

Horsham District Council

Interim Sustainability Appraisal of Horsham District Local Plan Regulation 18 Consultation

Final Report
Prepared by LUC
February 2020



Horsham District Council

**Interim Sustainability Appraisal of Horsham District Local Plan
Regulation 18 Consultation**

Project Number
10660

Version	Status	Prepared	Checked	Approved	Date
1.	Internal Draft	K Moroney H Briggs E Smith O Dunham	K Moroney J Owen	J Owen	28.01.2020
2.	Draft for client review	K Moroney H Briggs E Smith O Dunham	J Owen	J Owen	31.01.2020
3.	Final Report	K Moroney	J Owen	J Owen	11.02.2020

Contents

Chapter 1		Chapter 5	
Introduction	1	SA findings for the policies in the Local Plan	31
The Local Plan area	1	SA of growth options	31
Horsham District Local Plan	4	SA findings for Policies 1 to 5 in the Local Plan (Policies for Growth and Change)	31
Sustainability Appraisal and Strategic Environmental Assessment	4	SA findings for Policies 6 to 13 in the Local Plan (Economic Development)	38
Health Impact Assessment	8	SA findings for Policies 15 to 23 in the Local Plan (Housing)	46
Equalities Impact Assessment	8	SA findings for Policy 24 in the Local Plan (Housing)	51
Structure of this report	8	SA findings for Policies 25 to 32 in the Local Plan (Conserving and Enhancing the Natural Environment)	54
		SA findings for Policies 33 to 36 in the Local Plan (Development Quality, Design and Heritage)	59
		SA findings for Policies 37 to 40 in the Local Plan (Climate Change and Flooding)	63
		SA findings for Policies 41 to 46 in the Local Plan (Infrastructure, Transport and Healthy Communities)	67
Chapter 2	9	Chapter 6	71
Methodology		Cumulative Effects	
SA Stage A: Scoping	10	Cumulative effects of the Local Plan Review	71
SA Stage B: Developing and refining options and assessing effects	12	In-combination effects	88
SA Stage C: Preparing the Sustainability Appraisal report	13	Mitigation	92
SA Stage D: Consultation on the Local Plan and the SA Report	14		
SA Stage E: Monitoring implementation of the Local Plan	14	Chapter 7	96
Assumptions and uncertainty	14	Monitoring	
Difficulties Encountered	14		
		Chapter 8	102
Chapter 3	16	Conclusions and next steps	
Sustainability context for development in Horsham and the SA framework		Conclusions	102
Key International Plans, Policies and Programmes	16	Next steps	103
National Planning Policy Framework	17		
Neighbourhood plans	17	Appendix A	A-1
Sustainability context	18	Consultation comments	
Key sustainability issues	18	Consultation comments on the SA Scoping Report	A-2
The SA framework	20		
Chapter 4	25		
SA findings for the spatial vision and spatial objectives			
Spatial vision and spatial objectives	25		

Appendix B	
Detailed sustainability context	B-1
Population, health and wellbeing	B-1
Economy	B-15
Transport connections and travel habits	B-20
Air, land and water quality	B-25
Climate change adaptation and mitigation	B-37
Biodiversity	B-43
Historic environment	B-48
Landscape	B-52

Appendix C	
Equalities Impact Assessment	C-1
The Horsham Local Plan	C-2
Method	C-3
Findings	C-3

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 Local Plan.

1.2 This report relates to the Regulation 18 version of the Local Plan Review. The report is presented alongside the Interim Sustainability Appraisal of Growth Options Report which details the SA findings for the options the Council is considering in relation to:

- The overall spatial strategy options for growth in the District.
- How much housing and employment growth should be accommodated in the District within the plan period.
- The large-scale site options that are being considered for allocation in the Local Plan.
- The small-scale site options that are being considered for allocation in the Local Plan.
- Scenarios for how the overall spatial strategy, quantum of growth, large scale and small-scale site options might combine to form an overall strategy for growth for the District within the plan period and beyond.

1.3 Together these two SA Reports comprise the Environmental Report for this stage of the plan-making process. They should be read together, in conjunction with the Regulation 18 version of the Local Plan Review.

The Local Plan area

1.4 Horsham District covers 53,000 hectares and is of predominantly rural character with 85% of its landmass falling within the rural classification¹. Population density in the District is 2.48 persons per hectare and this emphasises its more rural character, given that the figure is significantly lower than that of West Sussex as a whole, which has a population density of 4.05 persons per hectare².

1.5 The District boasts 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

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

² 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

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 & Sullington, and Southwater support 4,100 households, 4,400 households and 3,900 households respectively.

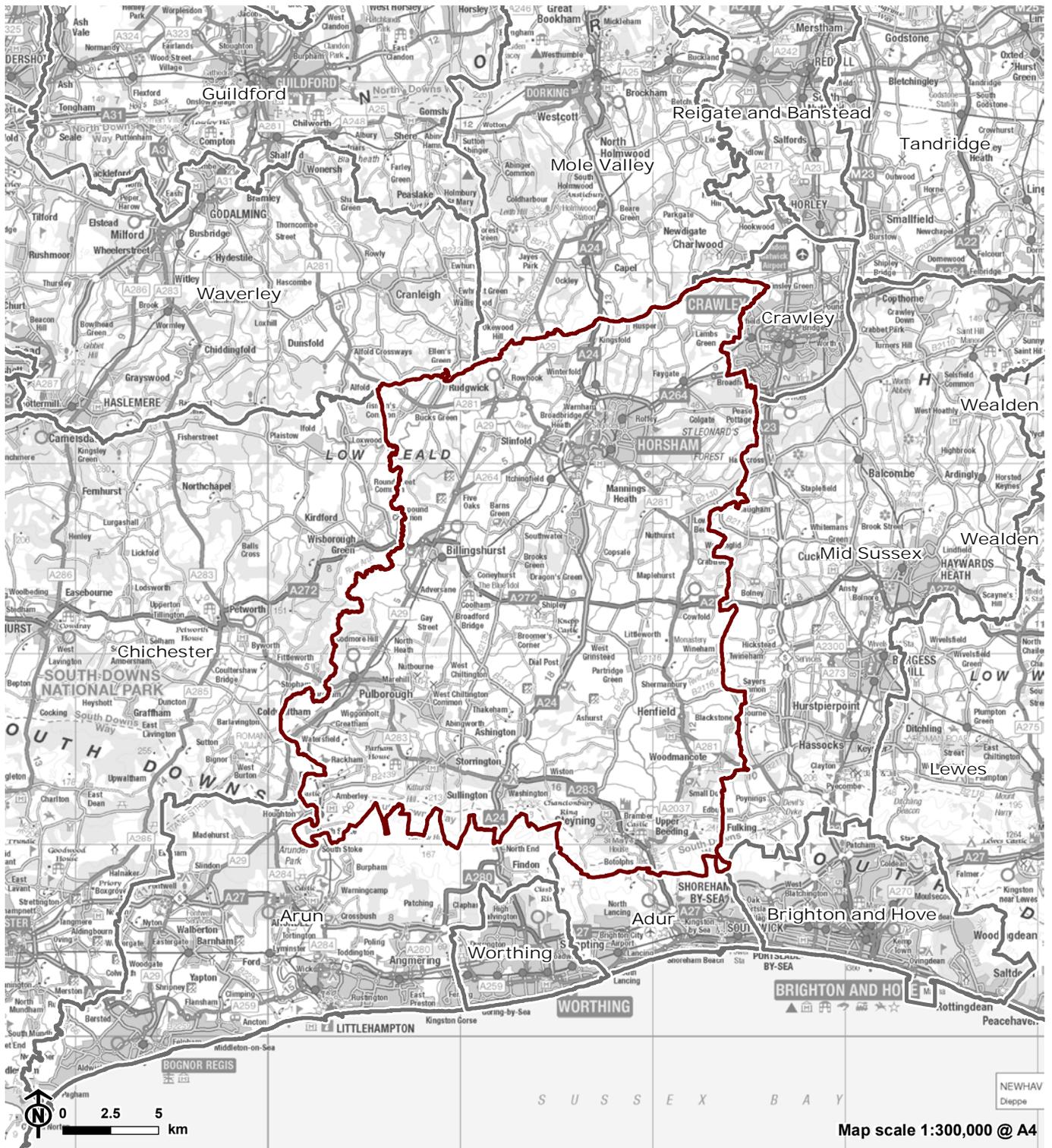
1.6 Many of the settlements in Horsham have experienced increasing populations in recent years. This is particularly the case at Horsham town, Southwater and Billingshurst, given that these settlements have seen a number of housing developments in past years³.

1.7 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 within the District boundaries which takes in the A24, A264, A272, A279, A281 and A283. The location of the Horsham town within 20 minutes from 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.

1.8 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.

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

³ 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>



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CB:KS EB:Beetham_m LUC FIG1_1_10660_Location_A4P 31/01/2020
Source: OS

Figure 1.1: Location of Horsham District

- Horsham
- Neighbouring authority

Horsham District Local Plan

1.10 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 Local Plan Review document do not apply to land in the South Downs National Park. The planning needs for the National Park area are set out in the South Downs Local Plan⁴ as adopted in July 2019.

1.11 In line with Government guidance, which states that local authorities should review their Local Plans every five years, the Council has now started the process of 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 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.

1.12 The new Local Plan will run from 2019 to 2036 and 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, Sustainable Rural Development which was subject to public consultation between April and May 2018.

The Regulation 18 Local Plan

1.13 The Regulation 18 Local Plan sets out the draft vision, objectives and strategy for the District over the coming years and contains a number of draft policies for guiding development.

1.14 Chapter 3 provides an aspirational vision of the District supported by the inclusion of spatial objectives to allow for a more tangible way of taking forward the plan's approach.

1.15 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, with changes to the hierarchy included in the adopted HDPF for the settlements of Thakeham and Partridge Green.

1.16 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 considered with potential for allocation to meet local employment needs.
- Housing development – to help ensure that the government's step change in housing growth is achieved and local needs are met. This chapter includes the consideration of different quanta of housing growth as well as the different site options with potential for allocation to deliver the housing required over the plan period.
- 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.
- 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 zero carbon 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 and community facilities and other service provisions which will contribute to healthy and inclusive communities over the plan period.

1.17 The Council is seeking views from stakeholders and the public on the Regulation 18 Local Plan, and the two accompanying SA Reports.

Sustainability Appraisal and Strategic Environmental Assessment

1.18 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

⁴ South Downs National Park Authority (July 2019) South Downs Local Plan

economic effects of the policies and proposals within a plan from the outset of its development.

1.19 SEA is also a statutory assessment process, required under the SEA Directive⁵, transposed in the UK by the SEA Regulations⁶. 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)⁷. 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”.

1.20 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 guidance⁸ 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: signposts how the requirements of the SEA Regulations have been met within this report.

⁵ 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.

⁶ 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).

⁷ Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

⁸ 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 requirements	Where covered in this report
Preparation of an environmental report in which 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, are identified, described and evaluated (Reg. 12). The information to be given is (Schedule 2):	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 1, Chapter 3 and Appendix B of this SA Report.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3 and Appendix B of this SA Report.
c) The environmental characteristics of areas likely to be significantly affected.	Chapter 3 and Appendix B of this SA Report.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Chapter 3 and Appendix B of this SA Report.
e) 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.	Chapter 3 and Appendix B of this SA Report.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Chapter 4 to Chapter 6 of this SA Report. Please see also the presentation of the appraisal of overall spatial strategy options, large site options, small site options and growth scenario options in the Interim Sustainability Appraisal of Growth Options Report which together with this SA Report forms part of the Environmental Report at this stage of the plan-making process.
g) 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.	Chapter 4 to Chapter 6 of this SA Report. Please see also the presentation of the appraisal of overall spatial strategy options, large site options, small site options and growth scenario options in the Interim Sustainability Appraisal of Growth Options Report which together with this SA Report forms part of the Environmental Report at this stage of the plan-making process.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 3 of this SA Report. Please see also the presentation of the appraisal of overall spatial strategy options, large site options, small site options and growth scenario options in the Interim Sustainability Appraisal of Growth Options Report which together with this SA Report forms part of the Environmental Report at this stage of the plan-making process.

SEA Regulations requirements	Where covered in this report
i) a description of measures envisaged concerning monitoring in accordance with Reg. 17.	Chapter 7 of this SA Report.
j) a non-technical summary of the information provided under the above headings.	A separate non-technical summary document will be prepared to accompany the SA Report for the Proposed Submission version of the Local Plan.
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Reg. 12(3)).	Addressed throughout this SA report.
Consultation requirements	
<ul style="list-style-type: none"> ■ Authorities with environmental responsibility, when deciding on the scope and level of detail of the information which must be included in the environmental report (Reg. 12(5)). 	<ul style="list-style-type: none"> ■ Focused consultation on the scope and level of detail of the SA carried out with the Environment Agency, Historic England, and Natural England for 5 weeks commencing 3rd September 2019.
<ul style="list-style-type: none"> ■ 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). 	<ul style="list-style-type: none"> ■ Regulation 18 consultation on the Horsham District Local Plan Review document is taking place between 17th February 2020 and 30th March 2020. The consultation documents are accompanied by the Interim Sustainability Appraisal of Growth Options Report and this SA Report which together form the Environmental Report at this stage of the plan-making process.
<ul style="list-style-type: none"> ■ 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 other EU Member States.
Taking the environmental report and the results of the consultations into account in decision-making (Reg. 16)	
<p>Provision of information on the decision:</p> <p>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:</p> <ul style="list-style-type: none"> ■ the plan or programme as adopted; ■ 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 ■ the measures decided concerning monitoring. 	To be addressed after the Local Plan is adopted.
<p>Monitoring of the significant environmental effects of the plan's or programme's implementation (Reg. 17).</p>	To be addressed after the Local Plan is adopted.

SEA Regulations requirements	Where covered in this report
<p>Quality assurance: environmental reports should be of a sufficient standard to meet the requirements of the SEA Regulations.</p>	<p>This report has been produced in line with current guidance and good practice for SEA/SA and this table demonstrates where the requirements of the SEA Regulations have been met.</p>

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 EqIA 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 EqIA is presented as an appendix to the 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 4 to Chapter 6** describe the results of the SA of each separate component of the Local Plan - the vision and objectives and policies.
 - **Chapter 7** sets out suggested indicators for monitoring the potential sustainability effects of Local Plan.
 - **Chapter 8** outlines conclusions relating to the SA findings presented in the preceding chapters of the SA Report and the next steps in the Local Plan and SA processes.
- **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 the 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 effects of the Local Plan.

Chapter 2

Methodology

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 planning practice guidance.

2.2 This calls for SA to be carried out as an integral part of the plan-making process and **Figure 2.1**: 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 and provide information on the subsequent stages of the process.

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 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 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. The 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 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, together with the assessed effects of the plan itself, additionally allows the SA to report on cumulative effects, another requirement of the SEA Regulations.

2.10 The SEA Regulations require assessment of 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 the SEA topics and 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 baseline information also allows the identification of existing sustainability issues, including problems as required by the SEA Regulations.

2.12 Sustainability issues and their likely evolution without the Local Plan Review are detailed 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 also take into account 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 site appraisal framework

2.15 To assist consistency and transparency when assessing the likely sustainability effects of development site options considered for allocation by the Local Plan Review, the SA Framework was supported by a set of site assessment criteria and assumptions. More detail on the criteria and assumptions used by the SA is provided in **Appendix A** of the accompanying **Interim Sustainability Appraisal of Growth Options Report** alongside the appraisal of overall spatial strategy options, large site options, small site options and growth scenario options.

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 Report⁹. This consultation on the SA Scoping Report was undertaken for a five week period starting September 2019.

2.18 Appendix A lists the comments that were received on the SA 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.

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 NPPF) 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 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 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 accompanying SA to date are outlined 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 range in scale from development of 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 small 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 have been 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 overall spatial strategy options as well as quanta of growth for appraisal in August 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. overall spatial strategy options, quantum of growth options, and large sites options) in August 2019 and presented the initial findings to 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. The findings of the SA for these various options are presented in the accompanying Interim Sustainability Appraisal of Growth Options Report.

⁹ This original scoping process is described in the SA Scoping Report prepared by LUC in August 2019.

Appraising the Local Plan policies

2.28 As highlighted above, the Council identified various options (reasonable alternatives) for its approach to the overall spatial strategy and quantum of growth to be provided over the plan period. Various site options and growth scenarios (which consider combinations of the overall spatial strategies across different quanta of growth) have also been 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. The Council has yet to decide which quantum of growth to include in the Local Plan, and which combination of large scale and small scale sites to allocate to meet this growth. The Interim Sustainability Appraisal of Growth Options Report, the responses of the consultation on the Regulation 18 Local Plan, and the evidence base that is continuing to be gathered, will all inform the final decision.

2.29 The plan-making process 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 has not considered reasonable alternatives for many of the policies in the Local Plan. The SA work has focussed on the potential effects of the draft policies included as part of the Local Plan Review.

Appraisal methodology

2.30 Reasonable alternative spatial options and policies for the Local Plan have been appraised against the SA objectives in the SA framework (see **Table 3.2** in **Chapter 3**), with scores being attributed to each option or policy to indicate its likely effects on each SA objective as shown in **Figure 2.2**.

2.31 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.).

2.32 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

SA Stage C: Preparing the Sustainability Appraisal report

2.33 This SA Report (to be read alongside the Interim Sustainability Appraisal of Growth Options Report which together form the Environmental Report at this stage of the plan-making process) describes the process that has been undertaken to date in carrying out the SA of the Horsham Local Plan Review.

2.34 The Environmental Report sets out the findings of the appraisal of 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.

2.35 These findings are set out in **Chapter 4** to **Chapter 6** of this SA Report and in **Chapter 3** to **Chapter 7** of the Interim Sustainability Appraisal of Growth Options Report. The Environmental Report also makes recommendations for improvements and clarifications that may help to mitigate negative effects and maximise the benefits of the policies. Recommendations on the key issues to consider when selecting the approach to growth and the overall spatial

strategy have been included in **Chapter 8** of the Interim Sustainability Appraisal of Growth Options Report. Recommendations for improvements to policies in the Local Plan have been included in **Chapter 6** alongside the appraisal of those individual policies.

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

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

2.37 Horsham District Council is now inviting comments on the Local Plan Review this SA Report alongside the Interim Sustainability Appraisal of Growth Options Report. These documents are being published on the Council's website for consultation between 17th February 2020 and 30th March 2020. Consultation comments on the SA of the Regulation 18 document will be taken into account in the remaining stages of the SA.

SA Stage E: Monitoring implementation of the Local Plan

2.38 Recommendations for monitoring the likely significant social, environmental and economic effects of implementing the Horsham Local Plan are presented in **Chapter 7**.

Assumptions and uncertainty

Assumptions to be applied during the SA

2.39 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 A** of the Interim Sustainability Appraisal of Growth Options Report which presents the appraisal of the site options. These assumptions were applied through the use of Geographical Information Systems (GIS) data.

2.40 The assumptions applied when considering the reasonable alternatives and the subsequent potential sites have been updated after consultation undertaken for the SA Scoping Report. Changes also reflect additional evidence which has emerged as the plan-making process for the Local Plan Review has been undertaken.

2.41 The SA assumptions for SA objective 2 have been updated to reflect changes to the Development Hierarchy in the Local Plan Review. The assumptions for this SA objective 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.

2.42 The SA assumptions for SA objective 6 have been updated to reflect the bat sustenance zone associated with the Mens SAC. This information was made available following the SA Scoping 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.

2.43 Revisions to SA objective 2 and SA objective 6 are detailed in **Appendix A** of the Interim Sustainability Appraisal of Growth Options Report. The changes to these SA assumptions have been denoted by underlined and ~~strikethrough~~ text.

Difficulties Encountered

2.44 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.”

2.45 A number of difficulties and limitations arose in the course of the Regulation SA 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 are 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 data sets. Nevertheless, the available information provides a sufficiently comprehensive view of the sustainability issues within the plan area.

- The assumptions presented in **Appendix A** of the Interim Sustainability Appraisal of Growth Options 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 the 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 water courses 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 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 potential site allocations are close to the District boundary, the spatial analysis was hampered 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 data for agricultural land classification did not distinguish between Grade 3a (considered to be high quality) and 3b (not considered to be high quality). This again resulted in some uncertainty in the scores, as set out in the assumptions.
- The landscape capacity assessment work available to inform the SA work is currently still in draft form and therefore it is recognised that this part of the evidence base is likely to be updated. Changes to this assessment will be reflected in future SA work.
- The effects of potential site allocations relating to the historic environment have been informed by proximity to designated heritage assets in the District as well as adopted character statements for Conservation Areas where this information is applicable. These character statements do not cover the entirety of the District. It is recognised that there may be a requirement to undertake additional heritage impact work to inform future SA work for the Local Plan Review.

2.46 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 difficult to assess these figures against the baseline, as 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.

Chapter 3

Sustainability context for development in Horsham and the SA framework

Key International Plans, Policies and Programmes

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 This section provides an overview of the relevant policies, plans and programmes which should be taken into consideration during preparation of the Horsham District Local Plan Review and its SA, as well as those plans and programmes which are of relevance at a regional and local level.

3.4 A more detailed review of the relevant documents is provided by topic heading in **Appendix B**. This includes a wide range of other international agreements and EU Directives, which have been transposed into UK law and national policy.

3.5 As of the end of January 2020 the UK has left the EU. A transition period is now in place until 31st December 2020. During this period, all EU rules and regulations will continue to apply to the UK. As such, the documents presented in Appendix include those at an EU level.

3.6 As set out in the Explanatory Memorandum accompanying the Brexit amendments¹⁰, the purpose of the

¹⁰ Explanatory Memorandum to the Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 No. 1232

Brexit amendments to the SEA Regs 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.

National Planning Policy Framework

3.7 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 2019¹¹. 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.”

3.8 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”.*

3.9 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.”*

3.10 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.*”

3.11 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.

3.12 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

3.13 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.

3.14 Neighbourhood Plans must be consistent with the requirements of the NPPF and be in ‘general conformity’ with the Local Plan for the area. Once adopted, 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.”

3.15 The NPPF also states that Neighbourhood Plans “can shape, direct and help to deliver sustainable development”,

¹¹ 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

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.

3.16 There are currently 26 designated neighbourhood plan areas (including one designated neighbourhood forum for the Unparished Area of Horsham town; i.e. the Horsham Blueprint Business Neighbourhood Forum) within Horsham District.

3.17 Neighbour Plans have been ‘made’ for Nuthurst (October 2015), Thakeham (April 2017), Shermanbury (June 2017), Woodmancote (June 2017), Warnham (June 2019) and Storrington, Sullington and Washington (September 2019). Neighbourhood Plans for the remaining designated neighbourhood plan areas are in various stages of preparation.

Sustainability context

3.18 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

3.19 The description of the likely future evolution of the baseline and key issues without the Local Plan considers past trends and current pressures. It is recognised that 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 The SA Report also considers the cumulative effect of delivering new development with consideration for growth being proposed in neighbouring authority areas.

3.20 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. Where there are data gaps in the baseline and forthcoming reports, these are highlighted in the text. 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. Relevant baseline information will be updated during the SA process as and when data is published.

Key sustainability issues

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

3.22 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

A. Population, health and wellbeing
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 comparable to the regional and national average. The level of socially rented housing which is currently provided in the District is also significantly lower than the regional and national level. 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 40% of the 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. Economy
B1. Horsham is generally seen to be an economically affluent area and the area has a higher average wage than the regional and national average. 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.
C. Transport connections and travel hubs
C1. Parts of the highway network in the District experiences high levels of congestion and delays. Rail capacity is also currently stretched, and capacity pressures 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 limited bus services and other public transport links.
D. Air, land and water quality
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.
E. Climate change adaptation and mitigation
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 ¹² . 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.

¹² Department for Business, Energy & Industrial Strategy (2019) UK Local Authority and Regional Carbon Dioxide Emissions National Statistics: 2005-2017 Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017>

E3. Flood risk in Horsham is dominated by fluvial flooding which is the source of most risk. 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.

F. Biodiversity

F1. The District contains and is in close proximity to a wide variety of both designated and non-designated natural habitats and biodiversity. 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.

G. Historic Environment

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.

H. Landscape

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

3.23 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 by reference to the key sustainability issues facing the District (see **Table 3.1**) and the international, national, and sub-regional policy objectives that provide the context for the Local Plan (see **Appendix A**).

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

3.25 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? 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?	A1 A2 A3 A4 A5 B1 B2 C1	Population, Human Health and Material Assets
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 internationally and nationally designated biodiversity and geodiversity assets within and outside the District? SA 6.2: Does the Plan avoid adverse effects on locally designated biodiversity and geodiversity assets within and outside the District, including ancient woodland?	A5 F1 F2	Biodiversity, Flora, Fauna and Human Health

SA Objective	Appraisal questions: Does the Local Plan option/policy...	Relevant key issues (see Table 3.1:)	Relevant SEA Topics
	<p>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?</p> <p>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?</p>		
<p>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.</p>	<p>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?</p> <p>SA 7.2: Does the Plan conserve and enhance the character and distinctiveness of the District's non-designated landscapes and settlements?</p> <p>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?</p>	<p>A5 F1 F2 H1</p>	<p>Landscape, Biodiversity, Flora, Fauna and Cultural Heritage</p>
<p>SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.</p>	<p>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?</p> <p>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?</p> <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>	<p>G1 H1</p>	<p>Cultural Heritage, Architectural and Archaeological Heritage</p>
<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>	<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>	<p>D2</p>	<p>Soil and Material Assets</p>
<p>SA 10: To conserve natural resources, including mineral resources in the District.</p>	<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>	<p>D3</p>	<p>Material Assets</p>
<p>SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.</p>	<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>D4</p>	<p>Water, Biodiversity, Fauna and Flora</p>

SA Objective	Appraisal questions: Does the Local Plan option/policy...	Relevant key issues (see Table 3.1:)	Relevant SEA Topics
	SA 11.5: Does the Plan ensure that there is sufficient water resource available to support new development? SA 11.6: Does the Plan support efficient use of water in new developments, including the recycling of water resources where appropriate?		
SA 12: To manage and reduce the risk of flooding.	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? SA 12.2: Does the Plan promote the use of Natural Flood Management schemes, SuDS and flood resilient design?	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.	SA 13.1: Does the Plan support access to public transport provision? SA 13.2: Does the Plan maintain and enhance networks for active travel, including walking and cycling? 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.	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.	SA 14.1: Does the Plan avoid, minimise and mitigate the effects of poor air quality? SA 14.2: Does the Plan promote more sustainable transport and reduce the need to travel? 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?	C1 D1 E1	Air and Human Health
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 Objective	Appraisal questions: Does the Local Plan option/policy...	Relevant key issues (see Table 3.1:)	Relevant SEA Topics
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

SA findings for the spatial vision and spatial objectives

4.1 This chapter presents the SA findings for the spatial vision and spatial objectives presented in the Local Plan document.

Spatial vision and spatial objectives

4.2 The Local Plan sets out an aspirational Spatial Vision for the District in 2036:

“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.”

4.3 Supporting the high level Vision is a description of what Horsham will be like in 2036 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.

4.4 To achieve the Vision, ten Spatial Objectives are set out as shown in **Table 4.1**.

Chapter 4

SA findings for the spatial vision and spatial objectives

SA of Horsham Local Plan Review (Regulation 18)
February 2020

Table 4.1 Spatial Objectives in the Horsham District Local Plan

Horsham District Local Plan - Spatial 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, providing 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.
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 in the District whilst preserving the unique ambience that contributes to its 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 appropriate 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 District's settlements and ensure that the distinct character of 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 and ensure that new development minimises the impact on the countryside.
9	To safeguard and enhance the environmental quality of the District, ensuring that development brings forward environmental net gains including biodiversity enhancements, and minimises the impact on environmental quality including air, soil, water quality and the risk of flooding.
10	Ensure that new development minimises carbon emissions, adapts to the likely changes in the future climate and promotes the supply of renewable, low carbon and decentralised energy.

4.6 As shown in the **Table 4.2** 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 4.2 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
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: Mineral 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 pollution	+	+	+	+	+	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

4.7 As shown in **Table 4.2** 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.

4.8 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**.

4.9 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**.

4.10 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**.

4.11 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 pollution**, and **SA objective 15: climate change**.

4.12 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**.

4.13 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

4.14 **Table 4.2** 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

4.15 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.

4.16 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**.

4.17 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 pollution and SA objective 15: climate change.**

4.18 Supporting development which is considerate of economic priorities as well 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

4.19 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. Therefore, this spatial objective is likely to produce significant positive effects in relation to **SA objective 16: economic growth and SA objective 17: access to employment opportunities.**

4.20 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, benefits may result in terms of air quality and carbon emissions. Minor positive effects are therefore also expected in relation to **SA objective 5: health and wellbeing, SA objective 14: air pollution and SA objective 15: climate change.**

Spatial Objective 3

4.21 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.

4.22 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 pollution and SA objective 15: climate change.**

Spatial Objective 4

4.23 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.**

4.24 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 pollution and SA objective 15: climate change.**

Spatial Objective 5

4.25 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.**

4.26 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

4.27 Spatial Objective 6 addresses the provision of appropriate 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**.

4.28 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 pollution** and **SA objective 15: climate change**.

Spatial Objective 7

4.29 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 the District's settlements. 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

4.30 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 District's countryside. 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

4.31 Spatial Objective 9 addresses the preservation and enhancement of the District's natural environment. This includes the support for development that promotes biodiversity net gains and minimises its impact on environmental quality. A significant positive effect is therefore expected in relation to **SA objective 6: biodiversity**.

4.32 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 pollution**. 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

4.33 Spatial Objective 10 addresses the need for the District to adapt to climate change and support development which minimises carbon emissions. This includes the promotion of more sustainable energy supplies that are renewable, low carbon, and decentralised. Therefore, significant positive effects are likely in relation to **SA objective 14: air pollution** and **SA objective 15: climate change**.

Recommendations

4.34 Although no significant negative effects were identified for the Spatial Vision and Spatial Objectives, the following is recommended:

- 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.

Chapter 5

SA findings for the policies in the Local Plan

5.1 This chapter presents the SA findings for policies in the Local Plan. 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 as well as recommendations of how the policies might be strengthened to better meet the SA objectives.

5.2 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.

SA of growth options

5.3 Not all aspects of the Local Plan have been decided by the Council at this stage. In particular, the Council is considering options for the quantum of growth (e.g. the number of homes to be provided over the plan period), and the location of development, both in terms of large scale (i.e. strategic) sites and smaller sites.

5.4 Therefore, accompanying this report is a separate **Interim Sustainability Appraisal of Growth Options** report, which sets out the findings of the SA of:

- Spatial strategy options
- Quantum of growth options
- Large site options
- Small site options
- Growth scenario options

5.5 The two reports should be read alongside one another

SA findings for Policies 1 to 5 in the Local Plan (Policies for Growth and Change)

5.6 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

5.7 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 will be considered within the context of delivering sustainable growth.

5.8 They address overarching issues relating to the development hierarchy and settlement expansion and preserving the role of Horsham town within the District.

5.9 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.

5.10 The potential sustainability effects of Policies 1 to 5 are shown in **Table 5.1** below with a summary provided below the table.

5.11 It should be noted that, although this part of the Regulation 18 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 still being considered by the Council and are the subject of the accompanying Interim **Sustainability Appraisal Report of Growth Options**.

5.12 The section of the Regulation 18 Local Plan does, though, set out a specific policy for the Broadbridge Heath Quadrant Opportunity Area.

Chapter 5

SA findings for the policies in the Local Plan

SA of Horsham Local Plan Review (Regulation 18)

February 2020

Table 5.1 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: Mineral resources	0	0	0	0	0
SA11: Water resources	0	0	0	+	0
SA12: Flooding	0	0	0	+	0
SA13: Travel	0	+/-	++/-	++	++/-
SA14: Air pollution	0	+/-	+/-	+	+/-
SA15: Climate change	0	+/-	+/-	+	+/-
SA16: Economic growth	+	0	+	++	++
SA17: Access to employment opportunities	0	++/-	++/-	++	++/-

Summary of SA findings for Policies 1 to 4

5.13 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.

5.14 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, 3: Settlement Expansion and 4: Horsham Town would support appropriate level of housing development within the defined built-up area boundaries in the District. For Policy 3 development and settlement growth is supported 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.

5.15 Policies 2 to 4 sets out the development hierarchy and the Council's overarching approach to delivering new development at settlements in Horsham. It is recognised through Policy 2 that development should be of a scale and nature to maintain settlement role in terms of service provision.

5.16 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.

5.17 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 in the District.

5.18 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. Therefore, 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.

5.19 The provision of enhanced green spaces could have future benefits in relation to local ecological networks in Horsham town. As such a minor positive effect is expected in relation to **SA objective 6: biodiversity and geodiversity** for Policy 4.

5.20 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 at smaller secondary settlements that is within a cohesive settlement form (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**.

5.21 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.

5.22 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**.

5.23 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. Therefore, a significant positive effect is expected for this policy in relation to **SA objective 9: efficient land use**.

5.24 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 Policies 3: Settlement Expansion and 4: Horsham Town is likely to be significant. Policy 3 requires that development does not result in increases in traffic movements on narrow and rural roads which might otherwise result in higher levels of congestion, while Policy 4 maintains the role of Horsham town as the primary centre. Policy 4 should help to reduce the need to travel by private vehicle given the strong sustainable transport offer at this location.

5.25 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 and beyond the current settlement edge of existing settlements) minor negative effects are expected in combination in relation to SA objective 13.

5.26 Minor positive effects are also identified in relation to **SA objective 14: air pollution** 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.

5.27 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.

5.28 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.

5.29 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.

Recommendations

5.30 Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Policy 2: Development Hierarchy – this policy could make clear the role settlements in neighbouring authorities should play that are adjacent to Horsham District's boundary, in particular Crawley, in terms of being an additional focus for development.
- Policy 4: Horsham Town - given the issue of housing affordability in the District, it may be of benefit to include reference for the support of an affordable mix of residential properties in Horsham town.

Summary of SA findings for Policy 5

5.31 Policy 5: Broadbridge Heath Quadrant set outs 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.

5.32 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**.

5.33 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**.

5.34 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**.

5.35 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**.

5.36 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 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. 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.

5.37 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 an uncertain significant negative effect is expected in combination.

5.38 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**.

5.39 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 pollution** 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.

5.40 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 are also required to secure 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 to 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.

Recommendations

5.41 Measures to limit the potential for negative effects and strengthen the positive effects identified for Policy 5: Broadbridge Heath Quadrant are recommended as follows:

- 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.
- 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

Chapter 5

SA findings for the policies in the Local Plan

SA of Horsham Local Plan Review (Regulation 18)

February 2020

development which would improve connectivity by sustainable means to Horsham town centre.

SA findings for Policies 6 to 13 in the Local Plan (Economic Development)

5.42 This section presents the appraisal of:

- Policy 6: Economic Growth
- Policy 7: Employment Development
- Policy 8: Rural Economic Development
- Policy 9: Conversion of Agricultural
- Policy Rural Buildings to Commercial, Community or 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

5.43 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.

5.44 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 potential allocation through Policy 6 has been presented alongside the appraisal of other small sites options considered for the Local Plan Review in the **Interim Sustainability Appraisal of Growth Options** 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.

5.45 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 5.2 Summary of SA findings for Policies 6 to 13 in the 'Economic Development' chapter of the Local Plan

SA objective	Strategic Policy 6: Economic Growth	Strategic Policy 7: Employment Development	Policy 8: Rural Economic Development	Policy 9: Conversion of Agricultural and Rural Buildings to Commercial, Community and 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	+	++	++
SA3: Inclusive Communities	+	+	+	++	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: Mineral resources	-?	-?	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	+	+	+
SA14: Air pollution	+/-	+/-	-	0	0	+	+	+
SA15: Climate change	+	+	-	0	0	+	+	+

SA objective	Strategic Policy 6: Economic Growth	Strategic Policy 7: Employment Development	Policy 8: Rural Economic Development	Policy 9: Conversion of Agricultural and Rural Buildings to Commercial, Community and 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
SA16: Economic growth	++	++	++	+	+	++	++	++
SA17: Access to employment opportunities	++	++	++	0	0	+	+	+

Summary of SA findings for Policy 6

5.1 The majority of the potential sites included in Policy 6: Economic Growth are located in close proximity to the built-up area of towns in 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**. However, a minor negative effect is also expected for the policy in relation to this SA objective as three of the proposed sites (including Graylands Estate, Broadlands Business Campus and Buck Barn Petrol Filling Station) are not located within close distance to the built-up areas of any settlements in the District.

5.2 The delivery of employment development in the District may help to reduce social deprivation through the provision of new job opportunities. The policy also includes a requirement that development should encourage 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: Economic Growth in relation to **SA objective 3: inclusive communities**.

5.3 A mixed minor positive and minor negative effect is expected for Policy 6: Economic Growth in relation to **SA objective 5: health and wellbeing**. This effect is likely considering the variable level of access to healthcare facilities and areas of open space from the potential employment allocations.

5.4 Five sites would provide a good level of access to existing healthcare facilities or areas/features which promote physical activities. One site (Star Road Industrial Estate)

provides a good level of access to both types of facility within Partridge Green. However, of the potential employment site allocations included in Policy 6, four are not within close proximity to infrastructure that would promote health and wellbeing. This includes the sites which do not directly adjoin the settlement and the site at Broadbridge Heath (Lower Broadbridge Farm).

5.5 The sites being considered for employment allocation through Policy 6: Economic Growth may result in adverse impacts on biodiversity through proximity to local designations or, their location within SSSI IRZs. Three sites within the west of the District (land at Lower Broadbridge Farm, Rosier Commercial Centre and Broomers Hill Business Park) also lie within the bat sustenance zone declared in relation to the Mens SAC. Considered cumulatively it is expected that the potential 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 adverse effects.

5.6 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: Economic Growth 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. A minor positive effect is expected in combination given that the policy requires that proposals should maintain and enhance the attractiveness of the District. The effect is uncertain as it will depend in part on design of any development which results at these sites, which is not yet known.

5.7 The delivery of the potential employment site allocations will result in a large amount of greenfield land take.

Considering the distribution of the employment sites being considered for allocation this is likely to include substantial areas of grade 1 to 3 agricultural soils. As such, a significant negative effect is expected for Policy 6: Economic Growth 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. A minor positive effect is expected in combination for Policy 6 in relation to SA objective 9 given that one of the potential employment sites (Rosier Commercial Centre) takes in brownfield land which could be redeveloped.

5.8 A large proportion of the District is also covered by Mineral Safeguarding Areas (MSAs), within which the majority of the potential employment sites are located. As such, a minor negative effect is expected for Policy 6: Economic Growth in relation to **SA objective 10: mineral 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 allows for access to mineral resources to be preserved.

5.9 As all but one (Rosier Commercial Centre) of the potential employment sites in Policy 6: Economic Growth are located exclusively on greenfield land there is potential for development to result in an increased flood risk from new impermeable surfaces, although use of SuDs is likely to mitigate this. As such, a minor negative effect is expected for Policy 6 in relation to **SA objective 12: flooding**.

5.10 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. Minor positive effects are expected for Policy 6: Economic Growth in relation to **SA objective 13: transport** and **SA objective 15: climate change**. The effect also reflects the proximity of the potential sites to sustainable travel options, which will allow employees to access work using sustainable travel modes rather than by private car.

5.11 The majority of proposed sites are not located in locations that will contribute to increased traffic through AQMAs in the District. However, the site at Buck Barn Petrol Filling Station may increase traffic through the Cowfold AQMA and the site by Warnham Station may increase traffic through the Hazelwick AQMA in Crawley. As such, a minor negative effect is expected in combination with the minor positive effect in relation to **SA objective 14: air quality** for Policy 8.

5.12 A significant positive effect is expected for Policy 6 in relation to **SA objective 16: economic growth**. The larger size of three sites (Rosier Commercial Centre, Buck Barn Petrol Filling Station and land by Warnham Station) provide

increased potential for economic growth in the District's economy and creating employment opportunities.

5.13 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. A significant positive effect is also identified for the policy in relation to **SA objective 17: access to employment opportunities** due to the good provision of sustainable transport options in the proposed locations for employment development. The policy is also supportive of economic growth within Horsham Town at accessible locations near the town centre and train station.

Summary of SA findings for Policy 7

5.14 The Key Employment Areas set out in Policy 7: Employment Development 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**.

5.15 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.

5.16 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**.

5.17 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.

5.18 The policy would support some redevelopment of employment sites where loss of employment floorspace is not significant or the area is no longer viable or needed for employment uses. The policy could allow for some change in on site activities and travel patterns. Furthermore, expansion of existing employment premises and sites and new sites for employment uses are also supported by the policy. As such, Policy 7: Employment Development is supportive of some development which could result in adverse impacts upon sensitive 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 and therefore a minor negative effect is expected in relation to **SA objective 6: biodiversity and geodiversity**. The effect is uncertain as appropriate mitigation may avoid adverse effects,

5.19 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 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.

5.20 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. Therefore, a minor positive effect is expected for Policy 7: Employment Development in relation to **SA objective 7: landscape**.

5.21 A minor negative effect is also expected 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.

5.22 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: Employment Development.

5.23 A minor negative effect is expected for the Policy in relation to **SA objective 10: mineral 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.

5.24 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 pollution** 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.

5.25 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.

5.26 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 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 which may contribute to a sustainable local economy. As such, a significant positive effect is expected for Policy 7: Employment Development in relation to **SA objective 16: economic growth**.

5.27 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

5.28 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 rural buildings for up to five residential units 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.

5.29 Policy 8: Rural Economic Development sets out that proposals outside of built-up area should generate social benefits for local communities. This approach is supported through Policy 9 given that the policy supports proposals for community uses where it can be demonstrated that they will maintain or enhance the vitality of rural communities. As such, a positive effect is expected for both policies in relation to **SA objective 3: inclusive communities**.

5.30 The positive effect expected for Policy 9: Conversion of Agricultural and Rural Buildings to Commercial is likely to be significant. The policy supports community uses which could promote social integration and would also help to address social deprivation related to housing delivery in more rural areas of the District. A minor positive effect is also expected for Policy 11: Tourism Facilities and Visitor Accommodation in relation to SA objective 3 given that it is supportive of development which would retain or enhance existing facilities. This could include community services which supportive social integration at 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.

5.31 Policy 9: Conversion of Agricultural and Rural Buildings to Commercial, Community or Residential Uses is expected to have a minor positive effect in relation to **SA objective 2: access to services and facilities** given that it supports community uses within rural communities. In addition, whilst the requirement in Policy 11 directly relates to increasing the visitor economy, it also requires that exiting facilities are retained or enhanced. This may include existing community uses which benefit residents at rural locations and therefore a

minor positive effect is also expected for Policy 11 in relation to SA objective 2.

5.32 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.

5.33 A minor positive effect is also expected for this policy in relation to **SA objective 6: biodiversity and geodiversity**. The policy may provide increased opportunities for people to come into contact with nature. It also requires that rural development should generate environmental benefits for local communities. Policy 9: Conversion of Agricultural and Rural Buildings to Commercial, Community or 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.

5.34 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. Policy 8 requires that proposals must demonstrate that they will not adversely affect the character an appearance of the countryside. Policies 9 and 10 contain similar requirements stating that development should be appropriate in terms of its siting, form and scale. 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 the townscape or landscape character. Minor positive effects are therefore expected for Policies 8 to 11 in relation to **SA objective 7: landscape**.

5.35 It is expected that requirements for schemes to be considerate of existing character, their potential impact in terms of siting and scale could have additional benefits in terms of limiting any 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 conserve local distinctiveness through the retention of heritage assets, which includes the return of historic property to active use.

5.36 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**.

Minor negative effects are expected for Policy 8 in relation to **SA objective 13: transport, SA objective 14: air pollution 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. 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.

5.37 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**.

5.38 The remaining policies are also expected to support rural economic growth through the prioritisation of commercial uses through the conversion of agricultural and rural buildings (Policy 9), 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.

5.39 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 employment opportunities to a wide range of local people.

Recommendations

5.40 Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- 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.

