% biodiversity net gain is achieved at development sites. Furthermore, development should maintain and enhance green infrastructure, the Nature Recovery Network and natural capital.</p>
SA7: Landscape	<p><b>Policy 26: The Natural Environment and Landscape Character</b> protects the natural environment including protected landscapes and habitats from inappropriate development and is supportive of development which would maintain and enhance the green infrastructure network and the Nature Recovery Network.</p>

SA Objective	Mitigation provided by Local Plan policies
	<p><b>Policies 27: Countryside Protection</b> and <b>28: Settlement Coalescence</b> limit the potential for development to encroach on the open countryside and the special character of this area as well as the potential for settlement coalescence.</p> <p><b>Policy 29: Protected Landscapes</b> requires development to be respectful of the setting of protected landscapes, including the High Weald AONB and the adjoining South Downs National Park.</p> <p><b>Policies 32: Development Quality</b> and <b>33: Development Principles</b> set out criteria for development in terms of achieving a high quality in the District and also the development principles for new proposals. Development is required to respond to locally distinctive characters and heritage of the District, including overall setting, townscape features, views and green corridors.</p>
SA8: Historic environment	<p><b>Policy 34: Heritage Assets and Managing change in the Historic Environment</b> is set out to ensure the positive management of development affecting heritage assets, by requiring development to be considerate of the significance of heritage assets and to make a positive contribution to the character and distinctiveness of the area.</p> <p><b>Policies 32: Development Quality</b> and <b>33: Development Principles</b> set out criteria for development in terms of achieving a high quality in the District and also the development principles for new proposals. Development is required to respond to locally distinctive characters and heritage of the District, including overall setting, townscape features, views and green corridors.</p>
SA9: Efficient land use	<p><b>Policy 2: Development Hierarchy</b> sets out that development is to be permitted within the built-up area boundaries of settlements in the plan area, including on any suitable previously developed land.</p> <p><b>Policy 24: Environmental Protection</b> states that development proposals should address land contamination by promoting the appropriate re-use of sites and requiring the delivery of appropriate remediation.</p> <p><b>Policy 33: Development Principles</b> set out that development should make efficient use of land and prioritise the use of previously developed land.</p>
SA10: Natural resources	<p><b>Policy 27: Countryside Protection</b> is supportive of development in the countryside which would enable the extraction of minerals or the disposal of waste.</p> <p><b>Policy 36: Climate Change</b> is supportive of development which includes measures to help reduce the amount of biodegradable waste sent to landfill and promotes grey water recycling.</p> <p><b>Policy 38: Sustainable Design and Construction</b> requires development to incorporate measures to minimise construction and demolition waste and utilise recycled and to support grey water recycling.</p>
SA11: Water resources	<p><b>Policy 24: Environmental Protection</b> requires development to maintain or improve the environmental quality of any watercourses, groundwater and drinking water supplies.</p> <p><b>Policy 30: Green Infrastructure and Biodiversity</b> is supportive of development which would maintain and enhance the green infrastructure network as well as existing fresh water features.</p> <p><b>Policy 36: Climate Change</b> is supportive of development which includes measures to support the conservation of water supplies.</p> <p><b>Policy 39: Flooding</b> requires that where there is potential to increase flood risk, proposals should incorporate the use of SuDS and should be considerate of the vulnerability and importance of local ecological resources such as water quality when determining the suitability of SuDS.</p> <p><b>Policy 40: Infrastructure Provision</b> requires that the release of land for development is to be dependent upon sufficient capacity in the existing local infrastructure (including infrastructure relating to water supplies) to meet the additional requirements.</p> <p>Specific to strategic scale development, <b>Policy HA1: Strategic Site Development Principles</b> states that proposals of this nature should deliver necessary new infrastructure to</p>

SA Objective	Mitigation provided by Local Plan policies
	support the new development, including provision of utilities, water supplies and wastewater treatment.
SA12: Flooding	<p><b>Policy 26: The Natural Environment and Landscape Character</b> requires development to incorporate and maintain SUDS in an optimal location for their purpose whilst also securing landscape enhancements and high-quality green spaces.</p> <p><b>Policies 30: Green Infrastructure and Biodiversity</b> and <b>36: Climate Change</b> are supportive of development which would maintain and enhance the green infrastructure network.</p> <p><b>Policy 39: Flooding</b> requires that where there is potential to increase flood risk, proposals should incorporate the use of SuDS and should be considerate of the vulnerability and importance of local ecological resources such as water quality when determining the suitability of SuDS. Development proposals are only to be supported where they follow a sequential approach to flood risk management.</p>
SA13: Transport	<p><b>Policies 36: Climate Change</b> and <b>41: Sustainable Transport</b> are supportive of development which reduces the need to travel and encourages travel by walking and cycling as well as by public transport.</p> <p>Specific to strategic scale development, <b>Policy HA1: Strategic Site Development Principles</b> states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Development should also be designed to minimise the need to travel by car.</p>
SA14: Air quality	<p><b>Policy 24: Environmental Protection</b> requires new development proposals to ensure that resultant air pollution is minimised and that they contribute to the implementation of Air Quality Action Plans.</p> <p><b>Policies 36: Climate Change</b> and <b>41: Sustainable Transport</b> are supportive of development which reduces the need to travel and encourages travel by walking and cycling as well as by public transport.</p> <p>Specific to strategic scale development, <b>Policy HA1: Strategic Site Development Principles</b> states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Development should also be designed to minimise the need to travel by car.</p>
SA15: Climate change	<p><b>Policy 24: Environmental Protection</b> requires new development proposals to ensure that resultant greenhouse gas emissions are minimised.</p> <p><b>Policies 36: Climate Change</b> and <b>41: Sustainable Transport</b> are supportive of development which reduces the need to travel and encourages travel by walking and cycling as well as by public transport. Policy 36 also supports developments which contribute to achieving net zero carbon emission, by helping to encourage behaviours that reduce energy use and promoting the use of decentralised, renewable and low carbon energy supply systems.</p> <p><b>Policy 37: Appropriate Energy Use</b> requires new development to contribute clean, efficient energy in the District. New developments must also demonstrate how they will provide zero and low carbon heating. Stand-alone renewable energy schemes are also supported by the policy.</p> <p>Specific to strategic scale development, <b>Policy HA1: Strategic Site Development Principles</b> states that this type of development will be expected to deliver the necessary services and facilities that contribute to the development of a successful community. Development should also contribute to the achievement of zero carbon and be designed to minimise the need to travel by car.</p>
SA16: Economic growth	<p><b>Policies 6: New Employment</b> and <b>7: Enhancing Existing Employment</b> support sustainable economic growth in the District up to 2036 by requiring the provision of sufficient employment land to meet the Council's identified requirements for use classes B1, B2 and B8. The redevelopment, regeneration, intensification and expansion of existing employment premises and sites for employment uses is also supported.</p>