Summary of SA findings for Policies 12 to 13

5.41 Policies 12: Retail Hierarchy and Town Centre First Principles and 13: Town Centre Uses seek to restrict retail development and town centre uses to defined town or village centre boundaries in the District, with the aim of focusing activities and uses which support their economic wealth and vitality towards these locations. There is to be a particular focus on Horsham town centre.

5.42 While neither policy directly supports the delivery of substantial new housing in the District, Policy 13 is supportive of changes of use from retail to residential where the existing 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**.

5.43 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.

5.44 The adoption of a town centre approach is also likely to provide residents with 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**.

5.45 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 car in Horsham District. Reduced travel times to services and facilities are likely to encourage the uptake of journeys made by active modes of transport. As such, both policies are expected to have a minor positive effect in relation to **SA objective 5: health and wellbeing**.

5.46 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**.

5.47 Policy 13: Town Centre Uses requires that development for restaurants/cafes, public houses and takeaways 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**.

5.48 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**.

5.49 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 pollution** and **SA objective 15: climate change**.

5.50 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 500m² or more should be able to demonstrate that local retail centres will not be adversely affected by that development.

5.51 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.

Recommendations

5.52 Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- 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.

SA findings for Policies 15 to 23 in the Local Plan (Housing)

5.53 This section presents the appraisal of:

- Policy 15: Strategic Site Development Principles
- Policy 16: Affordable Housing
- Policy 17: Housing Mix
- Policy 18: Improving Housing Standards in the District
- Policy 19: Exceptions Housing Schemes
- Policy 20: Retirement Housing and Specialist Care
- Policy 21: Rural Workers' Accommodation
- Policy 22: Replacement Dwellings and House Extensions in the Countryside
- Policy 23: Ancillary Accommodation

5.54 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.

5.55 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.

Policy 14: Options for Housing Growth

5.56 Policy 14 sets out the options considered for the appropriate levels of housing growth to be provided over the plan period. The three options are:

- 1,000 homes per year;
- 1,200 homes per year; and
- 1,400 homes per year.

5.57 It also sets out how these levels of housing would be met including through agreed development commitments, housing completions, allocation of larger sites, allocation of smaller sites and windfall units. The supporting text of this policy presents those large sites and small sites which have potential for allocation to help meet the objectively assessed housing need as well as the needs of surrounding local authority areas. However, it does not state which quantum of growth is preferred, or which sites will be allocated.

5.58 In effect, Policy 14 presents a series of options instead of a defined policy, and it is therefore not subject to appraisal in this SA Report. The various growth scenarios which could result through the allocation of the various site options and the large site and small site options themselves have been

appraised in the separate accompanying **Interim Sustainability Appraisal of Growth Options** report.

5.59 The potential sustainability effects of Policies 15 to 23 are described below.

Table 5.3 Summary of SA findings for Policies 16 to 23 in the 'Housing' chapter of the Local Plan

SA objective	Strategic Policy 15 - Strategic Site Development Principles	Strategic Policy 16 - Affordable Housing	Strategic Policy 17 - Housing Mix	Policy 18 - Improving Housing Standards in the District	Policy 19 - Exceptions Housing Schemes	Policy 20 - Retirement Housing and Specialist Care	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	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	0
SA7: Landscape	+	0	+	0	0	0	+?	+	+
SA8: Historic environment	+	0	+	0	0	0	+	+	+
SA9: Efficient land use	0	0	0	0	-	0	+	+	+
SA10: Mineral resources	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
SA13: Travel	++/-	0	0	0	-	+	-	0	0
SA14: Air pollution	++/-	0	0	0	-	+	-	0	0
SA15: Climate change	++/-	0	0	0	-	+	-	0	0
SA16: Economic growth	+	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

5.60 It is expected that all policies would have a positive effect in relation to **SA objective 1: housing** considering their focus on this topic area. Policy 15: Strategic Site Development Principles does not set out large sites to be allocated through the plan but instead sets out principles to achieve sustainable development at such locations. This includes the delivery of a range of housing types and tenures at large sites, which will help to meet the needs of range of occupiers. The other policies in this chapter would help to achieve an appropriate proportion of affordable homes at larger development schemes (Policy 16: Affordable Housing), as well as a mix of housing sizes and types to best meet local requirements (Policy 17: Housing Mix). 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. They are also expected to help ensure that this type of development is of a high quality (Policy 18) both in terms of internal space standards and adaptability and accessibility.

5.61 Policies 19: Exceptions Housing Schemes and 20: 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. 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.

5.62 Significant positive effects have been recorded for the majority of these policies, the exception being Policies 21 and 23. 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, given that they would 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.

5.63 Policy 15 requires that the large sites allocated would provide necessary services and facilities including education, healthcare, community, recreation and retail. Therefore, a significant positive effect is expected for this policy in relation to **SA objective 2: access to services and facilities**. It is expected that where housing is provided at more rural locations access to services and facilities will be reduced. Therefore, a minor negative effect is expected in relation to SA objective 2 for Policies 19: Exceptions Housing Schemes and 21: Rural Workers' Accommodation.

5.64 As Policy 19 would allow for some residential development at more rural locations which could support rural service use and prevent its stagnation, a minor positive effect

is expected in combination for this SA objective. Furthermore, Policy 19 also supports the delivery of housing to support those whose work provides important services for rural communities. Policy 20 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.

5.65 Policy 15: Strategic Site Development Principles requires that the allocation of large sites is supported by new service provision to allow for the development of successful communities. Furthermore, long-term management structures should be identified at these sites to ensure the success of these communities. A significant positive effect alone is therefore expected for Policy 15 in relation to **SA objective 3: inclusive communities**.

5.66 As supported by other 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 17: Housing Mix). Ensuring that new development is adaptable and accessible for a wide range of users including wheelchair users (Policy 18: Improving Housing Standards in the District) and including policy to help meet rural housing requirements (Policy 19: Exceptions Housing Schemes) and those with additional care needs (Policy 20: Retirement Housing and Specialist Care) is expected to make the District a better place to live for these groups of people. A minor positive effect is therefore expected for Policies 16, 17, 18, 19 and 20 in relation to SA objective 3.

5.67 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. As such a minor positive effect is also expected in relation to SA objective 3 for Policy 23.

5.68 Positive effects are also expected for Policies 15: Strategic Site Development Principles, 18: Improving Housing Standards in the District and 20: Retirement Housing and Specialist Care in relation to **SA objective 5: health and wellbeing**. Policy 15 sets out the expectation that development at large sites should provide new healthcare facilities to support the functioning of local communities and therefore the positive effect is likely to be significant. Policies

18 and 20 are expected to help meet the specific housing needs of residents who have additional care requirements and might otherwise be vulnerable without these types of provisions. This includes the provision of homes at large sites to meet the Optional Standards for Wheelchair User dwellings as set out through Policy 18.

5.69 Development at large sites is required by Policy 15: Strategic Site Development Principles to demonstrate that a minimum of 10% biodiversity net gain can be achieved. This policy would help to mitigate adverse impacts as development occurs at large sites. This is considered of particular importance given the number of large sites being considered by the Council for allocation. As such a significant positive effect is expected in relation to **SA objective 6: biodiversity and geodiversity** for this policy.

5.70 Policy 15: also includes requirements for the development of large sites to incorporate measures which would help to mitigate adverse impacts relating to landscape character and heritage assets. This includes the delivery of development in a landscape-led manner that should complement positive landscape characteristics. Development should also be designed to a high quality. Policy 17: Housing Mix states that housing mix should be considerate of factors such as the established character of a given area. It is expected that these elements of Policies 15 and 17 might help to prevent adverse impact upon the established character (including landscape and townscape) as well as elements which contribute positively to the built historic environment. Therefore, a minor positive effect is expected in relation to **SA objective 7: landscape** and **SA objective 8: historic environment** for both policies.

5.71 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, while replacement dwellings in the countryside and ancillary accommodation should be considerate of the original form and character of the surrounding area. These requirements are likely to help preserve established landscape character and features of importance for cultural heritage in Horsham.

5.72 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 19: Exceptions Housing Schemes in relation to **SA objective 9: efficient land use**. As Policy 20: Retirement Housing and Specialist Care would support new development for rural worker's accommodation only 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 and 22: Replacement Dwellings and House Extensions in the Countryside in relation to SA objective 9 given that 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.

5.73 The requirements of Policy 15: Strategic Site Development Principles are likely to help mitigate detrimental impacts of development relating to water quality and flood risk at strategic sites. The policy requires the incorporation of SuDS features and green infrastructure. Infrastructure required by the policy to support development at strategic sites includes facilities for wastewater treatment. Minor positive effects are therefore expected for Policy 15 in relation to **SA objective 11: water resources** and **SA objective 12: flooding**.

5.74 Policy 15 also requires strategic development to promote modes of sustainable transport and minimise reliance on the private car. However, this type of development is also required to be supported by any necessary new infrastructure provisions which includes transport. This element of Policy 15 may limit the potential for ingrained dependency on private vehicle travel to be reduced. Therefore, a mixed significant positive and minor negative effect is expected for this policy in relation to **SA objective 13: transport**.

5.75 Allowing for some level of development at rural exception sites as well as rural workers accommodation would provide some level of housing growth at locations where services and facilities are likely to be 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 particularly in comparison to residents within the larger settlements. Minor negative effects are therefore expected for Policies 19: Exceptions Housing Schemes and 21: Rural Workers' Accommodation in relation to **SA objective 13: transport**.

5.76 Given the potential for increasing 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**. In contrast Policy 20: Retirement Housing and Specialist Care is expected to have a minor positive effect in relation to SA objectives 13, 14 and 15. The policy would require retirement housing, 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.

5.77 Policy 15 is expected to have mixed effects overall in relation to SA objective 14 and SA objective 15. By requiring

new transport infrastructure to support development the potential for car use to be reduced as new houses are occupied may be limited. Providing services and infrastructure to allow for the successful functioning of new communities is likely to facilitate a level of self-containment at these locations thereby reducing the need to travel. Furthermore, development will be expected to contribute to the achievement of zero carbon including through the provision of alternative sources of energy.

5.78 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 particularly 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. As such 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**.

5.79 Policy 15 should help to make the plan area more attractive to economic investment through the provision of infrastructure to allow for the successful functioning of new development. It would also require that sites include new employment land. The policy is particularly supportive of access to employment opportunities at these sites given that it includes the principle of providing one new job per home at new strategic developments. As such Policy 15: Strategic Site Development Principles is expected to have a minor positive effect in relation to SA objective 16 and a significant positive effect in relation to SA objective 17.

5.80 Policy 19 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 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.

Recommendations

5.81 Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Policy 15: Strategic Site Development Principles - specific requirement should be included for strategic development to be considerate of the setting of heritage assets and the wider historic environment.
- Policy 15: Strategic Site Development Principles - 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.
- Policy 15: Strategic Site Development Principles - 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.
- 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.
- 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.
- Policy 15: Strategic Site Development Principles - 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.

SA findings for Policy 24 in the Local Plan (Housing)

5.82 This section presents the appraisal of Policy 24: Gypsy, Traveller and Travelling Showpeople Accommodation in Chapter 6 (Housing) of the Local Plan. This policy has been included as part of the Local Plan Review to address issues relating to the provision of gypsy and traveller accommodation in the District.

5.83 This includes the safeguarding of existing provision as well as addressing the need for new provisions.

5.84 The potential sustainability effects of Policy 24 are described below.

Table 5.4 Summary of SA findings for Policy 24 in the 'Housing' chapter of the Local Plan

SA objective	Policy 24 – Gypsy and Travelling Showpeople Accommodation
SA1: Housing	++
SA2: Access to services and facilities	++
SA3: Inclusive Communities	+
SA4: Crime	0
SA5: Health and wellbeing	+
SA6: Biodiversity and geodiversity	0
SA7: Landscape	+
SA8: Historic environment	+
SA9: Efficient land use	0
SA10: Mineral resources	+
SA11: Water resources	+
SA12: Flooding	+
SA13: Travel	+/-
SA14: Air pollution	+/-
SA15: Climate change	+/-
SA16: Economic growth	0
SA17: Access to employment opportunities	0

Summary of SA findings for Policy 24

5.85 Policy 24: Gypsy, Traveller and Travelling Showpeople Accommodation in the Local Plan recognises the importance of providing a sufficient supply of accommodation for Gypsy, Traveller and Travelling Showpeople communities. The policy seeks to protect and maintain the existing authorised sites unless they would no longer be required to meet the identified needs. New sites to meet any outstanding needs should be considered for allocation on strategic site allocations. As such, a significant positive effect is expected for Policy 24 in relation to **SA objective 1: housing**.

5.86 Policy 24 requires that new Gypsy and Traveller accommodation has reasonable access to local services and community facilities, including education, healthcare, and public transport services. As such, this policy is likely to have a significant positive effect in relation to **SA objective 2: access to services and facilities**.

5.87 As the policy would seek to meet the needs of a specific group in the District a minor positive effect is expected in relation to **SA objective 3: inclusive communities**. It is also likely that providing new Gypsy and Traveller sites as part of strategic site allocations instead of at separate, more isolated sites could help to promote social integration in the District.

5.88 A minor positive effect is also expected for the policy in relation to **SA objective 5: health and wellbeing** considering that residents at Gypsy and Traveller sites should benefit from access to healthcare facilities.

5.89 Policy 24 would ensure that existing and newly allocated sites achieve a suitable layout and that proposals implement high quality boundary treatment and landscaping. As such, this policy is expected to have a minor positive effect in relation to **SA objective 7: landscape**.

5.90 The policy is also expected to have a minor positive effect in relation to **SA objective 8: historic environment**. Development of this nature is required by the policy to avoid significant adverse impacts on the visual amenity which is likely to protect the setting of heritage assets in the District.

5.91 The requirements of the policy include provisions for waste disposal which may help to promote the achievement of the waste hierarchy, including higher rates of recycling, at Gypsy and Traveller sites. As such, a minor positive effect is expected in relation to **SA objective 10: natural resources**.

5.92 The policy addresses the provision of essential services at these sites and seeks to ensure that there is a sufficient supply of water and infrastructure for sewerage and drainage. As such, development of this type should benefit from provisions which help to address wastewater requirements

and therefore, a minor positive effect is expected in relation to **SA objective 11: water resources**.

5.93 Policy 24 sets out the requirement for Gypsy and Traveller sites to be subject to the appropriate flood risk tests (exception and sequential). As such, this type of development is less likely to come forward in areas where it might be susceptible to flood risk or might contribute to flood risk elsewhere. Therefore, a minor positive effect is expected in relation to **SA objective 12: flooding**.

5.94 By providing new accommodation sites for the Gypsy and Traveller community, Policy 24: Gypsy, Traveller and Travelling Showpeople Accommodation could lead to an increase in the use of private vehicles in the plan area, thereby contributing to congestion, reduced air quality and increased carbon emissions. Therefore, this policy may have minor negative effects in relation to **SA objective 13: travel**, **SA objective 14: air pollution** and **SA objective 15: climate change**. Given that the policy is supportive of sites which are well related to services and facilities as well as sustainable transport links, it is likely that some of journeys required from these locations could be made by more sustainable modes. It is therefore expected that the policy would have combined minor positive effects in relation to SA objectives 13, 14 and 15.

Recommendations

5.95 Measures to limit the potential for negative effects and strengthen the positive effects identified for Policy 24: Gypsy, Traveller and Travelling Showpeople Accommodation are recommended as follows:

- The policy could be strengthened by including reference for sites to be provided with reasonable access to employment sites as well as services and facilities to further promote the aims of modal shift.
- 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.

SA findings for Policies 25 to 32 in the Local Plan (Conserving and Enhancing the Natural Environment)

5.96 This section presented the appraisal of:

- Policy 25: Environmental Protection
- Policy 26: Air Quality
- Policy 27: The Natural Environment and Landscape Character
- Policy 28: Countryside Protection
- Policy 29: Settlement Coalescence
- Policy 30: Protected Landscapes
- Policy 31: Strategic Policy: Green Infrastructure and Biodiversity
- Policy 32: Local Green Space

5.97 Policies 25 to 32 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.

5.98 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.

5.99 Policies have also been included to protect existing landscape character, including that within the countryside and the protected landscape areas within the District.

5.100 This section of the Local Plan also includes consideration for the designation of Green Belt in Horsham District, although this is not specifically included as a draft policy at this stage of the Local Plan Review.

5.101 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.

5.102 The potential sustainability effects of Policies 25 to 32 are described below.

Table 5.5 Summary of SA findings for the 'Conserving and Enhancing the Natural Environment' chapter of the Local Plan

SA objective	Strategic Policy 25: Environmental Protection	Policy 26: Air Quality	Strategic Policy 27: The Natural Environment and Landscape Character	Strategic Policy x28: Countryside Protection	Consideration of potential Green Belt designation in the District	Policy 29: Settlement Coalescence	Policy 30: Protected Landscapes	Strategic Policy 31: Green Infrastructure and Biodiversity	Policy 32: Local Greenspace
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: Mineral 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 pollution	++	++	0	+	+/-?	+	0	+	0
SA15: Climate change	++	++	0	+	+/-?	+	0	++	0
SA16: Economic growth	0	0	+	+?	-?	-?	+	0	0
SA17: Access to employment opportunities	0	0	0	0	+/-?	0	0	0	0

Summary of SA findings for Policies 25 to 32

5.103 Policies 29: Settlement Coalescence and 30: 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 that housing need for the District could be met at other locations.

5.104 Policies 27: The Natural Environment and Landscape Character and 28: 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**.

5.105 Allowing for some level of rural development to ensure rural areas are sustainable support 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 help promote social integration and addressing some issues of deprivation. Therefore, Policies 27: The Natural Environment and Landscape Character and 28: 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**.

5.106 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.

5.107 Policy 32: 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.

5.108 Policies 25: Environmental Protection and Policy 26: Air Quality address the protection of environmental quality in the District, including noise, air and odour. Policy 26 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**.

5.109 Policies 28: Countryside Protection, 30: Protected Landscapes, 31: Green Infrastructure and Biodiversity and 32: Local Green Space would 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.

5.110 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.

5.111 Policies 25 to 32 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.

5.112 Policy 31: Green Infrastructure and Biodiversity would help to protect and enhance the network of green infrastructure and the Nature Recovery Network and natural capital. It also promotes the achievement of at least 10% biodiversity net gain at new development. Policy 26: 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. This could have added benefits in relation to the health and quality of habitats. Significant positive effects are therefore expected for Policies 25 to 32 in relation to **SA objective 6: biodiversity and geodiversity**.

5.113 Policies 27: The Natural Environment and Landscape Character, 28: Countryside Protection, 29: Settlement Coalescence, and 30: 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. Designating Green Belt in the District could have benefits by providing more stringent protection of the open countryside in line with national policy.

5.114 Therefore, a significant positive effect is likely in relation to **SA objective 7: landscape** for these four policies as well as the potential for Green Belt designation in Horsham. However, Policy 30: Protected Landscapes notes the

possibility that major proposals demonstrated to be in the public interest could come forward within protected landscape areas. As such, the significant positive effect recorded for this is uncertain.

5.115Policy 26: Air Quality and Policy 31: Green Infrastructure and Biodiversity support the preservation and enhancement of green infrastructure which could contribute to local landscape character. Policy 32: Local Greenspace seeks to protect and enhance publicly-accessible local green spaces which could make similar contributions. Minor positive effects are therefore expected in relation to SA objective 7 for these three policies.

5.116Policies 27: The Natural Environment and Landscape Character, 28: Countryside Protection, and 30: 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**.

5.117Preventing 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.

5.118Policies 25: Environmental Protection, 27: The Natural Environment and Landscape Character and 28: Countryside Protection are supportive of the redevelopment of land that has been previously developed. For Policies 27 and 28 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 27 is likely to be significant as it is also supportive of the remediation of contaminated land.

5.119A minor positive effect is also expected for SA objective 9 for the potential designation of a Green Belt in the District. It is expected that this type of approach could help to promote the recycling of derelict and other urban land in line with national policy.

5.120Policy 28: Countryside Protection is supportive of development for the extraction of minerals outside of the built-up area boundaries in certain circumstance. Therefore, a

minor positive effect is expected for this policy in relation to **SA objective 10: minerals**.

5.121Policies 25: Environmental Protection and 31: 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**.

5.122Policy 27: 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.

5.123As this policy directly addresses the provision and maintenance of SuDS a significant positive effect is expected in relation to **SA objective 12: flooding**. Policy 25: Environmental Protection states that the Council's intentions are to ensure surface water flooding is managed correctly in order to prevent contaminated run-off.

5.124Policies 28: Countryside Protection, 29: Settlement Coalescence, 30: Protected Landscapes, 31: Green Infrastructure and Biodiversity and 32: Local Green Space would help to maintain undeveloped areas of the District at the open countryside, protected important landscapes, the green infrastructure network and Local Green Spaces where surface water is more likely to safely 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.

5.125Policy 26 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: travel**.

5.126By allowing for some limited amount of development in countryside locations to maintain the sustainability of these locations, Policy 28: Countryside Protection could help to limit the need to travel from these locations. Policy 29: 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.

5.127Designating 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.

5.128 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 31: Green Infrastructure and Biodiversity in relation to this SA objective.

5.129 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 pollution** and **SA objective 15: climate change**. The positive effect recorded for Policy 31 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.

5.130 Policy 25: 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.

5.131 Policies 27: The Natural Environment and Landscape Character and 28: 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**.

5.132 Policy 30: 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 minor positive effect is therefore also expected for this policy in relation to SA objective 16.

5.133 Policy 29: Settlement Coalescence and the designation 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.

5.134 It is also considered 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**.

Recommendations

5.135 Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Policy 29: 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.
- Policy 31: 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.

SA findings for Policies 33 to 36 in the Local Plan (Development Quality, Design and Heritage)

5.136This section presents the appraisal of:

- Policy 33: Development Quality
- Policy 34: Development Principles
- Policy 35: Heritage Assets and Managing change in the Historic Environment
- Policy 36: Shop Fronts and Advertisements

5.137Policies 33 to 36 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.

5.138The potential sustainability effects of Policies 33 to 36 are described below.

Table 5.6 Summary of SA findings for the 'Development Quality, Design and Heritage' chapter of the Local Plan

SA objective	Strategic Policy 33: Development Quality	Strategic Policy 34: Development Principles	Policy 35: Heritage Assets and Managing Change within the Historic Environment	Policy 36: Shop Fronts and Advertisements
SA1: Housing	+	+	0	0
SA2: Access to services and facilities	0	0	0	0
SA3: Inclusive Communities	+	+	0	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
SA10: Mineral resources	0	0	0	0
SA11: Water resources	0	+	0	0
SA12: Flooding	+	+	0	0
SA13: Travel	+	+	0	0
SA14: Air pollution	+	+	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 33 to 36

5.139 Minor positive effects are expected for Policies 33: Development Quality and 34: 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.

5.140 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 33) and provide a good level of amenity for all existing and future occupants (Policy 34) is likely to ensure new development is acceptable to a wide range of users.

5.141A As both of these policies are supportive of development that contribute to a safe environment and minor positive effects are therefore expected in relation to **SA objective 4: crime**.

5.142 Policy 33: Development Quality includes a requirement to contribute to and enhance green infrastructure and retain natural features such as trees and hedgerows. Similarly, Policy 34: 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 33 and 34 in relation to **SA objective 5: health and wellbeing**.

5.143 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 35: 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.

5.144 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 33: Development Quality and 34: Development Principles, this includes the retention of distinctive features which contribute to landscape, townscape and established character. As such, significant positive effects are expected for both the policies in relation to **SA objective 7: landscape and townscapes**.

5.145A As the Policy 35: 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 36: 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 surrounding townscape and landscape.

5.146 Policy 35: 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. A significant positive effect is expected for this policy in relation to **SA objective 8: historic environment**.

5.147A A significant positive effect is also expected for Policies 33: Development Quality and 36: 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 36 this would relate 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 34: Development Principles is likely to be minor given that requiring that new development is locally distinctive in character is likely to help protect the setting of nearby heritage assets.

5.148A A significant positive effect is expected for Policy 34 in relation to **SA objective 7: 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 33: Development Quality in relation to SA objective 7 is likely to be minor. This policy requires that efficient land use is promoted at development proposals but does not specifically refer to the use of previously developed land.

5.149 Policy 34: Development Principles also includes a requirement for buildings to be resource efficient which is likely to ensure that water is used efficiently in new developments. This policy furthermore 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**.

5.150A A minor positive effect is expected for Policy 33: Development Quality and 34: 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.

5.151The support Policy 33: 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 34: 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. As such, minor positive effects are expected for both policies in relation to **SA objective 13: transport**.

5.152Limiting the need to travel by private car 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 pollution** 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.

5.153By promoting high quality design in developments, Policies 33: Development Quality and 34: 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 8.4 given that it is likely to help protect the vibrancy of the District's shopping areas.

Recommendations

5.154Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Policy 33: 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).

SA findings for Policies 37 to 40 in the Local Plan (Climate Change and Flooding)

6.156 This section presents the appraisal of:

- Policy 37: Climate Change
- Policy 38: Appropriate Energy Use
- Policy 39: Sustainable Design and Construction
- Policy 40: Flooding

5.155 Policies 37 to 40 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.

5.156 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.

5.157 The potential sustainability effects of Policies 37 to 40 are described below

Table 5.7 Summary of SA findings for the 'Climate Change and Flooding' chapter of the Local Plan

SA objective	Strategic Policy 37: Climate Change	Strategic Policy 38: Appropriate Energy Use	Policy 39: Sustainable Design and Construction	Strategic Policy 40: 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
SA6: Biodiversity and geodiversity	+	0	+	+
SA7: Landscape	+	+	0	0
SA8: Historic environment	0	0	+	0
SA9: Efficient land use	0	0	0	0
SA10: Mineral resources	+	0	+	0
SA11: Water resources	+	0	+	+
SA12: Flooding	++	0	0	++
SA13: Travel	+	0	+	0
SA14: Air pollution	+	0	+	0
SA15: Climate change	++	++	++	+
SA16: Economic growth	0	+	0	0
SA17: Access to employment opportunities	0	0	0	0

Summary of SA findings for Policy 37 to 40

5.158 While the policies in Chapter 9 do not relate directly to the delivery of housing to meet local needs, Policy 37: 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 37 in relation to **SA objective 1: housing**.

5.159 It is likely that helping to ensure that development is suitable for future adaptation would mean that it is suitable for a wide range of users. Therefore, a minor positive effect is expected for Policy 39: Sustainable Design and Construction in relation to **SA objective 3: inclusive communities**.

5.160 Similarly, whilst policies 37 and 39 are not set out to directly address public health in Horsham District, they include requirements that development should 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 the policies in relation to **SA objective 5: health and wellbeing**.

5.161 The potential for climate change to be mitigated through green infrastructure provision is included as part of Policy 37: 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. As such, a minor positive effect is expected for this policy in relation to **SA objective 6: biodiversity and geodiversity**. A minor positive effect is also expected for Policy 39: Sustainable Design and Construction in relation to SA objective 6 as it includes a requirement that development should incorporate measures that will enhance the biodiversity value.

5.162 Policy 40: 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.

5.163 Changes to the District's landscape may be influenced by the impacts of climate change and Policy 37: 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 38: 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 38 in relation to SA objective 7.

5.164 A minor positive effect is expected for Policy 40: Flooding in relation to **SA objective 8: historic environment** given that any retrofitting of traditional and historic buildings to reduce emissions should be done in an appropriate manner.

5.165 Policies 37: Climate Change and 39: 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: mineral resources**.

5.166 Policy 37 is likely to 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 and/or grey water recycling. The aim is supported further through Policy 39 in which the requirement for a 'Very Good' BREEAM standard in new developments should have a specific focus on water efficiency. Minor positive effects are expected for Policies 37: Climate Change and 39: Sustainable Design and Construction in relation to **SA objective 11: water resources**. A minor positive effect is also expected for Policy 40: Flooding in relation to this SA objective. The policy requires consideration for any potential impacts on water quality in SuDS design for new developments.

5.167 To address increased flood risk related to climate change, Policy 37 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 40 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.

5.168 Policy 37: 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: travel** and **SA objective 14: air pollution**. A minor positive effect is also identified in relation to these SA objectives for Policy 39. This

policy also encourages development designed and located to encourage active modes of transport over private car use.

5.169 Policy 37: Climate Change sets out energy efficiency improvement requirements for new development, which aim to reduce energy used in construction and during operation of buildings. These objectives are likely to be supported through more specific requirements set out in Policy 39: Sustainable Design and Construction. This Policy (39) requires that new 'non-domestic floorspace must achieve a minimum standard of BREEAM 'Very Good', which will minimise the contribution new housing development makes to carbon emissions. Policy 39 also sets out an overarching objective in relation to encouraging the use of decentralised, renewable or low carbon energy supply systems. Furthermore, this policy supports the design of development to encourage more sustainable modes of travel, including through the provision of electric vehicle charge points.

5.170 Support for stand-alone renewable energy schemes is set out through Policy 38: Appropriate Energy Use. The Policy also sets out a heating/cooling 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 37, 38 and 39 in relation to **SA objective 15: climate change** given their strong relationship to measures which would directly help to minimise carbon emissions. A minor positive effect is expected for Policy 40: Flooding in relation to SA objective 15 given that it will help to address the changes in flood risk resulting from climate change.

5.171 Policy 38: Appropriate Energy Use includes support for stand-alone renewable energy schemes as well as community initiatives which seek to deliver renewable and low carbon energy. 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**.

Recommendations

5.172 Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Policy 37: 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.
- Policy 38: Appropriate Energy Use - 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.

- Policy 38: Appropriate Energy Use - the policy could be strengthened by including reference to the need for renewable energy proposals to be considerate of 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. Policy 40: Flooding - 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.
- Policy 39: 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.

SA findings for Policies 41 to 46 in the Local Plan (Infrastructure, Transport and Healthy Communities)

5.173 This section presents the appraisal of:

- Policy 41: Infrastructure Provision
- Policy 42: Sustainable Transport
- Policy 43: Parking
- Policy 44: Gatwick Airport Safeguarded Land
- Policy 45: Inclusive Communities, Health and Wellbeing
- Policy 46: Community Facilities and Uses

5.174 Policies 41 to 46 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.

5.175 Requirements for new green infrastructure and open spaces are also addressed through these policies.

5.176 The potential sustainability effects of Policies 41 to 46 are described below.

Table 5.8 Summary of SA findings for the 'Infrastructure, Transport and Healthy Communities' chapter of the Local Plan

SA objective	Strategic Policy 41: Infrastructure Provision	Strategic Policy 42: Sustainable Transport	Policy 43: Parking	Policy 44: Gatwick Airport Safeguarded Land	Strategic Policy 45: Inclusive Communities, Health and Wellbeing	Policy 46: 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	+	0	+	+
SA5: Health and wellbeing	++	+	+/-	-?	++	++
SA6: Biodiversity and geodiversity	0	0	0	-?	0	+
SA7: Landscape	0	0	0	0	0	+
SA8: Historic environment	0	0	0	0	0	0
SA9: Efficient land use	0	0	0	0	0	0
SA10: Mineral resources	0	0	0	0	0	0
SA11: Water resources	0	0	0	0	0	0
SA12: Flooding	0	0	0	0	0	0
SA13: Travel	+	++	+/-	-	+	+
SA14: Air pollution	+	++	+/-	-	+	+
SA15: Climate change	+	++	+/-	-	+	+
SA16: Economic growth	0	+	+	++	+	0
SA17: Access to employment opportunities	0	++	++	+	+	0

Summary of SA findings for Policies 41 to 46

5.177 Policies 41: Infrastructure Provision, 42: Sustainable Transport, 43: Parking, 44: Gatwick Airport Safeguarded Land, 45: Inclusive Communities, Health and Wellbeing and 46: Community Facilities and Uses 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.

5.178 Policy 41 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**.

5.179 Policy 44 ensures that land is retained for the potential expansion of the airport, by preventing development that is considered incompatible with this expansion. 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.

5.180 As Policy 45 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.

5.181 In addition to Policy 1: Infrastructure Provision, Policy 42: 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 45: Inclusive Communities is expected to ensure that the infrastructural requirements of all members of the community, including the disabled, rural workers, and minority groups, are addressed. This policy will be particular in terms of allowing for supporting the needs of local community groups.

5.182 Furthermore, Policy 46: Community Facilities and Uses 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**.

5.183 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 43 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.

5.184 Policy 43: Parking seeks to ensure that parking development within the District, particularly in town centres, promotes good urban design, and is safe and secure. As such, the policy is expected to have a minor positive effect in relation to **SA objective 4: crime**. As Policy 45: 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.

5.185 A minor positive effect is also expected for Policy 46: Community Facilities and Uses 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.

5.186 Policies 41: Infrastructure Provision, 45: Inclusive Communities, and 46: Community Facilities and Uses 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 through infrastructure secured via Planning Obligations and Community Infrastructure Levy, as set out through Policy 41. Policy 45 requires the delivery of development to support healthy, inclusive and safe places and Policy 46 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**.

5.187 Policies 42: Sustainable Transport and 43: 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 43, 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 44: Gatwick Airport Safeguarded Land. Safeguarding land which could support the extension of the 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.

5.188 The potential for the runway at 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**. Policy 46: Community Facilities and Uses includes a requirement for community facilities to be of a scale and intensity of use to

avoid impacts on nearby habitats. A minor positive effect is therefore expected for this policy in relation to SA objective 6.

5.189 Policy 46 also states that community facilities should include lighting proposals that limit the potential for light pollution. As such, a minor positive effect is expected for the policy in relation to **SA objective 7: landscape**.

5.190 It is expected that supporting a degree of self-containment by requiring a level of service provision to support new development could have benefits in terms of reducing the need to travel regularly in the plan area. A minor positive effect is therefore expected for Policies 41: Infrastructure Provision, 45: Inclusive Communities, and 46: Community Facilities and Uses.

5.191 Policy 46 is 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 these three policies in relation to **SA objective 13: transport, SA objective 14: air pollution and SA objective 15: climate change**. Policy 42: Sustainable Transport is directly supportive of development that reduces the distance people need to travel regularly as well as development that would improve sustainable transport provisions 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.

5.192 Policy 43: Parking is supportive of sustainable and low carbon modes of transport, 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.

5.193 It is likely that Policy 44 would support long term expansion of Gatwick Airport, meaning that a higher number of people travel 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 44 in relation to SA objective 13, SA objective 14 and SA objective 15.

5.194 Providing transport infrastructure as new development is delivered over the plan period (Policy 42: Sustainable Transport) will be required to support economic investment in Horsham District. Policy 43: Parking is also likely to support this type of growth by requiring that adequate additional car parking facilities are provided, including at employment sites and in town centres. Policy 44: Gatwick Airport Safeguarded Land safeguards for land to allow for the future expansion of the airport which is likely to benefit the wider economy in the

area. Policy 45: 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.

5.195 As such, these policies (42, 43, 44 and 45) 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 44.

5.196 Policies 42 and 43 are likely to help ensure that employment opportunities in the plan area are accessible by public transport services as well as private vehicle. Policy 43 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.

5.197 As such, significant positive effects are expected for Policies 42 and 43 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 44 in relation to SA objective 17.

5.198 As Policy 45: Inclusive Communities requires that development addresses the needs of rural workers it is likely that this section of local residents could benefit from improved access to employment opportunities. As such a minor positive effect is also expected for Policy 45 in relation to SA objective 17.

Recommendations

5.199 Measures to limit the potential for negative effects and strengthen the positive effects identified for these policies are recommended as follows:

- Policy 41: Infrastructure Provision - the policy may be strengthened by prioritising the enhancement of existing infrastructure, to help promote more efficient land use.
- Policy 42: 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.
- Policy 43: 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.

Chapter 6

Cumulative Effects

6.1 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 are included in **Table 6.1** later in this section.

6.2 At this stage it is recognised that there is uncertainty surrounding the overall quantum of growth and which sites will be allocated through the Local Plan Review. Although the focus of this SA Report is on the policies included in the Local Plan document, commentary is also provided in relation to where additional effects might result if sites relating to a specific development strategy option were to be allocated, drawing on the findings presented in the **Interim Sustainability Appraisal of Growth Options**. This has enabled a preliminary judgement to be made of the potential cumulative effects of the Local Plan to be made.

6.3 The second part of the cumulative considers the potential for in-combination effects with development proposals in the Local Plans for neighbouring authorities.

Cumulative effects of the Local Plan Review

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

6.4 The Local Plan considers the provision of between 1,000 and 1,400 homes per year for the development between 2019 and 2036. As such, the policy would require the provision of at least enough homes to meet the objectively assessed 'local housing need' as based on the Government's Standard Method (965 dwelling per annum) with consideration for a slight uplift to ensure flexibility in housing supply. The higher levels of housing being considered would make different levels of contribution to the unmet housing need in neighbouring authorities under the 'Duty to Cooperate' and could also help to improve the affordability of local housing.

6.5 In accordance with Policy 16: Affordable Housing, developments of 10 dwellings or more are to be supported in the District, 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 17: Housing Mix to meet the needs of the District's communities.

6.6 Homes in the District will be required by Policy 18 to meet the Nationally Described Space Standards (or any subsequent Government update) for internal floor areas and storage space and 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.

6.7 Of the sites being considered for development the larger sites are expected to make a more positive contribution to housing affordability in the District. While there is uncertainty in relation to which sites are being taken forward at this stage, the large sites by Crawley (at Ifield and Kilnwood Vale) could contribute to the unmet housing need in that authority area.

6.8 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

6.9 The development hierarchy set out through Policy 2: Development Hierarchy is likely to help 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 high number of residents (including by public transport) it is likely that this policy will benefit a proportion of the local population in terms of access to services and facilities. It is not clear, however, how the Development Hierarchy relates to settlements outside but adjoining the District, in particular Crawley, in terms of directing development.

6.10 Policy 12: Retail Hierarchy and Town Centre First Principles 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.

6.11 Policies 41: Infrastructure Provision and 46: 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 41 provides scope for infrastructure provision to be secured by Planning Obligations and Community Infrastructure Levy.

6.12 At this stage the level of growth to be provided and the sites to be allocated have not been confirmed. However, providing a relatively high number of new homes over the plan period could potentially result in existing services and facilities becoming overburdened. Of the sites being considered for allocation many are large sites which would form urban extensions to the larger settlements in the plan area and the surrounding areas. These are the settlements which provide the best access to existing services and facilities. Other large sites are to be provided as new settlements. At these locations the provision of a large amount of development, alongside new services and facilities may instil a degree of self-containment.

6.13 Policy 15: 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.

6.14 Of the small sites considered for allocation only a small number are located at the smaller settlements which provide limited access to existing services and facilities. Providing new development at these locations could help to ensure the viability of the limited service provision at these locations, but also result in some residents having limited access to essential services and facilities.

6.15 Overall a **cumulative uncertain 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

6.16 The Local Plan includes policies seeking to ensure that development meets the long-term needs of a range of occupiers and users and to ensure they are accessible to all members of the community. Development is also required by Policy 45: Inclusive Communities, Health and Wellbeing to meet the needs of older people and people with disabilities.

6.17 Policy 46: 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.

6.18 Furthermore, it is likely to provide a mix of homes which meet the needs of and is adaptable to a range of local people,

as required by Policies 17: Housing Mix and 18: Improving Housing Standards in the District will help to promote community cohesion in the plan area.

6.19 The allocation of specific sites through the Local Plan is currently unknown. However, where large sites have been included as urban extensions to the larger settlements in and surrounding the plan area (most notably at those sites at Rookwood, North Horsham, Ifield, Kilnwood Vale, Southwater and Billingshurst) residents will benefit from access to existing services and facilities. Large scale development at these locations have more limited potential to disrupt existing community networks considering their more established nature, although impacts may result in terms of overburdening existing services.

6.20 Sites which would support the delivery of new settlements would not benefit from this type of access. All large sites include proposals for new service provision, however, these will take time to 'bed-in' and the high level of infrastructure provisions required from scratch at new settlements may mean that lead times are longer.

6.21 Considering the proportion of overall growth to be provided at large sites, Policy 15: 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. Necessary services and facilities to ensure a successful community should also be incorporated at strategic developments.

6.22 Specific effects relating to community integration will be influenced by which site options are included for allocation through the Local Plan.

6.23 Overall a **cumulative uncertain minor positive and minor negative effect** is expected in relation to access 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

6.24 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 being considered for allocation through the Local Plan would help to address or result in further issues of this nature.

6.25 However, benefits in relation to improved safety of development in the plan area might be promoted through Policy 33: Development Quality which requires that development is provided to secure safe and adaptable environments in Horsham District. Policy 34: 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 likely to be achieved through Policy 45: 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 46: Community Facilities, Leisure and Recreation to help reduce crime at these locations.

6.26 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

6.27 Policies 37: Climate Change and 42: Sustainable Transport are supportive of 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 31: Green Infrastructure and Biodiversity), will also help to encourage active recreation.

6.28 Policy 45: Inclusive Communities, Health and Wellbeing directly addresses the delivery of development in Horsham to support healthy lifestyles including the protection and enhancement of existing community facilities, services and open spaces. The Local Plan (Policy 41: Infrastructure Provision) also requires that additional need for local infrastructure provision (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. Provision of new or improved community facilities or services is supported directly through Policy 46: Community Facilities and Uses. This will include open spaces and recreation facilities.

6.29 The population growth that will result from the residential development considered 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.

6.30 There is uncertainty attached to the land to be allocated through the Local Plan. Large sites considered as urban extensions to the larger settlements (including Horsham town, Crawley, Southwater and Billingshurst) will provide many new residents with access to existing healthcare facilities. It is noted that the development of land at Ifield and Rookwood at

Crawley and Horsham town respectively, could result in the loss of access to existing sport facilities. All large sites have the potential include new services and facilities. The good level of access to these provisions for residents may encourage travel by more active modes which could benefit local public health.

6.31 Considering the large proportion of development to be provided at large sites over the plan period, the principles for strategic development (Policy 15: Strategic Site Development Principles) are likely to be particularly important in terms of securing a healthy population over the plan period. Proposals are required by this policy 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.

6.32 Only a small number of small residential sites considered for allocation (at Rusper and West Chiltington Village and Common) would not provide access to facilities which could benefit local health and wellbeing. The delivery of development to smaller settlements could have mixed effects in terms of supporting the viability of local services but also providing growth where new service provision is unlikely to be viable.

6.33 Overall a **cumulative uncertain 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

6.34 The relatively high amount of development proposed through the Local Plan could have detrimental effects in terms of 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 further that intensively cultivated greenfield sites may have limited ecological value) with associated effects likely to result as new homes are occupied.

6.35 There is uncertainty about which sites will be taken forward for allocation through the Local Plan. However, the development of urban extension and/or new settlement site options, would result in a particularly high amount of greenfield land take. The majority of the small site options also lie on greenfield land. Adverse effects have also been identified where sites lie in close proximity to biodiversity sites or within SSSI IRZs which identified the specific type of development proposed as a potential risk. Many of the sites considered for allocation within the west of the District also lie within the bat sustenance zone associated with the Mens SAC.

6.36 The effects of new development on Horsham District's biodiversity and geodiversity, however, are to some extent uncertain until detailed proposals for particular sites come forward at the planning application stage.

6.37 The Local Plan seeks to ensure the protection and enhancement of biodiversity and geodiversity in the District, particularly through Policy 27: The Natural Environment and Landscape Character and 31: 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.

6.38 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 townscapes, maintaining and strengthening local distinctiveness and sense of place

6.39 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 and therefore, the large-scale residential and employment development proposed through the Local Plan could have adverse effects. The plan area also accommodates part of the High Weald AONB to the north east and provides setting for the South Downs National Park to the south. New development supported through the plan has the potential to affect the respective settings of these designated landscapes.

6.40 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.

6.41 While there is uncertainty about which sites are to be included for allocation, a number of large-scale urban extensions at the larger settlements and by Crawley as well as three new settlements are being considered. The large amount of greenfield land take at these locations could have adverse impacts on existing character. The site by Kilnwood Vale being considered for allocation is located in particularly close proximity to the High Weald AONB. A number of the small sites being considered for allocation are located within areas assessed as having no/low landscape capacity for medium scale development.

6.42 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 through Policies 27: The Natural Environment and Landscape Character, 28: Countryside Protection and 29: Settlement Coalescence respectively. Through Policy 30: 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 31: 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.

6.43 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. Effects will also be dependent upon with sites are taken forward for allocation.

6.44 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

6.45 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 in the District. These effects are particularly likely given that a large proportion of the new development will be directed to previously undeveloped sites. There is uncertainty regarding which sites are to be taken forward for allocation through the Local Plan.

6.46 However, the majority of the large sites being considered for allocation are expected to have significant negative effects in relation to the historic environment considering their proximity to designated assets. The majority of small sites considered for allocation are likely to have minor or significant negative effects in relation to the historic environment. 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.

6.47 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 33: Development Quality). Policy 35: Heritage Assets and Managing change in the Historic Environment directly addresses development which might

affect heritage assets and 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.

6.48 While Policies 27: The Natural Environment and Landscape Character, 28: Countryside Protection, 29: Settlement Coalescence and 30: 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 therefore contribute to the protection of the settings of heritage assets.

6.49 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

6.50 The Local Plan requires a high level of growth over the plan period relative to the adopted Local Plan, whichever quantum of growth is decided upon. The rural character of the District means that while uncertainty surrounds the level of growth required and the specific sites to be taken forward for allocation, the majority of development will occur on greenfield land. In any case, the majority of small and large sites considered are located on greenfield land. This will result in the loss of large areas of undeveloped land and much of these areas comprise soils which are of Grade 3 agricultural value or higher.

6.51 The Local Plan's approach to environmental protection set out through Policy 25: 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 34: Development Principles. However, considering the more undeveloped nature of Horsham District, the scope for this approach to development is relatively limited.

6.52 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

6.53 By requiring a relatively high amount of development over the plan period the Local Plan (as set out through Policy 6: Economic Growth 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 site options considered for allocation as urban extensions or new settlements through the Local Plan take in large areas of land within MSAs. The majority of the small sites (with the exception of a number of sites at Southwater and Bramber and Upper Beeding) 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.

6.54 While the specific sites to be allocated through the Local Plan are currently unknown, the high number of sites that lie within MSAs means that it is expected that any combination of options taken forward would result in particularly adverse impact.

6.55 Policies 34: Development Principles and 37: Climate Change which set out the development principles for new proposals in Horsham District and seek to address climate change, are most likely to help promote waste minimisation in line with the waste hierarchy. Policy 39: Sustainable Design and Construction, furthermore, requires that development proposals minimise construction and demolition waste and utilise recycled and low-impact materials.

6.56 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

6.57 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 adversely affected. The development of sites also has the potential to increase water contamination during construction, however, it is assumed that construction management plans will help to mitigate these types of adverse impacts.

6.58 While there is uncertainty over which sites will be taken forward for allocation, it is understood that development by Crawley (which is being considered at the large sites at Ifield and Kilnwood Vale) could not be accommodated by the existing wastewater infrastructure. Most of the development sites being considered for development do not lie within SPZs

in the plan area, the exception to this being small sites at West Chillington Village and Common and at Thakeham.

6.59 Sustainable design and construction requirements for developments in the District are provided through Policy 39: Sustainable Design and Construction. This includes the requirement for residential development to achieve water efficiency rates of a maximum 110 litres per person per day.

6.60 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 as part of its approach to environmental protection which is set out through Policy 25: 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 31: Green Infrastructure and Biodiversity, which also states that development should retain and enhance existing fresh water features in the plan area.

6.61 Overall a **cumulative uncertain minor positive and minor negative effect** is expected in relation to water resources.

SA objective 12: To manage and reduce the risk of flooding

6.62 While the allocation of specific sites for development is not yet confirmed through the Local Plan 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 considered for allocation are on greenfield land. Increased local flood risk may therefore result.

6.63 It is noted that some of the larger sites considered for allocation include areas of higher flood risk although it is possible that built development could be avoided in those areas. This includes the site at Ifield which takes in parts of the River Mole and Ifield Brook; Rookwood which includes parts of Boldings Brooks; Land North East of Henfield (Mayfield) which includes parts of the Adur East; and Buck Barn which contains parts of tributaries of the River Adur.

6.64 However, the Local Plan directly addresses flood risk through Policy 40: Flooding. This policy requires development to follow a sequential approach to flood risk management. The recommendations of the District's SFRA are also to be adhered to by proposals which should also incorporate SuDS where there is a potential to increase flood risk. Measures seeking to protect and enhance the green infrastructure network (Policy 31: Green Infrastructure and Biodiversity) will also be of benefit to flood risk management.

6.65 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

6.66 The Local Plan makes provision for improvements to the sustainable transport network. This includes through Policy 42: Sustainable Transport which sets out a commitment to develop an integrated community in the District connected by sustainable transport. The policy is supportive of 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 34: Development Principles) set out that, where relevant, development proposals should provide safe and visually attractive areas for the parking of vehicles and cycles. Policy 37: Climate Change sets out that patterns of development which reduce the need to travel, encourage walking and cycling and include good accessibility to public transport are to be supported.

6.67 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 will help to support growth within the built-up area of settlements with the greatest service offer. It is expected that this approach could reduce the need to travel in Horsham District, although it is unclear how this relates to settlements outside the District, particularly Crawley.

6.68 While it is not known which site options will be allocated within the Local Plan, many of the large site options will help to promote modal shift in the plan area. This includes those sites which are well-related to the large settlements in the plan area (which provide stronger sustainable transport links) to be delivered as urban extensions. It is noted that allocating sites by Crawley (including Ifield and Kilnwood Vale) could result in increased congestion in this area, however, this development would also present opportunities to secure upgrades to the strategic road network which might help to mitigate these issues.

6.69 Sites being promoted as new settlements in the District would be less favourably related to the existing larger settlements. Development at these locations would also provide poor access to the existing railway stations in the District, with Adversane providing the best but still limited access to rail services, given that Billingshurst Station is within 2.2km of this site. It is noted, however, that proposals for improving sustainable transport provisions at these sites have been included. 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.

6.70 Policy 15: 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.

6.71 Many of the small sites being considered for allocation are also well related to existing sustainable transport links. However, some at the smaller settlements (including Bramber and Upper Beeding and West Chiltington Village and Common) which do not provide immediate access to stronger bus services.

6.72 The effect in relation to reducing the need to travel and reliance on transport by private vehicle will be highly dependent on which sites are taken forward for allocation, which is unknown at this stage.

6.73 Overall a **cumulative uncertain 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

6.74 While the overall level of development has not been confirmed, providing 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. Policy 14: Housing Provision sets out the options for growth with between 1,000 and 1,400 homes to be delivered per year over the plan period. The large sites considered are to be delivered as urban extensions or as new settlements.

6.75 Of the large site options considered those close to Crawley (Ifield and Kilnwood Vale) could lead to increased traffic within the Hazelwick AQMA, while development of the Mayfield (Land North East of Henfield) and Buck Barn new settlement sites could lead to increased traffic within the Cowfold AQMA. As such, the allocation of these sites could have particularly adverse impacts in terms of intensifying existing air quality issues in the District or nearby local authority areas.

6.76 Urban extension sites 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 in and surrounding the District, including at Horsham town (the Rookwood site) and Crawley (the Ifield and Kilnwood Vale sites). Many of the urban extension sites would provide new residents with access to good sustainable transport links (including sites by Horsham

and Billingshurst which would benefit from access to a railway station). New settlement site options would be less well related to existing services and facilities, but a degree of self-containment could be instilled at these locations as proposals include new service provision and employment land. It is likely that settlements which allow for a higher level of development could help to promote greater degrees of self-containment.

6.77 The principles for strategic scale development (Policy 15: 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.

6.78 Of the small sites considered for allocation, those in Cowfold and Storrington are expected to have the greatest potential to detrimentally impact upon air quality considering the AQMAs declared within these settlements.

6.79 Impacts relating to air quality will be greatly dependent upon which large and small sites are taken forward for allocation. Effects will be influenced both by the potential for the sites allocated to promote modal shift as well as the potential for increased traffic volumes within AQMAs.

6.80 Policy 25: Environmental Protection sets out to protect the environment of the plan area including air quality. Development should minimise air pollution and contribute to the implementation of local Air Quality Action Plans. Policies 34: Development Principles, 37: Climate Change and 42: 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 46: 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 occurred in the plan area.

6.81 Overall a **cumulative uncertain 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

6.82 The overall level of development is not yet confirmed through the Local Plan. However, providing a relatively high level of development over the plan period will 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 to services and employment opportunities.

6.83 The Local Plan considers the delivery of much of the new growth as large sites which would act as urban extensions or new settlements. Urban extension sites could provide residents with nearby access to existing services and facilities as well as employment opportunities. This is particularly likely where sites are well related to important centres in and surrounding the District, including at Horsham town (the Rookwood site) and Crawley (the Ifield and Kilnwood Vale sites). Strong sustainable transport links would also be accessible to many of the new residents at urban extension sites (including sites by Horsham and Billingshurst which would benefit from access to a railway station).

6.84 Existing services and facilities are less accessible from the new settlement site options considered, however, self-containment could be promoted at these sites given that proposals include new service provision and employment land. Settlements which include a higher level of development are likely to be more successful in incorporating substantial service provision and securing a stronger sense of self-containment.

6.85 Policy 15: Strategic Site Development Principles which sets out the principles for strategic scale development for the District, will be of particular importance to help achieve self-containment at large site allocations. This type of development 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.

6.86 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 CHP and district heating schemes. Policy 15: Strategic Site Development Principles states that as well as minimising the need to travel, strategic development should contribute to the achievement of zero carbon.

6.87 The majority of the small sites considered for allocation are well related to existing sustainable transport links. Some of the sites considered at Bramber and Upper Beeding and West Chilmington Village and 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.

6.88 Policies 37: Climate Change and 38: 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 in the operation of buildings and allows for decentralised, renewable and low carbon energy supply systems. Furthermore, major

development should incorporate renewable/low carbon energy production equipment to provide at least 10% of predicted energy requirements. Strategic developments and development located within Heat Priority Areas are required by Policy 38 to incorporate combined heat and power.

6.89 The promotion of modal shift at new development is supported through Policies 34: Development Principles, 37: Climate Change and 42: 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 46: Community Facilities, Leisure and Recreation.

6.90 Overall a **cumulative uncertain significant positive and minor negative effect** is expected in relation to climate change.

SA objective 16: To facilitate a sustainable and growing economy

6.91 The Local Plan, through Policy 6: Economic Growth seeks to support sustainable economic growth through the provision of sufficient employment land to meet the Council's identified requirements. Securing the sustainable growth of the rural economy in Horsham is also supported through Policy 8: Rural Economic Development.

6.92 Although there is uncertainty in relation to which large sites and small sites are to be taken forward for allocation, many of the large urban extension and new settlement site options include the delivery of new employment floorspace. The provision of this new high-quality floorspace has the potential to attract new businesses to the plan area. Including some small site options at more rural locations could help to support the viability of the rural economy.

6.93 The sites considered at Crawley (Ifield and Kilnwood Vale) as well as at Horsham (Rookwood and the densification of North Horsham) would respond most favourably to the economic realities and existing commuting patterns of the plan area, which currently see many residents travel to Crawley and the wider Gatwick Diamond area for job opportunities.

6.94 Policy 15: Strategic Site Development Principles strengthens the effect of providing strategic development in the plan area in terms of supporting economic growth, by requiring the provision of new employment opportunities through new employment land to meet the principle of one new job. Ten small sites have also been considered for allocation through the Local Plan for employment use only, and the allocation of some or all of these sites could further help to promote investment and economic growth in the area.

6.95 Horsham town has been identified as the main commercial gateway to 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 wider District economy. Gatwick Airport is also noted to play a key economic role in the District. As Policy 44: Gatwick Airport Safeguarded Land safeguards land for its potential expansion it is considered particularly important for future economic growth in the District.

6.96 Development in the District is required by Policy 33: Development Quality to be of a high quality and considerate of its economic context. The policy is expected to help ensure that employment generating uses are of a high quality, which is attractive to investors.

6.97 It is expected that the policies of the Local Plan would help to secure sustainable economic growth over the plan period. The inclusion of sites which respond positively to the economic realities and identified commuting patterns of the plan area as well as those which could provide high value employment space to achieve a higher degree of self-containment in terms of the local economy would strengthen the positive effect expected.

6.98 Overall a **cumulative uncertain 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

6.99 Policies 6: Economic Growth and 7: Employment Development 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.

6.100 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. Although there is uncertainty in relation to which large sites and small sites are to be taken forward for allocation, the inclusion of the large sites considered for allocation at Crawley (at Ifield and Kilnwood Vale) would provide residents with access to existing employment opportunities and also respond to existing commuting patterns. Allowing for large-scale development at Horsham town (at Rookwood and the densification of the existing allocation at North Horsham) would provide residents with good access to the area which contains the highest concentration of employment opportunities in the District.

6.101 Furthermore, many of the urban other urban extension site options would provide access to local employment

opportunities and key employment areas within the settlements of Billingshurst and Southwater. Many of the large urban extension and new settlement site options include the delivery of new employment floorspace which is likely to help attract new job providers to the area. At the new settlement options this type of approach could help to achieve a degree of self-containment.

6.102The achievement of self-containment and good access to employment opportunities at large sites once development is built out is likely to be promoted by Policy 15: Strategic Site Development Principles which requires the provision of new employment land at such sites to meet the principle of one new job for every new home. Ten small sites have also been considered for allocation through the Local Plan for employment use only. These sites are mostly located in close proximity to the larger settlements of the plan area or are well related to larger site options, such as the employment site options by Kingsfold, Buck Barn, Billingshurst and Southwater. It is therefore likely that a high number of residents would have access to these site options.

6.103Policy 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.

6.104However, the plan considers the potential allocation of small sites at the small settlements of Barns Green, Lower Beeding, Rusper, and Bramber and Upper Beeding. These settlements do not provide immediate access to existing employment opportunities, most notably at key employment areas. The allocation of some small sites at smaller settlements may support the viability of the economy at more rural locations and the provision of new job opportunities. However, it may also result in some residents having limited access to these types of opportunities.

6.105In all, 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 may, however, provide some residents with reduced access to employment opportunities. Effects will be dependent in part on which sites are taken forward for allocation.

6.106Overall a **cumulative uncertain significant positive and minor negative effect** is likely in relation to access to employment.

Table 6.1 Summary of cumulative effects of the policies in the Horsham District Local Plan

SA objectives	SA1: Housing	SA2: Access to services and facilities	SA3: Inclusive communities	SA4: Crime	SA5: Health	SA6: Biodiversity and geodiversity	SA7: Landscapes and townscapes	SA8: Historic environment	SA9: Efficient land use	SA10: Mineral resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air Quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment opportunities
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: Economic Growth	0	++/-	+	0?	+/-	--?	--/+?	--?	--/+?	-?	0	-	+	+/-	+	++	++

Chapter 6
Cumulative Effects

SA of Horsham Local Plan Review (Regulation 18)
February 2020

SA objectives	SA1: Housing	SA2: Access to services and facilities	SA3: Inclusive communities	SA4: Crime	SA5: Health	SA6: Biodiversity and geodiversity	SA7: Landscapes and townscapes	SA8: Historic environment	SA9: Efficient land use	SA10: Mineral resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air Quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment opportunities
Strategic Policy 7: Employment Development	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 Commercial, Community and Residential Uses	+	+	++	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: Retail Hierarchy and Town Centre First Principles	0	++	++	0	+	0	+	+	0	0	0	0	+	+	+	++	+

Chapter 6
Cumulative Effects

SA of Horsham Local Plan Review (Regulation 18)
February 2020

SA objectives	SA1: Housing	SA2: Access to services and facilities	SA3: Inclusive communities	SA4: Crime	SA5: Health	SA6: Biodiversity and geodiversity	SA7: Landscapes and townscapes	SA8: Historic environment	SA9: Efficient land use	SA10: Mineral resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air Quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment opportunities
Strategic Policy 13: Town Centre Uses	+	++	++	0	+	0	+	+	0	+	0	0	+	+	+	++	+
Housing																	
Strategic Policy 14 – Options for Housing Growth	<i>See the accompanying Interim Sustainability Appraisal of Growth Options report</i>																
Strategic Policy 15 - Strategic Site Development Principles	++	++	+	0	+	++	+	+	0	0	+	+	++/-	++/-	++/-	+	++
Strategic Policy 16 - Affordable Housing	++	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Strategic Policy 17 - Housing Mix	++	0	+	0	0	0	+	+	0	0	0	0	0	0	0	0	0
Policy 18 - Improving Housing Standards in the District	++	0	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0
Policy 19 - Exceptions Housing Schemes	++	+/-	+	0	0	0	0	0	-	0	0	0	-	-	-	0	+/-

Chapter 6
Cumulative Effects

SA of Horsham Local Plan Review (Regulation 18)
February 2020

SA objectives	SA1: Housing	SA2: Access to services and facilities	SA3: Inclusive communities	SA4: Crime	SA5: Health	SA6: Biodiversity and geodiversity	SA7: Landscapes and townscapes	SA8: Historic environment	SA9: Efficient land use	SA10: Mineral resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air Quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment opportunities
Policy 20 - Retirement Housing and Specialist Care	++	+	+	0	+	0	0	0	0	0	0	0	+	+	+	0	0
Policy 21 - Rural Workers' Accommodation	+	-	0	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	0
Policy 23 - Ancillary Accommodation	+	0	+	0	0	0	+	+	+	0	0	0	0	0	0	0	0
Policy 24 – Gypsy and Travelling Showpeople Accommodation	++	++	+	0	+	0	+	+	0	+	+	+	+/-	+/-	+/-	0	0
Conserving and Enhancing the Natural Environment																	
Strategic Policy 25: Environmental Protection	0	0	0	0	+	++	+	0	++	0	++	+	0	++	++	0	0
Policy 26: Air Quality	0	0	0	0	+	++	+	0	0	0	0	0	++	++	++	0	0

Chapter 6
Cumulative Effects

SA of Horsham Local Plan Review (Regulation 18)
February 2020

SA objectives	SA1: Housing	SA2: Access to services and facilities	SA3: Inclusive communities	SA4: Crime	SA5: Health	SA6: Biodiversity and geodiversity	SA7: Landscapes and townscapes	SA8: Historic environment	SA9: Efficient land use	SA10: Mineral resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air Quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment opportunities
Strategic Policy 27: The Natural Environment and Landscape Character	+	+	+	0	0	++	++	+	+	0	+	++	0	0	0	+	0
Strategic Policy 28: Countryside Protection	+	+	+	0	+	++	++	+	+	+	0	+	+	+	+	+?	0
Consideration of potential Green Belt designation in the District	-?	+/-?	+/-?	0	+/-?	++	++	+	+	0	0	+	+/-?	+/-?	+/-?	-?	+/-?
Policy 29: Settlement Coalescence	-?	0	0	0	0	++	++	+	0	0	0	+	+	+	+	-?	0
Policy 30: Protected Landscapes	-?	0	0	0	+	++	++ ₂	+	0	0	0	+	0	0	0	+	0
Strategic Policy 31: Green Infrastructure and Biodiversity	0	0	0	0	+	++	+	0	0	0	++	+	+	+	++	0	0
Policy 32: Local Greenspace	0	0	+	0	+	++	+	+	0	0	0	+	0	0	0	0	0
Development Quality, Design and Heritage																	

Chapter 6
Cumulative Effects

SA of Horsham Local Plan Review (Regulation 18)
February 2020

SA objectives	SA1: Housing	SA2: Access to services and facilities	SA3: Inclusive communities	SA4: Crime	SA5: Health	SA6: Biodiversity and geodiversity	SA7: Landscapes and townscapes	SA8: Historic environment	SA9: Efficient land use	SA10: Mineral resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air Quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment opportunities
Strategic Policy 33: Development Quality	+	0	+	+	+	+	++	++	+	0	0	+	+	+	+	+	0
Strategic Policy 34: Development Principles	+	0	+	+	+	+	++	+	++	0	+	+	+	+	+	+	0
Policy 35: Heritage Assets and Managing Change within the Historic Environment	0	0	0	0	0	+	++	++	0	0	0	0	0	0	0	0	0
Policy 36: Shop Fronts and Advertisements	0	0	0	0	0	0	++	++	0	0	0	0	0	0	0	+	0
Climate Change and Flooding																	
Strategic Policy 37: Climate Change	+	0	0	0	+	+	+	0	0	+	+	++	+	+	++	0	0
Strategic Policy 38: Appropriate Energy Use	0	0	0	0	0	0	+	0	0	0	0	0	0	0	++	+	0
Policy 39: Sustainable Design and Construction	0	0	+	0	+	+	0	+	0	+	+	0	+	+	++	0	0

Chapter 6
Cumulative Effects

SA of Horsham Local Plan Review (Regulation 18)
February 2020

SA objectives	SA1: Housing	SA2: Access to services and facilities	SA3: Inclusive communities	SA4: Crime	SA5: Health	SA6: Biodiversity and geodiversity	SA7: Landscapes and townscapes	SA8: Historic environment	SA9: Efficient land use	SA10: Mineral resources	SA11: Water resources	SA12: Flooding	SA13: Transport	SA14: Air Quality	SA15: Climate change	SA16: Economic growth	SA17: Access to employment opportunities
Strategic Policy 40: Flooding	0	0	0	0	0	+	0	0	0	0	+	++	0	0	+	0	0
Infrastructure, Transport and Healthy Communities																	
Strategic Policy 41: Infrastructure Provision	+	++	++	0	++	0	0	0	0	0	0	0	+	+	+	0	0
Strategic Policy 42: Sustainable Transport	0	++	++	0	+	0	0	0	0	0	0	0	++	++	++	+	++
Policy 43: Parking	0	+	+	+	+/-	0	0	0	0	0	0	0	+/-	+/-	+/-	+	++
Policy 44: Gatwick Airport Safeguarded Land	+/-	0	0	0	-?	-?	0	0	0	0	0	0	-	-	-	++	+
Strategic Policy 45: Inclusive Communities, Health and Wellbeing	+	++	++	+	++	0	0	0	0	0	0	0	+	+	+	+	+
Policy 46: Community Facilities, Leisure and Recreation	0	++	++	+	++	+	+	0	0	0	0	0	+	+	+	0	0

In-combination effects

6.107 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 with consideration for growth being proposed in neighbouring authority areas.

6.108 Horsham is bordered by the following local authority areas for which the following Local Plan documents are currently adopted or are in preparation:

Crawley

6.109 To the north east Crawley Borough Council has adopted the Crawley Borough Local Plan 2015 – 2030¹³ 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 Plan¹⁴ is to run from January 2020 to March 2020. The document makes provision for the development of a minimum of 5,355 net dwellings in Crawley between 2020 and 2035. A total requirement for 33ha of new B-class business land is identified for the Borough, with opportunities for approximately 12ha identified and an outstanding requirement of 21ha additional land over the plan period to 2035.

6.110 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.

6.111 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 (particularly if multiple sites at Ifield and Kilnwood Vale are taken forward in combination) may result in

increased local congestion as well as increased higher levels of traffic within the Hazelwick AQMA.

6.112 Opportunities to upgrade the strategic road network are likely to be achieved through the allocation and development of these sites, however, which could help mitigate increases in congestion. Increased development at Kilnwood Vale as a further extension of development and the urban edge at this location could have increased impact on the High Weald AONB. However, much of the development within Crawley Borough would occur within the existing built-up area boundary. As such there is reduced potential for in-combination effects in relation to local landscape character.

Mole Valley

6.113 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)¹⁵ is to be consulted upon 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 Strategy¹⁶ (which plans for at least 3,760 new dwellings up to 2026) and the Mole Valley Local Plan 2000¹⁷.

6.114 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.

6.115 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, particularly if the land at the large site option at Kingsfold is taken forward for development within Horsham District.

¹³ Crawley Borough Council (2015) the Crawley Borough Local Plan 2015 – 2030

¹⁴ Crawley Borough Council (2020) Draft Crawley Borough Local Plan 2020 – 2035 (For Submission Publication Consultation)

¹⁵ Mole Valley District Council (2020) Future Mole Valley Consultation Draft Local Plan

¹⁶ Mole Valley District Council (2009) Mole Valley Core Strategy

¹⁷ Mole Valley District Council (2000) Mole Valley Local Plan 2000

Waverley

6.116To the north-west Waverley Local Plan Part 1: Strategic Policies and Sites¹⁸ 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 Preferred Options document for the Local Plan Part 2: Site Allocations and Development Management Policies¹⁹ was consulted upon in the period ending July 2018 and contains policies that direct planning application decisions and identify sites for housing development.

6.117Strategic 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

6.118To the west Chichester District Council has adopted Chichester Local Plan: Key Policies 2014 - 2029²⁰ 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 2014-2029²¹ 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 2035²² 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.

6.119The 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

6.120To the south west the Arun Local Plan 2011 - 2031²³ 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.

6.121The 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

6.122To the south east Adur Council adopted Adur Local Plan 2017²⁴ 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.

6.123The 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 Regeneration Area Western Arm, 600 new homes at New Monks Farm and 480 new homes at West Sompting.

¹⁸ Waverley Borough Council (2018) Waverley Borough Local Plan Part 1: Strategic Policies and Sites

¹⁹ Waverley Borough Council (2018) Local Plan Part 2: Site Allocations and Development Management Policies (Preferred Options Consultation)

²⁰ Chichester District Council (2015) Chichester Local Plan: Key Policies 2014 – 2029

²¹ Chichester District Council (2019) Site Allocation Development Plan Document 2014 - 2029

²² Chichester District Council (2018) Chichester Local Plan Review 2035 (Preferred Approach Consultation)

²³ Arun District Council (2018) Arun Local Plan 2011-2031

²⁴ Adur District Council (2017) Adur Local Plan 2017

6.124 Only a small amount of development is being considered within the area of Adur which is within closest proximity to the southern portion of Horsham District. Sites are being considered for allocation as part of the Horsham Local Plan Review around the settlements of Bramber and Upper Beeding and Steyning. These sites are relatively small in size but have the potential to deliver up to 110 new homes in total on land around the A283 which provides important access though 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

6.125 To the east Mid Sussex District Council adopted Mid Sussex District Plan 2014 – 2031²⁵ 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.

6.126 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.

6.127 The strategic allocation to the east of Pease Pottage would provide approximately 600 new homes within 1km of the District boundary within the AONB. This would be within 2.5km of the large site being considered for allocation at Kilnwood Vale meaning that allocation of these sites could lead to in-combination effects in terms of the setting of the AONB. There is potential for effects relating to congestion on the strategic road network to result if the Ifield and Kilnwood Vale sites were allocated as well as air pollution relating specifically to 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 sites in this area within Horsham District could help to mitigate effects relating to local congestion.

Brighton and Hove

6.128 To the south east Brighton and Hove City Council adopted the Brighton and Hove City Plan Part One²⁶ 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 Draft City Plan Part Two²⁷ 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 consulted upon for a ten-week period up until September 2018.

6.129 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).

6.130 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, the options for development being considered for inclusion 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 the District, which is in closest proximity to Brighton and Hove. These are at the settlements of Steyning, Bramber and Upper Beeding and Small Dole.

6.131 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 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

²⁵ Mid Sussex District Council (2018) Mid Sussex District Plan 2014-2031

²⁶ Brighton and Hove City Council (2016) Brighton and Hove City Council City Plan Part One

²⁷ Brighton and Hove City Council (2018) Draft Brighton and Hove City Council City Plan Part Two

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

6.132The South Downs National Park Authority adopted the South Downs Local Plan in July 2019²⁸ and this now 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)²⁹, Arun District Local Plan (2003)³⁰, Chichester District Local Plan First Review (1999)³¹, Mid

Sussex Local Plan (2004)³² and Horsham Core Strategy (2007)³³.

6.133Only 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.

6.134As 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.

²⁸ South Downs National Park Authority (2019) South Downs Local Plan 2014-33

²⁹ Adur District Council (1996) Adur District Local Plan

³⁰ Arun District Council (2003) Arun Local Plan 2003

³¹ Chichester District Council (1999) Chichester District Local Plan First Review

³² Mid Sussex District Council (2004) Mid Sussex Local Plan

³³ Horsham District Council (2007) Horsham Core Strategy

Mitigation

6.135 While uncertainty is attached the specific level of growth required over the plan period the Local Plan considers a range of development which is considered to be relatively high. 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.

6.136 Table 6.2 summarises the key policies of the Local Plan which could mitigate potential negative effects of delivering a high level of growth over the plan period in relation to each of the SA objectives.

Table 6.2 Local Plan policies that would contribute to the mitigation of negative effects identified

SA Objective	Mitigation provided by Local Plan policies
SA1: Housing	<p>Policy 14: Options for Housing Growth requires the delivery of a significant number of homes which would at least meet the objectively assessed need for the District.</p> <p>Policies 16: Affordable Housing, 17: Meeting Local Housing Needs and 18: Improving Housing Standards in the District 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.</p>
SA2: Access to services and facilities	<p>Policies 2: Development Hierarchy and 12: Retail Hierarchy and Town Centre First Principles 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>Policy 41: Infrastructure Provision and 46: Community Facilities, Leisure and Recreation 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 41 provides scope for infrastructure provision to be secured by Planning Obligations and Community Infrastructure Levy.</p> <p>Specific to strategic scale development, Policy 15: Strategic Site Development Principles 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>Policies 2: Development Hierarchy and 12: Retail Hierarchy and Town Centre First Principles 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>Policy 45: Inclusive Communities, Health and Wellbeing directly addresses the need for the delivery of development to create socially inclusive and adaptable communities.</p> <p>Specific to strategic scale development, Policy 15: Strategic Site Development Principles 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>Policy 33: Development Quality requires that development is provided to secure safe and adaptable environments in Horsham District.</p> <p>Policy 34: Development Principles 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>Policy 45: Inclusive Communities, Health and Wellbeing 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>Policy 41: Infrastructure Provision and 46: Community Facilities, Leisure and Recreation 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 41 provides scope for infrastructure provision to be secured by Planning Obligations and Community Infrastructure Levy.</p>

SA Objective	Mitigation provided by Local Plan policies
	<p>Policies 37: Climate Change and 42: Sustainable Transport 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, Policy 15: Strategic Site Development Principles 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>Policy 27: The Natural Environment and Landscape Character 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>Policy 31: Green Infrastructure and Biodiversity requires that designated sites and habitats are appropriately considered as part of the development process and 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>Policy 27: The Natural Environment and Landscape Character 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>Policies 28: Countryside Protection and 29: Settlement Coalescence 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>Policy 30: Protected Landscapes 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>Policies 33: Development Quality and 34: Development Principles 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 and views.</p>
SA8: Historic environment	<p>Policy 35: Heritage Assets and Managing change in the Historic Environment 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>Policies 33: Development Quality and 34: Development Principles 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 and views.</p>
SA9: Efficient land use	<p>Policy 2: Development Hierarchy 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>Policy 25: 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.</p> <p>Policy 34: Development Principles set out that development should make efficient use of land and prioritise the use of previously developed land.</p>
SA10: Mineral resources	<p>Policy 28: Countryside Protection is supportive of development in the countryside which would enable the extraction of minerals.</p> <p>Policy 37: Climate Change is supportive of development which includes measures to help reduce the amount of biodegradable waste sent to landfill and promotes grey water recycling.</p>

SA Objective	Mitigation provided by Local Plan policies
	<p>Policy 39: Sustainable Design and Construction requires development to incorporate measures to minimise construction and demolition waste and utilise recycled and low-impact materials and to provide satisfactory arrangements for the storage of refuse and recyclable materials as a part of the design.</p>
SA11: Water resources	<p>Policy 25: Environmental Protection requires development to maintain or improve the environmental quality of any watercourses, groundwater and drinking water supplies.</p> <p>Policy 31: Green Infrastructure and Biodiversity is supportive of development which would maintain and enhance the green infrastructure network as well as existing fresh water features.</p> <p>Policy 37: Climate Change is supportive of development which includes measures to promote grey water recycling.</p> <p>Policy 40: Flooding 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>Policy 41: Infrastructure Provision 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, Policy 15: Strategic Site Development Principles states that proposals of this nature should deliver necessary new infrastructure to support the new development, including provision of utilities, water supplies and wastewater treatment.</p>
SA12: Flooding	<p>Policy 27: The Natural Environment and Landscape Character requires development to incorporate and maintain SUDS in an optimal location for their purpose.</p> <p>Policies 31: Green Infrastructure and Biodiversity and 37: Climate Change are supportive of development which would maintain and enhance the green infrastructure network.</p> <p>Policy 40: Flooding 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>
SA13: Transport	<p>Policies 37: Climate Change and 42: Sustainable Transport 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, Policy 15: Strategic Site Development Principles 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 pollution	<p>Policy 25: Environmental Protection 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>Policies 37: Climate Change and 42: Sustainable Transport 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, Policy 15: Strategic Site Development Principles 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>Policy 25: Environmental Protection requires new development proposals to ensure that resultant greenhouse gas emissions are minimised.</p> <p>Policies 37: Climate Change and 42: Sustainable Transport are supportive of development which reduces the need to travel and encourages travel by walking and cycling</p>

SA Objective	Mitigation provided by Local Plan policies
	<p>as well as by public transport. Policy 37 also supports developments which contribute to achieving zero carbon, by helping to encourage behaviours that reduce energy use and promoting the use of decentralised, renewable and low carbon energy supply systems.</p> <p>Policy 38: Appropriate Energy Use requires new major development to incorporate renewable/low carbon energy systems to provide at least 10% of predicted energy requirements and is also supportive of stand-alone renewable energy schemes.</p> <p>Specific to strategic scale development, Policy 15: Strategic Site Development Principles 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>Policy 6: Economic Growth supports 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.</p> <p>Policy 8: Rural Economic Development supports sustainable rural economic growth in the District in order to generate local employment opportunities.</p> <p>Policies 10: Equestrian Development and 11: Tourism Facilities and Visitor support economic growth in equestrian and tourism which are important for rural locations.</p> <p>Policy 44: Gatwick Airport Safeguarded Land 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>Policy 7: Employment Development is supportive of the upgrading, refurbishment, safeguarding and expansion of existing employment sites (including key employment areas) to meet the employment needs of the District up to 2036.</p> <p>Policy 8: Rural Economic Development supports sustainable rural economic growth in the District in order to generate local employment opportunities.</p> <p>Specific to strategic scale development, Policy 15: Strategic Site Development Principles 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>

Chapter 7

Monitoring

7.1 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”*. 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.

7.2 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.

7.3 Because of the early stage of the Horsham Local Plan Review and the uncertainty attached to many of the potential effects identified, monitoring measures have been proposed in this SA Report in relation to all of the SA objectives in the SA framework. As the Horsham Local Plan Review is progressed further and the likely significant effects are identified with more certainty, it may be appropriate to narrow down the monitoring framework to focus on a smaller number of the SA objectives.

7.4 **Table 7.1** overleaf sets out a number of suggested indicators for monitoring the potential sustainability effects of implementing the Horsham Local Plan, as a starting point. 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. Further refinement will likely be necessary as the final Local Plan is produced including consideration of any monitoring framework proposed for the Local Plan itself. This will be addressed in the next iteration of the SA Report.

7.5 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 7.1 Proposed Monitoring Framework for the Horsham Local Plan Review

SA objectives	Proposed Monitoring Indicators	Policies for which significant negative effect has been identified
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	<ul style="list-style-type: none"> ■ Housing completions ■ Average house prices ■ Affordable Housing completions ■ Affordable housing schemes granted permission ■ Number of people on housing waiting list ■ Percentage of households which are owner occupied ■ Total number of house sales ■ Number of windfall sites granted permission ■ Number of replacement dwellings, house extensions and conversions permitted outside BUAB ■ Number of units allocated through Neighbourhood Development Plans ■ Housing permissions by dwelling size and type ■ Number of dwellings granted permission in accordance with Policy 16 ■ Number of retirement dwellings/care home permitted ■ Number of permitted sites for park homes and residential caravans ■ Number of permitted pitches for Gypsies and Travellers and Travelling Showpeople 	N/A
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.	<ul style="list-style-type: none"> ■ Number of C1, D1, D2 uses granted permission ■ Number of permissions for D1 uses which meet the needs for faith ■ Total revenue from CIL contributions ■ Total revenue from S106 ■ Amount of new leisure space in town & village centres 	N/A
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.	<ul style="list-style-type: none"> ■ Number of retirement dwellings/care home permitted ■ Indices of Multiple Deprivation ■ Employment rates based on gender, age, race and ethnicity ■ Number of Gypsy, Traveller and Travelling Showpeople pitches granted permission ■ Percentage of housing stock in fuel poverty ■ Number of permissions for D1 uses which meet the needs for faith 	Strategic Policy 14: Options for Housing Growth
SA 4: To support the creation of safe communities in which levels of crime,	<ul style="list-style-type: none"> ■ Number of noise complaints ■ Incidents of antisocial behaviour ■ Number of recorded offences and number of recorded offences per 1000 population 	N/A

SA objectives	Proposed Monitoring Indicators	Policies for which significant negative effect has been identified
anti-social behaviour and disorder and the fear of crime are reduced.		
SA 5: To improve public health and wellbeing and reduce health inequalities.	<ul style="list-style-type: none"> ■ Number of C1, D1, D2 uses granted permission ■ Number of retirement dwellings/care home permitted ■ Visitor numbers to HDC Sport facilities ■ Amount of new leisure space in town & village centres 	Strategic Policy 5: Broadbridge Heath Quadrant
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"> ■ River quality ■ Area (ha) or % of designation / reserve in Horsham infringed by planning applications ■ Area (ha) or % of habitats infringed by planning applications ■ SSSI condition ■ % of District Classified as Ancient Woodland ■ Permitted applications in designated sites ■ Permitted applications in priority habitats ■ Number of records of protected species within 500m buffer of a planning application ■ Number of records of protected species, bats and notable birds 	Strategic Policy 6: Economic Growth Strategic Policy 14: Options for Housing Growth
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.	<ul style="list-style-type: none"> ■ Condition of landscape character areas ■ Number of Design Statements produced ■ Number of applications outside BUAB ■ Number of replacement dwellings, house extensions and conversions permitted outside BUAB 	Strategic Policy 6: Economic Growth Strategic Policy 14: Options for Housing Growth
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"> ■ Number of sites/buildings on the Heritage at Risk register ■ Number of Design Statements produced ■ Number of permissions in Conservation Areas ■ Number of Listed Building Consents granted permission ■ Number of buildings on Local List 	Strategic Policy 6: Economic Growth Strategic Policy 14: Options for Housing Growth
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"> ■ Gross amount of employment floorspace completed on Previously Developed Land (PDL) ■ Gross housing completions on PDL 	Strategic Policy 6: Economic Growth Strategic Policy 14: Options for Housing Growth

Chapter 7

Monitoring

SA of Horsham Local Plan Review (Regulation 18)

February 2020

SA objectives	Proposed Monitoring Indicators	Policies for which significant negative effect has been identified
SA 10: To conserve natural resources, including mineral resources in the District.	<ul style="list-style-type: none"> ■ Number of applications outside BUAB ■ Enforcement against Site Waste Management Plans (SWMP) ■ District recycling rates 	Strategic Policy 14: Options for Housing Growth
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.	<ul style="list-style-type: none"> ■ River quality 	N/A
SA 12: To manage and reduce the risk of flooding.	<ul style="list-style-type: none"> ■ Percentage of new development located in floodplain ■ Permissions granted contrary to advice of EA on flooding and water quality grounds 	N/A
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	<ul style="list-style-type: none"> ■ Number of Green Travel Plans submitted ■ Proportion of households with two or more cars ■ Travel to work data (mode and distance) ■ Number of tickets sold for Park and Ride ■ Number of bus routes provided throughout District ■ Monitor usage of car parks 	Strategic Policy 14: Options for Housing Growth
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.	<ul style="list-style-type: none"> ■ Exceedances in UK Air Quality ■ Number of AQMA's in District ■ Number of Green Travel Plans submitted ■ Proportion of households with two or more cars ■ Travel to work data (mode and distance) ■ Number of tickets sold for Park and Ride ■ Number of bus routes provided throughout District 	N/A
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.	<ul style="list-style-type: none"> ■ Number of District Heating networks in District ■ Total emissions of CO₂ ■ Carbon emissions by sector (Industrial & Commercial, Domestic and Road) and per capita ■ Tonnage of non-inert waste sent to landfill ■ Percentage of inert-waste sent to landfill ■ District recycling rates ■ Number of permissions for renewable energy installations ■ Number of Green Travel Plans submitted 	N/A

SA objectives	Proposed Monitoring Indicators	Policies for which significant negative effect has been identified
	<ul style="list-style-type: none"> ■ Proportion of households with two or more cars ■ Travel to work data (mode and distance) ■ Number of tickets sold for Park and Ride ■ Number of bus routes provided throughout District 	
SA 16: To facilitate a sustainable and growing economy.	<ul style="list-style-type: none"> ■ Amount of new retail floorspace in town & village centres ■ Number of retail units converted to other uses ■ Amount of retail permitted outside of the defined town and village centres ■ Retail vacancy rates ■ Total amount of floorspace for 'town centre uses/' ■ Amount of land developed for employment land / land supply by type (B1 / B2 / B8), particularly in strategic locations ■ Amount of employment land lost from Key Employment Areas ■ Amount of employment land lost to residential development ■ Total number of jobs in Horsham District ■ Levels of unemployment ■ Average annual income ■ Employment land available ■ Number of business use permission granted in rural locations. ■ Number of C1, D1, D2 uses granted permission ■ Mix of uses- A3 / A1 split ■ Monitor usage of car parks ■ Average number of market stalls sold through HDC contract ■ Annual number of market stalls sold per event ■ No of applications for new, temporary or replacement shop fronts granted and refused ■ Number of permissions for equestrian development ■ Total revenue from CIL contributions ■ Total revenue from S106 ■ Number of business uses granted planning permission outside of the BUAB. 	N/A
SA 17: To deliver, maintain and enhance access to diverse employment	<ul style="list-style-type: none"> ■ Amount of land developed for employment land / land supply by type (B1 / B2 / B8), particularly in strategic locations ■ Amount of employment land lost from Key Employment Areas ■ Amount of employment land lost to residential development 	N/A

Chapter 7
Monitoring

SA of Horsham Local Plan Review (Regulation 18)
February 2020

SA objectives	Proposed Monitoring Indicators	Policies for which significant negative effect has been identified
opportunities, to meet both current and future needs in the District.	<ul style="list-style-type: none">■ Total number of jobs in Horsham District■ Levels of Unemployment■ Employment land available■ Employment rates based on gender, age, race and ethnicity	

Chapter 8

Conclusions and next steps

Conclusions

8.1 The Sustainability Appraisal (SA) objectives developed at the Scoping stage of the SA process have been used to undertake a detailed appraisal of the Regulation 18 Horsham District Local Plan. This work has been presented over two reports – this SA Report and the Interim SA of Growth Options report. Together these documents comprise the Environmental Report at this stage of the plan-making process.

8.2 The appraisal work in the Interim SA Report focussed on the sites the Council is considering for allocation, as well as the growth strategy (including quantum and overall location of growth) over the plan period. The Council is currently in the process of deciding which options should be included in the Local Plan and therefore uncertainty is attached to many of the cumulative findings for the SA Report.

8.3 The appraisal work in this SA Report considered the draft policies in the Regulation 18 Local Plan. The policies considered relate to how the Council might address the needs and identified key issues of Horsham District.

8.4 The plan considers the allocation of land to accommodate a relatively high level of housing development as well as land for employment development within Horsham District to meet its future needs. Some of the options considered for the plan's growth strategy and large site options could help to meet the needs of adjoining or nearby local authority areas including Crawley. As such the Draft Plan has the potential to result in beneficial effects relating to the provision of new homes and floorspace for employment opportunities. It is expected that the delivery of growth to meet local needs would also derive benefits relating to securing a sustainable level of local economic growth.

8.5 The relatively high levels of growth being considered may, however, have adverse impacts in relation to many environmental receptors in the plan area. Effects of this nature have been identified in relation to efficient land use, biodiversity, the historic environment and landscape. Of particular relevance is the District's position in relation to the High Weald AONB and the South Downs National Park, which take up land within the plan area to the north east, and at the boundary of the plan area to the south, respectively.