SA Objective	Mitigation provided by Local Plan policies
	<p><b>Policy 8: Rural Economic Development</b> supports sustainable rural economic growth in the District in order to generate local employment opportunities.</p> <p><b>Policies 10: Equestrian Development</b> and <b>11: Tourism Facilities and Visitor</b> support economic growth in equestrian and tourism which are important for rural locations.</p> <p><b>Policy 43: Gatwick Airport Safeguarding</b> safeguards land for the expansion of Gatwick Airport, which is identified to be of importance for District and the wider economy in the Gatwick Diamond.</p>
SA17: Access to employment opportunities	<p><b>Policies 6: New Employment</b> and <b>7: Enhancing Existing Employment</b> support sustainable economic growth in the District up to 2036 by requiring the provision of sufficient employment land to meet the Council's identified requirements for use classes B1, B2 and B8. The redevelopment, regeneration, intensification and expansion of existing employment premises and sites for employment uses is also supported.</p> <p><b>Policy 8: Rural Economic Development</b> supports sustainable rural economic growth in the District in order to generate local employment opportunities.</p> <p>Specific to strategic scale development, <b>Policy HA1: Strategic Site Development Principles</b> states that this type of development will be expected to provide new employment land to meet the principle of one new job per home.</p>

## Recommendations

**9.127** As part of the SA work for the Regulation 18 Local Plan consultation, a number of recommendations for changes to

that version of the Local Plan were provided to the Council. These are listed in below, together with the Council's response.

**Table 9.3 Recommendations arising from the SA and Horsham District Council's response**

Place in Document (where policy numbering has changed between Regulation 18 and Regulation 19 Local Plan this is shown in brackets)	SA Recommendation	Council response and action
Throughout the document	Where policies require development to be supportive of green infrastructure in the District, those policies should be cross referenced to Policy 31	Noted, a balanced approach has been taken and only where GI is a key issue is a reference to the GI policy included because it is a policy that potentially should be taken into account within all development proposals.
Spatial Objectives	The Spatial Objectives make no reference to the context within which Horsham lies. It is therefore recommended that the Spatial Objectives set out the role and function that development in Horsham District is intended to play with respect to Crawley and the Gatwick Diamond, and if appropriate with other main settlements outside the District, such as the coastal towns to the south.	The spatial context including the Gatwick Diamond and links to the coastal towns to the south is set out in Sections 2 and 3 of the Regulation 19 Plan.
Policy 5: Broadbridge Heath Quadrant	While it is acknowledged that this policy is to be read in conjunction with the other policies which address Horsham town centre, Policy 5 could be strengthened by including reference to support for development which helps create a high quality and sustainable environment with a positive public realm, strong, legible connections including those for cycling and walking.	Reference to sustainable connectivity with Horsham town, and promotion of walking and cycling within development, has been added to policy.