8.6 Chapter 6 of this report described the likely cumulative effects of the plan.

8.7 Potentially significant positive cumulative effects were identified in relation to:

- SA objective 1: housing
- SA objective 2: access to services and facilities
- SA objective 13: transport
- SA objective 15: climate change
- SA objective 16: economic growth
- SA objective 17: access to employment opportunities

8.8 For SA objectives 2: access to services and facilities, 13: transport, 15: climate change and 17: access to employment opportunities it is expected that the significant positive effect identified would be in combination with a minor negative effect as part of an overall mixed cumulative effect.

8.9 Potentially significant negative cumulative effects were identified in relation to:

- SA objective 6: biodiversity and geodiversity
- SA objective 7: landscape and townscape
- SA objective 8: historic environment
- SA objective 9: efficient land use
- SA objective 10: mineral resources

8.10 All were in combination with a minor positive effect as part of an overall mixed cumulative effect.

8.11 The Council is seeking to actively tackle climate change through its policies, thereby contributing to achieving a net zero carbon target through its activities. The Local Plan expects development proposals to include measures which contribute to this aim. The requirements set out in the plan are expected to help limit the District's contribution to carbon emissions. Criteria relating to strategic development and supporting the achievement of zero carbon through these types of schemes will be particular importance given the number of large sites the Council is considering as part of its Local Plan allocations. This is to include the promotion of alternative sources of energy such as combined heat and power.

8.12 The approaches to development include options which would result in much of the new growth being located in close proximity to the larger settlements. This approach would provide residents with easy access to existing services and facilities and reduce the need to travel by private vehicle in the plan area. Furthermore, options considered which would include development at large sites would provide concentrations of new growth which could allow for new

service provision. Service provision in this manner is supported by the strategic site development principles policy approach included in the Local Plan.

8.13 The Council is also considering the option of new settlements. These offer the opportunity to 'design-in' sustainable development principles from the start on a whole settlement basis (e.g. prioritising walking and cycling, creating new bus networks, integrating green infrastructure, and embedding in renewable energy resources). But they also can present challenges in terms of their lead-in times, delivery of jobs, services and facilities, and easy access to existing stations on the rail network. They are also likely to be locations that are currently more rural in character, or at least some distance from existing settlements.

8.14 Options that would allow for some limited rural growth are expected to help maintain the viability of service provision at these locations and could also reduce the need for some daily journeys. Sustainable modes of transport at new development are also supported through the Local Plan and this could further help to discourage the use of private vehicles. Impacts relating to both climate change and air pollution could be mitigated in this manner.

8.15 Other measures to mitigate potential environmental effects include specific criteria to protect the special character of the AONB and the wider countryside. Criteria relating to the setting and significance of heritage assets and designated biodiversity sites in the District has also been included. The Local Plan incorporates a net gain approach to biodiversity and seeks to protect existing quality and function of green infrastructure as well as supporting new provision of this type.

8.16 These requirements are expected to be of particular importance considering the rural character of the District. They may also help to address the identified potential for coalescence to occur in the plan area including at areas surrounding the settlements of Southwater and Horsham, and West Chiltington Common with West Chiltington Village.

Next steps

8.17 This SA Report and the Interim SA of Growth Options report will be available for consultation between 17th February 2020 and 26th March 2020. Following the consultation on these documents, the responses received, and the findings of the SA will be considered and incorporated into the next iteration of the Horsham District Local Plan.

LUC

January 2020

Appendix A

Consultation comments

Consultation comments on the SA Scoping Report

Horsham District Council undertook a five week period of consultation on the SA Scoping Report from 3rd September 2019 with the councils for the surrounding local authority areas and the three statutory consultees. The local authorities contacted comprise: Mid Sussex District Council, Crawley Borough Council, Arun District Council, Adur and Worthing Councils (Adur and Worthing share a joint management structure for the two authorities), South Downs National Park Authority, Mole Valley District Council, Brighton and Hove City Council, Waverley Borough Council and Chichester District Council.

Details of the responses that were received for this consultation are detailed in the table below.

Consultee	Representation relating to	Comment	SA Team Response
Environment Agency	Baseline	The scope appropriately considers the key issues and topics related to the Environment Agency's remit, in particular water quality and resources including the water framework directive, flood risk, biodiversity, contaminated land and waste. With regard to climate change, and specifically paragraph 7.23 in the SA Scoping Report it is recommended that some reference is made to the expected updates to the climate changes allowances.	Comment noted – the SA Report presents an update baseline in Appendix B which now includes reference to the expected updates to the climate changes allowances.
	Plans, policies and programmes	The Report identifies all the key plans, policies and programmes in relation to the Environment Agency's remit.	Comment noted.
	Key sustainability issues	The text could be strengthened to ensure that water quality covers both groundwater and surface water quality.	Comment noted – the key sustainability issues are presented in Table 3.1 in the SA Report and have been updated to include reference to groundwater and surface water quality.
	SA Framework, SA objectives and assumptions	The inclusion of relevant SA objectives for issues within the Environment Agency's remit is supported. Notably these include SA objective 6 with regard to biodiversity; SA objective 9 relating to reuse of previously developed land; SA objective 11 regarding water quality; SA objective 12 above managing and reducing flood risk and SA objective 15 with regard to climate change. The following updates are suggested: SA objective 6 – recommended that the appraisal question 6.3 could be strengthened to not only consider the “promotion” of the achievement of net gain to actually consider how the Plan will achieve net gain. SA objective 11 – recommended that the wording for question 11.2 be amended. As drafted, it considers how the Plan will “minimise inappropriate development” which suggests that some may be allowed.	Comment noted – the suggested wording changes to the questions for the SA framework have been incorporated and these are presented in Table 3.2 of the SA Report.

Appendix A
 Consultation comments
 SA of Horsham Local Plan Review (Regulation 18)
 February 2020

Consultee	Representation relating to	Comment	SA Team Response
		SA objective 12 – the reference to consider opportunities for natural flood management is supported. It is, however, recommend that the wording for question 12.1 is amended. As drafted, it considers how the Plan will “minimise inappropriate development” which suggests that some inappropriate development would be considered.	
Natural England	Plans, policies or programmes	Natural England has not reviewed the plans listed but recommends that the following types of plans are considered: <ul style="list-style-type: none"> – Green infrastructure strategies – Biodiversity plans – Rights of Way Improvement Plans – Shoreline management plans – Coastal access plans – River basin management plans – AONB and National Park management plans. – Relevant landscape plans and strategies 	Comment noted - the SA Report includes the update baseline and policy context in Appendix B.
	SA Framework	Natural England agree that the SA framework is appropriate.	Comment noted.
Historic England	Baseline	Historic England advises that the scoping report for Horsham Local Plan Review displays a poor understanding of the historic environment, and inadequately covers the issues that may arise in respect of the potential effects of proposed development sites on the historic environment and heritage assets. Current Baseline relating to the historic environment is cursory and lacks a comprehensive understanding of the full nature and extent of the heritage resources of the district. Considerations of character and distinctiveness need to be based upon more than a simple inventory of statutory designations. Historic landscape characterisation is available for the whole of West Sussex and can assist in identifying significant components of the wider historic environment and the particular character of distinct historic areas within the district beyond the defined conservation areas. A review of the Historic Environment Record for West Sussex would illustrate the extent of undesignated archaeological resources, as well as highlighting any archaeological priority areas.	Comment noted - the SA Report presents an updated baseline in Appendix B which now includes further detail in relation to the historic environment in Horsham District.

Appendix B

Detailed sustainability context

Population, health and wellbeing

Policy context

International

B.1 United Nations Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (the ‘Aarhus Convention’) (1998): Establishes a number of rights of the public (individuals and their associations) with regard to the environment. The Parties to the Convention are required to make the necessary provisions so that public authorities (at national, regional or local level) will contribute to these rights to become effective.

B.2 United Nations Declaration on Sustainable Development (Johannesburg Declaration) (2002): Sets a broad framework for international sustainable development, including building a humane, equitable and caring global society aware of the need for human dignity for all, renewable energy and energy efficiency, sustainable consumption and production and resource efficiency.

B.3 European Environmental Noise Directive (2002): Sets out a hierarchy for the avoidance, prevention and reduction in adverse effects associated with environmental noise, including noise generated by road and rail vehicles, infrastructure, aircraft and outdoor, industrial and mobile machinery.

National

B.4 National Planning Policy Framework (NPPF)³⁴: contains the following:

- The NPPF promotes healthy, inclusive and safe places which; promote social integration, are safe and accessible and enable and support healthy lifestyles.
- One of the core planning principles is to “take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community”.
- The plan should “contain policies to optimise the use of land in their area and meet as much of the identified

³⁴ 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

need for housing as possible". To determine the minimum number of homes needed strategic policies should be informed by the application of the standard method set out in national planning guidance, or a justified alternative approach.

- The framework states that "access to a network of high quality open spaces and opportunities for sport and recreation is important for the health and well-being of communities".
- The NPPF states "good design is a key aspect of sustainable development" and requires development supported by planning decisions to function well and add to the overall quality of the area over its lifetime. The importance for planning decisions to result in development which is of a quality which incorporates good architecture and appropriate and effective landscaping as to promote visual attractiveness, raise the standard more generally in the area and address the connections between people and places is emphasised.
- The NPPF promotes the retention and enhancement of local services and community facilities in villages, such as local shops, meeting places, sports, cultural venues and places of worship.
- The framework also seeks to ensure that developments create safe and accessible environments where crime and disorder, and fear of crime, do not undermine quality of life or community cohesion.
- There is a need set out in the document to take a "proactive, positive and collaborative approach" to bring forward development that will "widen choice in education", including sufficient choice of school places.
- Paragraph 72 states that "The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure and facilities". As such the NPPF provides support for the identification of locations which are suitable for this type of development in a manner which would help to meet needs identified in a sustainable way.

B.5 National Planning Practice Guidance (PPG)³⁵: contains the following:

- Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making.

B.6 Select Committee on Public Service and Demographic Change Report: Ready for Ageing?³⁶: warns that society is underprepared for the ageing population. The report states "longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises". The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.

B.7 Fair Society, Healthy Lives³⁷: Investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

B.8 Planning Policy for Traveller Sites³⁸: Sets out the Government's planning policy for traveller sites, replacing the older version published in March 2012. The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.

B.9 Laying the foundations: a housing strategy for England³⁹: Aims to provide support to deliver new homes and improve social mobility.

B.10 Healthy Lives, Healthy People: Our strategy for public health in England⁴⁰: Sets out how the Government's approach to public health challenges will:

- Protect the population from health threats – led by central government, with a strong system to the frontline.
- Empower local leadership and encourage wide responsibility across society to improve everyone's

³⁵ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at:

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

³⁶ Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] Available at:

<https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf>

³⁷ The Marmot Review (2011) Fair Society, Healthy Lives. [online] Available at:

<http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf>

³⁸ Department for Communities and Local Government (2015) Planning policy for traveller sites [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457420/Final_planning_and_travellers_policy.pdf

³⁹ HM Government (2011) Laying the Foundations: A Housing Strategy for England [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf

⁴⁰ HM Government (2010) Healthy Lives, Healthy People: Our strategy for public health in England [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216096/dh_127424.pdf

health and wellbeing and tackle the wider factors that influence it.

- Focus on key outcomes, doing what works to deliver them, with transparency of outcomes to enable accountability through a proposed new public health outcomes framework.
- Reflect the Government's core values of freedom, fairness and responsibility by strengthening self-esteem, confidence and personal responsibility; positively promoting healthy behaviours and lifestyles; and adapting the environment to make healthy choices easier.
- Balance the freedoms of individuals and organisations with the need to avoid harm to others, use a 'ladder' of interventions to determine the least intrusive approach necessary to achieve the desired effect and aim to make voluntary approaches work before resorting to regulation.

B.11 A Green Future: Our 25 Year Plan to Improve the Environment⁴¹: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this section are: using and managing land sustainably; and connecting people with the environment to improve health and wellbeing. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Embed an 'environmental net gain' principle for development, including housing and infrastructure.
- Connecting people with the environment to improve health and wellbeing:
 - Help people improve their health and wellbeing by using green spaces including through mental health services.
 - Encourage children to be close to nature, in and out of school, with particular focus on disadvantaged areas.
 - 'Green' our towns and cities by creating green infrastructure and planting one million urban trees.

- Make 2019 a year of action for the environment, working with Step Up To Serve and other partners to help children and young people from all backgrounds to engage with nature and improve the environment.

Sub-national

B.12 Gatwick Diamond Local Strategic Statement 2016 (2017)⁴²: The GD LSS provides a framework for joint working and a means to help fulfil the Duty to Co-operate covering common strategic planning and development themes across the Gatwick Diamond authorities. It sets out the long term strategic planning and investment priorities for the Gatwick Diamond area to guide plan making and decision taking for the individual Gatwick Diamond authorities to 2031. The four main purposes of the GD LSS are to:

- To provide a consistent strategic direction for the Gatwick Diamond area, shaping a sustainable future.
- To set out how that strategic direction will be translated into change and development.
- To establish effective mechanisms for inter-authority cooperation on strategic issues so that longer term decisions made through the plan making processes are fully informed.
- To identify priority themes for joint working.

B.13 Horsham Town Community Partnership 5 Year Plan 2017-2022⁴³: The HTCP consists of local people, groups, organisations and the local authority. The plan sets out the HTCP's aim of reaching out to the local community on local projects which fall into the categories detailed below. These projects relate to issues such as simple advice, signposting, discussing options, ongoing support, project management or grant applications. The four main types of projects include:

- Make Horsham a better place to live.
- Improve opportunities for all.
- Better health for all.
- Staying and feeling safe.

B.14 Housing Strategy (2013-2015)⁴⁴: Sets out a vision, objectives and priorities for housing provision in the District. It aims to increase the delivery of affordable homes, provide effective support for homeless households, provide

⁴¹ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

⁴² The Gatwick Diamond authorities (2016) Gatwick Diamond Local Strategic Statement [Online] Available at: <http://crawley.gov.uk/pw/web/PUB344429>

⁴³ Horsham Town Community Partnership (2011) 5 Year Action Plan

⁴⁴ Horsham District Council (2013) Housing Strategy 2013-2015 [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0020/9029/Housing-Strategy-2013-15.pdf

appropriate housing for vulnerable people and create thriving rural communities in the plan area.

B.15 Housing to Meet Local Needs- Future Delivery (2014)⁴⁵: Outlines the Council's Housing Policy Statement regarding deliverability of affordable housing in the District, including a summary of challenges and targets of how to overcome such challenges.

B.16 Strategic Quality Improvement Plan (2014-2019)⁴⁶: Sets out a health-care strategy for Sussex. This plan sets out healthcare objectives which include physical and mental wellbeing, staff wellbeing, individualised care and patient care in the right place and closer to home.

B.17 Crawley and Horsham Market Housing Mix Report (2016)⁴⁷: The report provides greater detail and clearer analysis of the market housing mix across the two local authorities. It identifies deficiencies in the current housing markets in terms of existing mix and type as well projections for the future. The document also includes recommendations for the future market housing mix and type in both districts. The document related to the findings of the Northern West Sussex SHMA.

B.18 Crawley and Horsham Starter Homes Report (2016)⁴⁸: The report supports the two local authorities' adopted Local Plans and aims to aid future plan-making and planning decisions regarding Starter Homes and first time buyers. The document provides an analysis of the scale and nature of 'Starter Homes' requirements and the implications that may arise in terms of securing a mix of affordable housing including affordable rent and intermediate tenures.

B.19 Northern West Sussex Housing Market Assessment - Affordable Housing Needs Model Update (2014)⁴⁹: The report identifies the affordable housing need in the area broadly covering Crawley, Horsham and Mid-Sussex. The document examines the active housing market including current house prices and the private rental market to give a calculation on affordable housing needs in the Northern West Sussex Housing Market Area and for each of the three constituent local authorities.

B.20 Strategic Housing and Economic Land Availability Assessment (SHELAA) – Housing Report (2018)⁵⁰: The aim of the SHELAA is to provide an assessment of potential housing and economic land in Horsham District and to enable the Council to identify a sufficient supply of deliverable sites to provide five years' worth of housing and identify suitable deliverable sites or broad locations for 6-10 years and 11-15 years where possible. It is an evidence based document used to support the adopted HDPF and its review and emerging Neighbourhood Development Plans.

B.21 Homelessness Prevention Action Plan (2013 (Updated in 2014))⁵¹: The Action Plan commits to preventing homelessness and focuses not only on those households who are homeless or facing homelessness imminently but also on those where future homelessness could be prevented by intervention. This document identifies the specific actions that the Council will undertake to prevent homelessness. These include improving access to training and employment opportunities, the role of the voluntary sector, reduce reoffending and work with 16 and 17 year olds to prevent youth homelessness.

B.22 Horsham Infrastructure Delivery Plan (2014)⁵²: The plan sets out what infrastructure is required to support new growth across the Horsham District. The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the adopted HDPF and to outline how and when these will be delivered.

B.23 Horsham Green Infrastructure Strategy (2014)⁵³: The strategy informs the production of planning policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network. It also seeks to contribute to the creation of sustainable communities through the provision of a wide range of ecosystem services and quality of life and health benefits for both future and existing residents.

⁴⁵ Horsham District Council (2014) Housing Policy Statement [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0013/11029/Housing-Policy-Statement-July-2014.pdf

⁴⁶ NHS Sussex Community (2013) Strategic Quality Improvement Plan 2014/2019 [Online] Available at: <https://www.sussexcommunity.nhs.uk/downloads/about-us/trust-reports/strategies/2017/quality-improvement-plan.pdf>

⁴⁷ Chilmark Consulting for Crawley Borough Council (CBC) and Horsham District Council (HDC) (2016) Market Housing Mix [Online] Available at: <http://www.crawley.gov.uk/pw/web/PUB311637>

⁴⁸ Chilmark Consulting (2016) CBC and HDC Starter Homes Needs and Implications [Online] Available at: <http://www.crawley.gov.uk/pw/web/PUB311638>

⁴⁹ Chilmark Consulting (2014) Northern West Sussex HMA- Affordable Housing Needs Model Update [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0008/66491/Affordable-Housing-Needs-Update-October-2014.pdf

⁵⁰ Horsham District Council (2018) SHELAA Housing Report [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0005/55787/SHELAA-2018-FINAL-v7-App1MSDC.pdf

⁵¹ Horsham District Council (2014) Homelessness Prevention Action Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0005/55787/SHELAA-2018-FINAL-v7-App1MSDC.pdf

⁵² Horsham District Council (2014) Infrastructure Delivery Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf

⁵³ Horsham District Council (2014) Green Infrastructure Strategy [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0007/66544/Green-Infrastructure-Study.pdf

B.24 Sport, Open Space and Recreational Assessment

(2014)⁵⁴: The assessment sets out to ensure that the provision of sports, recreational and open spaces in the District is sufficient, is of an appropriate quality and is in the right place, to meet local needs and in line with the HDPF and NPPF.

B.25 Contaminated Land Inspection Strategy (January

2017)⁵⁵: The strategy outlines how the Council will meet its statutory duties to investigate potentially contaminated land in Horsham District.

B.26 Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (2014)⁵⁶:

The document aims to provide advice to developers and their consultants on how to address local air quality when making a planning application in Horsham District. This guidance forms part of the Horsham District Air Quality Action Plan.

Current baseline

Population

B.27 Horsham District covers 53,000 hectares and is of predominantly rural character with 85% of its landmass falling within the rural classification⁵⁷. Population density in the District is 2.48 persons per hectare and this emphasises its more rural character, given that the figure is significantly lower than that of West Sussex as a whole, which has a population density of 4.05 persons per hectare⁵⁸.

B.28 The District boasts 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 Southwater support 4,100 households, 4,400 households and 3,900 households respectively. It should be noted that

households do not have the same definition as homes. Households are defined by Office for National Statistics (ONS) as one person or a group of people who have the (same) accommodation as their only or main residence. For groups the individuals in question should share at least one meal a day, or share the living accommodation, that is, a living room or sitting room.⁵⁹.

B.29 Many of the settlements in Horsham have experienced increasing populations in recent years. This is particularly the case at Horsham town, Southwater Billingshurst, given that these settlements have seen a number of housing developments in past years⁶⁰.

B.30 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 within the District boundaries which takes in the A24, A264, A272, A279, A281 and A283. The location of the Horsham town within 20 minutes from 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.

B.31 The population of Horsham in mid-2018 was 142,217⁶¹ compared to the 2011 Census, when 131,300 people lived in the District, across 54,900 households⁶². The resident population has an older age profile compared with England, with 18% aged 0 to 15 years (England, 19%) and 22% aged 65 and over years (England, 18%)⁶³. It is reported that of those residents over 65 years of age, 7,500 live alone and are therefore at greater risk of loneliness⁶⁴. Since 2001, there has been a clear reduction in the proportion of 30 to 40-year olds in the District and the percentage of 35 to 39-year olds has seen a greater reduction in the same time period, falling from approximately 8.4%⁶⁵ to 6.2% from 2001 to 2011. A similar trend has been experienced in West Sussex and in the South

⁵⁴ Kit Campbell Associates (2014) Sport, Open Space and Recreation Assessment [Online] Available at: http://www.horsham.gov.uk/_data/assets/pdf_file/0003/66504/Sport-Open-Space-Recreation-Assessment-February-2014.pdf

⁵⁵ Horsham District Council (2017) Contaminated Land Strategy [Online] Available at: http://www.horsham.gov.uk/_data/assets/pdf_file/0014/53411/Contaminated-Land-Strategy-2017.pdf

⁵⁶ Horsham District Council (2014) Air Quality Action Plan [Online] Available at: http://www.horsham.gov.uk/_data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf

⁵⁷ Horsham District Council (2015) HDPF [Online] Available at: http://www.horsham.gov.uk/_data/assets/pdf_file/0006/28563/Horsham-District-Planning-Framework-2015.pdf

⁵⁸ UK Census Data (2011) [online] available at: <http://www.ukcensusdata.com/west-sussex-e10000032#sthash.S5dqgBXz.dpbs>

⁵⁹ Gov.uk (2012) Definitions of general housing terms [Online] Available at: <https://www.gov.uk/guidance/definitions-of-general-housing-terms#household>

⁶⁰ 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>

⁶¹ ONS (2019) Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland: Mid-2018 using April 2019 local authority district codes [Online] Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

⁶² UK Census Data (2011) Horsham [Online] Available at: <http://www.ukcensusdata.com/horsham-e07000227#sthash.1PuT0ZfZ.zziHvNnt.dpbs>

⁶³ West Sussex JSNA (2018) Horsham District- People and Places [Online] Available at: <https://jsna.westsussex.gov.uk/assets/core/Horsham-People-and-Challenges-JSNA-April-2019.pdf>

⁶⁴ West Sussex JSNA (2018) Horsham District- People and Places [Online] Available at: <https://jsna.westsussex.gov.uk/assets/core/Horsham-People-and-Challenges-JSNA-April-2019.pdf>

⁶⁵ Horsham District Council (2018) The Horsham District Economic Profile [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0006/58479/Horsham-Economic-Profile-December-2018.pdf

East in general. The average age in Horsham is 46.1, which is higher than the average for England as a whole which is 39.8⁶⁶. There is expected to be an overall increase in all ages in Horsham from 2018 to 2038, which is in line with the expected population increase across the UK within the next 20 years.⁶⁷

B.32 The pattern of in-migration reflects the growth that Horsham has experienced over the last 20 years. The growth of Horsham District has been greater than that in surrounding areas such as Crawley which has built up to the edge of its administrative boundaries. Districts to the north in Surrey have seen less expansion which is constrained by land designated as Metropolitan Green Belt. Migration in Horsham District is broadly characterised by young adults moving away and new families moving in with children. Most of this movement is from other towns and villages in West Sussex, but there are some flows from south London. The District has also experienced some inward movement of retired people. Possible reasons for this migratory trend could be the general lack of further education opportunities within the District and the low availability of accommodation affordable to those on entry level jobs in the area. Net in-migration fell slightly between 2001 and 2011, which was predominantly due to an increase in the number of 16 to 24-year olds leaving. During the reporting year 2018, this trend continued with a net out-flow of 627 residents among the age group 15 to 19-year olds. This may be as a result of this age group attending higher education. This was slightly balanced out by an increase in net in-migration of over 25s. In addition, more families appear to be moving into the area with higher numbers of young and adolescent children settling in the District and increases in the number of 30 to 49-year olds and those aged between 0 and 14. Considering all age groups in the District, net in-migration was 1,779 during the 2018 reporting year. This level of net in-migration was slightly lower than the 2016 figure of 1,780⁶⁸.

Housing

B.33 From the start of the Plan period (2011/12) and 2018/19 6,908 dwellings have been built in the District. This represents an over-delivery of 508 homes against the annual HDPF target⁶⁹.

B.34 Horsham has a relatively high number (74.5%) of residents living in privately-owned housing as opposed to public housing. This proportion is greater than the national average of 63.3%. The proportion of residents living in private

housing is reflective of the higher salaries which some residents in the District benefit from in comparison with the national average. Many people who reside within the District are long-term residents, are above the working age (18 to 64) and have often lived in the District for a considerable length of time. Only 11.6% of the housing tenure in Horsham is currently socially rented, compared to 16.8% in England⁷⁰.

B.35 House prices are higher in Horsham compared to the West Sussex average and the regional average, as presented in **Table B.1**. In 2018, of the 2,370 properties sold in Horsham only 1 in 4 was less than £300,000. House prices within Horsham town are however comparable to nearby towns of similar size outside of the District such as Chichester and Haywards Heath. House prices within Horsham District are on average much higher when compared to those within other districts within West Sussex such as Crawley and Worthing. The higher prices within Horsham are influenced by the rural classification of much of the District. Many of the houses are therefore built on larger plots which subsequently results in higher property prices⁷¹.

Table B.1 Comparison of average house prices in Horsham, West Sussex and South East for 2019

Location	Horsham	West Sussex	South East
Average Property Value	£379,725	£325,000	£322,000

B.36 Horsham saw a 4% increase in house prices for the period of 2015 to 2016, which is below the 7% average increase in West Sussex. Chichester and Crawley saw the largest growth rates in house prices across West Sussex in the same time period. For Crawley, increases in house prices are likely to be influenced by the relatively short distance to London which makes it an ideal commuter location. More recently, house prices across the District have risen by 1.3% for the year period up to March 2019. The SHMA Update (2014) highlighted that 63.4% of households were unable to afford to buy in the private sector without support, a proportion slightly higher than neighbouring authorities of Mid Sussex

⁶⁶ Horsham District Census Demographics (2011) [Online] Available at: <http://localstats.co.uk/census-demographics/england/south-east/horsham>

⁶⁸ 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>

⁶⁹ Horsham District Council (2019) Annual Monitoring Report 2018/19 [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0010/78373/AMR_2018_2019_CHAPTER_3_Housing.pdf

⁷⁰ 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>

⁷¹ Horsham District Council (2016) The Horsham District Economic Profile [Online] Available at: <http://www.horshamblueprint.org/wp-content/uploads/2017/05/Horsham-Economic-Profile-December-2016.pdf>

(62.7%) and Crawley (62.5%)^{72,73}. Furthermore, the property price to earnings ratio in Horsham District has increased almost threefold in the twenty-year period ending in 2018. In 1998 the property price to earnings ratio in the District was 4.8 compared to 9.7 in 2008 and 13.9 in 2018. The 2018 property price to earnings ratio for Horsham in 2018 was significantly higher than the average for England and Wales. Full-time workers for this entire area could expect to pay an estimated 7.8 times their annual workplace-based earnings on purchasing a home⁷⁴.

B.37 The predominant house size in Horsham is three bedrooms and these types of properties account for 37% of total stock. There are also significant levels of two- and four-bedroom sized properties in the District (24% and 21% respectively). Houses with five bedrooms or more account for 7% of total stock. The 50 to 64 age group is the largest proportion of owner-occupiers, followed closely by those aged 35 to 49 and those over 64 years of age. In total these age groups make-up almost two thirds of the owner-occupier market in Horsham where 3- and 4-bedroom properties account for the majority of owner-occupied properties. The

Table B.2 Housing completions, including affordable housing in Horsham District 2012/13 to 2018/19

Housing category	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
Social/Affordable Housing	114	125	175	130	154	159	297
Intermediate (Shared-Ownership)	33	114	70	-	70	90	22
Sub-Total (Affordable)	147	239	245	130	224	249	319
Private Housing	366	637	653	1,100	682	924	1079
Total	513	876	898	1,230	906	1,173	1,398
% affordable housing	28.7%	27.3%	27.3%	-	24.7%	21.2%	22.8

private rented sector plays a particularly important role in terms of meeting the housing needs of those residents within the 35 to 49 age group, followed by those within the 25 to 34 age group⁷⁵.

B.38 There were 319 gross affordable housing completions for social/affordable rent and intermediate housing during 2018/19 reporting period. This was the highest number of completions of this type for the previous seven years. During the reporting year 2018/19 the Council was able to secure £1,181,519 through S106 agreements for affordable housing in the District. The Council monitors affordable housing provision and the housing waiting lists. As of 1st April 2019, there were 582 households on the Council's social housing register, a decrease of 10 from the previous year. The housing completions in Horsham District are shown below in **Table B.2**. Eleven large individual sites contributed 271 affordable homes to the gross affordable housing figure and these include; Kingslea Farm, East of Billingshurst, Kilnwood Vale, Land at Junction of Stonepit Lane and West End Lane, Paula Rosa Robell Way and Novartis⁷⁶.

B.39 The District's current housing requirement is 800 dwellings per annum as set out in the HDPF adopted in November 2015. This equates to a 5-year requirement of 4,000 units. Considering the addition of a 5% buffer in line with paragraph 73 of the NPPF, the District's housing requirement

for the next 1-5 years is 4,263 units and a further 4,000 units for years 6-10 and years 11-15 thereafter. The SHELAA demonstrates that the Council has enough potential housing sites to meet its five- and ten-year housing requirements⁷⁷. Due to a surplus of sites, the Council has been able to

⁷² Horsham District Council (2018) Authority Monitoring Report (2017/19) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0018/55710/AMR_2017_2018_CHAPTER_3_Housing.pdf

⁷³ Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0010/78373/AMR_2018_2019_CHAPTER_3_Housing.pdf

⁷⁴ Office of National Statistics (2018) Housing Affordability in England and Wales [Online] Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2018>

⁷⁵ Chilmark Consulting (2016) Market Housing Mix- Crawley and Horsham [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0011/41897/Crawley-and-Horsham-Market-Housing-Mix-Report-Final-FCA081216.pdf

⁷⁶ Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0018/55710/AMR_2017_2018_CHAPTER_3_Housing.pdf

⁷⁷ Horsham District Council (2018) Strategic Housing and Economic Land Availability Assessment (SHELAA) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0005/55787/SHELAA-2018-FINAL-v7-App1MSDC.pdf

progress sites which have been assessed as the 'most sustainable'. Through the SHELAA work 4,539 dwellings on sites which are considered 'deliverable' within years 1-5 and 3,616 dwellings which the Council considers developable within years 6-10 have been identified⁷⁸. The number of housing completions on previously developed land in recent reporting years has seen an increase from 212 in 2010/11 to 568 in 2018/19. The percentage of completions on previously developed land sites has risen in 2018/19 from the previous monitoring year from 34.3% to 40.6%⁷⁹. The nine year average up to the year 2018/19 is reported as 40.6%. Due to the rural nature of the District there is comparatively less brownfield land present than in the surrounding districts and boroughs.

Gypsy, Traveller and Travelling Showpeople

B.40 The Gypsy and Traveller Study (December 2012) identified that there were 96 gypsy or traveller pitches in the District. The number of identified gypsy and traveller pitches identified in the District in 2018 was recorded as 116. Of the 116 recorded, 44 were unauthorised caravans predominantly on private land. Of the authorised sites 40 were socially rented caravans and 32 were private caravans⁸⁰.

B.41 The Gypsy and Traveller Study suggested that between 2011 and 2017 there was a need for an additional 39 pitches to be delivered. In the District during the period October 2012 to 1st December 2019, 60 Gypsy and Traveller pitches were granted planning permission on 14 separate sites. A further 4 plots for Travelling Showpeople were granted planning permission on 1 site during the same period of time⁸¹.

B.42 The Council published a second draft of the Gypsy, Traveller and Travelling Showpeople Development Plan Document (DPD) for consultation in December 2017. The DPD was produced to identify further pitches for Gypsies and Travellers, finding that there were insufficient sites available to meet the identified need of the community. It has therefore been decided that needs for Gypsy, Traveller and Travelling Showpeople will be provided for by updating the Needs Assessment (December 2012)⁸², carrying out a new 'Call for

Sites' exercise; including a new Gypsy, Traveller and Travelling Showpeople policy in the Horsham Local Plan Review and using the development management process to allow for new sites⁸³ where appropriate.

Education

B.43 The most up to date records shows that in 2017 there were 83,500 residents aged 16 and over in the District in 2017. For the period January 2018 to December 2018 95.2% of residents aged 16-64 were found to have NVQ Level 1 qualifications or better, 84.5% were found to have NVQ Level 2 qualifications or better, 62.6% were found to have NVQ Level 3 qualifications or better and 43.1% were found to have NVQ Level 4 qualifications or above. This is considerably higher than the regional and UK average, where 89.2% in the South East and 85.4% in the UK have NVQ Level 1 qualifications or better. The percentage of those in Horsham with no qualification for the same period of time has a sample size too small to provide a reliable estimate. 7.8% of the UK population has no qualifications⁸⁴.

B.44 There are 43 primary schools in Horsham District and five secondary schools, of which two have post 16 provision. West Sussex County Council is responsible for the planning, organisation and commissioning of school places in the County, including within Horsham. A number of schools in Horsham are operating at or close to their current pupil capacity. It is expected that large scale development in the District will need to coincide with additional primary and secondary school provision.

B.45 The County Council has identified that there is likely to be an increase of required primary school places (671) and secondary school places (1,555) up to 2022-23 and up to 2028-2029 respectively, with consideration for known committed housing developments. The development supported through the currently adopted HDPF was identified as likely to require the provision of two new primary schools accommodating 420 pupils each and a sixth form entry secondary school accommodating 900 students⁸⁵. Additional early years' provision was also identified as required to

⁷⁸ Horsham District Council (2018) Strategic Housing and Economic Land Availability Assessment (SHELAA) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0005/55787/SHELAA-2018-FINAL-v7-App1MSDC.pdf

⁷⁹ Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0010/78373/AMR_2018_2019_CHAPTER_3_Housing.pdf

⁸⁰ Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0010/78373/AMR_2018_2019_CHAPTER_3_Housing.pdf

⁸¹ Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0010/78373/AMR_2018_2019_CHAPTER_3_Housing.pdf

⁸² Horsham District Council (2012) Gypsy/Traveller, Travelling Showpeople Accommodation Needs Assessment [Online] Available at: <https://www.southdowns.gov.uk/wp-content/uploads/2018/04/TSF-21-Horsham-District-GTAA.pdf>

⁸³ Horsham District Council (2018) Authority Monitoring Report (2017/18) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0018/55710/AMR_2017_2018_CHAPTER_3_Housing.pdf

⁸⁴ NOMIS Labour Market Profile - Horsham [Online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx?town=horsham#supply>

⁸⁵ Horsham District Council (2015) HDPF [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0006/28563/Horsham-District-Planning-Framework-2015.pdf

accommodate 98 children. Across the four school planning areas in Horsham, Billingshurst, Horsham East, Horsham West and Steyning/Storrington all have been identified as having net capacity at primary schools as of autumn 2018. However, of the four school planning areas in the District which contain secondary schools, two (Horsham East and Horsham West) were identified as being above 95% full, the figure at which the school planning area is deemed to be full⁸⁶. A new secondary school is identified in the Land North of Horsham development location to meet this need. A temporary site is being provided in Horsham town from September 2019 to meet these emerging needs.

Deprivation

B.46 When considering all Indices of Deprivation (2019), the District of Horsham falls within the 50% of least deprived areas in the country. There is however disparity across the local authority area of Horsham and some wards are more deprived than others. The wards within Horsham that were identified as the most deprived in the District and in the 40% most deprived quartile in the UK are Forest and Roffey South in Horsham town⁸⁷.

B.47 An area within the ward of Itchingfield, Slinfold and Warnham falls within the 30% most deprived areas in the UK. Areas within the Forest and Roffey South wards are within the 40% most deprived areas in the country. These three areas all saw increased levels of deprivation in comparison to position recorded at the previous data release in 2015. The most noticeable changes were recorded in the areas within the wards of Itchingfield, Slinfold and Warnham and Forest. Horsham ranked the 290th out of a total of 317 local authorities in England, where 1 is most deprived and 317 is the least⁸⁸.

B.48 When considering all Indices of Deprivation (2019), the wards of Holbrook East, Holbrook West, Roffey North, Trafalgar, and Forest are identified as the least deprived in Horsham and fall within the 10% of least deprived wards nationally⁸⁹.

B.49 As reported up to October 2019 the District has a lower proportion of residents (1.3%) who receive Universal Credit than at the regional (2.0%) and national level (2.9%). The

broader span of claimants covered under this benefit than that covered by Jobseeker's Allowance means that as this benefit is rolled out in particular areas, the number of people recorded as being on the claimant count is likely to rise. This trend is however applicable to Great Britain as a whole not only to Horsham. While the proportion of young people (aged 18 to 24) in Horsham who currently receive this benefit (2.0%), is higher than the proportion of older people (aged 25 to 49) who receive it (1.5%), the figure for young people is lower than the figure for the South East (2.7%) and Great Britain (4.0%)⁹⁰.

B.50 In Horsham in 2017 it was estimated that 7.3% of households (4,249) were classed as being fuel poor. This is lower than the figure for West Sussex at this time which was 8.2%⁹¹. These figures are reflective of household income, household energy requirements and fuel prices in a given area.

Health

B.51 The 2011 Census statistics suggest that health in the District is reasonably good with 85.4% of the population reporting themselves to be in very good, or good health. Some 11.1% state they are in fair health, with only 2.7% and 0.8% in bad or very bad health respectively. Furthermore, 85.4% of the population reported that their day to day activities are not limited by their health, 8.8% state that they are limited a little and 6.0% limited a lot. Some 10.3% of the population receive paid care⁹².

B.52 Average life expectancy in Horsham is slightly above the national average, at 82.3 for males and 84.7 for females⁹³. Life expectancy is 7.6 years lower for men and 6.6 years lower for women in the most deprived areas of Horsham than in the least deprived areas. The estimated level of adult classified as overweight or obese is slightly lower in the District than at the national level. 61.1% of the local population falls within this classification compared to the national figure which is 62.0%.

B.53 In 2018, Horsham (69.0%) had a slightly lower percentage of adults who consider themselves physically active than West Sussex (69.8%). The figure for the District is however above the national average (66.3%)⁹⁴. The latest update of the Sport England Active People Survey interviewed

⁸⁶ West Sussex County Council (2019) Planning School Places [Online] Available at:

https://www.westsussex.gov.uk/media/12383/planning_school_places.pdf

⁸⁷ Ministry of Housing, Communities and Local Government (2019) Indices of Deprivation: 2019 and 2015 [Online] Available at:

http://dclgapps.communities.gov.uk/imd/ioid_index.html

⁸⁸ Ministry of Housing, Communities & Local Government (2019) IoD 2019 Interactive Dashboard. Local Authority Focus: Horsham [Online] Available at: <https://app.powerbi.com/view?r=eyJrJjoiOTdjYzlyNTMtMTcxNi00YmQ2LW11YzgtMTUyYzZmOWQ3NzQ2liwidC16ImJmMzQ2ODEwLTIjN2Q2tNDNkZS1hODcyLTl0YTJlZlM5OTVhOCJ9>

⁸⁹ West Sussex County Council (2019) West Sussex Joint Strategic Needs Assessment Briefing: Indices of Deprivation 2019 [Online] Available at: <https://jsna.westsussex.gov.uk/assets/core/Briefing-West-Sussex-IMD-2019.pdf>

⁹⁰ NOMIS Labour Market Profile - Horsham [Online] Available at:

<https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx#tabrespop>

⁹¹ Department for Business, Energy and Industrial Strategy (2017) Sub-regional fuel poverty data 2019 [Online] Available at:

<https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2019>

⁹² NOMIS – Local Area Report (2011) –Horsham [online] Available at:

<https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

⁹³ Public Health England (2019) Local Authority Health Profile 2019 -Horsham [Online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000227.html?area-name=horsham>

⁹⁴ Public Health England (2019) Local Authority Health Profile 2019 -Horsham [Online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000227.html?area-name=horsham>

500 people in Horsham about their weekly physical activity. It was reported for the October 2015 to September 2016 figures that of those interviewed 34.1% participated in thirty minutes moderate intensity sport once a week (at least four sessions in the previous 28 days). This showed slight decrease on figures for April 2015 to March 2016 which was 34.5%⁹⁵.

Open spaces, sports and recreation

B.54 95km² land area of the Horsham District is situated within the South Downs National Park⁹⁶, which is an important informal recreational resource. Horsham contains over 400 hectares of greenspace, including 53 play areas which are managed by the Council. Many of the parishes are responsible for the maintenance of additional sites. There are also a number of recreation grounds, woodlands, allotments, cemeteries, green corridors and a number of strategic green spaces within the District. Notable areas of strategic green space include Southwater Country Park and Chesworth Farm, Warnham Local Nature Reserve and Horsham Park⁹⁷.

B.55 The northern area of Horsham District has a particularly strong provision of green infrastructure. The High Weald Area of Outstanding Natural Beauty (AONB) adjoins the built-up area boundary of the town of Horsham to the east and is also in close proximity to a number of other villages, including Mannings Heath, Lower Beeding and Cowfold. The South Downs National Park to the south of the District provides access to other important elements of green infrastructure for many residents. Many settlements also have a range of parks, leisure centres and allotments⁹⁸.

B.56 The overall quality, quantity and accessibility of existing leisure and recreation facilities in the District is good, with a range of leisure facilities (including three swimming pools, leisure centres, playing fields and parks, allotments and children's' play areas). A total of 1,087,307 visitors at Horsham's leisure centres were recorded during the 2018/19 report period. This represented a 2.8% increase on the number of visitors in the previous reporting period. During the most recent reporting period 312 net sq. metres of leisure floorspace was completed in town centre locations and 200

net sq. metres of leisure floorspace was completed in locations outside of town centre locations⁹⁹. In addition, other forms of provision for leisure and recreation activities are present in the District, including a cinema, museums, libraries, restaurants and pubs.

B.57 A number of strategic recreation routes also pass through the District including the Down's link¹⁰⁰. The South Down's Way falls within the boundaries of the South Downs National Park to the south of Storrington with Horsham. Route 223 of the National Cycle Network also passes through the District. The route runs from the north of Horsham District at Chertsey, passing into the District and then travelling to the west of the town of Horsham, through Southwater and Steyning. This route provides access to Shoreham-by-Sea to the south of the District where it connects to Route 2 which allows for travel along the southern coast.

B.58 In 2014 an updated audit of the quantity of public accessible sports, recreation and open space across the District was carried out. Of the overall multi-functional greenspace in the District, 25% consists of amenity greenspace, 34% of natural greenspace and 41% of parks and recreation grounds. The total quantity of multi-functional green spaces in the District equates to 15.3m² per person of neighbourhood space, 2.9m² per person of sub-district open space and 2.6m² per person of strategic green space¹⁰¹.

B.59 The Sport, Open Space and Recreation Assessment indicated that there are some shortages in open space and leisure provision in the District and a need for some new provision. This included provision for play, multi-functional greenspaces (MFGS), youth facilities, allotments and indoor tennis courts. In addition, work on green infrastructure provision has also demonstrated that despite the rural character of the District, the amount of accessible green space is limited for some residents, often due to private land ownership or limited public footpath network. Some of the settlements which were identified as most likely to have significant deficiencies in open space provision include Broadbridge Heath and North Horsham^{102 103}. Furthermore, the delivery of new developments across the District could

⁹⁵ Sport England (December 2016) Active People Survey

⁹⁶ Horsham District Council (2015) HDPF [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0006/28563/Horsham-District-Planning-Framework-2015.pdf

⁹⁷ Horsham District Council (2017) Play Strategy 2017-2027 [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/51897/Play-Strategy-2017-2027.pdf

⁹⁸ 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

⁹⁹ Horsham District Council (2019) Authority Monitoring Report 2018/19 [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0007/78379/AMR_2018_2019_CHAPTER_6_Policy_Indicators.pdf

¹⁰⁰ Horsham District Council (2015) Horsham District Planning Framework [Online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0006/28563/Horsham-District-Planning-Framework-2015.pdf

¹⁰¹ Kit Campbell Associates (2014) Sport, Open Space and Recreation Assessment [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0019/31582/Sport-Open-Space-Recreation-Assesment.pdf

¹⁰² 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

¹⁰³ Kit Campbell Associates for Horsham District Council (2014) Sport, Open Space and Recreation Assessment [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0019/31582/Sport-Open-Space-Recreation-Assesment.pdf

result in increased deficiency in open space provision unless this need is planned for in a sustainable manner.

Crime

B.60 In general Horsham is a relatively safe District to live in. Actual crime rates in the District are amongst the lowest in the country with 46 per 1,000 of the population compared to the figure for Sussex which was recorded as 70 per 1,000 as of June 2019¹⁰⁴. The total number of recorded crimes in Horsham in the selected categories has decreased by 4% between the monitoring years ending in 2018. Increases in certain types of crime relate to violent crime, weapon use and illegal drug use, at both the County and national levels. At a *Table B.3 Horsham District: Selected recorded crime statistics*

County level, within West Sussex, anti-social behaviour, robbery and violent crime are the principal contributors to the recorded level of crime and these recorded categories account for over half of all crimes committed¹⁰⁵.

B.61 The number of crimes which are committed and recorded for a given area can be influenced by the design of new buildings and public spaces (i.e. such a lack of public surveillance or lighting for new development). Crime rates are also substantially impacted by other factors, such as economic influences, better reporting and increasing populations. **Table B.3** below gives a selective illustration of crime levels in Horsham¹⁰⁶.

Year Crime	2014	2015	2016	2017	2018	Yearly Difference	% Yearly Difference
ASB	3,035	2,524	2,085	1,863	1,666	-197	-11%
Burglary	625	513	492	672	413	-259	-39%
Robbery	8	28	25	31	35	4	13%
Vehicle	504	357	327	510	513	3	1%
Violent	1,102	1,542	1,793	1,980	2,180	200	10%
Shoplifting	348	417	347	309	319	10	3%
CD&A	753	887	797	791	723	-68	-9%
Other Theft	593	636	637	677	663	-14	-2%
Drugs	159	146	140	140	179	39	28%
Bike Theft	100	93	110	91	102	11	12%
Theft from Person	56	37	43	58	45	-13	-22%
Weapons	28	22	59	61	69	8	13%
Public Order	146	385	433	519	540	21	4%
Other	64	106	128	145	125	-20	-14%

¹⁰⁴ 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>

¹⁰⁵ UK Crime Stats (2019) West Sussex Police [Online] Available at: <https://ukcrimestats.com/Subdivisions/CTY/2244/>

¹⁰⁶ Horsham District Council (2018) Authority Monitoring Report (2017/18) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/55713/AMR_2017_2018_CHAPTER_6_Policy_Indicators_final.pdf

Year Crime	2014	2015	2016	2017	2018	Yearly Difference	% Yearly Difference
Total	7,521	7,693	7,416	7,847	7,572	-275	-4%

B.62 Nationally, average crime rates are lower in rural areas than urban areas. For example, in 2016/17, the rate of violence was 14.1 per 1,000 population in predominantly rural areas compared to 22.2 per 1,000 population in predominantly urban areas. This would suggest that the rural areas of Horsham would similarly have a lower rate of violence than the more built up areas¹⁰⁷.

B.63 In 2015-17 there were 274 people killed or seriously injured on Horsham's roads, representing a rate of 65.9 per 100,000 population. This figure was significantly higher than the national rate which was recorded as 40.8 per 100,000

population¹⁰⁸. The relatively high rate of people killed or seriously injured on the District's roads may be reflective of the high rate of car use in Horsham.

Air and noise pollution

Air and noise pollution are issues for the health of residents and workers in Horsham District, particularly around Storrington and Cowfold where the areas have been identified as Air Quality Management Areas (AQMAs) in the district. Air pollution in the District is addressed in more detail later in this appendix.

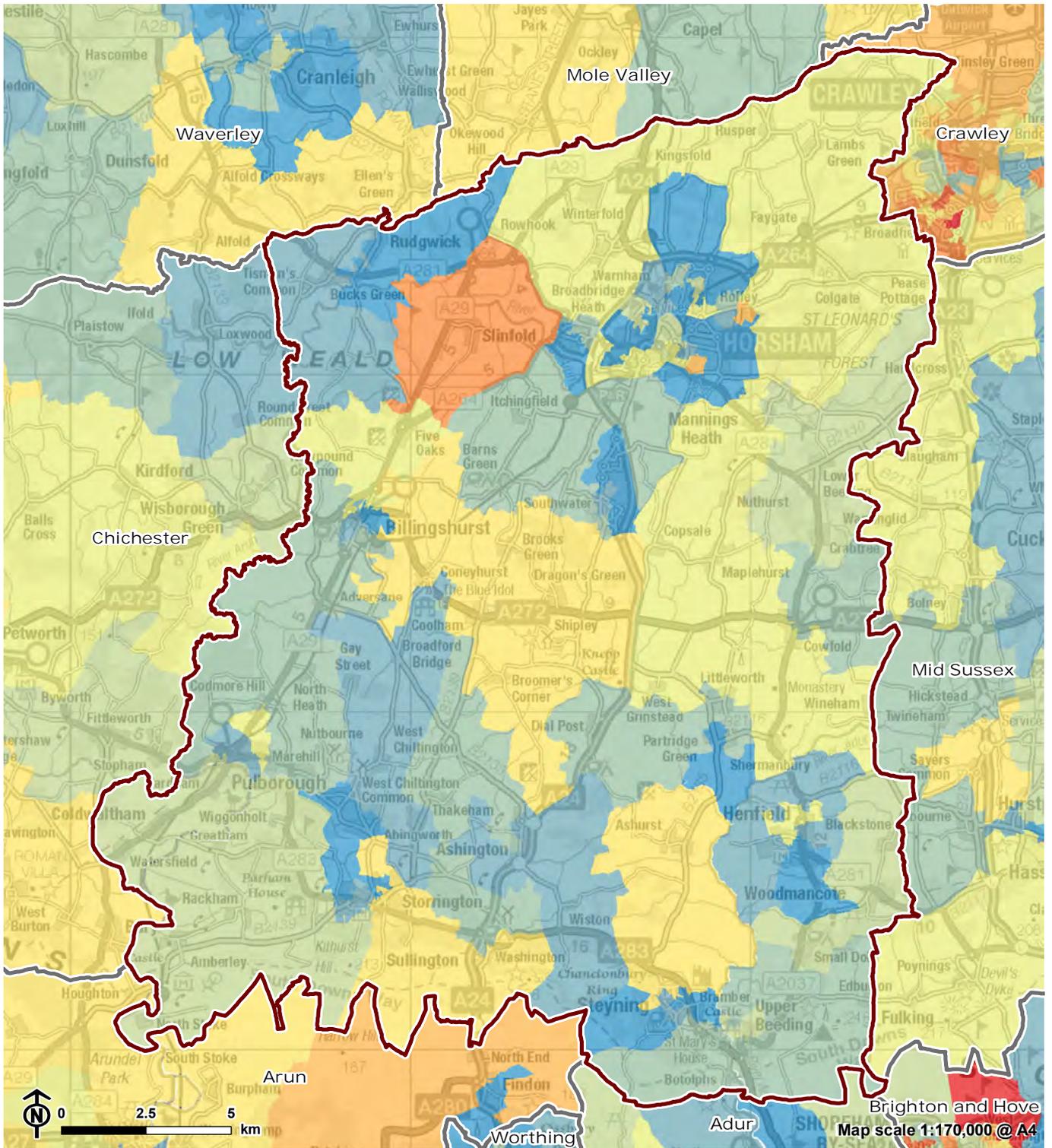
Table B.4 Key sustainability issues for Horsham and likely evolution without Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objectives
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.	Without the Local Plan Review it is likely that services and facilities will still be delivered. Population growth and demographic change is accounted for through many policies within the HDPF, including Policies 42 and 43 which support the creation of socially inclusive and adaptable environments and the provision of new or improved community facilities or services. However, it is less likely that provision supported through these policies will be in appropriate locations, or of sufficient quality and quantity to keep pace with demands of particular groups. The Local Plan Review offers an opportunity to deliver the required services and facilities in a coherent, sustainable manner alongside new development.	SA objective 2
House prices in Horsham are high comparable to the regional and national average. The level of socially rented housing which is currently provided in the District is also significantly lower than the regional and national level. 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.	Without the Local Plan Review it is likely that house prices will continue to be an issue across the District. Policies 15, 16 and 18 in the HDPF seek to address the delivery of new homes in Horsham, including affordable units and accommodation for more specialist groups. However, the Local Plan Review offers the opportunity to facilitate and expedite the delivery of affordable housing and private market accommodation which will also help to meet the needs of more specialist groups including older people. The review process will also help support the provision of a more appropriate mix of new homes to meet the requirements of local families. Policy 21, 22 and 23 in the HDPF address Gypsy and Traveller accommodation in the District and will continue to apply without the Local Plan Review. However, the Council has decided to address the need for appropriate accommodation for Gypsies and Travellers through a new Gypsy, Traveller and Travelling Showpeople policy and sites in the Local Plan Review. It is likely that without the review that the development management process will continue to have to play a significant role in meeting this requirement. As such sites are more likely to come forward at less sustainable and appropriate locations without the review process.	SA objective 1
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	Without the Local Plan Review there is potential for issues of disparity to become more apparent in the District. Policies 15, 16 and 18 in the HDPF seek to address the issue of access to housing within the District, while Policies 42 and 43 seek to support the provision of services and facilities which are likely to help address	SA objective 1 SA objective 2

¹⁰⁷ Crime, January 2018 [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/676118/Crime_Jan_2018.pdf

¹⁰⁸ West Sussex JSNA (2018) Horsham District- People and Places [Online] Available at: <https://jsna.westsussex.gov.uk/assets/core/Horsham-People-and-Challenges-JSNA-April-2019.pdf>

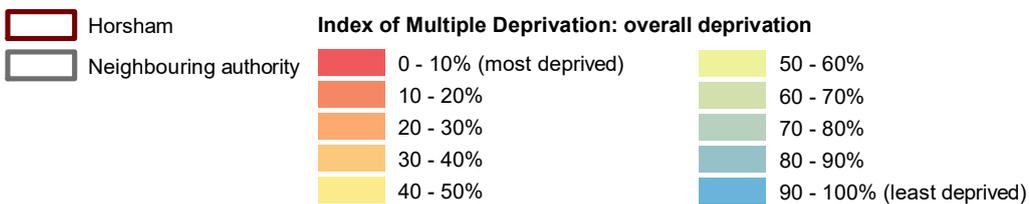
Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objectives
<p>Horsham. A number of wards are within 40% of the most deprived in the UK.</p>	<p>improve living standards in the District. These policies would continue to apply in the absence of the Local Plan Review. The review process presents the opportunity to build on the thrust of these policies to ensure that indicators of disparity such as access to housing, income deprivation, health deprivation, employment deprivation, living environment deprivation and education skills deprivation are appropriately addressed. This approach will also allow for changing circumstances in the District to be more appropriately addressed.</p>	<p>SA objective 3 SA objective 5</p>
<p>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.</p>	<p>The topic of health is intertwined with many policies throughout the current HDPF. This includes Policies 40, 42 and 43 which seek to encourage active modes of transport, create socially inclusive and adaptable environments and provide new or improved community facilities or services. However, without the Local Plan Review policies will be less suitable to help prevent any continued rise in levels of obesity in the District, although national campaigns may work to reduce this. The Local Plan Review could further contribute to tackling obesity through policies that more appropriately seek to encourage uptake of active modes of transport and access to green space and other recreation opportunities. The Local Plan Review also presents an opportunity to address health deprivation in the District by supporting the provision of healthcare facilities and other relevant improvements at areas of most need.</p>	<p>SA objective 2 SA objective 3 SA objective 5 SA objective 14</p>
<p>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.</p>	<p>Policies 31, 32, 42 and 43 in the HDPF seek to support the appropriate maintenance and provision of new green infrastructure, open spaces and services and facilities for residents. However, without the Local Plan Review there is potential that the quality of open spaces will deteriorate and access to these types of provisions in certain areas will remain limited. The Local Plan Review offers the opportunity to better address the changing circumstances in the plan area by ensuring the protection and enhancement of access to and quality of open space and services and facilities. The review process will also allow for new local green spaces to be planned and incorporated alongside new development.</p>	<p>SA objective 2 SA objective 7</p>
<p>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.</p>	<p>Policy 33 of the HDPF sets out design principles for new development in the District and these include the incorporation of measures to reduce opportunities for crime. This policy would remain in place in the absence of the Local Plan Review. The Local Plan Review however presents an opportunity to build on the requirement of this policy to encourage aims to make the local environment and streets safer, for example through relevant approaches to 'designing out' crime. Any new policy would contribute to achieving this aim alongside other local and national measures.</p>	<p>SA objective 4</p>



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CB:KS EB:Beetham_m LUC FIGB_1_10660_IMD_A4P 31/01/2020 Source: OS, MHCLG

Figure B.1: Index of Multiple Deprivation in Horsham District



Economy

Policy context

International

B.64 There are no specific international or European economic policy agreements relevant to the preparation of the Local Plan Review and the SA, although there are a large number of trading agreements, regulations and standards that set down the basis of trade within the European Union (subject to changes post-Brexit) and with other nations.

National

B.65 National Planning Policy Framework (NPPF)¹⁰⁹ contains the following:

- The economic role of the planning system is to contribute towards building a “*strong, responsive and competitive economy*” by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation. There is also a requirement for the planning system to identify and coordinate the provision of infrastructure.
- Planning policies should address the specific locational requirements of different sectors.
- Local planning authorities should *incorporate planning policies which “support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”*.
- When considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre. Sustainable growth and expansion of all types of business and enterprise in rural areas should be supported, both through conversion of existing buildings and well-designed new buildings.
- The NPPF requires Local Plans to “*set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.*”

B.66 National Planning Practice Guidance (PPG)¹¹⁰:

Reiterates the importance for Local Plans to include a positive strategy for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.

B.67 The Local Growth White Paper (2010)¹¹¹: Highlights the importance of economic policy that focusses on the delivery of strong, sustainable and balanced growth of income and employment over the long-term, growth which is broad-based industrially and geographically to provide equality of access and opportunity and build businesses that are competitive internationally.

B.68 Rural White Paper 2000 (Our Countryside: the future – A fair deal for rural England)¹¹²: Sets out the Government’s Rural Policy Objectives:

- To facilitate the development of dynamic, competitive and sustainable economies in the countryside, tackling poverty in rural areas.
- To maintain and stimulate communities and secure access to services which is equitable in all the circumstances, for those who live or work in the countryside.
- To conserve and enhance rural landscapes and the diversity and abundance of wildlife (including the habitats on which it depends).
- To promote government responsiveness to rural communities through better working together between central departments, local government, and government agencies and better co-operation with non-government bodies.

B.69 LEP Network Response to the Industrial Strategy Green Paper Consultation (2017)¹¹³:

The aim of the document is to ensure that all relevant local action and investment is used in a way that maximises the impact it has across the Government’s strategy. Consultation responses set out how the 38 Local Enterprise Partnerships will work with Government using existing and additional resources to develop and implement a long term Industrial Strategy.

¹⁰⁹ Department for 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

¹¹⁰ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at:

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

¹¹¹ Department for Business, Innovation and Skills (2010) Local Growth: Realising Every Place’s Potential. Available at:

<https://www.gov.uk/government/publications/local-growth-realising-every-places-potential-hc-7961>

¹¹² HM Government (2000) Rural White Paper (Our Countryside: the future – A fair deal for rural England) [online] Available at: <http://www.tourisminsights.info/ONLINEPUB/DEFRA/DEFRA%20PDFS/RURAL%20WHITE%20PAPER%20-%20FULL%20REPORT.pdf>

¹¹³ LEP Network (2017) Response to the Industrial Strategy Green Paper Consultation [Online] Available at: <https://www.lepnetwork.net/media/1470/lep-network-industrial-strategy-response-april-2017-final.pdf>

Sub-national

8.18 West Sussex Economic Growth Plan (2018)¹¹⁴: A review of the potential for growth in West Sussex and identifies the priority objectives:

- Maximising the opportunities from Gatwick.
- Strengthening coastal towns.
- Green Energy County.
- Developing the visitor economy.
- Future workforce.

B.70 Gatwick Diamond Strategic Business Plan 2018-2021¹¹⁵: A vision to concentrate on critical strategic issues, to collaborate with local authority and private sector partners to lobby, influence, inspire and promote the Gatwick Diamond locally, nationally and internationally as the best connected, fastest growing and most dynamic business location.

B.71 Gatwick Revised Business Plan to 2024¹¹⁶: The plan sets out a vision for the airport up to 2024. The vision sets out a number of key elements including improvements in all elements of the passenger journey throughout the airport, growth in passenger traffic to around 37 million towards 2020, growth in non-aeronautical spend per passenger through innovation and improved offerings and £1 billion of capital expenditure between 2014 and 2020.

B.72 The Coast to Capital Strategic Economic Plan (2018-2030)¹¹⁷: The Strategic Economic Plan sets out a statement of ambition and action for the Coast to Capital Local Enterprise Partnership (LEP) towards 2030. The Gatwick Diamond forms an important element of the LEP area comprising the cluster of towns in East Surrey and West Sussex surrounding Gatwick airport. It has a combined economy of £24 billion and 368,000 jobs, representing an economic relationship between the airport and the local area. The plan sets out the eight economic priorities which make up the programme for growth. They are as follows:

- Deliver prosperous urban centres.
- Develop business infrastructure and support.
- Invest in sustainable growth.

- Create skills for the future.
- Pioneer innovation in core strengths.
- Promote better transport and mobility.
- Improve digital network capability.
- Build a strong national and international identity.

B.73 Horsham Infrastructure Delivery Plan (May 2014)¹¹⁸: The plan sets out what infrastructure is required to support new growth across the Horsham District. The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the HDPF and to outline how and when these will be delivered.

B.74 Horsham Corporate Plan (2016-19)¹¹⁹: The Corporate Plan identifies key priorities grouped and presented in four broad headings which cover economic, environmental, social and organizational responsibilities. These priorities are as follows:

- Support communities.
- Improve and support the local economy.
- Efficient and great value services.
- Manage the natural and built environment.

B.75 Horsham Economic Strategy 2017-2027¹²⁰: The strategy sets out a vision to be achieved by 2027 and five priorities. The strategy vision sets out to make Horsham a first choice business and visitor destination. The five main priority areas are as follows;

- Securing inward investment, focused on the offer of North Horsham and Novartis in the short term.
- Promoting enterprise by ensuring there is a range of quality commercial floorspace.
- Development skills and provide employment opportunities to those who are finding it difficult to get jobs.
- Infrastructure provision to address the barriers to economic growth including higher speed broadband and mobile coverage.

¹¹⁴ West Sussex County Council (2018) West Sussex Economic Growth Plan 2018-2023 [Online] Available at:

https://www.westsussex.gov.uk/media/11971/economic_growth_plan.pdf

¹¹⁵ Gatwick Diamond Initiative (2018) Gatwick Diamond Strategic Business Plan 2018-2021 [Online] Available at:

<http://www.gatwickdiamond.co.uk/media/95386/Gatwick-Diamond-Business-Plan-2018-to-2021.pdf>

¹¹⁶ Gatwick Airport (2013) A New Deal at London Gatwick Revised Bused Business Plan to 2024

¹¹⁷ Gatwick 360 (2018-2030) Coast 2 Capital Strategic Economic Plan [Online] Available at:

https://www.coast2capital.org.uk/storage/downloads/coast_to_capital_strategic_economic_plan_2018-2030_pdf-1535099447.pdf

¹¹⁸ Horsham District Council (2014) Infrastructure Delivery Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf

¹¹⁹ Horsham District Council (2016) Cooperate Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0005/31478/HDC-Corporate-Plan-2016-19-Final-220216.pdf

¹²⁰ Horsham District Council (2017) [Online] Available at: <https://www.horsham.gov.uk/business/economic-strategy>

- Promoting the district offer by building on current strengths and securing a vibrant visitor economy.

B.76 Horsham Visitor Economic Strategy 2018-2023¹²¹:

The Partnership's vision for this strategy builds on the Horsham Economic Strategy Vision statement: Think Horsham. The strategy aims to drive success and change across the District with a vision of Horsham: hub and host. One main aim for achieving this vision includes *"To increase the benefits the visitor economy brings to the district and monitor its performance focusing on: a. Attracting longer staying visitors and b. Increasing visitor spend across the District."*

B.77 Horsham Town Centre Vision (Consultation Draft)¹²²:

The vision sets out an aspirational, comprehensive and deliverable medium term vision (10-15 years) for Horsham Town Centre. This document is to be used by the Council, and others, to seek to ensure proposals reflect the detail of the vision.

Current baseline

B.78 The District's residents are generally economically affluent and educated to a high standard. 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 LEP area, which is committed to growing the economy of the area and creating job opportunities.

B.79 The Gatwick Diamond is one of the strongest economies in the UK with 45,000 businesses and £24 billion Gross Value Added (GVA). The area's sector strengths include: advanced manufacturing and engineering; aviation, aerospace and defence; financial and professional services; life sciences, health technologies and medical devices; environmental technologies; and food and drink¹²³.

B.80 The Coast to Capital LEP¹²⁴ operates as a network of functional economic hubs within which many international brands have their UK bases. The LEP is the combined seventh largest economy in England with a total GVA of £50.7 billion. Horsham has a GVA of £3,573 million which places it sixth out of the fourteen local authorities that comprises the LEP. Labour productivity for the District is recorded as

£25,889 which is slightly below the average for the LEP area (£26,202)¹²⁵.

B.81 The future projected growth to Gatwick Airport is likely to have an influence on employment opportunities accessible to the residents of Horsham. The airport is planning to accommodate growth in air traffic from the 2013 figure of around 34 million passengers, to around 37 million passengers towards 2020. It is predicated that £1bn of capital expenditure will result at the airport between 2014 and 2020. The Masterplan for the airport indicates that the maximum throughput for Gatwick remains above 40 million passengers per annum which is expected to be achieved by the early 2020's¹²⁶.

B.82 Horsham town is the main urban area in the District and supports a range of employment opportunities. It was ranked as second most attractive market town to live in UK in 'The Times' list of top market towns in 2015. The town benefits from an active and engaged local community. It is also part of the 'Creative Corridor' between London and Brighton which may provide future opportunities for growth within the town in certain sectors. The town centre has been noted to have weaknesses in terms of the size of retail units which historic buildings in the centre provide for occupiers. However, the historic environment and character is also one of the reasons people choose to visit the town. In recent years much of the office stock in Horsham town centre has been lost to residential use through the prior approval process. Some of this loss has been older stock less suited to business purposes. A demand for modern office space has been identified and there remains demand for B uses in Horsham town. Some of the retail offer needed to meet local requirements has been identified as not being met through current provision¹²⁷.

B.83 The loss of office space and changing business practices has changed the number of town centre midweek daytime visitors who have resulted to town centre locations in recent years. Horsham is in close proximity to Guildford, Crawley and Worthing meaning that it has to continue to attract further investment to remain competitive. Prime rents in Horsham have stayed at around £85 per square foot (psf) for the most central zone of the town for the period 2015 to 2017. This is

¹²¹ Horsham District Council (2017) Horsham Visitor Economic Strategy 2016-2023 [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0008/49337/Final-Strategy.pdf

¹²² Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision

¹²³ Gatwick Diamond Initiative (2018) Gatwick Diamond Strategic Business Plan 2018-2021 [Online] Available at: <http://www.gatwickdiamond.co.uk/media/95386/Gatwick-Diamond-Business-Plan-2018-to-2021.pdf>

¹²⁴ The Coast to Capital LEP takes in the local authorities of Croydon, Adur, Brighton & Hove, Crawley, Reigate and Banstead, Mid Sussex, Horsham, Mole Valley, Chichester, Worthing, Arun, Tandridge, Lewes, and Epsom and Ewell.

¹²⁵ The Coast to Capital LEP (2018) The Coast to Capital Strategic Economic Plan 2018-2030

¹²⁶ Gatwick Airport (2013) A New Deal at London Gatwick Revised Business Plan to 2024

¹²⁷ Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision

however significantly lower than the pre-recession level at £105 psf¹²⁸.

B.84 The decline of British High Streets is reported to be “getting faster” however this is a trend which is being experienced across the UK. The growth of e-commerce and changes in consumer habits, have greatly influenced this trend. The town has catchment of around 93,000 and this is considered to be average for its size. Overall the town centre is considered to have a small, strong local economy, which is thriving¹²⁹.

B.85 Wholesale and retail trade (including the repair of motor vehicles) makes up the largest industry in the District with 15.4% of the working population employed in this industry. The next largest sectors are health and social work activities 10.2% and education with 9.6%.¹³⁰

B.86 In general, it is noted that there is a higher percentage of residents in higher and intermediate occupations as well as self-employment compared with the national average. The lack of higher educational facilities in Horsham has resulted in a low percentage of students in higher or further education in the District. Professional occupation workers are the largest employment group for Horsham (25.5%) followed by associate professional and technical occupations (15.4%) and manager, directors and senior officials (11.5%). Horsham has a higher average wage (£33,789) than that recorded for the South East region (£31,954) and nationally (£29,692)¹³¹.

B.87 Horsham District’s economically active population reduced to 75.9% in the year ending in December 2018. This figure is below that for the county, region and nation. There has been a large reduction in economically active females down from over 80% to less than 70%. At county, regional and national levels a reverse of this trend has occurred, with more of the population becoming economically active during the same period of time¹³².

B.88 Compared to the other local authorities in West Sussex, Horsham has the greatest net imbalance of commuters (-10,126), where the inflow of commuters is 16,728 and the outflow of commuters is 26,854. The highest proportion of workers commuting into Horsham District is from Crawley (14%) and Worthing (12%). There is a higher proportion of

workers commuting out to Crawley (23%), Mid-Sussex (8%), all London metropolitan boroughs (6.5%) and Brighton and Hove (6.4%) compared to the proportion of workers commuting in from these locations. These patterns are influenced by Horsham’s strong transport links to surrounding areas which provide a strong employment offer. The A24 travels through Horsham and allows for connections to both Crawley and Worthing. Strong links are also provided to London and the South Coast via M23, M25, A24 and A29. Furthermore over 80 rail services are available to London daily¹³³. The highest proportion of out commuters from Horsham to Crawley is likely to reflect the location of Gatwick Airport and business centre, a vast employment hub at the centre of the Gatwick Diamond in Crawley¹³⁴.

B.89 In total, the gross and net employment floorspace developed within the District for the year 2017/18 was 25,070 m² (the net figure is 20,788 m²). This is substantially higher than that recorded for the 2016/17 year, which was 19,352 m². Over 59% of new employment floorspace developed in the monitoring year was for B8 use (Storage & Distribution). The 2017/18 rate of employment land delivery was the highest record over the past decade, which indicates that in broad terms, the economy has picked up and Horsham District is a desirable business location within the Gatwick Diamond. However, employment floorspace completions decreased from 25,070 sq. metres to 15,936 sq. metres between 2017/18 and 2018/19¹³⁵¹³⁶. In regard to unemployment, in 2016 the rate of claimants (people claiming benefit principally for the reason of being unemployed) in the District was 6.0%, compared to 8.3% in the South East and 11.0% in the UK. The percentage of people claiming Job Seekers Allowance in Horsham was 0.5% lower than the national average (1.1%). While there has been a fall across all age categories in terms of the number so people receiving Job Seekers Allowance, 18 to 24-year olds are still more likely to be claiming this benefit than older people. This may be due in part to the lack of further educational facilities and reduced access to entry-level jobs in the District. Of the population in Horsham, 79.1% are economically active which is slightly lower than the figure for

¹²⁸ Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision

¹²⁹ Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision

¹³⁰ NOMIS – Local Area Report (2018) – Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

¹³¹ NOMIS- Local Area Report (2018) Horsham [Online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx#tabempunemp>

¹³² 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>

¹³³ 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>

¹³⁴ West Sussex District Council (2011) Census Bulletin- Travel for work in and beyond West Sussex [Online] Available at: https://www.westsussex.gov.uk/media/4622/censusbulletin_traveltowork.pdf

¹³⁵ Horsham District Council (2018) Authority Monitoring Report (2017/18) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/55713/AMR_2017_2018_CHAPTER_6_Policy_Indicators_final.pdf

¹³⁶ Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0007/78379/AMR_2018_2019_CHAPTER_6_Policy_Indicators.pdf

the South East region which is 80.9%. This figure reflects the increasingly ageing population in Horsham¹³⁷.

B.90 In relation to the visitor, there are over 50 businesses and organisations across the District, which offer a wide variety of attractions and activities to visitors. The most popular attraction in Horsham is Horsham Museum and Art Gallery, where the free attraction had 91,312 visitors in 2015. This represented a 6.2% increase from the previous year. Other popular attractions in the District include the RSPB Pulborough Brooks, Amberley Museum (in the South Downs National Park) and Heritage Centre and Sussex Prairie Garden. In Horsham the visitor economy supports 6.1% of jobs and although the District's visitor economy experienced

some growth in 2015, it was marginal compared to the national average which was 3.8%. The number and value of day visitors to the District was recorded as 2,870,000 and £88,970,000 respectively. The figures recorded for the District for these indicators perform well when compared to the South East and England. Overnight visitors spend on average £88.89 per trip which is comparatively lower than surrounding local authority areas, such as Chichester, Mid Sussex and Crawley which recorded £229.84, £186.05 and £175.44 respectively for this indicator¹³⁸.

B.91 The UK has now left the European Union. It is uncertain what effect this will have on the Horsham economy.

Table B.5 Key sustainability issues for Horsham and likely evolution with the Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
Horsham is generally seen to be an economically affluent area and the area has a higher average wage than the regional and national average. 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.	It is uncertain how the job market will change without the implementation of the Local Plan Review and some degree of change is inevitable, particularly given the uncertainties posed by Brexit. Policies 7, 9, 10 and 11 of the HDPF seek to ensure the growth of new economic and employment opportunities including those for tourism and rural employment and also to protect existing Key Employment Areas. Furthermore Policy 39 addresses the provision of new infrastructure to meet new needs of development including employment growth. However, the Local Plan Review offers the opportunity to create and safeguard jobs through the allocation and promotion of new employment generating uses including office and industrial spaces and the promotion of the rural economy, as well as promoting access and opportunity for all.	SA objective 3 SA objective 16 SA objective 17
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.	The HDPF through Policies 12 and 13, in particular, which set out the hierarchy for the District's town and village centres as well as Council's 'Town Centres First' strategy, seek to protect and bolster the role that the District's centres play in providing jobs and reinforce their vitality, viability and character. The Local Plan Review presents the opportunity to incorporate updated policy to protect the evolving role of the town centres in the District. The Local Plan policy position may be updated to better reflect the current strengths and opportunities at the centres in the District with consideration for existing weaknesses and emerging pressures to protect these locations in terms of their importance for economic growth and job provision.	SA objective 3

¹³⁷ NOMIS – Local Area Report (2011) – Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

¹³⁸ Horsham District Council (2018) Visitor Economy Strategy 2018-2023 [Online] Available at:

https://www.horsham.gov.uk/data/assets/pdf_file/0009/49338/Visitor-Economy-Strategy-2018-23-Appendices.pdf

Transport connections and travel habits

Policy context

International

B.92 The Trans-European Networks (TEN): Created by the European Union by Articles 154-156 of the Treaty of Rome (1957), with the stated goals of the creation of an internal market and the reinforcement of economic and social cohesion. These include the Trans-European Transport Networks (TEN-T), which includes High Speed 1, and the Trans-European Telecommunications Networks (eTEN).

National

B.93 National Planning Policy Framework (NPPF)¹³⁹: Encourages local planning authorities to consider transport issues from the earliest stages of plan making so that: opportunities to promote sustainable transport are identified and pursued; the environmental impacts of traffic and transport infrastructure can be identified and assessed; and opportunities from existing or proposed transport infrastructure and changing transport technology and usage are realised. The framework also states that the planning system should actively manage growth patterns in support of these objectives.

B.94 National Planning Practice Guidance (PPG)¹⁴⁰ : Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

B.95 Department for Transport, The Road to Zero (2018)¹⁴¹: Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

Sub-national

8.19 West Sussex Transport Plan 2011-2026¹⁴²: The key priorities in this plan are to bring about radical improvements

to quality of life for the people and businesses in the County. These priorities include:

- Improvements to the A27 trunk road and complementary public transport improvements to the current bottlenecks at Chichester, Arundel and Worthing (not currently programmed) to increase capacity, improve reliability and safety and increase the competitiveness of local businesses and attract investment.
- Programmed improvements to the A23 trunk road at the current bottleneck between Handcross and Warninglid to increase capacity and improve the safety record.
- Maintaining the highway network.
- Continue working with the community to improve the safety record on local roads, increase usage of healthy and sustainable modes of transport, and provide access to services.

B.96 West Sussex Walking and Cycling Strategy 2016-2026¹⁴³: The strategy outlines the design and safety principles for walking and cycling that the County Council will follow, and developers will be expected to follow, when implementing infrastructure schemes. The main purposes of the document are as follows:

- To clearly state West Sussex County Council's aims and objectives for cycling and walking between 2016 and 2026.
- To determine the Council's priorities for funding reflecting the overall walking and cycling aspirations of the Council.
- To provide guidance in support of prioritising cycling and walking infrastructure in new development.
- To provide a framework through which local interest and community groups can make suggestions for the development of cycling and walking improvements.
- To support interested parties in securing additional funding where available.

B.97 West Sussex Rights of Way Management Plan (2018-2021)¹⁴⁴: The plan sets out the vision to "enable people to enjoy the countryside on foot, by horse and by bicycle, for health, recreation and to access services" in the county. The

¹³⁹ Department for 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

¹⁴⁰ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at:

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

¹⁴¹ Department for Transport, The Road to Zero (2018) [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

¹⁴² West Sussex District Council (2011) West Sussex Transport Plan [Online] Available at:

https://www.westsussex.gov.uk/media/3042/west_sussex_transport_plan_2011-2026_low_res.pdf

¹⁴³ West Sussex County Council (2017) West Sussex Walking and Cycling Strategy 2016-2026 [Online] Available at:

https://www.westsussex.gov.uk/media/9584/walking_cycling_strategy.pdf

¹⁴⁴ West Sussex County Council (2018) Rights of Way Management Plan (2018-2028) [Online] Available at: <https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx#tabempunemp>

plan aims to work in partnership with volunteers and key organisations to achieve the following objectives:

- Manage the existing Public Rights of Way (PRoW) network efficiently and maintain to an appropriate standard for use.
- Improve path links to provide circular routes and links between communities.
- Improve the PRoW network to create safe routes for both leisure and utility journeys, by minimising the need to use and cross busy roads.
- Provide a PRoW network that enables appropriate access with minimal barriers for as many people as possible.
- Promote countryside access to all sections of the community enabling people to confidently and responsibly use and enjoy the countryside.
- Support the rural economy.
- Support health and wellbeing.

B.98 Horsham Infrastructure Delivery Plan (May 2014)¹⁴⁵:

The plan sets out what infrastructure is required to support new growth across the Horsham District. The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the HDPF and to outline how and when these will be delivered.

B.99 Horsham Transport and Development Study (2015)¹⁴⁶: The study assessed the relative impact associated with the strategic development sites set out in the HDPF and proposes mitigation measures to accommodate traffic associated with such development.

B.100 Network Rail South East Route: Sussex Area Route Study (May 2015)¹⁴⁷: Sets out the strategic vision for the future of this part of the rail network over the next 30 years. The study builds on the recommendation in the Shaw Review that the railway is planned based on customer, passenger and freight needs. The Route Study seeks to identify capacity requirements in the medium and long term to allow the railway to play its part in delivering economic growth, in addition to improving the connections between people and jobs and

businesses and markets. It identifies some potential sources of capacity to meet needs into the early 2020s, but uncertainty remains beyond that.

B.101 Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (May 2014)¹⁴⁸: The document aims to provide advice to developers and their consultants on how to address local air quality when making a planning application in Horsham District. This guidance forms part of the Horsham District Air Quality Action Plan.

Current baseline

B.102 Horsham is located in the central northern part of West Sussex County and covers a large area of the county (250km²) of which the majority is rural. Currently, 88% of the population have one car or van or more¹⁴⁹. Horsham is located in the western portion of the Gatwick Diamond. The Gatwick Diamond faces growing congestion on the strategic road network which results in unreliable journey times and is likely to be further exacerbated by increases in road traffic. Congestion and increases in road traffic have the potential to result in increased noise and emissions of air pollutants and greenhouse gases with resulting health and environmental issues¹⁵⁰.

B.103 Rail services which pass through the District connect London and the south coast. There are over 80 services to London per day from the District, demonstrating the connectivity to the capital. Railway stations are currently accessible at Horsham town and a number of smaller towns such as Pulborough and Billingshurst. However, due to the location and spacing of stations on the Arun Valley Line, many commuters make substantial journeys to get to the nearest rail station some of which are outside the district at Shoreham by Sea and Hassocks. There can also be problems of congestion on the trains themselves with many of the London services being over capacity during peak periods¹⁵¹. Bus services are generally good within the town of Horsham. Routes 17A/17, 23, 51, 61, 63/63X, 65, 93, 98, 100 and 200 serve the town and provide daily or weekday access of varying frequencies to nearby settlements including Brighton, Worthing, Guilford and Dorking, as well as Gatwick Airport. The town also benefits from a car club service with a number of car club parking bays

¹⁴⁵ Horsham District Council (2014) Infrastructure Delivery Plan [Online] Available at: https://www.horsham.gov.uk/data/assets/pdf_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf

¹⁴⁶ WSP (2014) Horsham District Transport and Development Study [Online] Available at: https://www.horsham.gov.uk/data/assets/pdf_file/0004/50998/CD_IN_01_Horsham-Transport-Study-Rpt-Apr2014.pdf

¹⁴⁷ Network Rail (2015) South East Route: Sussex Area Route Study [Online] Available at: https://www.horsham.gov.uk/data/assets/pdf_file/0004/50998/CD_IN_01_Horsham-Transport-Study-Rpt-Apr2014.pdf

¹⁴⁸ Horsham District Council (2014) Air Quality Action Plan [Online] Available at: [https://www.horsham.gov.uk/data/assets/pdf_file/0011/15131/HDC-Planning-](https://www.horsham.gov.uk/data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf)

[Advice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf](https://www.horsham.gov.uk/data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf)

¹⁴⁹ West Sussex (2011) Census Bulletin: Travel to work and car or van ownership in West Sussex [Online] Available at: https://www.westsussex.gov.uk/media/2702/censusbulletin_traveltowork.pdf

¹⁵⁰ Gatwick Diamond Local Strategic Statement Sustainability/Strategic Environmental Assessment Statement [Online] Available at: https://www.horsham.gov.uk/data/assets/pdf_file/0018/3717/GatwickDiamondLSS_SEA.pdf

¹⁵¹ Network Rail (2015) South East Route: Sussex Area Route Study [online] Available at: <https://cdn.networkrail.co.uk/wp-content/uploads/2016/11/South-East-Route-Sussex-Area-Route-Study-FINAL.pdf>

on North Street and Queen Street¹⁵². Many outlying rural communities are offered limited bus services that do not provide a convenient travel option and many people rely on the private car to access employment and services. This includes services which operate less frequently than two hourly at least five days a week¹⁵³.

B.104 There are issues of congestion resulting in some delays along the A24 as it crosses the District linking London to the south coast. Many of the delays experienced along this route are northbound at the Washington Roundabout by the boundary of the South Downs National Park. A lack of safe crossing points on the A24 discourages people from accessing neighbouring communities and enjoying the public rights of way network. Congestion on roads that have to cross or feed into the A24 is often experienced during the peak periods of the day. The A264, A29, A281, A272, A283, and the A2037 all of which pass through the District suffer from some level of congestion during peak periods. This is particularly the case along the A264 between Horsham and Crawley. Air Quality Management Areas (AQMAs) have been declared by Horsham District Council in Storrington, either side of the A283 passing through the centre of the village and the central route through Cowfold on the A272 and A281 junction¹⁵⁴.

B.105 The Network Rail Sussex Area Route Study also highlights capacity issues on the railways in the South East and states that the number of passengers using the railway into central London is expected to increase substantially by 2043. There is expected to be a 115% increase on passengers using the faster services and 44% increase of passengers using the stopping services from Sussex into central London. Routes into London are particularly busy, with limited capacity to operate additional services¹⁵⁵.

B.106 In terms of mode of travel to work, of the 94,318 residents aged 16 to 74 in the District in the 2011 Census,

45.8% use a private vehicle to get to work, 5% use the train, 7% walk, 1.1% cycle, 6% work from home, 1.2% use the bus, and 29.7% are not in work¹⁵⁶. The 2011 Census also presented details of the length of distance commuters travelled to their place of work. Just over half of residents in Horsham (53.8%) travel 20km or less to their place of work. 9.7% of residents however, were found to travel more than 40km to their place of work¹⁵⁷. The level of homes working in 2011 in West Sussex was recorded as 12.2%, and rural parts of Horsham District displayed a notable higher level of home working at 18.4% of that portion of the population¹⁵⁸.

B.107 The HDPF includes measures to encourage a shift from dependency on car travel to more sustainable transport methods to reduce congestion, improve air quality and to support international and national policy responses to tackling climate change.

B.108 At present Route 223 of the National Cycle Network passes through the District. The route runs from the north of Horsham District at Chertsey, passing into the District and then travelling to the west of the town of Horsham, through Southwater and Steyning. This route provides access to Shoreham-by-Sea to the south of the District where it connects to Route 2 which allows for travel along the southern coast. The West Sussex Walking and Cycling Strategy 2016-2026 contains a prioritised list of over 300 potential walking and cycling improvements suggested by a range of stakeholders and partner organisations within the County area. These improvements are subject to the availability of funding and land and other constraints, but potentially could include substantial improvements to cycle provision from Ashington to Wisborough Green (in Chichester District), Ashington to Southwater, and Horsham to Colgate and Crawley. Further improvements would potentially include off road links, town centre improvements and crossing points within Horsham town¹⁵⁹.