Place in Document (where policy numbering has changed between Regulation 18 and Regulation 19 Local Plan this is shown in brackets)	SA Recommendation	Council response and action
	The policy seeks to support development which could complement the existing and future offer of Horsham town centre and improve connectivity with adjoining new communities. The policy approach could be strengthened by including reference to support for development which would improve connectivity by sustainable means to Horsham town centre	
Policy 8: Rural Economic Development	While it accepted that some journeys will be made to rural employment sites by private vehicle given that they will not be as accessible by public transport, the policy could include requirements for levels of car parking at rural employment sites (or the surrounding area) to be made to an appropriate level with consideration for the potential for sustainable transport modes to be used.	Noted, it is considered that this point is more appropriately addressed within the parking policy / the Council's parking requirements.
Policy 13: Town Centre Uses	The policy could be strengthened by requiring proposals for A3, A4 and A5 to give details of storage and disposal of refuse including measures to promote recycling and other forms of sustainable waste management.	Reference to sustainable waste management / recycling added. A3/A4/A5 no longer exist so this has been added to a new reference to takeaways and restaurants, pubs and drinking establishments.
Policy 15: Strategic Site Development Principles (Policy HA1: Strategic Site Development Principles)	<p>Specific requirement should be included for the delivery of SUDS to address any flood risk identified as well as to be incorporated into the provision of biodiversity gain and wider green infrastructure provision.</p> <p>Specific requirement should be included for strategic development to be considerate of the setting of heritage assets and the wider historic environment.</p> <p>The requirement for strategic development to support the provision of alternative sources of energy could be strengthened by including direct reference to low carbon and renewable energy sources, including solar, district heating and combined heat and power.</p> <p>While the policy includes reference for the requirement for strategic development to provide a range of housing types and tenures it should also require that affordable homes are delivered onsite unless it can be demonstrated to be unviable.</p>	<p>Suggestions for changes noted.</p> <p>Matters relating to SuDs are set out more fully in Policy 39: Flooding.</p> <p>Heritage assets are bespoke to each site and are therefore covered in specific site policies and their supporting text.</p> <p>CHP is a feature particularly suited to strategic development however policies in Section 9 (Climate Change and Flooding) provide a more detailed framework.</p> <p>The reference to 'tenures' includes affordable housing, a detailed framework requiring provision of affordable housing is set out in Policy 16: Affordable Housing.</p>
Policy 21: Rural Workers Accommodation	The policy could be strengthened by including reference to requiring development to be considerate of existing landscape character and the open character of the countryside.	<p>Noted. Policy 21 criterion 'e' is outlined below. It is considered that this criterion will address the issue of advocating good design and asks the decision maker to make consideration of character and landscape.</p> <p><i>'the new dwelling is well related to existing buildings, and its siting and design is appropriate to the rural character and landscape of the locality'.</i></p>
Policy 22: Replacement Dwellings and House Extensions in the Countryside	The policy could be strengthened by including reference to requiring replacement dwellings and extensions to be in keeping with the scale and character of the existing dwelling and of the surrounding area.	Noted and policy wording updated to reflect recommendation through criterion 'b'.
Policy 24: Gypsy, Traveller and Travelling	The policy could be strengthened by including reference for sites to be provided with reasonable access to employment sites as	Noted.

Place in Document (where policy numbering has changed between Regulation 18 and Regulation 19 Local Plan this is shown in brackets)	SA Recommendation	Council response and action
Showpeople Accommodation	<p>well as services and facilities to further promote the aims of modal shift.</p> <p>The policy could also include reference to the need for sites to provide essential services such as waste disposal including those which promote recycling and other sustainable waste management processes.</p>	<p>On balance it is considered that the suggested addition relating to access to employment and services and facilities is overly restrictive given the need for some flexibility regarding the location of Gypsy and Traveller sites.</p> <p>The inclusion of reference for sites to provide essentials services is considered to be unnecessary detail and is covered in Policy 33 Development Principles of the Regulation 19 Local Plan.</p>
Policy 29: Settlement Coalescence (Policy 28: Settlement Coalescence)	The policy may be strengthened by allowing for some alternative and suitable uses of land between settlements (for example acceptable and less intensive recreational uses), in order to support the successful integration of communities. The policy would need to be considerate of the potential cumulative effects of this type of development as to prevent the erosion of openness between settlements.	Noted, the policy is taken forward as Policy 28. The potential for suitable development that does not result in significant effects relating to openness and urbanisation is addressed through the individual criteria of the policy.
Policy 31: Green Infrastructure and Biodiversity (Policy 30: Green Infrastructure and Biodiversity)	In order to support the 'mainstreaming' of green infrastructure support for development which allows the enhancement of key strategic Green Infrastructure Assets and opportunities in the District as identified in the Green Infrastructure Strategy should be explicitly referenced in the policy text as well as the supporting text. Furthermore, where other policies require development to be supportive of green infrastructure in the District, those policies should be cross referenced to Policy 31	<p>Noted. Policy wording and supporting text has been updated however no specific references has been included because there are no specific cases and this is a criteria based policy.</p> <p>In respect of policies cross referencing to the green infrastructure policy. A balanced approach has been taken and only where green infrastructure is a key issue is a reference to the green infrastructure policy included because it is a policy that potentially should be taken into account within all development proposals.</p>
Policy 33: Development Quality (Policy 32: Development Quality)	The policy could be strengthened by requiring developments to contribute to sense of place by having consideration for the built historic environment and townscape (as well as structural surroundings and the landscape in which they sit).	Noted. Policy wording updated in criterion 3.
Policy 37: Climate Change (Policy 36: Climate change)	Whilst the policy does set out that development should be designed to reduce the need to travel, it could be strengthened by making reference to support for compact, mixed-use developments where residents are able to access services and facilities within walking distance.	Noted. Policy wording updated in bullet point 1e.
Policy 38: Appropriate Energy Use (Policy 37: Appropriate Energy Use)	<p>To contribute to achieving zero carbon in the District development will need to move towards making use of more sustainable energy sources. It is accepted that it has been identified that there is limited capacity for wind turbine development due to the landscape. However, notwithstanding constraints of the District relating to landscape and nature conservation in particular, the policy could provide guidance on the locations in the District where renewable or low carbon energy development of particular types or scales are more likely to be acceptable.</p> <p>The policy could be strengthened by including reference to the need for renewable energy proposals to be considerate of</p>	<p>Noted however standalone renewable energy schemes are specifically supported in Policy 37: Appropriate Energy Use and strategic developments are encouraged to connect to renewable powered district heating schemes where viable. This is considered proportionate in the context of the evidence available.</p> <p>Reference to protected landscapes is not proposed in Policy 37 given there is a clear statement that stand-alone renewable</p>

Place in Document (where policy numbering has changed between Regulation 18 and Regulation 19 Local Plan this is shown in brackets)	SA Recommendation	Council response and action
	landscape sensitivity, as well as the setting of the protected landscapes. This should be presented in the policy itself as well as in the supporting text of the policy. The policy should continue to link to Policy 30 - Protected Landscapes.	energy schemes must not conflict with other policies in the Local Plan.
Policy 39: Sustainable Design and Construction (Policy 38: Sustainable Design and Construction)	The policy could be strengthened by encouraging that non-domestic floorspace achieve a BREEAM rating of 'Excellent' subject to viability issues and requiring that a minimum BREEAM rating of 'Very good' is achieved	Noted and the policy has been updated.
Policy 40: Flooding (Policy 39)	Green infrastructure can play an important role in terms of flood risk mitigation. Reference to the inclusion of this type of infrastructure within development should be strengthened and included in its own right. At present consideration for green infrastructure is only included in relation to the role SuDS can play in this regard.	Noted. Green Infrastructure is included in section 3. This policy is about flood risk, not about green infrastructure per se. Green infrastructure will not prevent flooding on its own, only in combination with a flood management strategy.
Policy 41: Infrastructure Provision (Policy 40: Infrastructure Provision)	The policy may be strengthened by prioritising the enhancement of existing infrastructure, to help promote more efficient land use.	Noted. The policy already requires consideration to be given to the capacity of existing local infrastructure. It is also considered that in some cases the provision of new infrastructure is more appropriate/welcomed and therefore the existing wording is sufficient to provide flexibility to ensure the most appropriate approach to infrastructure provision is taken, based on the specific circumstances at the time.
Policy 42: Sustainable Transport (Policy 41: Sustainable Transport)	The policy could help promote the attractiveness of sustainable transport by requiring that sustainable transport hubs, nodes and stops, and walking connections to them, are where possible protected from extreme weather events, such as heavy rainfall and direct sunlight, which are likely to become more frequent and intense with climate change	A reference to weather-proof bus shelters added to policy. Would not be appropriate to have detailed design criteria for shelters in the policy.
Policy 43: Parking (Policy 42: Parking)	The policy might be strengthened by requiring that adequate and appropriate levels of parking are provided to meet the needs of anticipated users and reasonably promote modal shift in the area	Noted. However, suggested change is not considered precise enough to be effective in the context of this policy. Policy includes requirement for cycle parking, and good urban design. The policy is to be read alongside Policy 41: Sustainable Transport which promote the use of more active and sustainable modes of transport.

**9.128** It can be seen from the above table that the Council has responded positively to many of the recommendations in the SA. Where the recommendations relate to issues which are best covered by other policies in the Regulation 19 Local Plan, this has been clarified in the Council's response.

**9.129** The SA of the individual large scale strategic sites and small sites also fed into the decision making of the Council when deciding which sites to allocated. The SA work was

considered alongside other evidence worked up as part of the plan making process, including the landscape capacity work and heritage impact assessment work which has informed the SA.

## The Council's reasons for choosing the Regulation 19 Local Plan

**9.130** A statement has been prepared by **the Council** in accordance with the requirements of Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004. This statement outlines how environmental considerations have been integrated into the Local Plan, how the Sustainability Appraisal has been taken into account, how

consultation responses have been taken into account, the reasons for choosing the adopted Local Plan policies in light of alternative options and the measures that will be taken to monitor the effects of the Local Plan.

**9.131** It should be noted that the reasons given by **the Council** for allocating or discounting specific sites are presented in **Appendix F (Audit trail of site options)**.

### How environmental and sustainability considerations have been integrated into the Local Plan

The Sustainability Appraisal of the Horsham District Local Plan has been undertaken in such a way that meets the requirements of the EU Strategic Environment Assessment Directives (including through EU exit legislation) and UK Government guidance on the preparation of Sustainability Appraisals. As required by the regulations, the Sustainability Appraisal has been developed through an iterative process and has informed decision making at every stage of developing the Horsham District Local Plan (Local Plan).

The initial informative stage of the Sustainability Appraisal was the scoping process. The scoping process included a review of other relevant plans, programmes and strategies that have an influence on sustainability and provide the policy context for the Local Plan. The social, environmental and economic baselines were established which identified the key sustainability issues to address and provided the basis from which the potential effects of the Local Plan could be assessed. A scoping report was undertaken in August 2019. It met the requirements of Stage A of the Sustainability Appraisal process as set out in the Planning Practice Guidance (PPG) to ensure it meets the regulatory requirements as set out in Schedule 2 of the SEA Regulations (Environmental Assessment of Plans and Programmes Regulations 2004).

### How the Sustainability Appraisal has been taken into account

The policies and sites within the Local Plan have been subject to Sustainability Appraisal throughout their development, along with reasonable alternative options. Each policy and proposal has been assessed against the social, environmental and economic objectives in the SA Framework in order to establish the positive and negative effects.

Where significant effects were found, potential mitigation measures were identified wherever possible. The results of the appraisals were used to form the decision making process and establish appropriate options to take forward into the Local Plan. Each stage of developing the Local Plan has included undertaking Sustainability Appraisal to take account of new evidence and new policy options. These updates helped further refine the options to include in the Local Plan.