¹⁵² West Sussex County Council (2015) Getting Around Horsham

¹⁵³ West Sussex County Council (2017) Bus route maps and guides [Online] Available at: <https://www.westsussex.gov.uk/roads-and-travel/travel-and-public-transport/bus-and-coach-travel/plan-your-journey/bus-route-maps-and-guides/>

¹⁵⁴ West Sussex District Council (2011) West Sussex Transport Plan [Online] Available at: https://www.westsussex.gov.uk/media/3042/west_sussex_transport_plan_2011-2026_low_res.pdf

¹⁵⁵ Network Rail (2015) South East Route: Sussex Area Route Study [online] Available at: <https://cdn.networkrail.co.uk/wp-content/uploads/2016/11/South-East-Route-Sussex-Area-Route-Study-FINAL.pdf>

¹⁵⁶ NOMIS method of travel to work (2011) Horsham [online] available at: https://www.nomisweb.co.uk/census/2011/QS701EW/view/1946157343?rows=c&ell&cols=rural_urban

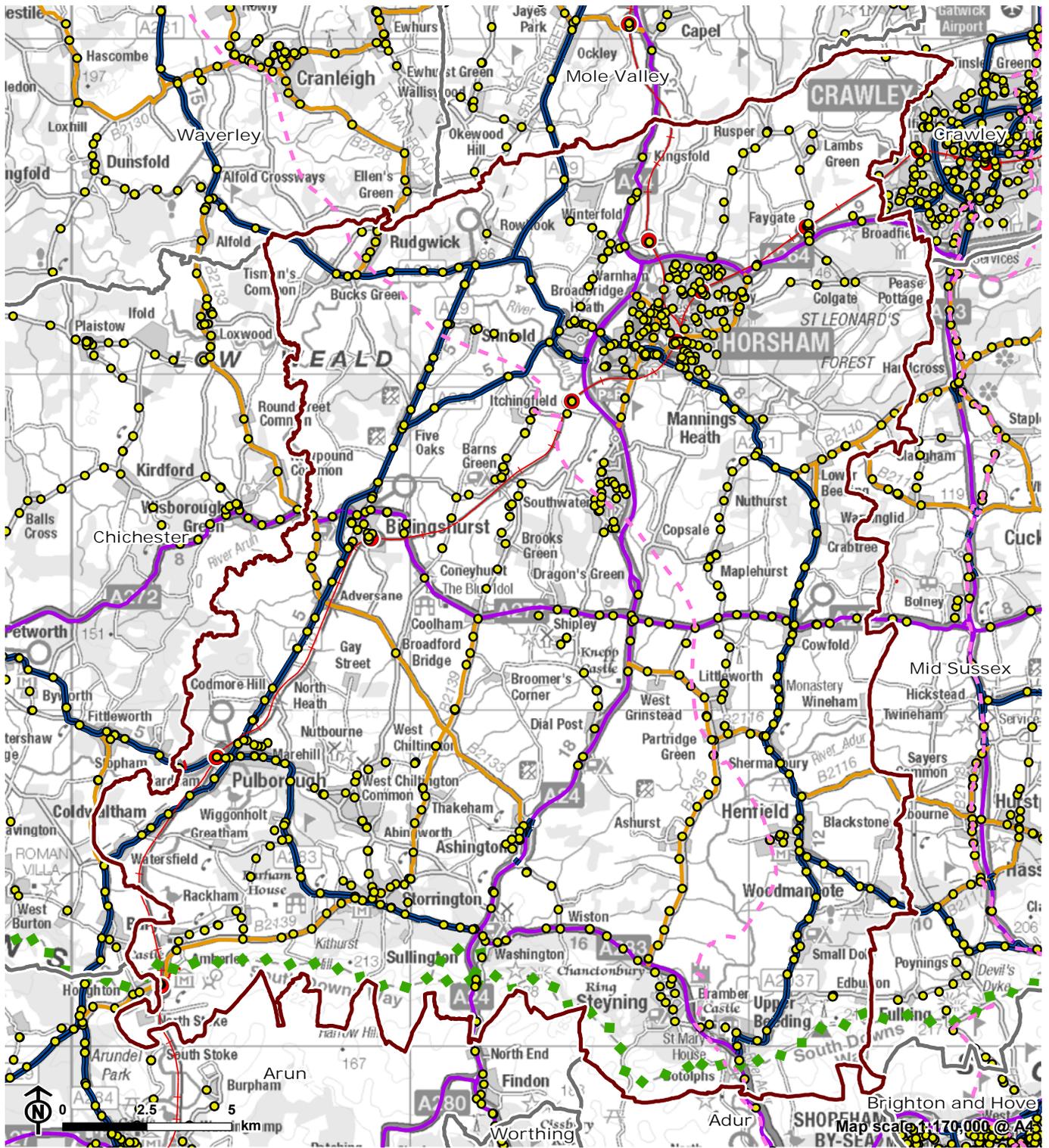
¹⁵⁷ Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0007/78379/AMR_2018_2019_CHAPTER_6_Policy_Indicators.pdf

¹⁵⁸ West Sussex (2011) Census Bulletin: Travel to work and car or van ownership in West Sussex [Online] Available at:

https://www.westsussex.gov.uk/media/2702/censusbulletin_traveltowork.pdf
¹⁵⁹ West Sussex County Council (2017) West Sussex Walking and Cycling Strategy 2016-2026

Table B.6 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

Key Sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
<p>Parts of the highway network in the District experiences high levels of congestion and delays. Rail capacity is also currently stretched, and capacity pressures London services are expected to increase. Population growth has the potential to exacerbate these problems.</p>	<p>Policy 39 of the HDPF addresses the provision of new infrastructure to meet new needs of development and this includes new transport provisions. Furthermore Policy 40 supports the aim of achieving an integrated community connected by a sustainable transport system in Horsham. However, without the Local Plan Review there is potential for congestion to continue to be an issue in Horsham, particularly given that the growing population is likely to exacerbate this issue. The Local Plan Review presents the opportunity to address this by providing clarity for infrastructure providers and also to strengthen policy to promote the use of alternative modes of transport. It also has the potential to direct new development to the most sustainable locations as to minimise the need to travel by private vehicle on the local network. This approach can be used to complement measures taken by highways authorities to combat congestion on the strategic road network.</p>	<p>SA objective 13</p>
<p>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 limited bus services and other public transport links.</p>	<p>Policy 40 of the HDPF supports the aim of achieving an integrated community connected by a sustainable transport system in Horsham. However, the Local Plan Review presents the opportunity to further address the issue of car dependency in the District. This can be achieved by promoting sustainable and active transport (based on sufficient population densities), sustainable development locations, and integrating new and more sustainable technologies, as new development is to be provided in the District.</p>	<p>SA objective 13</p>



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Figure B.2: Transport Links in Horsham District

- Horsham
- Neighbouring authority
- Bus stop
- Railway station
- + Railway
- A road
- B road
- Primary road
- ◆◆◆ National Trail
- - - National Cycle Route

Air, land and water quality

Policy context

International

B.109 European Nitrates Directive (1991): Identifies nitrate vulnerability zones and puts in place measures to reduce water pollution caused by the introduction of nitrates.

B.110 European Urban Waste Water Directive (1991): Protects the environment from the adverse effects of urban wastewater collection, treatment and discharge, and discharge from certain industrial sectors.

B.111 European Air Quality Framework Directive (1996) and Air Quality Directive (2008): Put in place measures for the avoidance, prevention, and reduction in harmful effects to human health and the environment associated with ambient air pollution and establish legally binding limits for the most common and harmful sources of air pollution.

B.112 European Drinking Water Directive (1998): Protects human health from the adverse effects of any contamination of water intended for human consumption by ensuring that it is wholesome and clean.

B.113 European Landfill Directive (1999): Prevents and reduces the negative effects on the environment from the landfilling of waste by introducing stringent technical requirements for waste and landfills.

B.114 European Water Framework Directive (2000): Protects inland surface waters, transitional waters, coastal waters and groundwater.

B.115 European Waste Framework Directive (2008): Sets out the waste hierarchy requiring the reduction of waste production and its harmfulness, the recovery of waste by means of recycling, re-use or reclamation and final disposal that does not harm the environment, including human health.

B.116 European Industrial Emission Directive (2010): Lays down rules on integrated prevention and control of pollution arising from industrial activities. It also lays down rules designed to prevent or, where that is not practicable, to reduce emissions into air, water and land and to prevent the generation of waste, in order to achieve a high level of protection of the environment taken as a whole.

National

B.117 National Planning Policy Framework (NPPF)¹⁶⁰ contains the following:

- The planning system should protect and enhance soils in a manner commensurate with their statutory status or quality identified in the development plan.
- New and existing development should be prevented from contributing to, being put at an unacceptable risk from, or being adversely affected by, soil, air, water or noise pollution or land instability.
- “*Despoiled, degraded, derelict, contaminated and unstable land*” should be remediated and mitigated where appropriate.
- The reuse of previously developed land is encouraged where suitable opportunities exist.

B.118 National Planning Practice Guidance (PPG)¹⁶¹: Requires local planning authorities to demonstrate every effort has been made to prioritise the use of poorer quality agricultural land for development where it has been demonstrated that significant development is required on agricultural land.

B.119 Waste management plan for England¹⁶²: Provides an analysis on the current waste management situation in England and evaluates how it will support implementation of the objectives and provisions of the revised Water Framework Directive.

B.120 National Planning Policy for Waste (NPPW)¹⁶³: Key planning objectives are identified within the NPPW, requiring planning authorities to:

- Help deliver sustainable development through driving waste management up the waste hierarchy.
- Ensure waste management is considered alongside other spatial planning concerns
- Provide a framework in which communities take more responsibility for their own waste
- Help secure the recovery or disposal of waste without endangering human health and without harming the environment.

¹⁶⁰ Department for 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

¹⁶¹ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

¹⁶² Department for Environment, Food and Rural Affairs (2013) Waste management plan for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/265810/pb14100-waste-management-plan-20131213.pdf

¹⁶³ Department for Communities and Local Government (2014) National Planning Policy for Waste [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/364759/141015_National_Planning_Policy_for_Waste.pdf

- Ensure the design and layout of new development supports sustainable waste management.

B.121 Safeguarding our Soils – A Strategy for England¹⁶⁴:

Sets out how England's soils will be managed sustainably. It highlights those areas which Defra will prioritise and focus attention in tackling degradation threats, including: better protection for agricultural soils; protecting and enhancing stores of soil carbon; building the resilience of soils to a changing climate; preventing soil pollution; effective soil protection during construction and; dealing with contaminated land.

B.122 Water White Paper¹⁶⁵: Sets out the Government's vision for the water sector including proposals on protecting water resources and reforming the water supply industry. It states outlines the measures that will be taken to tackle issues such as poorly performing ecosystem, and the combined impacts of climate change and population growth on stressed water resources.

B.123 Water for Life White Paper¹⁶⁶: Sets out how to build resilience in the water sector. Objectives of the White Paper are to:

- Paint a clear vision of the future and create the conditions which enable the water sector and water users to prepare for it.
- Deliver benefits across society through an ambitious agenda for improving water quality, working with local communities to make early improvements in the health of our rivers by reducing pollution and tackling unsustainable abstraction.
- Keep short and longer term affordability for customers at the centre of decision making in the water sector.
- Protect the interest of taxpayers in the policy decisions that we take.
- Ensure a stable framework for the water sector which remains attractive to investors.
- Stimulate cultural change in the water sector by removing barriers to competition, fostering innovation and efficiency, and encouraging new entrants to the

market to help improve the range and quality of services offered to customers and cut business costs.

- Work with water companies, regulators and other stakeholders to build understanding of the impact personal choices have on the water environment, water resources and costs.
- Set out roles and responsibilities – including where Government will take a stronger role in strategic direction setting and assessing resilience to future challenges, as well as clear expectations on the regulators.

B.124 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland¹⁶⁷: Sets out a way forward for work and planning on air quality issues by setting out the air quality standards and objectives to be achieved. It introduces a new policy framework for tackling fine particles and identifies potential new national policy measures which modelling indicates could give further health benefits and move closer towards meeting the Strategy's objectives. The objectives of the Strategy are to:

- Further improve air quality in the UK from today and long term.
- Provide benefits to health quality of life and the environment.

B.125 Future Water: The Government's Water Strategy for England¹⁶⁸: Sets out how the Government wants the water sector to look by 2030, providing an outline of steps which need to be taken to get there. These steps include: improving the supply of water; agreeing on important new infrastructure such as reservoirs; proposals to time limit abstraction licences; and reducing leakage. The document also states that pollution to rivers will be tackled, whilst discharge from sewers will be reduced.

B.126 A Green Future: Our 25 Year Plan to Improve the Environment¹⁶⁹: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this section are: using and managing land

¹⁶⁴ Department for Environment, Food and Rural Affairs (2009) Safeguarding our Soils: A Strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69261/pb13297-soil-strategy-090910.pdf

¹⁶⁵ Department for Environment, Food and Rural Affairs (2012) The Water White Paper [online] Available at: <https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf>

¹⁶⁶ Department for Environment, Food and Rural Affairs (2011) Water for life [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228861/8230.pdf

¹⁶⁷ Department for Environment Food and Rural Affairs (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf

¹⁶⁸ HM Government (2008) Future Water: The Government's water strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69346/pb13562-future-water-080204.pdf

¹⁶⁹ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

sustainably; recovering nature and enhancing the beauty of landscapes; and increasing resource efficiency and reducing pollution and waste. Actions that will be taken as part of these three key areas are as follows:

- Using and managing land sustainably:
 - Embed a ‘net environmental gain’ principle for development, including natural capital benefits to improved and water quality.
 - Protect best agricultural land.
 - Improve soil health and restore and protect peatlands.
- Recovering nature and enhancing the beauty of landscapes:
 - Respect nature by using our water more sustainably.
- Increasing resource efficiency and reducing pollution and waste:
 - Reduce pollution by tackling air pollution in our Clean Air Strategy and reduce the impact of chemicals.

B.127 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations¹⁷⁰: Sets out the Government’s ambition and actions for delivering a better environment and cleaner air, including £1 billion investment in ultra low emission vehicles (ULESVs), a £290 million National Productivity Investment Fund, a £11 million Air Quality Grant Fund and £255 million Implementation Fund to help local authorities to prepare Air Quality Action Plans and improve air quality, an £89 million Green Bus Fund, £1.2 billion Cycling and Walking Investment Strategy and £100 million to help improve air quality on the National road network.

B.128 Clean Air Strategy 2019¹⁷¹: The strategy sets out the comprehensive action that is required from across all parts of government and society to meet these goals. This will be underpinned by new England-wide powers to control major sources of air pollution, in line with the risk they pose to public health and the environment, plus new local powers to take action in areas with an air pollution problem. These will

support the creation of Clean Air Zones to lower emissions from all sources of air pollution, backed up with clear enforcement mechanisms. The UK has set stringent targets to cut emissions by 2020 and 2030.

B.129 Department for Transport, The Road to Zero (2018)¹⁷²: Sets out new measures towards cleaner road transport, aiming to put the UK at the forefront of the design and manufacturing of zero emission vehicles. It explains how cleaner air, a better environment, zero emission vehicles and a strong, clean economy will be achieved. One of the main aims of the document is for all new cars and vans to be effectively zero emission by 2040.

Sub-national

B.130 West Sussex Joint Minerals Local Plan (2018-2033)¹⁷³: The joint plan sets out key areas which will help shape the future of minerals activities in West Sussex. The plan includes a vision and strategic objectives for sustainable minerals development, 10 policies (Policies M1-M10) to achieve the strategic objectives for minerals development in West Sussex, 15 development management policies (policies 12-26) to ensure no unacceptable harm to the environment, economy or communities of West Sussex and a site allocation set through policy M11 to help meet the need for brick making clay.

B.131 Horsham Infrastructure Delivery Plan (May 2014)¹⁷⁴: The plan sets out what infrastructure is required to support new growth across Horsham District. The primary purpose is to identify the infrastructure schemes considered necessary to support the development proposed in the HDPF and to outline how and when these will be delivered.

B.132 Horsham Green Infrastructure Strategy (April 2014)¹⁷⁵: The strategy informs the production of planning policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network. It also seeks to contribute to the creation of sustainable communities through the provision of a wide range of ecosystem services and quality of life and health benefits for both future and existing residents.

B.133 Sport, Open Space and Recreational Assessment (2014)¹⁷⁶: The purpose of the assessment is to ensure that the

¹⁷⁰ Department for Environment Food and Rural Affairs and Department for Transport (2017) UK plan for tackling roadside nitrogen dioxide concentrations [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf

¹⁷¹ DEFRA, Clean Air Strategy 2019 [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf

¹⁷² Department for Transport, The Road to Zero (2018) [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf

¹⁷³ Wessex County Council and South Downs National Park Authority (2018) West Sussex Joint Minerals Local Plan [online] Available at: https://www.westsussex.gov.uk/media/11736/mlp_adoption.pdf

¹⁷⁴ Horsham District Council (2014) Infrastructure Delivery Plan [online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf

¹⁷⁵ Horsham District Council (2014) Green Infrastructure Strategy [online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0007/66544/Green-Infrastructure-Study.pdf

¹⁷⁶ Kit Campbell Associates (2014) Sport, Open Space and Recreation Assessment [online] Available at:

provision of sports, recreational and open spaces in the district is sufficient, of an appropriate quality and in the right place, to meet local needs and is in line with the HDPF and NPPF.

B.134 Contaminated Land Inspection Strategy (January 2017)¹⁷⁷: The strategy outlines how the Council will meet its statutory duties to investigate potentially contaminated land in Horsham District.

B.135 Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (May 2014)¹⁷⁸: This document aims to provide advice to developers and their consultants on how to address local air quality when making a planning application in Horsham District. This guidance forms part of the Horsham District Air Quality Action Plan.

B.136 Cowfold Air Quality Action Plan¹⁷⁹: The Cowfold AQMA has been in place since 2010 in areas of the village that are likely to exceed air quality objectives for nitrogen dioxide (NO₂). The plan reviews all the possible reduction measures and assesses them in terms of pollution reduction, acceptability, cost effectiveness and feasibility.

B.137 Storrington Air Quality Action Plan¹⁸⁰: The Storrington AQMA has been in place since 2010 in areas of the village that are likely to exceed air quality objectives for nitrogen dioxide. The plan reviews all the possible reduction measures and assesses them in terms of pollution reduction, acceptability, cost effectiveness and feasibility.

B.138 Water for life and livelihoods Part 1: South East River Basin District- River Basin Management Plan (2015)¹⁸¹: The management plan sets out four key areas which it seeks to address including preventing the deterioration of water bodies, highlighting areas of land and bodies of water that have specific uses that need special protection, setting out statutory objectives for water bodies and providing a framework for action and future regulation.

B.139 River Adur Catchment Flood Management Plan (2009)¹⁸²: The management plan aims to promote more sustainable approaches to managing flood risk.

B.140 Arun and Western Streams Catchment Flood Management Plan (2009)¹⁸³: The management plan aims to promote more sustainable approaches to managing flood risk.

B.141 Marine Management Organisation Evidence Strategy 2015 to 2020¹⁸⁴: This strategy contributes to the delivery of integrated marine management in England. The objective is to establish sustainable levels of economic and social activity in our marine area while protecting the environment.

Current baseline

Air quality

B.142 Equalities issues are often found to correlate strongly with air pollution and associated health quality problems as areas with poor air quality are also often found to be those that are less affluent areas. The annual cost of particulate matter alone in the UK is thought to be around £16 billion in terms of health.

B.143 The District is primarily agricultural in character. It does not incorporate a significant heavy industrial base or major transport hubs. Air pollution sources within the plan area are primarily from road traffic emissions from major roads. These include the A24, which crosses the District from north to south; the A264 which is to the north of Horsham; the A272 and the A281 at Cowfold; and the A283 at Storrington.

B.144 Since 1990 road travel has increased by 18%, thereby increasing the potential for adverse impacts on air quality. This increase in road travel is in line with the national trend. There is potential that further development within Horsham and the surrounding authorities in West Sussex, will contribute to adverse impacts on the air quality and AQMA¹⁸⁵.

https://www.horsham.gov.uk/_data/assets/pdf_file/0003/66504/Sport-Open-Space-Recreation-Assessment-February-2014.pdf

¹⁷⁷ Horsham District Council (2017) Contaminated Land Strategy [online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0014/53411/Contaminated-Land-Strategy-2017.pdf

¹⁷⁸ Horsham District Council (2014) Air Quality Action Plan [online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Documents-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf

¹⁷⁹ Horsham District Council (2013) Cowfold Air Quality Action Plan [online] Available at: <https://www.horsham.gov.uk/environmental-health/air-quality/cowfold-air-quality-management>

¹⁸⁰ Horsham District Council (2012) Storrington Air Quality Action Plan [online] Available at: <https://www.horsham.gov.uk/environmental-health/air-quality/storrington-air-quality-management>

¹⁸¹ DEFRA and Environment Agency (2015) Water for Life and Livelihoods: Part 1 South East River Basin District [online] Available at:

<https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att>

[achment_data/file/718337/South East RBD Part 1 river basin management plan.pdf](achment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf)

¹⁸² Environment Agency (2009) River Adur Catchment Flood Management Plan [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/293867/Adur_Catchment_Flood_Management_Plan.pdf

¹⁸³ Environment Agency (2009) Arun and Western Streams Catchment Flood Management Plan [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/293864/Arun_and_Western_Streams_Catchment_Flood_Management_Plan.pdf

¹⁸⁴ Marine Management Organisation (2019) Evidence Strategy 2015 to 2020 [online] Available at: <https://www.gov.uk/government/publications/evidence-strategy-for-the-marine-management-organisation-mmo/evidence-strategy-2015-to-2020>

¹⁸⁵ Horsham District Council (2014) Air Quality Action Plan [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Documents-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf

B.145 There are several locations, within Horsham, where levels of (NO₂) exceed the UK and EU air quality standards. Horsham District Council has identified parts of two villages, Storrington and Cowfold, where NO₂ levels exceed the annual mean air quality objective. At high concentrations NO₂ can act as an irritant causing inflammation of the airways and, by affecting the immune cells in the lungs, can increase susceptibility to respiratory infections. Air quality action plans have been developed for both AQMAs^{186 187}. Both AQMAs are located along busy 'A' road routes which accommodate high traffic volumes and have residential properties situated close to the kerbside. There are several other villages within the District which share similar characteristics in their potential to be susceptible to air quality issues.

B.146 AQMAs at Horley and Crawley are within close proximity of the District to the north east. Development within the District therefore has potential to exacerbate existing air quality issues at these locations, considering the likely cross-boundary traffic flows along the A2011 and M23 outside of the District towards these settlements. In addition, there is also an AQMA in Hassocks located in Mid Sussex district to the east of the District.

B.147 A number of measures have been taken forward by Horsham District Council in the reporting year of 2017 to help improve local air quality. These include pursuing Traffic Regulation Orders (TROs) at North Street and at the junction of Manley's Hill and School Hill in Storrington, considering the installation of signage to reduce lorry traffic at Cowfold AQMA, an update of the list of air quality planning conditions, and undertaking actions to improve the EV (elective vehicle) charging network in the District and the surrounding areas¹⁸⁸.

Geology and minerals

B.148 The underlying geology of Horsham consists of a number of distinct rock types that define the landform and character of the area – Chalk, Hythe Beds, Upper Tunbridge Wells Sand, Gault Clay, Lower Greensand, Upper Greensand, Atherfield Clay, Wealden Clay and Sandgate Beds run in bands of varying width in a north westerly to south easterly direction across the District¹⁸⁹.

B.149 West Sussex County Council has designated a number of Mineral Safeguarding Areas for sharp sand and gravel, soft

sand, brick clay, chalk and building stone in the West Sussex Minerals & Waste Local Plan (2018-2033)¹⁹⁰. The majority of the District is covered by a brick clay Mineral Safeguarding Area, while smaller areas by Storrington and Washington fall within Mineral Safeguarding Areas for soft sand and chalk. Mineral Safeguarding Areas have also been designated to the north and north west of Storrington and around Horsham town for building stone ('Horsham Stone'), which is a distinctive local building material. Geological mapping is indicative of the existence of a mineral resource. It is possible that the mineral has already been extracted and/or that some areas may not contain any of the mineral resource being safeguarded. Nevertheless, the onus is on promoters of non-mineral development to demonstrate satisfactorily at the time that the development is promoted that the indicated mineral resource does not actually exist in the location being promoted, or extraction would not be viable or practicable under the particular circumstances.

B.150 The process of allocating land for non-mineral uses in local plans will take into account the need to safeguard minerals resources and mineral infrastructure. The allocation of land within a Mineral Safeguarding Area will only take place after consideration of the factors that would be considered if a non-minerals development were to be proposed in that location, or in proximity to it.

Soils

B.151 Horsham District has a wide variety of soils reflecting the underlying geology which have had an influence on the land use of the area. The most extensive group are the heavy, poorly drained stagnogleys which have developed over the Gault and Weald Clays. They are difficult to cultivate, and traditionally found under grass. However, in recent times improved drainage techniques have significantly extended this area for arable farming. The south of the District is characterised by Rendzinas, a feature of the South Downs, which are often narrow in depth and extensively ploughed for cereal farming. The lower course of the River Adur and Arun, in the south of the district, is characterised by poorly drained silt rich alluvium¹⁹¹.

B.152 The underlying soils give rise to a mix of classified agricultural land, the majority being of Grade 3, with small areas of Grade 2 and Grade 4. Grade 1 and Grade 2

¹⁸⁶ Horsham District Council (2013) Cowfold Air Quality Action Plan [Online] Available at: <https://www.horsham.gov.uk/environmentalhealth/environmental-health/air-quality/cowfold-air-quality>

¹⁸⁷ Horsham District Council (2012) Storrington Air Quality Action Plan [Online] Available at: <https://www.horsham.gov.uk/environmentalhealth/environmental-health/air-quality/storrington-air-quality>

¹⁸⁸ Horsham District Council (2018) 2018 Annual Status Report (ASR) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0013/54040/Local-Air-Quality-Management-Annual-Status-Report-2018.pdf

¹⁸⁹ Horsham District Council (in association with Chris Bland Associates) (2003) Horsham District Landscape Character Assessment [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0020/31349/Landscape-Character-Assessment-2003.pdf

¹⁹⁰ Wessex County Council and South Downs National Park Authority (2018) West Sussex Joint Minerals Local Plan [Online] Available at: https://www.westsussex.gov.uk/media/11736/mlp_adoption.pdf

¹⁹¹ Horsham District Council (in association with Chris Bland Associates) (2003) Horsham District Landscape Character Assessment [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0020/31349/Landscape-Character-Assessment-2003.pdf

agricultural land represent the best and most versatile land for farming, along with Grade 3a agricultural land (the national maps of agricultural land classification do not distinguish between Grade 3a and Grade 3b agricultural land). Beyond the significant area which comprises Grade 3 agricultural land, notable areas within the District are the Grade 2 land located to north and east of Storrington as well as around the settlement of Henfield. There are also significant areas of Grade 4 land to north of District around Horsham town¹⁹².

Contaminated land

B.153 A contaminated land register has been kept in the District since April 2000 and is available for inspection at the Environmental Health Department. There are currently no entries on the register. Due to the history of quarrying throughout Horsham District there are 63 closed landfill sites. In addition, there are two closed sewage works. There are town gas holdings located across the District, including Horsham, Christ's Hospital, Storrington and Steyning¹⁹³. These areas are recognised as those at which past use may have resulted in contamination.

B.154 Existing land uses of a notable scale in the District which could contribute towards contaminated land areas in the future are as follows: 10 in use landfill sites; eight waste sites; one large sewage treatment works; 37 installation sites (including one Environment Agency regulated, Storrington Oilfield and 2 Brickworks); 16 petrol stations; and seven sites where registered companies are using radioactive substances¹⁹⁴.

Water

B.155 A number of rivers and their smaller tributaries flow through Horsham District. The Adur in the south-east skirts Henfield and then passes between Bramber and Upper Beeding. More substantial tributaries of this watercourse include Blakes Gill and Knepp Mill Stream which flow along much of the route of the A24 towards Southwater as well as

Chess Stream, Honeybridge Stream and Lancing Brook. The Arun, which rises in St Leonard's Forest, forms much of the western boundary of the Horsham District and passes through Amberley. Boldings Brook flows to the Arun through Horsham town itself. There are also many natural and man-made ponds and lakes throughout the District. The protection of the surface water quality is an important issue as contamination of these waters has implications on water abstraction, the conservation of existing ecosystems and their amenity value. To the north is the River Mole, this rises in the north east part of Horsham District and flows towards Crawley and through Gatwick Airport and into Surrey.

B.156 The District is covered by the River Basin Management Plan for the South East River Basin District. Land within the plan area falls across the Adur and Ouse catchment and Arun and Western Streams catchment. These areas extent beyond the boundaries of the District to include land to the east and west¹⁹⁵.

B.157 Priority issues for these catchment areas include fish passage, diffuse pollution, invasive non-native species, channel morphology, elevated phosphate levels and poor fish populations. Actions to improve estuarine and coastal waters by working with relevant local fora and partnerships are also to be developed. Some of the water bodies in these catchments have been identified by the Environment Agency as having 'bad' or 'poor' ecological status, but none have been identified as having 'bad' chemical status^{196 197}.

B.158 A further breakdown of the number of water courses which have achieved various ecological and chemical classifications is provided in **Table B.7** and **Table B8**. For both catchment areas the reasons for not achieving good status and reasons for deterioration in water quality were mainly agriculture and rural land management or related to water industry. In Horsham during the 2018/19 monitoring year no objections to planning applications were received from the Environment Agency on water quality grounds¹⁹⁸.

¹⁹² Natural England (2010) Agricultural Land classification Map- London and the South East [Online] Available at: <http://publications.naturalengland.org.uk/publication/141047?category=5954148537204736>

¹⁹³ Horsham District Council (2017) Contaminated Land Strategy [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0014/53411/Contaminated-Land-Strategy-2017.pdf

¹⁹⁴ Horsham District Council (2017) Contaminated Land Strategy [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0014/53411/Contaminated-Land-Strategy-2017.pdf

¹⁹⁵ Environment Agency (2015) Water for life and livelihoods - Part 1: South East river basin district River basin management plan [Online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/718337/South_East_RBD_Part_1_river_basin_management_plan.pdf

¹⁹⁶ Environment Agency (accessed 2019) Adur and Ouse – Summary [Online] Available at: <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3000/Summary>

¹⁹⁷ Environment Agency (accessed 2019) Arun and Western Streams - Summary [Online] Available at: <https://environment.data.gov.uk/catchment-planning/ManagementCatchment/3004/Summary>

¹⁹⁸ Horsham District Council (2018) Authority Monitoring Report (2018/19) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0007/78379/AMR_2018_2019_CHAPTER_6_Policy_Indicators.pdf

Table B.7 Ecological and Chemical Classification for surface waters in Adur and Ouse catchment

Number of water bodies	Ecological status or potential					Chemical status	
	Bad	Poor	Moderate	Good	High	Fail	Good
46	6	17	21	2	0	0	46

Table B8 Ecological and chemical classification for surface waters in Arun and Western Streams catchment

Number of water bodies	Ecological status or potential					Chemical status	
	Bad	Poor	Moderate	Good	High	Fail	Good
40	2	12	24	2	0	0	40

B.159 The water companies, Southern Water and Thames Water, supply the majority of the District's drinking water, although only Southern Water abstracts water from within the Horsham District. Pulborough in the south west of the District is located within a Surface Water Drinking Water Safeguard Zone, where the catchment area has an influence on the water quality of the Drinking Water Protected Area. In addition, an area surrounding Pulborough and to the east towards to A24 is identified as a Source Protection Zone¹⁹⁹.

Waste

B.160 The District is performing well in terms of achieving a high rate of waste which is sent to be recycled. A total of 52,543 tonnes of household waste was recycled or composted during the 2017/2018 reporting period. This represents 49.8% of total household waste generated in the District which is slightly lower than the figure at the county level given that

51.3% of household waste was recycled in West Sussex during the same period of time²⁰⁰.

B.161 West Sussex's non-recycled household waste is currently taken to a landfill site at Brookhurst Wood. The Mechanical Biological Treatment facility at this location to the north of the District makes use of a combination of technologies for sorting and treatment. This is expected to help maximise the amount of rubbish that can be used as a resource or recycled²⁰¹. Climate Change Adaptation and Mitigation

B.162 In June 2019, Horsham District Council agreed a motion to acknowledge their corporate commitment to address a wide range of environmental issues including scientific agreement of the emerging climate emergency. The Council agreed to commit to continuing to utilise resources, public engagement involvement to underpin and support climate initiatives, such as moving towards a net zero carbon target.

Table B.9 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

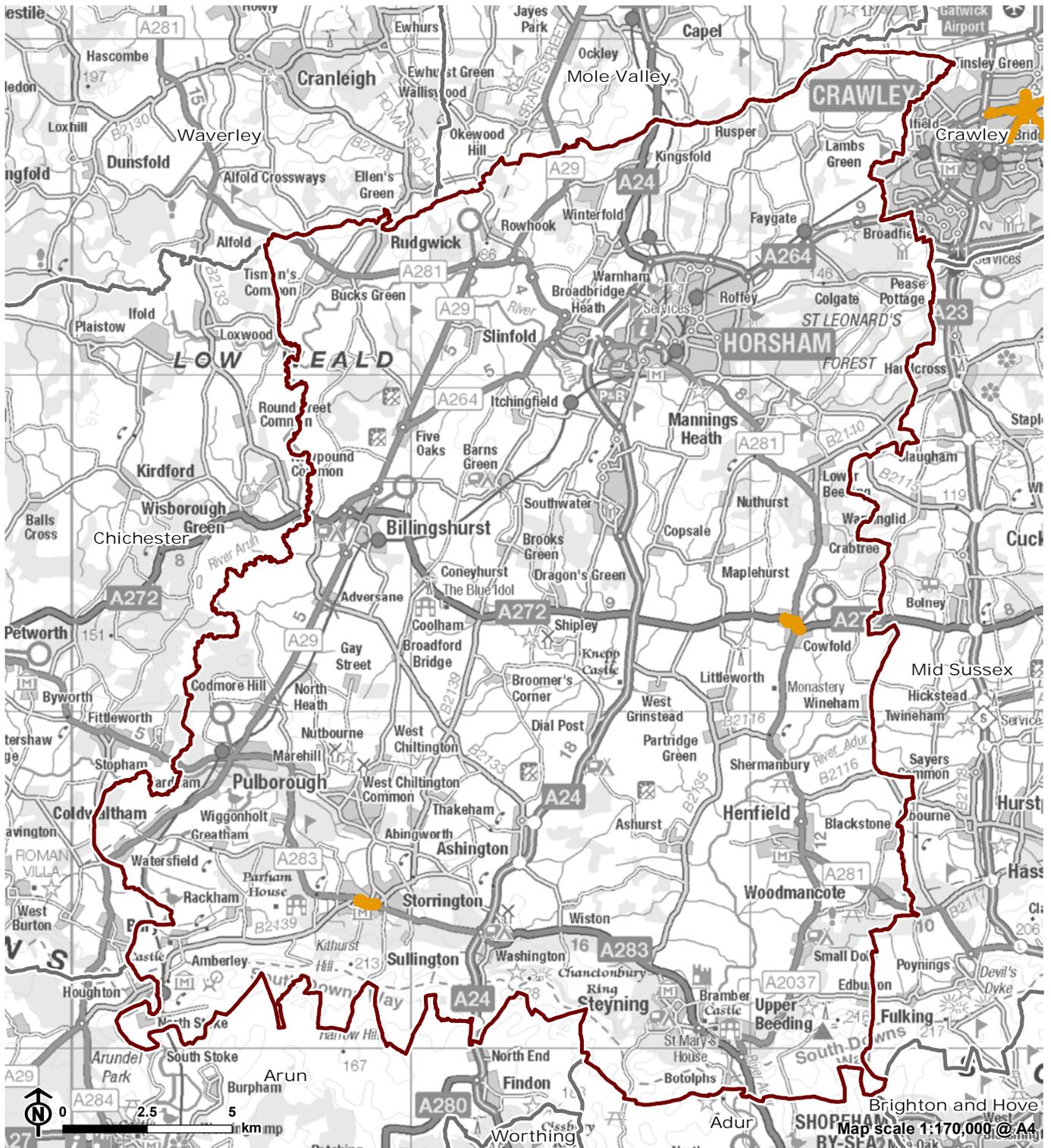
Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
Horsham District Council has two identified AQMAs at Cowfold and Storrington. There are also two AQMAs in close proximity to the north eastern edge of the District at Horley and Crawley and a further AQMA in Hassocks to the East. In	How air quality will change in the absence of a Local Plan Review is in part unknown, given that the District accommodates a high volume of through traffic. Policies 24 and 40 in the HDPF seek to minimise air pollution and protect air quality as well as promoting sustainable transport in the District. Without the Local Plan Review, development may be located in less sustainable locations that increase reliance on car use, which is likely to increase air pollution. Recent national policies and the emergence of new technologies are likely to improve air	SA objective 14

¹⁹⁹ DEFRA (2019) Magic Map [Online] Available at: <https://magic.defra.gov.uk/MagicMap.aspx>

²⁰⁰ Recycle for West Sussex (2019) [Online] Available at: <http://www.recycleforwestsussex.org/home-recycling/your-recycling-bin/horsham/>

²⁰¹ Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0007/78379/AMR_2018_2019_CHAPTER_6_Policy_Indicators.pdf

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
<p>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.</p>	<p>pollution, for example, through cleaner fuels/energy sources. Nonetheless, the Local Plan Review provides an opportunity to contribute to improved air quality in the District through the sustainable siting of development and the promotion of alternative travel modes to the motorised vehicle, in line with national policy aspirations.</p>	
<p>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.</p>	<p>The HDPF seeks to promote the development of brownfield land which is not of high environmental value through Policy 2. Furthermore, the NPPF supports the re-use of brownfield land and states that planning policies and decisions should contribute to and enhance the natural and local environment by <i>“recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land”</i>. The Local Plan Review provides an opportunity to strengthen the approach and ensure these natural assets are not lost or compromised. This may involve the prioritisation of use of brownfield sites and lower quality agricultural land for development.</p>	<p>SA objective 9</p>
<p>The District contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.</p>	<p>Without the Local Plan Review it is possible that development could result in unnecessary sterilisation of mineral resources which would mean they are not available for future generations to use. Policy M9 of the West Sussex Joint Minerals Local Plan addresses proposals for non-mineral development within the Minerals Safeguarded Areas.</p>	<p>SA objective 10</p>
<p>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.</p>	<p>Without the Local Plan Review it is possible that un-planned development could be located in areas that will exacerbate existing water quality issues, although existing safeguards, such as the EU Water Framework Directive, would provide some protection. Development which occurs within Source Protection Zones presents the risk of contamination from any activities that might cause pollution in the area. Policy 39 of the HDPF requires that sufficient capacity in the existing local infrastructure is provided to meet the additional requirements arising from new development and this is likely to support the delivery of mitigation which would help to prevent water quality issues emerging. The Local Plan Review will provide the opportunity to ensure that development is located and designed to take into account the sensitivity of the water environment. It will also provide further certainty in terms of planning for adequate wastewater infrastructure to address development requirements over the plan period.</p>	<p>SA objective 11</p>

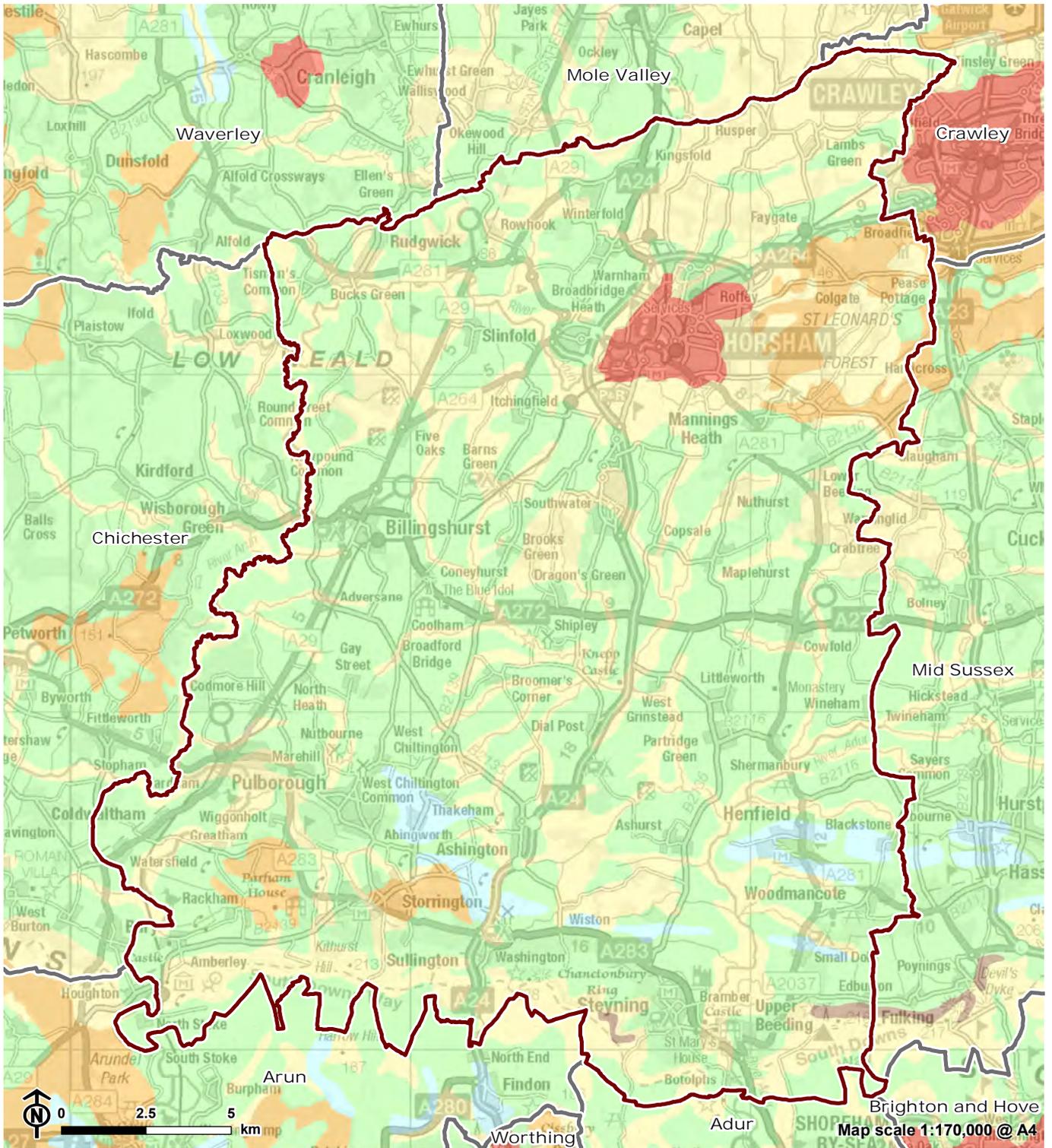


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CB:KS EB:Beetham_m LUC FIGB_3_10660 AQMA A4P 31/01/2020
Source: OS, DEFRA, HDC

Figure B.3: Air Quality Management Areas in Horsham District

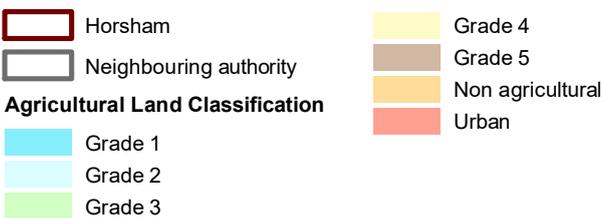
- Horsham
- Neighbouring authority
- Air Quality Management Area



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CB:KS EB:Beetham_m LUC FIGB_4_10660_ALC_A4P 31/01/2020
Source: OS, NE

Figure B.4: Agricultural Land Classification in Horsham District



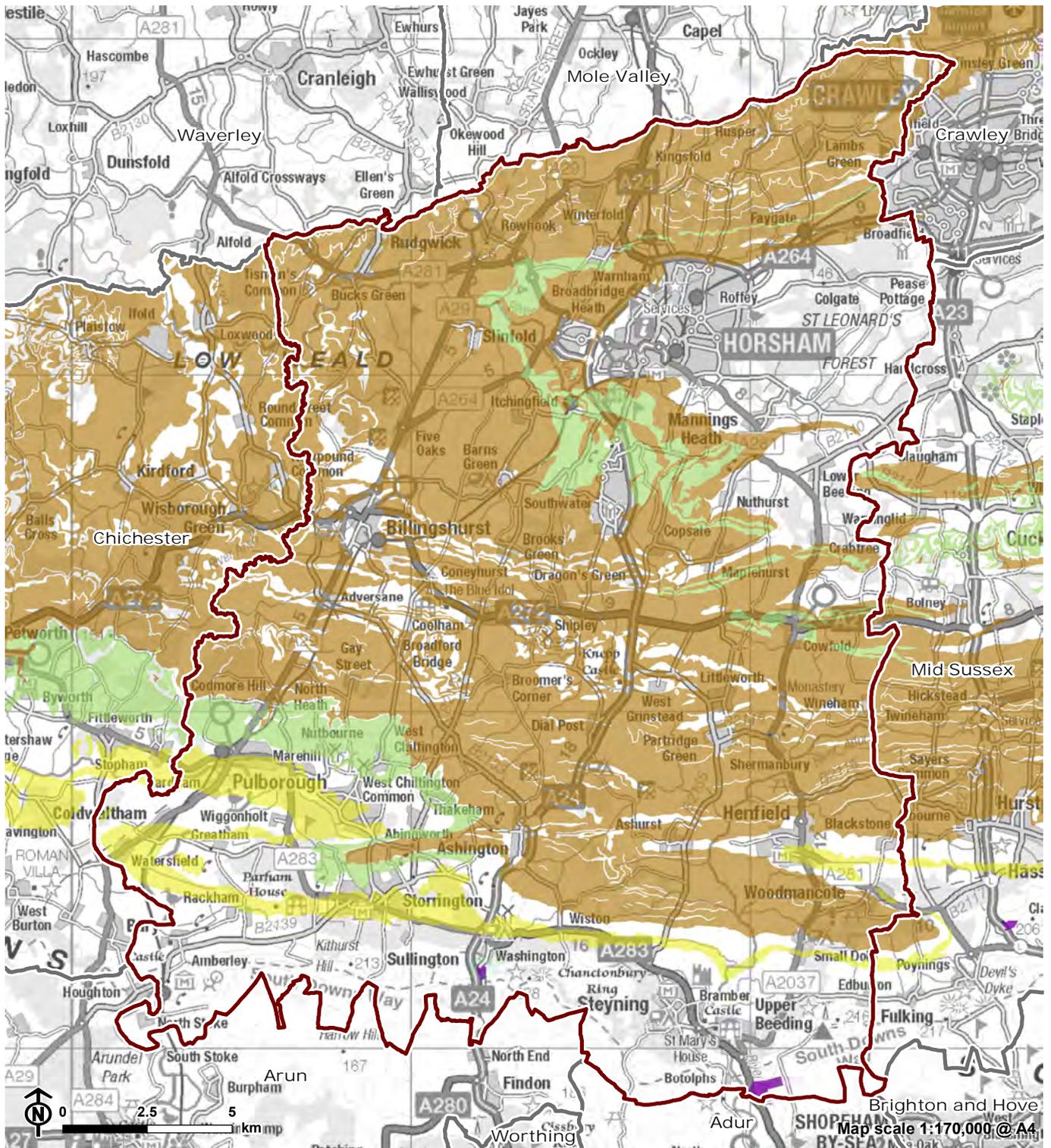
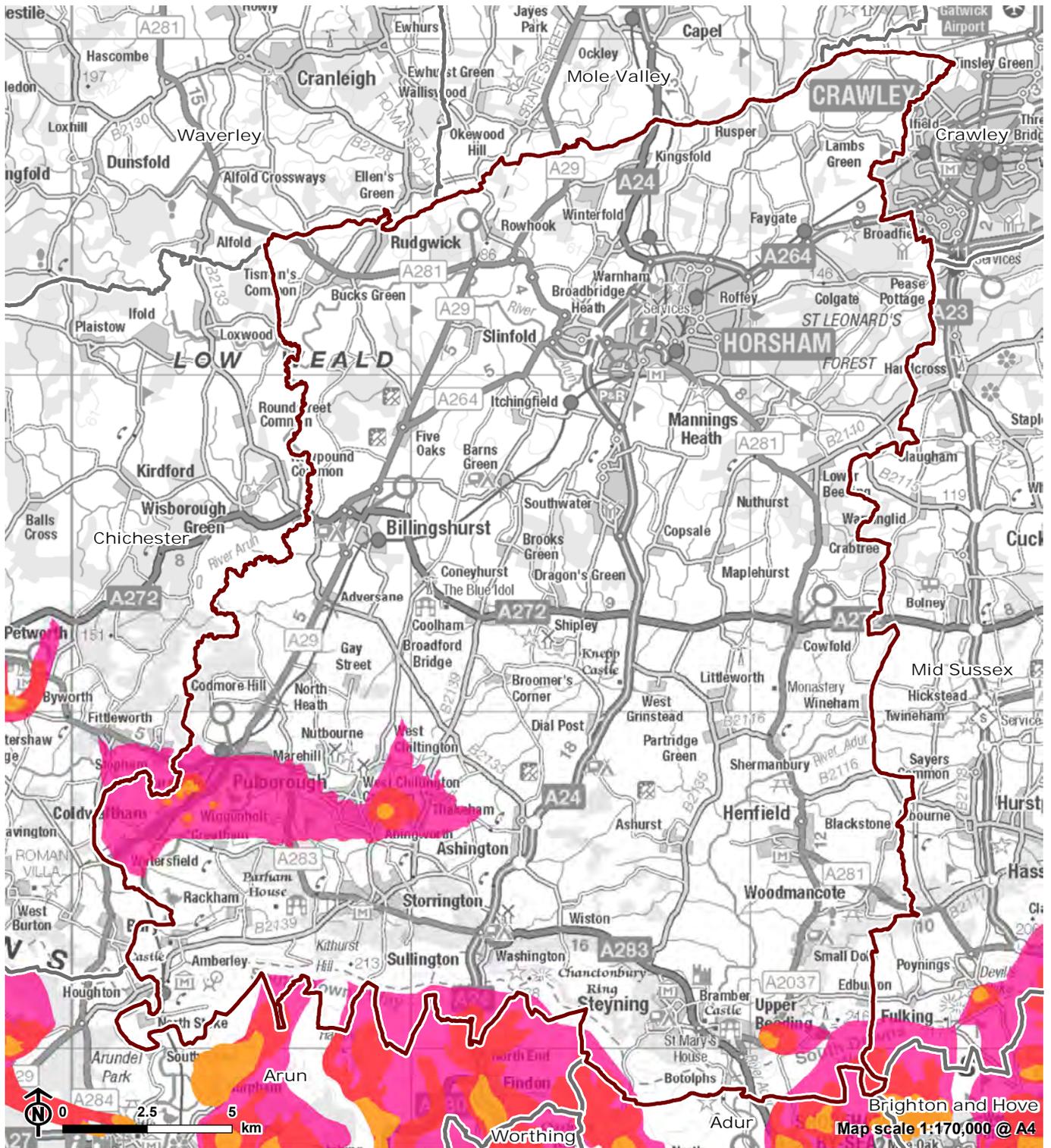


Figure B.5: Mineral Safeguarding Areas in Horsham District

- Horsham
 - Neighbouring authority
 - Chalk
 - Building stone
- Minerals Safeguarding Area (MSA)**
- Soft sand
 - Brick clay



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CB:KS EB:Beetham_m LUC FIGB_6_10660_WaterQuality_A4P_31/01/2020
Source: OS, EA

Figure B.6: Water Quality in Horsham District

- Horsham
- Neighbouring authority
- Zone 2c
- Zone 3

Source Protection Zone

- Zone 1
- Zone 1c
- Zone 2

Climate change adaptation and mitigation

Policy context

International

B.163 European Floods Directive (2007): A framework for the assessment and management of flood risk, aiming at the reduction of the adverse consequences for human health, the environment, cultural heritage and economic activity.