The Sustainability Appraisal report included the appraisals for quantum of growth and spatial strategy options; large site options; small site options; growth scenario options; and for each policy option taken forward into the Local Plan as well as all of the reasonable alternative options considered. The SA report also included assessment of cumulative effects and mitigation.

### How the results of consultation have been taken into account

The SEA Regulations require that opinion expressed by consultees be taken into account during the development of a plan before the plan is adopted.

The Scoping Report was published on the Council's website for 5 weeks between 3 September to 7 October 2019, and the three relevant statutory bodies notified. All three of the statutory consultees, Environment Agency, Natural England, and Historic England responded. The Interim Sustainability Appraisal was consulted on alongside consultation on the draft Local Plan at the Regulation 18 stage. All comments and representations at both stages were taken into account and used to further the Sustainability Appraisal.

### The reasons for selecting the preferred strategy for the plan

The Preferred Strategy set out in the current version of the Local Plan has evolved from earlier medium-growth scenarios, and recognises housing market limitations whereby putting too much development in one part of the district can put rates of delivery at risk. It is a balanced strategy which builds on the settlement hierarchy (including sustainable urban extensions), whilst also planning for a new garden village community. This is considered to achieve an appropriate balance between the following:

- maximising newly-acquired benefits arising from developing strategic housing sites (e.g. boosting housing supply to meet nationally-set targets, new schools infrastructure, community facilities, open spaces and strategic-level net biodiversity gain); and
- maximising sustainability benefits of some growth around existing smaller settlements, to deliver new community infrastructure and boost the viability of village services, whilst not forcing disproportionate and rapid levels of development on existing communities.

A choice was necessary between one of three new settlement locations to support this strategy. After careful consideration against the Local Plan's and sustainability objectives, the Council is recommending that land is allocated for the following new settlement:

- Land at Buck Barn (to be known as Wealdcross) is considered by the Council to best meet the objectives of the Local Plan. The site is located centrally within the District, on the A24 dual carriageway which links to Horsham and (via the A264) Crawley to the north, and also to Worthing to the South. Of the three new settlement sites, it is the one considered to offer the best opportunity to achieve a cohesive new village community in its own right, whilst also providing high quality bus access to the key employment and service destination of Horsham Town, plus onward links to the Crawley and Gatwick area. Local active travel opportunities could also be readily achieved to Southwater and Horsham via the Downs Link high-quality cycle/pedestrian route. It also would offer good bus access to Worthing and the South Coast. It would be designed as a walkable / cyclable neighbourhood, and homes would be zero-carbon. Local employment opportunities suiting a range of skills would be provided on the site. As well as a comprehensive bus strategy, the development would deliver significant improvements to a number of junctions on the A24 (including bus priority features and cycling and pedestrian improvements), thus addressing both existing traffic congestion and the future traffic impacts of development. It would deliver a secondary school, two primary schools, neighbourhood shopping centres/community hub, and 20% biodiversity net gain.

A strategic site at Rookwood Golf Club was considered and recognised as a sustainably located urban extension to Horsham town. This site has not been taken forward as an allocation, as it has subsequently been withdrawn as a promoted site by the landowner and is therefore not currently available.

The high level strategy for employment development is to provide a range of employment opportunities that are attractive to local residents (existing and future), such that a greater number of the District's residents choose to work in the District as well as live there. This encourages more local journeys and reduces the need to travel. New employment sites have been selected where they are best placed to build on existing employment hubs and strengthen rural employment opportunities, whilst employment provision will also be made at the strategic sites to maximise self-containment within the new communities. The strategy will provide existing businesses in particular the opportunity to expand into new modern premises where required, thus building on the District's inherent economic strengths.



# Chapter 10

## Monitoring

### Introduction

**10.1** The SEA Regulations require that:

“the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action” and that the environmental report should provide information on “a description of the measures envisaged concerning monitoring”.

**10.2** Monitoring proposals should be designed to provide information that can be used to highlight specific issues and significant effects, and which could help decision-making.

**10.3** Monitoring should be focused on the significant sustainability effects that may give rise to irreversible damage (with a view to identifying trends before such damage is caused) and the significant effects where there is uncertainty in the SA and where monitoring would enable preventative or mitigation measures to be taken.

**10.4** **Table 10.1** overleaf sets out a number of suggested indicators for monitoring the potential significant sustainability effects of implementing the Horsham Local Plan. As no significant positive or negative effects were identified through the SA for any of the policies in the Local Plan in relation to **SA objective 4: crime**, no monitoring indicators have been suggested for this SA objective. The monitoring framework and relevant indicators from the adopted HDPF have been used as a starting point for the monitoring framework in this SA Report.

**10.5** The data used for monitoring in many cases will be provided by outside bodies. Information collected by other organisations (e.g. the Environment Agency) can also be used as a source of indicators. It is therefore recommended that the Council continues the dialogue with statutory environmental consultees and other stakeholders that has already been commenced and works with them to agree the relevant sustainability effects to be monitored and to obtain information that is appropriate, up to date and reliable.

Table 10.1 Proposed Monitoring Framework for the Horsham Local Plan Review

SA objectives	Proposed Monitoring Indicators
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	<ul style="list-style-type: none"> <li>Housing completions</li> <li>Average house prices</li> <li>Number of windfall sites granted permission</li> <li>Affordable housing schemes granted permission</li> <li>Housing permissions by dwelling size and type</li> <li>Number of Exception Housing Schemes permitted</li> <li>Number of permitted pitches for Gypsies and Travellers and Travelling Showpeople</li> </ul>
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.	<ul style="list-style-type: none"> <li>Number of C1, D1, D2 uses granted permission</li> <li>Number of permissions for D1 uses which meet the needs for faith</li> <li>Total revenue from CIL contributions</li> <li>Total revenue from S106</li> <li>Amount of new leisure space in town &amp; village centres</li> </ul>
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.	<ul style="list-style-type: none"> <li>Number of retirement dwellings/care home permitted</li> <li>Indices of Multiple Deprivation</li> </ul>
SA 5: To improve public health and wellbeing and reduce health inequalities.	<ul style="list-style-type: none"> <li>Number of C1, D1, D2 uses granted permission</li> <li>Number of retirement dwellings/care home permitted</li> <li>Visitor numbers to HDC Sport facilities</li> <li>Amount of new leisure space in town &amp; village centres</li> </ul>
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.	<ul style="list-style-type: none"> <li>River quality</li> <li>Area (ha) or % of designation / reserve in Horsham infringed by planning applications</li> <li>Area (ha) or % of habitats infringed by planning applications</li> <li>SSSI condition</li> <li>% of District Classified as Ancient Woodland</li> <li>Permitted applications in designated sites</li> <li>Permitted applications in priority habitats</li> <li>Number of records of protected species within 500m buffer of a planning application</li> <li>Number of records of protected species, bats and notable birds</li> </ul>
SA 7: To conserve and enhance the character and distinctiveness of the District's landscapes and townscape, maintaining and strengthening local distinctiveness and sense of place.	<ul style="list-style-type: none"> <li>Condition of landscape character areas</li> <li>Number of Design Statements produced</li> <li>Number of applications outside BUAB</li> <li>Number of replacement dwellings, house extensions and conversions permitted outside BUAB</li> </ul>
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.	<ul style="list-style-type: none"> <li>Number of sites/buildings on the Heritage at Risk register</li> <li>Number of Design Statements produced</li> <li>Number of permissions in Conservation Areas</li> <li>Number of Listed Building Consents granted permission</li> <li>Number of buildings on Local List</li> </ul>
SA 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils.	<ul style="list-style-type: none"> <li>Gross amount of employment floorspace completed on Previously Developed Land (PDL)</li> <li>Gross housing completions on PDL</li> </ul>
SA 10: To conserve natural resources, including mineral resources in the District.	<ul style="list-style-type: none"> <li>Number of applications outside BUAB</li> <li>Enforcement against Site Waste Management Plans (SWMP)</li> <li>District recycling rates</li> </ul>

SA objectives	Proposed Monitoring Indicators
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.	<ul style="list-style-type: none"> <li>■ River quality</li> </ul>
SA 12: To manage and reduce the risk of flooding.	<ul style="list-style-type: none"> <li>■ Percentage of new development located in floodplain</li> <li>■ Permissions granted contrary to advice of EA on flooding and water quality grounds</li> </ul>
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	<ul style="list-style-type: none"> <li>■ Number of Green Travel Plans submitted</li> <li>■ Proportion of households with two or more cars</li> <li>■ Travel to work data (mode and distance)</li> <li>■ Number of tickets sold for Park and Ride</li> <li>■ Number of bus routes provided throughout District</li> <li>■ Monitor usage of car parks</li> </ul>
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.	<ul style="list-style-type: none"> <li>■ Exceedances in UK Air Quality</li> <li>■ Number of AQMA's in District</li> <li>■ Number of Green Travel Plans submitted</li> <li>■ Proportion of households with two or more cars</li> <li>■ Travel to work data (mode and distance)</li> <li>■ Number of tickets sold for Park and Ride</li> <li>■ Number of bus routes provided throughout District</li> </ul>
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.	<ul style="list-style-type: none"> <li>■ Number of District Heating networks in District</li> <li>■ Total emissions of CO<sub>2</sub></li> <li>■ Carbon emissions by sector (Industrial &amp; Commercial, Domestic and Road) and per capita</li> <li>■ Tonnage of non-inert waste sent to landfill</li> <li>■ Percentage of inert-waste sent to landfill</li> <li>■ District recycling rates</li> <li>■ Number of permissions for renewable energy installations</li> <li>■ Number of Green Travel Plans submitted</li> <li>■ Proportion of households with two or more cars</li> <li>■ Travel to work data (mode and distance)</li> <li>■ Number of tickets sold for Park and Ride</li> <li>■ Number of bus routes provided throughout District</li> </ul>
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.	<ul style="list-style-type: none"> <li>■ Amount of land developed for employment land / land supply by type (B1 / B2 / B8), particularly in strategic locations</li> <li>■ Amount of employment land lost from Key Employment Areas</li> <li>■ Amount of employment land lost to residential development</li> <li>■ Total number of jobs in Horsham District</li> <li>■ Levels of Unemployment</li> <li>■ Employment land available</li> <li>■ Employment rates based on gender, age, race and ethnicity</li> </ul>

# Chapter 11

## Conclusions and next steps

### Conclusions

**11.1** This document has considered the sustainability implications of the policies and sites presented in the Regulation 19 Horsham Local Plan. Alongside these, reasonable alternative policy and site options have also been appraised.