B.164 European Energy Performance of Buildings Directive (2010): Aims to promote the energy performance of buildings and building units. Requires the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance.

B.165 United Nations Paris Climate Change Agreement (2015): International agreement to keep global temperature rise this century well below 2 degrees Celsius above pre-industrial levels.

National

B.166 National Planning Policy Framework (NPPF)²⁰²: Contains the following:

- One of the core planning principles is to “support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”.
- Inappropriate development in areas at risk of flooding should be avoided. Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.
- Local planning authorities should adopt a proactive approach to mitigate and adapt to climate change, taking full account of flood risk, coastal change, water supply,

biodiversity and landscapes, and the risk of overheating from rising temperatures.

B.167 National Planning Practice Guidance (PPG)²⁰³: Supports the content of the NPPF by promoting low carbon and renewable energy generation, including decentralised energy, the energy efficiency of existing and new buildings and sustainable transport.

B.168 Climate Change Act 2008²⁰⁴: Sets targets for UK greenhouse gas emission reductions of at least 80% by 2050 and CO₂ emission reductions of at least 26% by 2015, against a 1990 baseline.

B.169 Flood and Water Management Act (2010)²⁰⁵: Sets out measures to ensure that risk from all sources of flooding is managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

B.170 The UK Renewable Energy Strategy²⁰⁶: Sets out the ways in which we will tackle climate change by reducing our CO₂ emissions through the generation of a renewable electricity, heat and transport technologies.

B.171 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK²⁰⁷: Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21st century energy management initiatives on 19th century homes.

B.172 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate²⁰⁸: Sets out visions for the following sectors:

- People and the Built Environment – “to promote the development of a healthy, equitable and resilient population, well placed to reduce the harmful health impacts of climate change...buildings and places (including built heritage) and the people who live and

²⁰² Department for 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

²⁰³ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

²⁰⁴ HM Government (2008) Climate Change Act 2008 [online] Available at: https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf

²⁰⁵ HM Government (2010) Flood and Water Management Act 2010 [online] Available at: http://www.legislation.gov.uk/ukpga/2010/29/pdfs/ukpga_20100029_en.pdf

²⁰⁶ HM Government (2009) The UK Renewable Energy Strategy [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228866/7686.pdf

²⁰⁷ Department of Energy & Climate Change (2012) The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/65602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf

²⁰⁸ HM Government (2018) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf

work in them are resilient and organisations in the built environment sector have an increased capacity to address the risks and make the most of the opportunities of a changing climate.”

- Infrastructure – “an infrastructure network that is resilient to today’s natural hazards and prepared for the future changing climate”.
- Natural Environment – “the natural environment, with diverse and healthy ecosystems, is resilient to climate change, able to accommodate change and valued for the adaptation services it provides.”
- Business and Industry – “UK businesses are resilient to extreme weather and prepared for future risks and opportunities from climate change.”
- Local Government – “Local government plays a central role in leading and supporting local places to become more resilient to a range of future risks and to be prepared for the opportunities from a changing climate.”

B.173 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England²⁰⁹: This Strategy sets out the national framework for managing the risk of flooding and coastal erosion. It sets out the roles for risk management authorities and communities to help them understand their responsibilities. The strategic aims and objectives of the Strategy are to:

- Manage the risk to people and their property.
- Facilitate decision-making and action at the appropriate level – individual, community or local authority, river catchment, coastal cell or national.
- Achieve environmental, social and economic benefits, consistent with the principles of sustainable development.

B.174 A Green Future: Our 25 Year Plan to Improve the Environment²¹⁰: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this section are: using and managing land sustainably; and protecting and improving our global

environment. Actions that will be taken as part of these two key areas are as follows:

- Using and managing land sustainably:
 - Take action to reduce the risk of harm from flooding and coastal erosion including greater use of natural flood management solutions.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.

Sub-national

8.20 West Sussex Sustainability Strategy²¹¹: The strategy sets out four priorities that update the previous 2011 sustainability actions. The four key priorities of the updated strategy are:

- Embedding sustainability within business.
- Leading the way in valuing the place of West Sussex.
- Realising efficiency savings in the short, medium and long term.
- Working with and influencing others to maximise the benefits for West Sussex.

B.175 Horsham Climate Change Strategy²¹²: Sets out the target to reduce carbon dioxide emissions in the district by 26% up to 2020 and by 80% by 2050. The strategy aims to achieve these targets through the following objectives:

- Reducing greenhouse gas emissions from Council operations and services.
- Ensuring that measures are taken to prepare the Council’s assets and services for likely future changes to the climate.
- Raising awareness in the wider community about climate change
- Working in partnership to reduce carbon emissions and prepare for the future changes to the climate across the District.

B.176 Horsham Green Infrastructure Strategy (April 2014)²¹³: This strategy informs the production of planning

²⁰⁹ HM Government (2011) Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228898/9780108510366.pdf

²¹⁰ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

²¹¹ West Sussex County Council (2015-2019) Sustainability Strategy [online] Available at:

https://www.westsussex.gov.uk/media/7357/sustainability_strategy.pdf

²¹² Horsham District Council (2009) Acting together on Climate Change – A Strategy for the Horsham District [online] Available at:

https://www.horsham.gov.uk/_data/assets/pdf_file/0004/9319/CD_EN_13_Climate-Change-Strategy-2009.pdf

²¹³ Horsham District Council (2014) Green Infrastructure Strategy [online] Available at:

policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network. It also seeks to contribute to the creation of sustainable communities through the provision of a wide range of ecosystem services and quality of life and health benefits for both future and existing residents.

B.177 Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (May 2014)²¹⁴: The document aims to provide advice to developers and their consultants on how to address local air quality when making a planning application in Horsham District.

B.178 River Adur Catchment Flood Management Plan (2009)²¹⁵: The management plan aims to promote more sustainable approaches to managing flood risk.

B.179 Arun and Western Streams Catchment Flood Management Plan (2009)²¹⁶: The management plan aims to promote more sustainable approaches to managing flood risk.

Current baseline

Climate change adaptation

B.180 The Met Office has released the UK Climate Projections 2018 study (UKCP18) that provides up to date information on how the climate of the UK is expected to change in the period up to the end of the 21st Century. In the highest emissions scenario, which may result based on current emissions reduction trends, summer temperatures in the UK could be 5.4C warmer by 2070 than the average summer between 1981 and 2000. Average summer rainfall would fall by 47% in this scenario. Winters could be up to 4.2C warmer, with up to 35% more rainfall by 2070.

B.181 The greatest warming in the UK will be in the South East where summer temperatures may increase another 3 to 4°C relative to present day²¹⁷.

B.182 Changes to the climate will bring new challenges to the District's built and natural environments. Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. A changing climate may place pressure on some native species

and create conditions suitable for new species, including invasive non-native species.

B.183 National climate change adaptation programmes in the UK are subject to future change according to updates in climate change allowances, which are expected to be published in the Government's third Climate Change Risk Assessment (CCRA3) in 2022.

B.184 Approximately 6.5% of the total administrative area of the District is located within the functional floodplain (Flood Zone 3b), where Pulborough, Steyning, Bramber and Upper Beeding settlements are identified as being most at risk of flooding. The Rivers Arun and Adur are identified as the most predominant sources of flood risk in the District, with tidal flooding being a specific concern in the south. To a lesser extent, there is also a potential risk of flooding from groundwater, surface water and sewer flooding. Climate change could exacerbate the risk of flooding in the future and increase the land area at risk due to increased intensity of rainfall from wetter winters²¹⁸. The Environment Agency has produced peak river flow allowances by river basin district which account for variation due to climate change. **Table B.10** below shows the potential change identified for the given time periods for the South East river basin district within which Horsham falls.

Table B.10 Peak river flow allowances for South East river basin district (1961 to 1990 baseline)

Allowance Category	Total potential change anticipated for 2015-2039	Total potential change anticipated for 2040-2069	Total potential change anticipated for 2070-2115
Upper End	25%	50%	105%
Higher Central	15%	30%	45%
Central	10%	20%	35%

Climate change mitigation

B.185 West Sussex is committed to a target of reducing the County's emission from the 2011/12 baseline by 50% by 2025. In addition, Horsham District aims for an emission reduction of

https://www.horsham.gov.uk/data/assets/pdf_file/0007/66544/Green-Infrastructure-Study.pdf

²¹⁴ Horsham District Council (2014) Air Quality Action Plan [online] Available at: https://www.horsham.gov.uk/data/assets/pdf_file/0011/15131/HDC-Planning-Advice-Documents-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf

²¹⁵ Environment Agency (2009) River Adur Catchment Flood Management Plan [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/293867/Adur_Catchment_Flood_Management_Plan.pdf

²¹⁶ Environment Agency (2009) Arun and Western Streams Catchment Flood Management Plan [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/293864/Arun_and_Western_Streams_Catchment_Flood_Management_Plan.pdf

²¹⁷ Met Office (2018) UKCP18 Factsheet: Derived projections [Online] Available at: <https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-fact-sheet-derived-projections.pdf>

²¹⁸ Horsham District Council (2015) Horsham District Planning Framework [Online] Available at:

https://www.horsham.gov.uk/data/assets/pdf_file/0006/28563/Horsham-District-Planning-Framework-2015.pdf

80% by the year 2050. As the table below demonstrates that there has been a year on year reduction in the total CO₂ emissions for the County between 2014 and 2017 with the exception of 2016. Domestic carbon emission for the District fell by 83.5 kilotonnes between 2005 and 2014, with domestic gas and electricity sales also falling during this time period by 150 GWh and 16 GWh respectively. This indicates that residents in Horsham are actively improving energy efficiency in their homes and/or are improving their energy consumption habits²¹⁹. These points considered, Horsham District has the second highest tonnage of carbon dioxide emissions in the County (713.2kt CO₂) after Chichester (780.9kt CO₂), and also has the second highest per capita emissions of 5.1 tonnes of CO₂ emissions per capita²²⁰.

Performance Sustainable Buildings' which provides advice and information for architects, designers, engineers, developers and builders on creating sustainable buildings²²¹.

B.11 Total CO₂ Emissions percentage change from previous year in West Sussex

Year	2014	2015	2016	2017
Total Emission % Reduction	-7%	-18%	+9%	-12%

B.186 For the year 2005 Horsham had an average rate of 8.0 tonnes of CO₂ emissions per capita, however in 2017 the rate decreased to 5.1 tonnes per capita. **Table B.12** shows CO₂ (kilotonne) emissions for Horsham for 2005 and 2017 across industrial, domestic and transport sectors. There has been a reduction between 2005 and 2017 across all sectors and transport accounts for the largest amount of CO₂ emissions.

Table B.112 CO₂ emissions in Horsham (shown as kt)

Year	Industrial and Commercial	Domestic	Transport	Total
2005	322.8	340.6	343.3	1006.7
2017	182.1	226.7	304.5	713.2

B.187 In the context of planned growth in the South East additional low carbon and appropriate renewable energy infrastructure, as well as an increase in uptake of energy efficiency initiatives will be needed to ensure West Sussex meets its targets and benefits from the opportunities for innovation in these sectors. In addition to reducing carbon emissions from existing sources, efforts to reduce the overall energy consumption and carbon emissions are being made through improvements to Part L of the Building Regulations. In conjunction with Sussex Building Controls Horsham District Council has produced the guidance document 'Creating High

²¹⁹ Horsham District Council (2017) Home Energy Conservation Act: Progress Report for 2017-19 [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0005/46382/HECA-Report-2017-to-2019.pdf

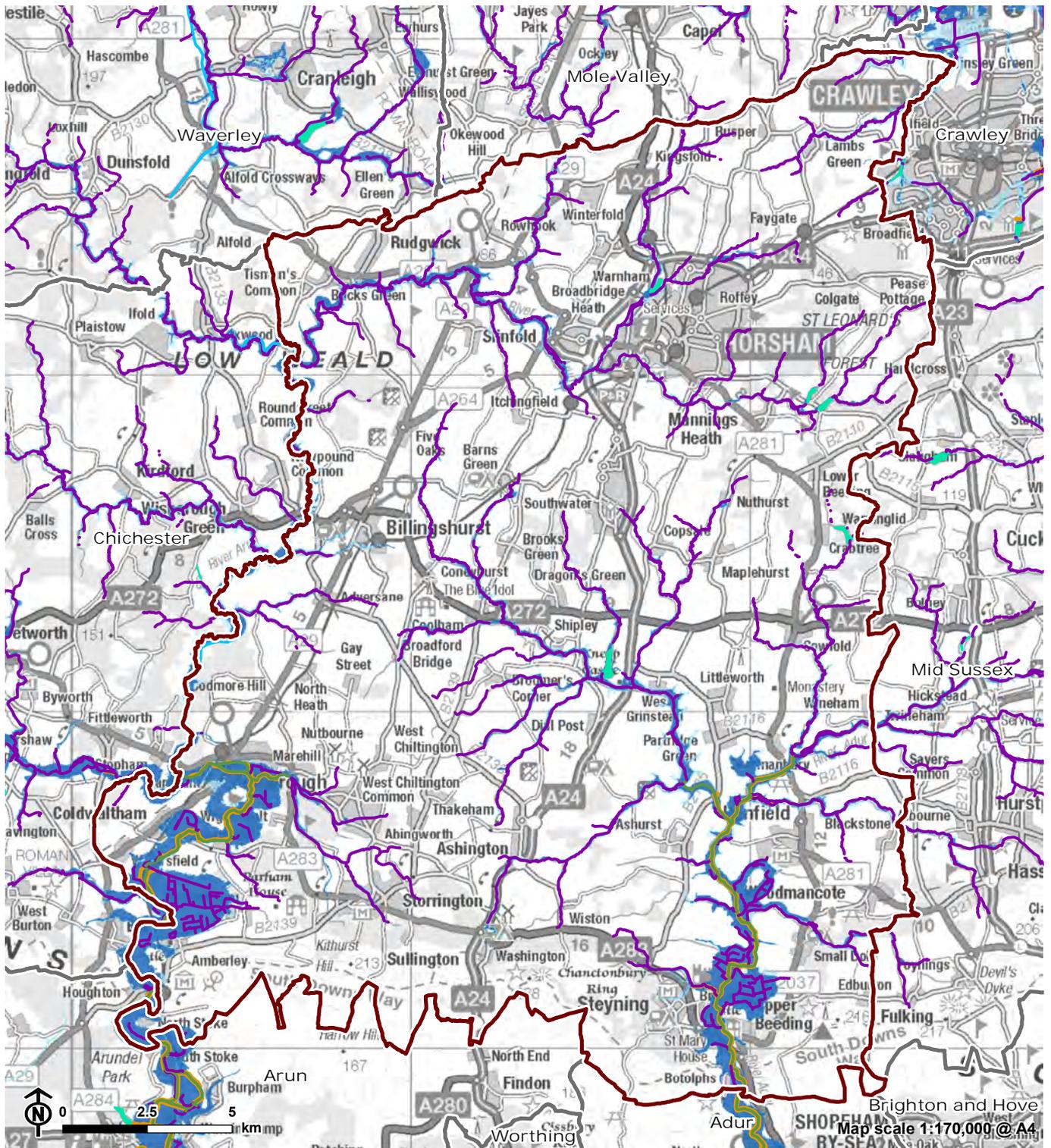
²²⁰ Department for Business, Energy & Industrial Strategy (2019) UK Local Authority and Regional Carbon Dioxide Emissions National Statistics: 2005-

2017 Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2017>

²²¹ Horsham District Council and Sussex Building Control (2009) Creating High Performance Sustainable Buildings [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0019/3484/Sustainability_Booklet_Low_Res.pdf

Table B.123 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
<p>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 highest carbon dioxide emissions in the County. 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.</p>	<p>Climate change is likely to have on-going effects regardless of the Local Plan Review, considering the scale of the challenge this issue poses. The HDPF already includes policies seeking to address this issue, including Policy 35 which supports development which makes a clear contribution to mitigating and adapting to the impacts of climate change. The obligation of the Council to reduce carbon emissions will also remain with or without the Local Plan Review. The Local Plan Review provides an opportunity to strengthen policies which seek to act positively in terms of climate change contributions. An important part of this overall approach will be to help limit the need to travel in the District through the appropriate siting of new development. The Local Plan Review will also present opportunities to encourage low-carbon design, promotion of renewable energy and sustainable transport infrastructure delivery.</p>	<p>SA objective 15</p>
<p>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.</p>	<p>Policy 35 of the HDPF is supportive of design and construction measures which provide resilience to climate change. Whilst the Local Plan Review will not influence extreme weather events, it can build upon the approach of current planning policy to ensure adaptation through design and better respond to current circumstances. This is likely to include building orientation, shading including tree planting, protection against extreme weather events in the public realm including public transport facilities, the use of SuDS and green infrastructure as well as promotion of water conservation and recycling.</p>	<p>SA objective 12 SA objective 15</p>
<p>Flood risk in Horsham is dominated by fluvial flooding which is the source of most risk. 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.</p>	<p>The Local Plan Review is not expected to reduce the likelihood of fluvial flooding. Policy 38 of the HDPF currently seeks to reduce the potential for increases in flood risk as a result of the location of new development and requires the use of SuDS. The Local Plan Review presents the opportunity, alongside national measures, to mitigate the effects of potential future flooding and locate development in sustainable locations that would not be significantly impacted by flooding and ensure it is designed to be flood resilient where appropriate. The review process will also allow policy to respond most appropriately to the updated evidence base in relation to flood risk in Horsham.</p>	<p>SA objective 12 SA objective 15</p>



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CB:KS EB:Beetham_m LUC FIGB_7_10660_FloodRisk_A4P 31/01/2020
Source: OS, EA

Figure B.7: Flood Risk in Horsham District

- Horsham
- Neighbouring authority
- Canal
- River
- Tidal river
- Flood defences
- Lake
- Flood zone 3
- Flood zone 2

Biodiversity

Policy context

International

B.188 International Convention on Wetlands (Ramsar Convention) (1976): International agreement with the aim of conserving and managing the use of wetlands and their resources.

B.189 European Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) (1979): Aims to ensure conservation and protection of wild plant and animal species and their natural habitats, to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species).

B.190 International Convention on Biological Diversity (1992): International commitment to biodiversity conservation through national strategies and action plans.

B.191 European Habitats Directive (1992): Together with the Birds Directive, the Habitats Directive sets the standard for nature conservation across the EU and enables all 27 Member States to work together within the same strong legislative framework in order to protect the most vulnerable species and habitat types across their entire natural range within the EU. It also established the Natura 2000 network.

B.192 European Birds Directive (2009): Requires the maintenance of all species of naturally occurring birds in the wild state in the European territory at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking account of economic and recreational requirements.

B.193 United Nations Declaration on Forests (New York Declaration) (2014): international commitment to cut natural forest loss by 2020 and end loss by 2030.

National

B.194 National Planning Policy Framework (NPPF)²²²: Encourages plans to “identify, map and safeguard components of local wildlife-rich habitats and wider ecological

networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”. Plans should also promote conservation, restoration and enhancement of priority habitats and species, ecological networks and measurable net gains for biodiversity.

B.195 The framework states that a strategic approach to maintaining and enhancing networks of habitats and green infrastructure is also to be supported through planning policies and that there should also be support for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

B.196 National Planning Practice Guidance (PPG)²²³: Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

B.197 Natural Environment and Rural Communities Act 2006²²⁴: Places a duty on public bodies to conserve biodiversity.

B.198 Biodiversity 2020: A strategy for England’s wildlife and ecosystem services²²⁵: Guides conservation efforts in England up to 2020 by requiring a national halt to biodiversity loss, supporting healthy ecosystems and establishing ecological networks. The Strategy includes 22 priorities which include actions for the following sectors: Agriculture, Forestry, Planning & Development, Water Management, Marine Management, Fisheries, Air Pollution and Invasive Non-Native Species.

B.199 Biodiversity offsetting in England Green Paper²²⁶: Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

B.200 A Green Future: Our 25 Year Plan to Improve the Environment²²⁷: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this section are: recovering nature and enhancing

²²² Department for 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

²²³ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <https://www.gov.uk/government/collections/planning-practice-guidance>

²²⁴ HM Government (2006) Natural Environment and Rural Communities Act 2006 [online] Available at: http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga_20060016_en.pdf

²²⁵ Department for Environment, Food and Rural Affairs (2011) Biodiversity 2020: A strategy for England’s wildlife and ecosystem services [online] Available

at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf

²²⁶ Department for Environment, Food and Rural Affairs (2013) Biodiversity offsetting in England Green Paper [online] Available at: https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting/supporting_documents/20130903Biodiversity%20offsetting%20green%20paper.pdf

²²⁷ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

the beauty of landscapes; securing clean, productive and biologically diverse seas and oceans; and protecting and improving our global environment. Actions that will be taken as part of these three key areas are as follows:

- Recovering nature and enhancing the beauty of landscapes:
 - Develop a Nature Recovery Network to protect and restore wildlife and provide opportunities to re-introduce species that have been lost from the countryside.
- Securing clean, healthy, productive and biologically diverse seas and oceans:
 - Achieve a good environmental status of the UK's seas while allowing marine industries to thrive and complete our economically coherent network of well-managed marine protected areas.
- Protecting and improving our global environment:
 - Provide international leadership and lead by example in tackling climate change and protecting and improving international biodiversity.
 - Support and protect international forests and sustainable agriculture.

Sub-national

B.201 A Living Landscape for the South East²²⁸: Sets out a vision for the South East Ecological Network, which involves the restoration and rebuilding of the natural environment, bringing wildlife into our towns and cities, and addressing the challenge of conserving marine wildlife. The document highlights the following issues:

- There is a need to increase the ability of the environment to protect us from flooding and to soak up carbon dioxide ('ecosystem services'). This will demand the restoration of extensive areas of natural habitat, particularly wetlands and woodlands.
- Better access to the natural environment helps improve mental and physical health and improves quality of life. There is a need to bring wild places to more people and bring more people into wild places.

- Isolated nature reserves and other protected sites are unlikely to be able to sustain wildlife in the long term. Sites will need to be buffered, extended and linked if wildlife is to be able to adapt to climate change.
- Outside protected sites, once common and widespread species are in catastrophic decline. Reversing this decline needs a new approach.

B.202 West Sussex Minerals Sites - Biodiversity Action Plan²²⁹: An action plan which sets out the mineral sites within West Sussex which are of biodiversity importance in terms of both habitats and species. The action plan identifies a number of actions to help protect and enhance the sites identified.

B.203 West Sussex Road Verges Habitat Action Plan²³⁰: The action plan sets out the notable road verges in West Sussex and particular objectives and measures to help protect the habitats and the species concerned.

B.204 Horsham Green Infrastructure Strategy (April 2014)²³¹: The strategy informs the production of planning policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network. It also seeks to contribute to the creation of sustainable communities through the provision of a wide range of ecosystem services and quality of life and health benefits for both future and existing residents.

B.205 South Downs National Park Partnership Management Plan (2014-2019)²³²: The five year strategy sets out policy for the management of the South Downs National Park. The fundamental approach which underpins the PMP is delivering sustainable development which is considerate of achieving support for an ecosystem approach and mitigating and adapting to climate change. The plan also embodies the principles of green infrastructure and seeks to provide opportunities to address and make good use of green infrastructure assets at a landscape scale, to deliver a wide range of benefits to people. The National Park Authority is currently undertaking a Partnership Management Plan Review. This review will incorporate new ideas on how to manage protected landscapes and produce a new Priority Action Plan cover the period up to 2024.

²²⁸ The South East Wildlife Trusts (2006) A Living Landscape for the South East [online] Available at: https://www.kentwildlifetrust.org.uk/sites/kent.live.wt.precedenthost.co.uk/files/A_Living_Landscape_for_the_South_East.pdf

²²⁹ Sussex Biodiversity Partnership (2004) West Sussex Minerals Site Biodiversity Action Plan [online] Available at: file:///C:/Users/field_I/Downloads/West%20Sussex%20Mineral%20Sites%20-%20A%20Biodiversity%20Action%20Plan.pdf

²³⁰ Sussex Biodiversity Partnership (2003) West Sussex Road Verges Habitat Plan [online] Available at:

file:///C:/Users/field_I/Downloads/West%20Sussex%20Road%20Verges%20Habitat%20Action%20Plan.pdf

²³¹ Horsham District Council (2014) Green Infrastructure Strategy [online] Available at: https://www.horsham.gov.uk/data/assets/pdf_file/0007/66544/Green-Infrastructure-Study.pdf

²³² South Downs National Park Authority (2013) South Downs National Park Partnership Management Plan 2014-2019 [online] Available at: <https://www.southdowns.gov.uk/wp-content/uploads/2015/01/SDNP-Partnership-Management-Plan-2014-19.pdf>

Current baseline

B.206 Habitats found within the District include arable, woodlands, hedgerows, a wide variety of grasslands, heathland, and aquatic environments including rivers, ponds and floodplain grasslands. The urban environment also provides a home to a wide variety of wildlife. Some of the wildlife in the District, including a number of bat species, snakes, great crested newts, dormice and badgers are rare or protected by law. There are also a number of species that are not protected by law but have been identified as being of biodiversity importance at a national or county wide scale, for example swifts.

B.207 Approximately 8% of the land area of the District is designated for its importance in nature conservation terms. The Arun Valley Special Protection Area (SPA) and RAMSAR site comprises 1% of the District's area and is of international importance for a number of bird species that overwinter at the site. Part of this area is also designated as a Special Area of Conservation (SAC). Other international designations which development in the plan area has the potential to impact upon include the Mens SAC which is within Chichester to the west. This site is of importance for its beech forest habitats and barbastelle bat and was screened in and included as part of the Habitats Regulations Assessment for the HDPF. There are also 23 Sites of Special Scientific Interest (SSSIs) which are of importance for nature conservation or geology, 70 locally important Sites of Nature Conservation Importance (SNCIs) and 22 Regionally Important Geological Sites (RIGS) as designated by WSCC²³³.

B.208 42.5% of all SSSIs in the District are in a favourable condition. 49.3% of the remaining SSSIs are in unfavourable but recovering condition. Only 5.5% of SSSIs in the District were found to be in declining condition²³⁴. In addition, monitoring of local designations, shows that 76% of SNCIs and 64% of RIGS are in positive conservation management.

B.209 After Surrey, West Sussex is the second most wooded county in England. Around 19% of the land area within the County is wooded. Furthermore, over half of the area which is wooded is covered by broadleaf trees, with the rest being made up of coniferous species and open scrub woodland. Ancient Woodlands, (as designated by Natural England) are areas that have been continuously wooded since the 1600s and support a range of plant and animal species that cannot be replaced in new woodlands. In 2009, a West Sussex wide study found that the percentage of Ancient woodland in the District was 6%²³⁵.

B.210 Other habitats in the District are also important in supporting biodiversity and key environmental services, such as flood attenuation, climate control, attenuating pollution and providing space for food production. The Green Infrastructure Strategy for the District has identified a number of key areas of existing importance for biodiversity and other environmental services. In addition, a number of Biodiversity Opportunity Areas have been identified where there is potential for biodiversity to be improved in the future. This includes The St Leonards Watershed, Rusper Ridge, Knepp Estate with Fluvial Extensions, Lower Adur Arun Watershed and Central Downs - Arun to Adur²³⁶. This approach is to be linked to the targeted landscape-scale approach to conserving biodiversity in Sussex.

²³³ Horsham District Council (2015) Horsham District Planning Framework [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0006/28563/Horsham-District-Planning-Framework-2015.pdf

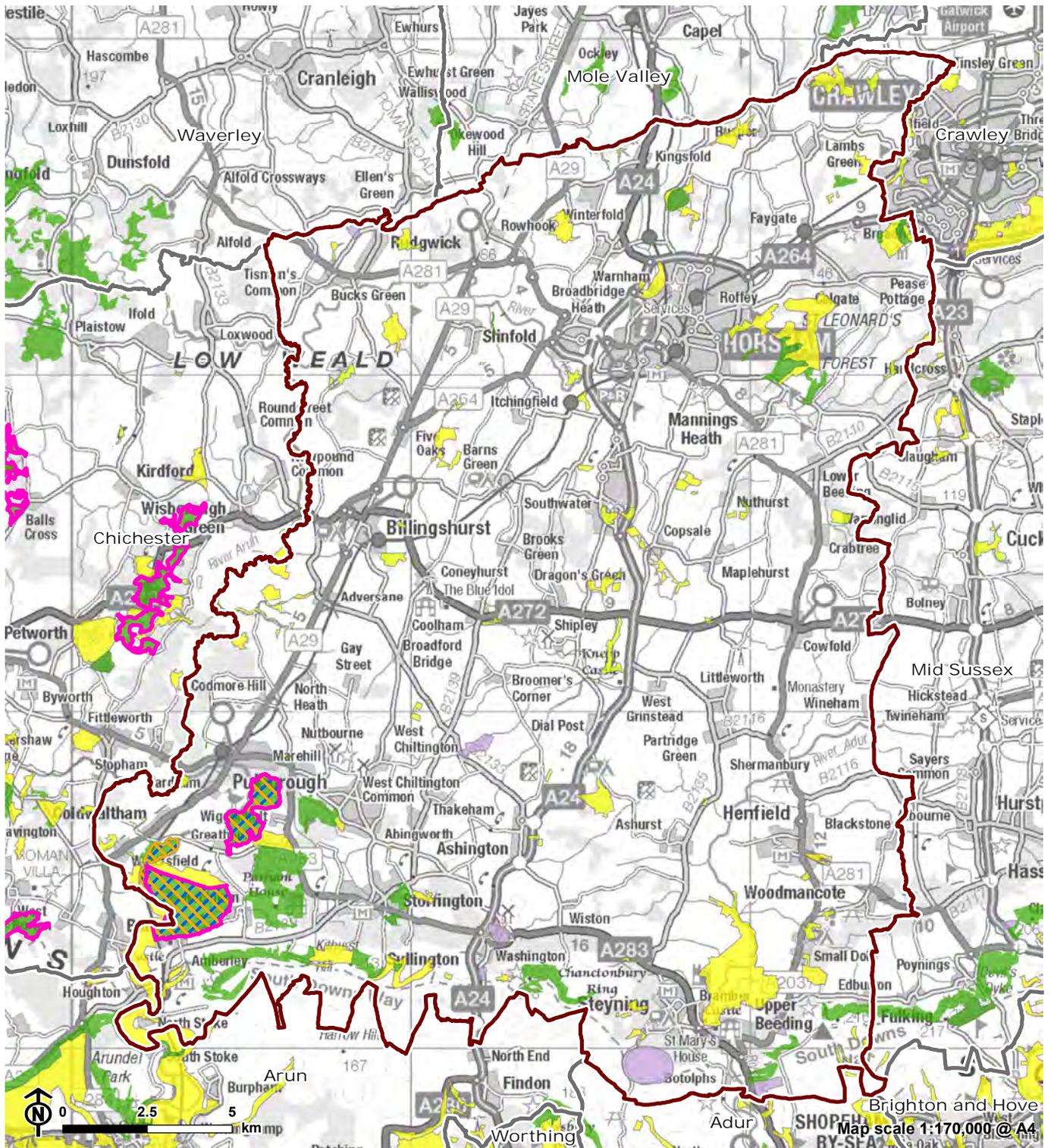
²³⁴ Horsham District Council (2019) Authority Monitoring Report (2018/2019) [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0007/78379/AMR_2018_2019_CHAPTER_6_Policy_Indicators.pdf

²³⁵ Weald and Downs Ancient Woodland Survey (2010) A revision of the Ancient Woodland Inventory for West Sussex [Online] Available at: <http://www.highweald.org/downloads/publications/project-reports/weald-a-down-ancient-woodland-survey/1061-west-sussex-ancient-woodland-inventory/file.html>

²³⁶ Horsham District Council (2015) Horsham District Planning Framework [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0006/28563/Horsham-District-Planning-Framework-2015.pdf

Table B.134 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
<p>The District contains and is in close proximity to a wide variety of both designated and non-designated natural habitats and biodiversity. This includes those designated for their national and international importance.</p>	<p>Pressures on the natural environment in Horsham are likely to continue regardless of the Local Plan Review particularly given the requirement for more development to meet growth projections. The HDPF includes policies seeking to address these pressures, including Policy 31 which provides for the support of the network of green infrastructure as well as sites and habitats identified for their specific importance. The Local Plan Review presents the opportunity for new development to come forward at the most appropriate locations as to limit detrimental impacts on biodiversity assets. The review process also offers the opportunity to update planning policy in relation to the protection of areas which are of importance in terms of their biodiversity and geodiversity value with consideration for the future evolution of development in the District and the provision of net biodiversity gain. The findings of HRA will be incorporated into the SA and will provide further insight into biodiversity impacts specifically at European sites presenting the opportunities to limit adverse impacts at such locations.</p>	<p>SA objective 6</p>
<p>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.</p>	<p>Erosion and fragmentation of habitats and ecological networks could take place through poorly located and designed development. The NPPF requires Local Plans to include policies to safeguard, restore and create ecological networks at a landscape scale. In addition, Policy 31 of the HDPF requires development proposals to contribute to the enhancement of existing biodiversity, and to create and manage new habitats where appropriate. The policy also supports development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks. The Local Plan Review provides the opportunity to ensure that the policy is working as planned and is up-to-date with current thinking and evidence.</p>	<p>SA objective 6 SA objective 15</p>



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Figure B.8: Biodiversity and Geodiversity Designations in Horsham District

- | | |
|------------------------------|-------------------------------------|
| Horsham | Site of Special Scientific Interest |
| Neighbouring authority | National Nature Reserve |
| Special Area of Conservation | Local Wildlife Site |
| Special Protection Area | Local Geological Site |
| Ramsar | |

Historic environment

Policy context

International

B.211 European Convention for the Protection of the Architectural Heritage of Europe (1985): Defines 'architectural heritage' and requires that the signatories maintain an inventory of it and take statutory measures to ensure its protection. Conservation policies are also required to be integrated into planning systems and other spheres of government influence as per the text of the convention.

B.212 Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)²³⁷: Aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study".

National

B.213 National Planning Policy Framework (NPPF)²³⁸: Plans should:

"set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place."

B.214 National Planning Practice Guidance (PPG)²³⁹: Supports the NPPF by requiring that Local Plans include strategic policies for the conservation and enhancement of the historic environment, including a positive strategy for the conservation and enjoyment of the historic environment. It also states that local planning authorities should identify

specific opportunities for conservation and enhancement of heritage assets.

B.215 The Government's Statement on the Historic Environment for England 2010²⁴⁰: Sets out the Government's vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life. Includes reference to promoting the role of the historic environment within the Government's response to climate change and the wider sustainable development agenda.

B.216 The Heritage Statement 2017²⁴¹: Sets out how the Government will support the heritage sector and help it to protect and care for our heritage and historic environment, in order to maximise the economic and social impact of heritage and to ensure that everyone can enjoy and benefit from it.

B.217 Sustainability Appraisal and Strategic Environmental Assessment, Historic England Advice Note 8²⁴²: Sets out Historic England's guidance and expectations for the consideration and appraisal of effects on the historic environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

Sub-national

B.218 West Sussex Local Design Guide²⁴³: Sets out County guidance for good design measures which complement national planning policy as well as other local planning guidance. It aims to achieve high standards of design and construction. Areas of focus include Masterplanning, Visibility, Street Layout and Parking. Improvements are to be achieved by promoting a common approach to the main principles which form the basis for Local Planning Authorities' criteria for assessing planning applications.

B.219 Billingshurst Village Centre Supplementary Planning Document (2017)²⁴⁴: The purpose of this SPD is to ensure the future vitality and viability of Billingshurst, by promoting it as a destination and creating a flexible village centre. The SPD, alongside the Community-led plan, also

²³⁷ Council of Europe (1992) Valletta Treaty [online] Available at: <https://rm.coe.int/168007bd25>

²³⁸ Department for 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

²³⁹ Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at:

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

²⁴⁰ HM Government (2010) The Government's Statement on the Historic Environment for England 2010 [online] Available at:

<https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>

²⁴¹ Department for Digital, Culture Media and Sport (2017) Heritage Statement 2017 [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664657/Heritage_Statement_2017_final_-_web_version_.pdf

²⁴² Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8 [online] Available at: <https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/hea036-sustainability-appraisal-strategic-environmental-assessment.pdf/>

²⁴³ West Sussex County Council (2008) Local Design Guide [online] Available at: <https://www.westsussex.gov.uk/media/1840/2910602.pdf>

²⁴⁴ Horsham District Council (2017) Billingshurst Village Centre SPD [online] Available at: https://www.horsham.gov.uk/data/assets/pdf_file/0009/44757/Adopted-Billingshurst-Village-Centre-SPD-March-2017.pdf

provides a framework and point of focus for HDC and the key community partners in taking forward projects in the village centre.

B.220 Horsham Town Plan Supplementary Planning Document (2012)²⁴⁵: The Council aims to steer future development in the town centre to maximise economic potential whilst sustaining and enhancing its attractive and historic environment to the benefit of residents and visitors. The Horsham Town Plan SPD provides planning guidance for future retail, commercial and leisure development in Horsham town centre.

B.221 West of Horsham Masterplan Supplementary Planning Document (2008)²⁴⁶: This document includes the requirement and policies for the development of a major mixed-use scheme including 2,000 homes on the land adjoining the western side of Horsham and to the south of Broadbridge Heath.

B.222 Land West of Horsham Design Principles and Character Areas Supplementary Planning Document (2009)²⁴⁷: This document aims to provide guidance on design matters for developers and others preparing or considering planning applications. Site specific design guidance reinforces the policies of the LDF and the West of Horsham Masterplan SPD which will ensure that the future development is appropriate and of high quality.