**11.2** The plan area is predominantly rural in character with areas of higher value landscapes, including those relating to the High Weald AONB and the setting of the South Downs National Park. The services and facilities within the District are mostly accessible in the main town of Horsham and the smaller towns and larger villages such as Southwater, Billingshurst, Storrington, Henfield, Steyning and Broadbridge Heath. The highest job provision in the plan area is also provided in Horsham town. The District also has a strong relationship with Crawley and the wider Gatwick Diamond as well as to a lesser extent London and the southern coastal authorities. In all around 40% of the District's residents commute to locations outside of the District. Crawley in particular is important for jobs, services and facilities for residents of Horsham in the north of the District.

**11.3** The affordability of housing in the plan area is a key issue. The median house price in Horsham District is around 13 times higher than average annual earnings. The District falls within two main housing market areas. The majority of the District falls within the North West Sussex Housing Market Area (HMA), and a small area to the south east falls within the Sussex Coast HMA.

**11.4** The District benefits from numerous nationally designated biodiversity sites with more sizeable designations present at St. Leonard's Forest Site of Special Scientific Interest (SSSI) to the east of Horsham town, Warnham SSSI to the south of Kingsfold and Sullington Warren and Chantry Mill to the south east of Storrington. Areas to the south west of the District within the National Park fall within the Arun Valley Special Area of Conservation (SAC) and Special Protection Area (SPA). The District also has functional links to the Mens SAC which is beyond its western boundary for which a bat sustenance zone has been declared in Horsham District. This embraces much of the land in the area to the west of the settlements of Horsham, Southwater and Ashington.

**11.5** The implications of climate change will add uncertainty for development over the plan period given the increase in

extreme weather events. Impacts relating to relating to Brexit and COVID-19 may also have longer implications in terms of economic and housing growth as well as commuting patterns in the area. This is of particular relevance given the increasing prevalence of homeworking in response to the Coronavirus pandemic.

**11.6** The Local Plan sets out a strategy for growth in the District up to 2038. The Local Plan provides for the delivery of 1,100 net additional homes per annum over the plan period. This level of housing growth will contribute positively to the step change in housing growth as required by Government. The figure is higher than that required through the standard methodology calculation for Horsham District which is calculated as 897 dwellings per annum thereby allowing for a degree of flexibility in supply. The level of housing is expected to help support a more affordable housing stock for local people. The overall level of housing will also contribute positively to meeting the unmet need of neighbouring authorities under the Duty to Cooperate. The inclusion of a large scale site at West of Ifield by Crawley and the West of Kilnwood Vale site will provide homes to help address the unmet need of Crawley Borough within the North West Sussex HMA. The Local Plan also supports the long term economic growth of the District, setting out new sites to meet the anticipated need for employment land. Sites are also allocated for Gypsy and Traveller accommodation.

**11.7** An additional 18,700 homes over the plan period represents an increasing in the housing stock of Horsham of nearly 30%, all to be delivered within 17 years<sup>65</sup>. This scale of growth will inevitably have implications in terms of the natural and built environments, including biodiversity, landscape and heritage assets. There are also likely to be implications in terms of air quality. This issue is of particular importance when considered in relation to the Air Quality Management Areas (AQMAs) within the District (Storrington and Cowfold AQMAs) and in neighbouring Crawley (Hazelwick AQMA) where further development at Ifield could result in intensification of existing air pollution.

**11.8** The SA has tested a number of options for distributing growth (i.e. the growth scenario options) in the plan area. From the options testing and the consideration of other evidence, the Council has decided that a balanced approach which includes urban extension sites as well as small sites broadly in line with the development hierarchy while also taking forward a new settlement site was highlighted as being most appropriate. This approach would make good use of the existing services and facilities, employment opportunities and sustainable transport links in the plan area while also allowing

for a more limited level of growth at the smaller settlements to provide support for their services and meet localised needs.

**11.9** The high level of growth set out at urban extension sites and the new settlement is of a scale to support substantial new service provision in the plan area. The new settlement at Buck Barn can also provide a new focus for longer term growth in the District. A number of new settlement options were considered in the SA. Although there was little to choose between them from the results of the SA, the Council selected Buck Barn due to its locational advantages in relation to Horsham and Southwater and issues with access for the other options. The larger scale urban extensions selected for inclusion in the Local Plan by the Council were supported by the findings of the SA. Furthermore, by including development as an urban extension to the West of Crawley and the West of Kilnwood Vale site, the Local Plan responds positively to economic realities of the area and interrelationship between the two authorities. While the strategy does not include a new large scale urban extension site at Horsham town, it includes the densification of the existing North Horsham allocation and a number of small site allocations at that settlement which would make good use of the high number of services and facilities and jobs here.

**11.10** Through this approach the Local Plan provides an opportunity to reduce the reliance on the private vehicle and support access to services and facilities which benefit public health. By including much of the new growth at urban extension sites at larger settlements there is greater opportunity to integrate with existing community networks. It is, however, noted that it could take considerable time to develop mature community networks, social inclusion and a sense of place at the new settlement site at Buck Barn, in particular. The strategy could also have implications in terms of landscape character given that some of the land taken forward was identified through the landscape capacity work as having no/low or low-moderate capacity for development. Furthermore, many of the sites were identified as likely to have significant impacts in relation to historic assets or archaeology, prior to mitigation.

**11.11** The overall level and distribution of development will result in increased noise, air and light pollution which could affect designated biodiversity sites as well as other important habitats in the District. The distribution of development would result in development within the bat sustenance zone associated with the Mens SAC to the west of the District. Furthermore, the development of smaller scale sites to the south west of the District have the potential to have adverse impacts on the Arun Valley SPA. The development of a new

<sup>65</sup> The Office of National Statistics (ONS) gathers data on the number of dwellings per local authority on an annual basis. The latest figures show that there were 63,473 dwellings of all types in Horsham District as of mid-2019.



settlement at Buck Barn is very close to the Knepp Estate which, although not currently subject to national designations, is a rewilding project of particular significance as an example of large-scale habitat restoration.

**11.12** In relation to the international sites, the HRA for the Horsham Local Plan<sup>66</sup> concluded at the screening stage that likely significant effects could arise on Arun Valley SPA/Ramsar site (from changes in water quality, changes in water levels and flows and loss of functionally-linked land), Ebernoe Common SAC and The Mens SAC (from loss of functionally linked land) and, for The Mens SAC, atmospheric nitrogen deposition. An Appropriate Assessment was therefore carried out, which resulted in a number of recommendations being made to ensure that the Local Plan does not result in an adverse effect on the integrity of an internationally designated site either in combination or in isolation.

**11.13** Through the testing of the site options, the SA reported that many of the sites at the Main Town (Horsham) or a Small Town or Larger Village in the District performed more favourably in relation to both access to services and facilities and health and wellbeing. This is particularly the case for sites at Billingshurst, Henfield, Pulborough and Codmore Hill, Steyning and Storrington. These larger settlements provide access to a range of services and facilities including healthcare. The larger settlement of Southwater would also provide new residents with generally good access to services and facilities, such as retail and community facilities. However, the distribution of site options considered in relation to the existing education and healthcare facilities at this settlement means that residents would have more limited access to these specific types of facilities. The smaller settlements of Rudgwick and Bucks Green, Cowfold and Partridge Green benefit from healthcare facilities but their smaller size means the range of services and facilities accessible at these locations is more limited.

**11.14** Particular benefits in relation to transport and climate change were noted where sites are close to settlements which provide access to a railway station. In Horsham District, stations are located at Billingshurst, Christ's Hospital, Horsham town, Pulborough, Codmore Hill and Warnham and Faygate towards the boundary with Crawley. The strategy taken forward in the Regulation 19 Local Plan includes sites which are well related to all of these locations. This approach may help to limit the need to travel by car in the plan area and have benefits in terms of reduced congestion and carbon emissions as well as improved air quality. Conversely, the strategy also includes sites at settlements (Cowfold and Storrington) which contain or are functionally linked to an

AQMA which may result in adverse impacts in relation to air quality.

**11.15** The Local Plan includes a number of topic based policies as well as site specific policy requirements which are likely to help mitigate the potential for many of the adverse effects described above. These include the requirement for development to achieve at least 10% biodiversity net gain and to incorporate measures which contribute to achieving net zero carbon emissions across the District by 2050. These measures will help to ensure the protection and enhancement of biodiversity sites and habitats in the plan area, as well as the limitation of greenhouse gases in the longer term. Policies are also included to protect local air quality, prevent increases in flood risk and preserve the historic environment and landscape character. This includes limiting the potential for settlement coalescence and preserving the open countryside as well as the setting of the High Weald AONB and South Downs National Park to reflect the relevant management plans and the South Downs Local Plan.

**11.16** In considering the total effects of all of the Local Plan's policies and site allocations together, the SA found that have significant positive effects are likely with respect to SA objective 1: housing, SA objective 2: accessing to services and facilities, SA objective 3: inclusive communities, SA objective 15: climate change, SA objective 16: economic growth and SA objective 17: access to employment opportunities.

**11.17** Overall significant negative effects for the Local Plan were identified for SA objective 6: biodiversity, 7: landscape, 8: historic environment, 9: soil quality and 10: mineral resources. However, in all cases these effects are expected to be combined with positive effects.

**11.18** In summary, the Local Plan sets out an approach to accommodate a relatively high level of development in a predominantly rural District. The policies of the Local Plan will help to address to housing affordability in the area as well as contributing to the unmet need of the neighbouring authorities. The delivery of sustainable development over the plan period will be challenged by the lack of existing service provision in some areas and the existing pattern of out commuting. The impacts which new development will have in terms of the District's landscape character, the integrity of its biodiversity assets and historic environment will also pose challenges. Given that most new development will take place on greenfield land, there will inevitably result in a loss of some agricultural soils. The sensitivities of the area mean that some of the significant negative effects will be difficult to avoid, but the policy safeguards set out in the Local Plan will mean that

<sup>66</sup> Aecom on behalf of Horsham District Council (2021) Horsham Local Plan Habitats Regulations Assessment

many of the adverse effects are only likely to be minor. Taken as a whole, therefore, the Local Plan sets out a positive approach to achieving sustainable development which will help to meet the needs of the local community up to 2038.

### Next steps

**11.19** This SA Report will be available for a period of representation alongside the Regulation 19 Horsham District Local Plan between September and October 2021.

**11.20** Following this consultation, the Local Plan and accompanying SA Report will be submitted to the Secretary of State for public examination. Any proposed modifications to the Submission version of the Local Plan arising out of this process may require SA, which will be consulted upon, as necessary

LUC

July 2021