B.223 Storrington Old Mill Drive Diamond Planning Brief Supplementary Planning Document (2008)²⁴⁸: This planning brief sets out the Council's guidelines and vision for any future development of the Old Mill Drive Diamond site in Storrington. The aim of the document is to guide prospective developers through the Council's development plan policy, encourage efficient and effective joined-up future development, and promote stronger links between the site and the wider town centre.

Current baseline

B.224 Horsham District has a rich and varied heritage ranging from prehistoric sites to Roman roads, Anglo-Saxon settlements and medieval buildings. Horsham retains a traditional settlement pattern of small hamlets and villages which are served by larger market towns.

B.225 The historic landscape character of dispersed farmsteads and small villages dominate the settlement pattern; however, this historic patterning has been altered in the post-medieval period by modern development, concentrated in railway towns such as Horsham. The District's settlements are also intermixed with small irregular fields and a co-axial field system orientated south west to north east runs by Horsham. This is thought to have origins in the early-medieval period²⁴⁹.

B.226 There are over 1,860 Listed Buildings in the District together with 37 Conservation Areas, 77 Scheduled Monuments and 252 sites of archaeological interest. Horsham is home to a number of Listed Buildings from the Jacobean, Georgian and Victorian era and the 20th Century.

B.227 Many of the Conservation Areas which are declared are concentrated around the historic cores of towns and villages and include a range of property ages and types. Nine of the conservation areas have adopted character statements. These highlight the broad character of the area as well as the features which contribute to the special character of these areas and should be preserved or enhanced. Conservation Areas in Horsham which have adopted character statements are; Amberley, Billingshurst, Bramber, Henfield, Horsham, Pulborough, Slinfold, Steyning and Storrington. In addition, there are also a number of historic parks and gardens in the District, including:

- Leonardslee Gardens.
- Parham House.
- St Mary's House.
- Horsham Park.

B.228 A small number of heritage assets in Horsham have been placed on the national 'Heritage At Risk' Register compiled by English Heritage. These include Billingshurst Conservation Area, three listed places of worship, two Scheduled Monuments, and a Scheduled Monument/Registered Park and Garden²⁵⁰. Preservation works to these structures are actively encouraged by the

²⁴⁵ Horsham District Council (2012) Horsham Town Plan SPD [online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0017/3518/Horsham_Town_Plan_SPD_2012.pdf

²⁴⁶ Horsham District Council (2008) Land West of Horsham Masterplan SPD [online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0014/30713/West-of-Horsham-Masterplan.pdf

²⁴⁷ Horsham District Local Development Framework (2009) Land West of Horsham Design Principles and Character Areas SPD [online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0003/50961/WoH-Design-Principles-SPD.pdf

²⁴⁸ Horsham District Local Development Framework (2008) Storrington Old Mill Drive Diamond Planning Brief SPD [online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0010/50959/OldMillDriveAdopt.pdf

²⁴⁹ West Sussex County Council, East Sussex County Council, Brighton & Hove Unitary Authority, English Heritage (2010) Sussex Historic Landscape Characterisation: Volume II – Interpretation [Online] Available at: https://archaeologydataservice.ac.uk/archiveDS/archiveDownload?t=arch-1739-1/dissemination/pdf/sussex_hlc_volume_2.pdf

²⁵⁰ Historic England (2019) Heritage at Risk: London & South East Register [online] Available at: <https://historicengland.org.uk/images-books/publications/har-2019-registers/lon-se-har-register2019/>

Council and would be given priority for renovation works²⁵¹. Horsham in comparison with other local planning authorities in West Sussex, has the third highest number of assets on the Heritage at Risk Register, after South Downs and Chichester²⁵².

B.229 There are a number of Archaeological Notification Areas (ANAs) within the District with potential for, as well as known, heritage assets. West Sussex County Council have set out recommended thresholds for when a Historic Environment Record (HER) search is considered appropriate in order to protect, conserve and enhance the historic environment of these areas. ANAs that are classified as 'Red' are very sensitive, where new development may have major adverse impact on nationally important and other significant archaeological sites, and an HER search is required. ANAs that are classified as 'Amber' are less sensitive to new development but still require an HER search²⁵³.

B.230 There is a total of five ANAs within the main town of Horsham. Two of these are categorised as 'Amber' and three as 'Red', namely 'Horsham Town Medieval Core', 'North Street Medieval Farmstead', and Chesworth House Medieval Moated Site and surrounding area.

B.231 In the settlement of Billingshurst, there is one 'Red' ANA – 'The Parish Church of St Mary'. In Bramber and Upper Beeding, there are two 'Red' ANAs, 'Bramber Historic Core and Medieval Salt Working and Occupation' and 'The Site of Sele Priory and the Parish Church of St Peter'. In Broadbridge Heath, there is one 'Red' ANA – 'Land Surrounding the Wickhurst Green Development'. There are four 'Red' ANAs within Henfield - 'Medieval Burage Plots', 'Henfield Historic Core', 'Medieval and Post-Medieval Hamlet of Nep Town', and 'Barrowhill Farm Medieval Historic Farmstead'.

B.232 Within the settlement area of Pulborough and Codmore Hill, there are five 'Red' ANAs – 'Old Swan Bridge', 'Pulborough Historic Core', 'Old Place Medieval Moated Site', 'Medieval Moated Site, Link Lane', 'Park Mound and Park Farm', and 'Large Roman Settlement Area'. There are only two 'Amber' ANAs in the settlement of Southwater – 'Land to the West of Southwater' and 'Medieval Moated Site at Watlings Farm'. At Steyning, there is one 'Red' ANA – 'Steyning Historic Core and associated Early Medieval and Medieval Occupation'. In the settlements of Storrington and Sullington there are two 'Red' ANAs – 'Bronze Age Bowl Barrow Cemetery on Sullington Warren' and 'Storrington Historic Core'²⁵⁴.

Table B.14 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

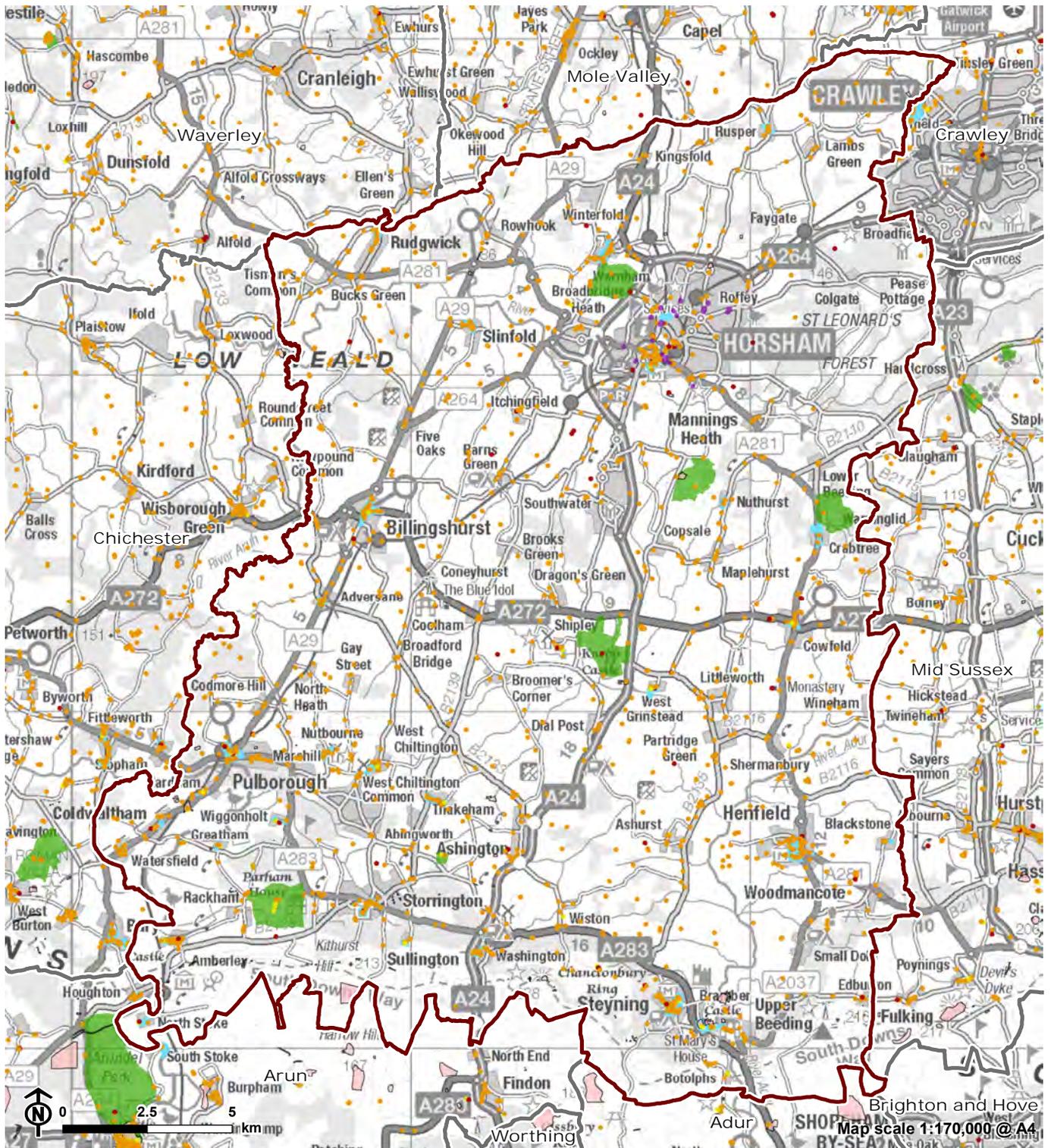
Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
There are many sites, features and areas of historical and cultural interest in the District, some of which are at risk and identified on the Heritage at Risk Register. These assets may be particularly vulnerable to development which is poorly located or designed.	The HDPF includes policies seeking to protect and enhance the historic environment, including Policy 34, which requires the Council to positively manage development affecting heritage assets. The Local Plan Review presents the opportunity to guide new development to locations which are less sensitive in terms of their impact on heritage assets (with consideration for other sustainability issues) through the SA process applied to potential site allocations. The Local Plan Review will allow for any update required to be made to the policy position the Council has taken with regards the protection of heritage assets and their setting through appropriate development policies.	SA objective 8

²⁵¹ Horsham District Council(2015) Horsham District Planning Framework [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0006/28563/Horsham-District-Planning-Framework-2015.pdf

²⁵² Historic England (2018) Heritage at Risk South East Register [Online] Available at: <https://historicengland.org.uk/images-books/publications/har-2018-registers/se-har-register2018/>

²⁵³ West Sussex County Council (2016) Historic Environment Record (HER): HER Search Threshold Guidance for Archaeological Notification Areas (ANAs) [Online] Available at: https://www.westsussex.gov.uk/media/7590/her_thresholds_april2016.pdf

²⁵⁴ West Sussex Country Council (2020) Archaeological Notification Areas Map [Online] Available at : <https://www.westsussex.gov.uk/land-waste-and-housing/landscape-and-environment/historic-environment-record/archaeological-notification-areas-1/> [Accessed 27th January 2020]



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Figure B.9: Horsham District's Historic Environment

- Horsham
- Neighbouring authority
- Registered Park and Garden
- Scheduled Monument
- Conservation Area
- Locally Listed Building
- Grade I Listed Building
- Grade II Listed Building
- Grade II* Listed Building

Landscape

Policy context

International

B.233 European Landscape Convention (2002): Promotes landscape protection, management and planning. The Convention is aimed at the protection, management and planning of all landscapes and raising awareness of the value of a living landscape.

National

B.234 National Planning Policy Framework (NPPF)²⁵⁵: Planning principles include:

- Recognising the intrinsic beauty and character of the countryside.
- Protecting and enhancing valued landscapes. Development should be sympathetic to local character and history, including the surrounding built environment and landscape setting.
- Conserve and enhance landscape and scenic beauty in National Parks, The Broads and Areas of Outstanding Natural Beauty.

B.235 A Green Future: Our 25 Year Plan to Improve the Environment²⁵⁶: Sets out goals for improving the environment within the next 25 years. It details how the Government will work with communities and businesses to leave the environment in a better state than it is presently. Identifies six key areas around which action will be focused. Those of relevance to this section are: recovering nature and enhancing the beauty of landscapes. Actions that will be taken as part of this key area are as follows:

- Working with AONB authorities to deliver environmental enhancements.
- Identifying opportunities for environmental enhancement of all England's Natural Character Areas, and monitoring indicators of landscape character and quality.

Sub-national

B.236 High Weald Area of Outstanding Natural Beauty: Management Plan 2019-2024²⁵⁷: The Plan sets out the long term policy objectives and short term targets for conserving and enhancing the natural beauty of the High Weald AONB. The management plan also provides a description of the High Weald and its history, the vision for the AONB, an introduction to the legislation and principles of the plan, the Statement of Significance, a description of the state of the High Weald landscape, and a section on implementation and monitoring.

B.237 South Downs National Park Partnership Management Plan (2014-2019)²⁵⁸: The five year strategy sets out policy for the management of the South Downs National Park. The fundamental approach which underpins the PMP is delivering sustainable development which is considerate of achieving support for an ecosystem approach and mitigating and adapting to climate change. The plan also embodies the principles of green infrastructure and seeks to provide opportunities to address and make good use of green infrastructure assets at a landscape scale, to deliver a wide range of benefits to people. The National Park Authority is currently undertaking a Partnership Management Plan Review. This review will incorporate new ideas on how to manage protected landscapes and cover the period up to 2024.

B.238 South Downs Green Infrastructure Framework²⁵⁹: The Framework sets out guidance on green infrastructure planning for the South Downs National Park and the wider region. The aim of the framework is: "to create, protect and enhance a connected network of green and blue spaces; which sustainably meets the needs of local communities and supports the special qualities of the South Downs National Park."

B.239 A Strategy for the West Sussex Landscape²⁶⁰: The five-year programme for West Sussex aims for higher quality development and land management practices which respect to the character and environment of the County. The key aim of this strategy is to protect and enhance the landscape of West Sussex as an asset for future generations.

²⁵⁵ Department for 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

²⁵⁶ HM Government (2018) A Green Future: Our 23 Year Plan to Improve the Environment [online] Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf

²⁵⁷ High Weald Joint Advisory Committee (2019) The High Weald AONB Management Plan 2019-2024 [online] Available at: <http://www.highweald.org/downloads/publications/high-weald-aonb-management-plan-documents/2291-high-weald-managment-plan-4th-edition-2019-2024/file.html>

²⁵⁸ South Downs National Park Authority (2013) South Downs National Park Partnership Management Plan 2014-2019 [online] Available at: <https://www.southdowns.gov.uk/wp-content/uploads/2015/01/SDNP-Partnership-Management-Plan-2014-19.pdf>

²⁵⁹ South Downs Authority (2016) South Downs Green Infrastructure Framework [online] Available at: <https://www.southdowns.gov.uk/wp-content/uploads/2016/12/South-Downs-Green-Infrastructure-Framework-March-2016.pdf>

²⁶⁰ West Sussex County Council (2005) A Strategy for the West Sussex Landscape [online] Available at: https://www.westsussex.gov.uk/media/1771/landscape_strategy.pdf

B.240 Horsham Green Infrastructure Strategy (April 2014)²⁶¹: This strategy informs the production of planning policy to ensure that future strategic development delivers, protects, improves and enhances the green infrastructure network. It also seeks to contribute to the creation of sustainable communities through the provision of a wide range of ecosystem services and quality of life and health benefits for both future and existing residents.

Current baseline

B.241 The landscape in Horsham District is diverse. Its landscape character is a combination of rolling chalk downs, steep wooded and open chalk scarp, complex greensand ridges and vales, lowland mosaics of small pastures, small scale woodlands and shaws, pastoral river valleys and steep wooded ridges and open arable landscapes. Much of the north eastern part of the District is designated as the nationally important High Weald Area of Outstanding Natural Beauty (AONB). The south of the District also adjoins the South Downs National Park. Both of these areas allow for panoramic views across the broad expanses of undulating hedgerowed fields and woodlands²⁶².

B.242 Horsham District has a settlement pattern of mainly small to medium sized towns and villages, and dispersed hamlets/farmsteads with traditional building materials of flint, brick, sandstone, half-timber and tiles still strongly evident locally. Churches, spires and the occasional windmills form the sparse skyline of the landscape. The west of the District remains largely tranquil with a rural character. The north-east of the District, around Horsham town and Crawley, and major transport corridors across the District act to influence parts of Horsham²⁶³.

B.243 The Horsham District Landscape Character Assessment identified 32 separate landscape character areas across the District. Fifteen of these character areas were found to be in good condition with 17 areas found to be in declining condition. The areas of decline tended to be nearer to centres of higher populations such as around Horsham, Steyning, Bramber and Upper Beeding and Henfield. In addition, 22-character areas were also found to be sensitive to change.

B.244 Areas identified as having low sensitivity to development were generally areas that had already experienced a high level of development. Issues likely to

contribute to the possible change of landscape character include tall structures, declining land management, increased traffic, suburbanisation in rural areas, engineered flood defences and large-scale development.

B.245 The landscape assessment of the region shows the distribution of the 16 District Landscape Character Types in Horsham. The character types are summarised below:

- Open Upper Downs (Open expansive arable landscape of hills and dry valleys).
- Major Dry Valley (Broad dry valleys with linear woodland strips).
- Scarp (Steep and dramatic north facing slopes).
- Rolling Scarp Foothills Farmlands (Smooth rolling topography for mixed farming uses).
- Pasture/Woodland and Heath Mosaic (Patchwork of pasture, woodland and heath).
- Mixed Farmlands and Horticulture (Regular fields of arable farmland).
- Wooded Small Scale Farmlands (Small scale pasture fields with strong wooded character).
- Wooded Ridges (Low wooded ridges and tall hedgerows).
- Broad Clay Vale Farmlands (Broad vale of mixed pasture and arable fields).
- Narrow Clay Vale Farmlands (Flat/gently undulating narrow clayvale landscape).
- Forest Ridges and Ghyll Farmlands (Frequent and varied in size deciduous woodland).
- Open Ridge and Valley Farmlands (Open ridges and predominantly arable farmlands).
- Major River Valleys (Wide, flat open floodplain).
- Minor River Valleys (Narrow alluvial floodplain)²⁶⁴.

B.246 The findings of the Horsham District Landscape Character Assessment were built upon by the Council through the Landscape Capacity Assessment which is currently being updated to inform the Local Plan Review and is in draft

²⁶¹ Horsham District Council (2014) Green Infrastructure Strategy [online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0007/66544/Green-Infrastructure-Study.pdf

²⁶² Horsham District Council (in association with Chris Bland Associates) (2003) Horsham District Landscape Character Assessment [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0020/31349/Landscape-Character-Assessment-2003.pdf

²⁶³ Horsham District Council (in association with Chris Bland Associates) (2003) Horsham District Landscape Character Assessment [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0020/31349/Landscape-Character-Assessment-2003.pdf

²⁶⁴ Horsham District Council (in association with Chris Bland Associates) (2003) Horsham District Landscape Character Assessment [Online] Available at: https://www.horsham.gov.uk/_data/assets/pdf_file/0020/31349/Landscape-Character-Assessment-2003.pdf

form²⁶⁵. The landscape capacity work also drew on working from the West Sussex Landscape Character Assessment, South Downs Integrated Landscape Character Assessment and historic landscape characterisation data for West Sussex County Council. It was found that even at land which is very close to the settlement edges many landscapes are sensitive to development. Much of the landscape in Horsham is also in good condition, and strongly rural in character thereby making increasing its sensitivity to change. Land within a number of landscape character areas in the District also play an important role in terms of maintaining separation between these settlements. This includes land between Horsham and Crawley, Horsham and Southwater and between Storrington and West Chiltington Common. Some landscape areas also play an important role in the setting of a particular setting of a town or village, often creating a rural approach or feel to the entrance to a particular area.

B.247 However, some areas were identified as being less sensitive to development. At these locations it was generally the case that the landscape had already been impacted on by urbanising influences, including the larger scale development at Gatwick airport and Warnham Brickworks or more

cumulative development impacts such as the combination of road and rail network, pylons, storage uses. Other urbanising influence included the presence of existing harsh urban edges. The study found that high capacity for development of housing and employment was present at land South of Gatwick Airport and Warnham Brickworks. The settlement of Rudgwick was also found to have high capacity for small scale housing development.

B.248 6.77% of land within Horsham is located within the High Weald AONB²⁶⁶. Land within the AONB has been designated for its special landscape quality, which makes it potentially more susceptible to development. A number of High Weald Joint Advisory Committee (JAC) Annual Reviews have been completed by the High Weald AONB body. The latest review published for the 2017/18 reporting period and identified that there were 78 planning application consultations received from local authorities across the AONB during this period. This included the Land to the west of Phase 1 Kilnwood Vale housing development proposal in the District. During the same period of time the AONB body also provided written input for one planning appeal in Horsham.

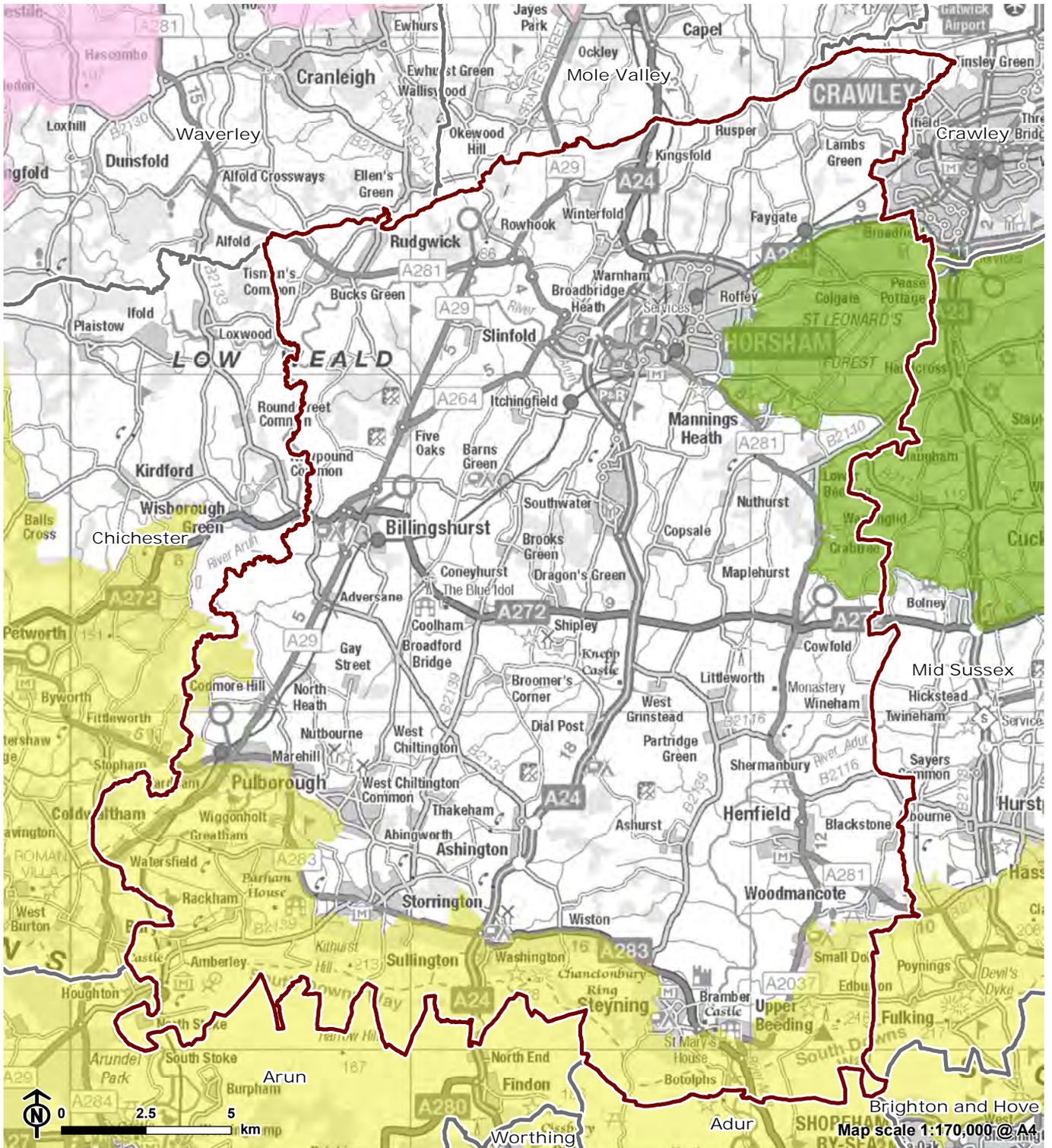
Table B.16 Key sustainability issues for Horsham and likely evolution without the Local Plan Review

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
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 HDPF includes policies to protect and enhance the landscape, including Policies 25 and 30, which seek to conserve and enhance the natural environment and landscape character, including the setting of the High Weald AONB and the South Downs National Park. The Local Plan Review offers the opportunity to update the current policy position in response to the evolution of the District and development pressures it currently faces through more specific development management policies and site allocations that are selected following consideration of their impacts on landscape character through the SA. The recently adopted High Weald AONB Management Plan and the emerging South Downs Local Plan and Priority Action Plan will provide further context to the development set out through the Local Plan Review and allow the updated pressures which the AONB and National Park and are now facing to be appropriately considered.	SA objective 7

²⁶⁵Horsham District Council (2019) Horsham District Landscape Capacity Assessment

²⁶⁶ High Weald Joint Advisory Committee (2019) The High Weald AONB Management Plan 2019-2024 [Online] Available at:

<http://www.highweald.org/downloads/publications/high-weald-aonb-management-plan-documents/2291-high-weald-management-plan-4th-edition-2019-2024/file.html>



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Figure B.10: Landscape Designations in Horsham District

- Horsham
- Neighbouring authority
- High Weald Area of Outstanding Natural Beauty
- Surrey Hills Area of Outstanding Natural Beauty
- South Downs National Park

Appendix C

Equalities Impact Assessment

C.1 This appendix presents the findings of an assessment of the likely effects of the Horsham Local Plan on equality issues.

C.2 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.

C.3 In fulfilling this duty, many authorities still find it useful to produce a written record of equalities issues having been specifically considered. That is the purpose of this report.

C.4 The Equality Act 2010 identifies nine 'protected characteristics' and seeks to protect people from discrimination on the basis of these characteristics. They are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

C.5 There are three main duties set out in the Equality Act 2010, which public authorities including Horsham District Council must meet in exercising their functions:

- To eliminate discrimination, harassment, victimisation and other conduct that is prohibited.
- To advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it.
- To foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The Horsham Local Plan

C.6 As described in the SA Report which has been provided within the full Integrated Impact Assessment (January 2020), the latest version of the Horsham Local Plan (February 2020), sets out 46 policies. The document also considers the potential allocation of a Green Belt designation in the District. Specific site options are being considered for housing, mixed use and employment development.

C.7 The purpose of the Local Plan is to guide development in the District up to 2036. Strategic planning is only one of the functions of Horsham District Council, so it is not expected that the Local Plan alone would address all of the duties of the Equalities Act.

Baseline Information

C.8 The Horsham Local Plan (February 2020) and Appendix B in the SA Report within the full Integrated Impact Assessment (January 2020) set out baseline information about Horsham District, including some information relevant to the protected characteristics covered by the Equalities Act. The most relevant information is summarised below.

- The population of Horsham in mid-2018 was 142,217²⁶⁷ compared to the 2011 Census, when 131,301 people lived in the District, across 54,900 households²⁶⁸. The population, is split between 73,042 females and 69,175 males.
- Of the population in Horsham, 96% are white. The remaining population is split between a number of ethnic minority groups, including Indian (0.6%), Chinese (0.4%), African (0.3%), and Arab (0.1%). A total of 85,587 (65.2%) of Horsham's total population are religious. The majority are Christian, with 63.5% of the population. The remaining religions consist of Buddhist (0.3%), Hindu (0.3%), Jewish (0.2%), Muslim (0.5%), Sikh (0.1%), and other religions (0.4%). As such, 34.8% of the population stated they have no religion (26.9%) or did not state a religion at all (7.9%)²⁶⁹.
- According to 2018 estimates, there are 84,400 residents aged been 16 and 64²⁷⁰. From the recent estimates available of the population that is aged 16 and over, 26.1% (27,914) are single, 55.3% (59,076) are married, and 0.2% (220) are in a registered same-sex civil partnership. A further 2.2% (2,313) are separated but are still legally married or in a same-sex civil partnership). The remaining 16.2% (17,235) are either divorced, widowed, or formerly in a same-sex civil partnership.²⁷¹
- Horsham has an older age profile in comparison to England, with 18% aged 0 to 15 years (England, 19%) and 22% aged 65 and over years (England, 18%)²⁷². The average age in Horsham considerate of mid-2017 estimates is 46.1, which is higher than the average for England as a whole which is 39.8²⁷³. There is expected to be an overall increase in all ages in Horsham from mid-2014 estimates to 2036, which is in line with the expected population increase across the UK for this period. Higher percentage increases are expected in Horsham and Mid Sussex for older age groups, specifically persons aged 65-84 years (+23.0% by 2026, and +43.4% by 2036)²⁷⁴.
- The 2011 Census statistics suggest that health in the District is reasonably good with 85.4% of the population reporting themselves to be in very good, or good health. Some 11.1% state they are in fair health, with only 2.7% and 0.8% in bad or very bad health respectively²⁷⁵.
- In 2018, Horsham (69.0%) had a slightly lower percentage of adults who consider themselves physically active than West Sussex (69.8%). The figure for the District is however above the national average (66.3%)²⁷⁶.
- Average life expectancy in Horsham is slightly above the national average, at 82.3 for males and 84.7 for

²⁶⁷ ONS (2019) Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland: Mid-2018 using April 2019 local authority district codes [Online] Available at:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalescotlandandnorthernireland>

²⁶⁸ UK Census Data (2011) Horsham [Online] Available at:

<http://www.ukcensusdata.com/horsham-e07000227#sthash.1PuT0ZfZ.zziHvNnt.dpbs>

²⁶⁹ UK Census Data (2011) Horsham (ONS - 2011 Census (KS209EW)) [Online] Available at:

<https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

²⁷⁰ Nomis (2019) Labour Market Profile – Horsham [Online] Available at:

<https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx#tabrespop>

²⁷¹ UK Census Data (2011) Horsham (ONS - 2011 Census (KS103EW)) [Online] Available at:

<https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

²⁷² West Sussex JSNA (2018) Horsham District- People and Places [Online] Available at: <https://jsna.westsussex.gov.uk/assets/core/Horsham-People-and-Challenges-JSNA-April-2019.pdf>

²⁷³ ONS (2018) Population estimates: median ages for administrative, electoral and census geographies [Online] Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/adhocs/009301populationestimatesmedianagesforadministrativeelectoralandcensusgeographies>

²⁷⁴ West Sussex Health and Wellbeing Board (2019) Population Estimates and Projections [Online] Available at: <https://jsna.westsussex.gov.uk/ccgs/horsham/population/estimates-and-projections/>

²⁷⁵ NOMIS – Local Area Report (2011) –Horsham [online] Available at: <https://www.nomisweb.co.uk/reports/localarea?compare=E07000227>

²⁷⁶ Public Health England (2019) Local Authority Health Profile 2019 -Horsham [Online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000227.html?area-name=horsham>

females²⁷⁷. Life expectancy is 7.6 years lower for men and 6.6 years lower for women in the most deprived areas of Horsham than in the least deprived areas. The estimated level of adult classified as overweight or obese is slightly lower in the District than at the national level. 61.1% of the local population falls within this classification compared to the national figure which is 62.0%.

- The rate of conception amongst those aged 15 to 17 in the District (6.9 per 1,000) is below the national figure (17.8 per 1,000).
- When considering all Indices of Deprivation (2019), the District of Horsham is ranked 290th out of 317 local authority areas where 1 is the most deprived²⁷⁸.
- In Horsham in 2017 it was estimated that 7.3% of households (4,249) were classed as being fuel poor. This is lower than the figure for West Sussex at this time which was 8.2%²⁷⁹. These figures are reflective of household income, household energy requirements and fuel prices in a given area.

C.9 There is little baseline information available that is directly relevant to other protected characteristics including gender reassignment, sex or sexual orientation.

Method

C.10 The Horsham Local Plan document has been reviewed to consider the likely impacts of the policy options and the site options on each of the nine protected characteristics from the Equality Act 2010 listed above. For each protected characteristic, consideration has been given to whether options considered for inclusion in the Local Plan are compatible or incompatible with the three main duties set out in the Equality Act 2010.

C.11 A colour coded scoring system has been used to show the effects that the Local Plan is likely to have on each protected characteristic, as shown below.

Score	Likely Effect
+	Positive
0	Neutral
-	Negative

C.12 Note that the criteria applied to the appraisal of site options as part of the EqIA differ from the criteria applied to the appraisal of sites as part of the Sustainability Appraisal in the main SA Report; therefore, the effects identified are not the same between the two assessments.

Findings

C.13 The detailed findings of the equalities assessment for the policies considered are presented in **Table C.1** below. **Table C.2** presents the findings of the equalities assessment for the site options considered as part of the Local Plan document. The Local Plan document does not directly affect a number of the protected characteristics. The options considered are expected to have either a positive, mixed or neutral effect in relation to all of the protected characteristics considered in this assessment. The document is therefore considered to be generally compatible with the three main duties of the Equality Act 2010.

Findings for the policies in the Local Plan

C.14 Policies which seek to address the provision of community services and facilities in the District, seek to support development that enhances community access to these facilities, or prevent development that would provide more limited to these facilities (Policies 2, 3, 4, 12, 13, 15, 28, 29 and 46) are all expected to result in a positive effect in relation to the protected characteristics of **pregnancy and maternity** and **religion or belief**. These policies are likely to contribute to the development of, and convenient access to, community facilities that could support meetings related to pregnancy or maternity and faith groups in the District.

C.15 The designation of a Green Belt in the District could have similar a positive effect by ensuring that development achieves a more compact distribution in Horsham District. However, the positive effect expected in relation to **pregnancy and maternity** and **religion or belief** is expected to be combined within an uncertain negative effect given that designation of a Green Belt could result in less flexibility with regards to development at edge of settlement locations. As such, the result may be some development 'jumping' the Green Belt to areas which are less well related to existing community facilities.

C.16 Policies 2 and 3 may allow for some development at the smaller secondary settlement and for the expansion of settlements, which in some instances could result in residents

²⁷⁷ Public Health England (2019) Local Authority Health Profile 2019 -Horsham [Online] Available at: <https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000227.html?area-name=horsham>

²⁷⁸ West Sussex County Council (2019) West Sussex Joint Strategic Needs Assessment Briefing [Online] Available at: <https://jsna.westsussex.gov.uk/assets/core/Briefing-West-Sussex-IMD-2019.pdf>

²⁷⁹ Department for Business, Energy and Industrial Strategy (2017) Sub-regional fuel poverty data 2019 [Online] Available at: <https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2019>

having a reduced level of access to community facilities. As such, these policies may reduce the proportion of residents which have access to community services and facilities and a negative effect is expected in combination for these policies in relation to **pregnancy and maternity** and **religion or belief**.

C.17 It is likely that helping to ensure a more legible environment which is easy to navigate would benefit the local population which is becoming increasingly elderly. Policy 5 is expected to have a minor positive effect in relation to the characteristic of **age**, as it seeks to support development which is well laid out and provides convenient and legible connections.

C.18 Policy 19 seeks to deliver affordable housing in rural areas, including that which would support people who provide important community services. This policy may therefore help to ensure the provision of community services to support pregnancy women and faith groups at more rural locations. However, residential development outside of larger settlements may leave some residents with poor access to community services and facilities. The policy is therefore expected result in a mixed (positive and negative) effect in relation to **pregnancy and maternity** and **religion or belief**.

C.19 The options for the level of housing to be delivered over the plan period are set out through Policy 14. Delivering higher levels of development over the plan period is likely to respond more favourably to addressing housing affordability in the plan area. This is likely to be particular benefit to young people wishing to get on the housing ladder. As the level of housing to be provided over the plan period has not yet been decided the effect of this policy in relation to **age** is currently uncertain. Policies that seek to ensure the provision of a range of housing sizes and types for specific groups of the community (Policies 15, 17, 18, 20 and 23) are likely to provide benefits in terms of helping young people to get on the housing ladder as well as ensuring that homes are suitable for older people. A minor positive effect is therefore expected in relation to the protected characteristic of **age**.

C.20 Support for housing suitable for people with disabilities is provided through a number of policies. Support for this group is to be achieved through the provision of housing that is suitable for wheelchair users (Policy 18), the delivery of retirement homes and specialist care housing (Policy 20), and support for annexes to properties that can be used by elderly family members or for staff supporting a dependent or family member (Policy 23). These three policies are expected to have a positive effect in relation to the characteristic of **disability**.

C.21 The Local Plan also includes policies which specifically seek to address the accommodation needs of Gypsies and Travellers. The development principles for strategic development (Policy 15) require that accommodation for

Gypsies and Travellers is considered at such sites. Policy 24 sets out that the Council will meet the identified current and future accommodation needs of this group. As such, both policies are expected to have a positive effect in relation to the protected characteristic of **race**.

C.22 Certain groups in the District are likely to be particularly vulnerable to air pollution. This includes younger and older people, people with cardiovascular or respiratory problem as well as pregnant women. Policies 25 and 26 require the minimisation of air pollution in the District in order to protect human. Through Policy 26 this includes through development which supports the implementation of local Air Quality Action Plans, minimisation of traffic minimisations, the use of cleaner fuels and electric car charging points. These policies are therefore likely to have a positive effect in relation to **age**, **disability** and **pregnancy and maternity**.

C.23 Ensuring that appropriate parking is provided at developments in the District will have benefits for groups who are likely to experience mobility issues. This is supported through Policy 43 and therefore this policy is expected to have a positive effect in relation to **age** and **disability**.

C.24 Policy 45 (Inclusive Communities, Health and Wellbeing) is likely to benefit all of the protected characteristics in the District. This policy seeks to address the requirements of all members of the community in new development. This includes the specific needs of older and younger people, minority groups, faiths and other community groups within the district. Furthermore, development is required by this policy to be designed to achieve healthy, inclusive and safe places.

Findings for the site allocations considered in the Local Plan

C.25 The large sites being considered for allocation are located at variable locations in relation to the areas of strongest service provision. In general, the sites being considered as urban extensions to larger settlements would provide residents with access to community facilities which might benefit the protected characteristics of **pregnancy and maternity**, **race** and **religion or belief**. Sites which are to be provided as new settlements or are at smaller settlements (the Ashington cluster and Kingsfold site) would provide more limited access to existing community facilities. As such, overall the large site options considered are expected to have a mixed (positive and negative) effect in relation to these protected characteristics.

C.26 It is expected that the large sites options would deliver development in line with development principles for strategic sites as set out in Policy 15. This would require the provision of new community provisions to support strategic scale growth, with benefits likely to result in relation to provision of space for meetings relating to pregnancy or maternity and

faith groups. The policy also requires the delivery of a range of housing types and tenures to meet the needs of young families, older people and Gypsies and Travellers. As such, the allocation of these sites may result in additional benefits in relation to **age, pregnancy and maternity, race and religion or belief**.

C.27 Small site options that are located within close proximity of the Main Town (Horsham town) or the Small Town and Lager Villages of the District may also provide a good level of access to community services and facilities. A positive effect has therefore been identified for small site options which would provide residential use within or adjacent to the built-up area boundaries for these settlements in the District in relation to the protected characteristics of **pregnancy and maternity and religion or belief**. Sites which include housing which are not located within or at the edge of these settlements are less likely to provide access to such services and facilities. Therefore, the allocation of these site options may have an adverse impact in relation to these protected characteristics.

C.28 Policy 17 and Policy 19 are expected to help ensure that housing is provided in the District to meet the needs of younger and older people as well as to meet the needs of people with disabilities. As such, the allocation of small site options which provide residential use may result in additional benefits in relation to **age and disability**.

Consultation on the Local Plan

C.29 As well as the content of the Local Plan, it is important that the protected characteristics of the Equalities Act are taken into consideration when preparing and consulting on the Plan, in particular ensuring that all groups of people have the opportunity to access and participate in consultations.

Appendix C
 Equalities Impact Assessment

SA of Horsham Local Plan Review (Regulation 18)
 February 2020

Table C.1 Likely effects of the policies in the Horsham Local Plan on the nine protected characteristics under the Equality Act 2010

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policies for Growth and Change									
Policy 1 – Sustainable Development	0	0	0	0	0	0	0	0	0
Policy 2 – Development Hierarchy	0	0	0	0	+/-	0	+/-	0	0
Policy 3 – Settlement Expansion	0	0	0	0	+/-	0	+/-	0	0
Policy 4 – Horsham Town	0	0	0	0	+	0	+	0	0
Policy 5 – Broadbridge Heath Quadrant	+	0	0	0	0	0	0	0	0
<p>Policy Option 4 would contribute to the provision of a range of services and facilities within Horsham town which is considered to be one of the most accessible locations in the District for many residents. This could result in a positive effect in relation to the provision of services relevant to pregnancy and maternity. There is potential for isolation amongst parents and pregnant women to be reduced through increased provision of meetings, classes and activities in locations such as community halls. An increase in the provision of community services and facilities within Horsham Town may also include places in which faith groups can meet and therefore a positive effect is identified for residents in the District in terms of support for religion or belief.</p> <p>Similarly, a positive effect is identified for Policy 2 and 3 in relation to pregnancy and maternity and religion or belief due to development being supported at locations with a good range of services and facilities (Policy 2) and where it is demonstrated that it will enhance community services and facilities (Policy 3). However, a negative effect may also result. These policies would support some development in smaller secondary settlements and outside of the main built up areas of settlements, where there is reduced access to services and facilities, which might otherwise benefit these protected groups.</p> <p>A positive effect is identified for Policy 5 in relation to age due to the requirement for development at Broadbridge Heath Quadrant to be delivered to provide strong, legible connections. This approach to development may be particularly sympathetic to the needs of more elderly residents in the District.</p>									

Appendix C
 Equalities Impact Assessment

SA of Horsham Local Plan Review (Regulation 18)
 February 2020

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Economic Development									
Policy 6 – Economic Growth	0	0	0	0	0	0	0	0	0
Policy 7 – Employment Development	0	0	0	0	0	0	0	0	0
Policy 8 – Rural Economic Development	0	0	0	0	0	0	0	0	0
Policy 9 – Conversion of Agricultural and Rural Buildings to Commercial, Community and Residential Uses	0	0	0	0	0	0	0	0	0
Policy 10 – Equestrian Development	0	0	0	0	0	0	0	0	0
Policy 11 – Tourism Facilities and Visitor Accommodation	0	0	0	0	0	0	0	0	0
Policy 12 – Retail Hierarchy and Town Centre First Principles	0	0	0	0	+	0	+	0	0

Appendix C
 Equalities Impact Assessment

SA of Horsham Local Plan Review (Regulation 18)
 February 2020

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policy 13 – Town Centre Uses	0	0	0	0	0	0	0	0	0
<p>Policy 12 supports development that will contribute to the vitality and viability of town centres by set out a town centre first approach with main town centre uses to be encouraged at these locations. These locations are noted to be the most accessible in the District. There is potential for the policy to have a positive effect in terms of resident's ability to access services relevant to pregnancy and maternity and religion or belief. Specifically, benefits may occur through improved access to community spaces that facilitate meetings, classes and activities or places of worship.</p>									
Housing									
Policy 14 – Housing Provision	?	0	0	0	0	0	0	0	0
Policy 15 – Strategic Site Development Principles	+	0	0	0	+	+	+	0	0
Policy 16 – Affordable Housing	0	0	0	0	0	0	0	0	0
Policy 17 – Meeting Local Housing Needs	+	0	0	0	0	0	0	0	0
Policy 18 – Improving Housing Standards in the District	+	+	0	0	0	0	0	0	0
Policy 19 – Exceptions Housing Schemes	0	0	0	0	+/-	0	+/-	0	0

Appendix C
 Equalities Impact Assessment

SA of Horsham Local Plan Review (Regulation 18)
 February 2020

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policy 20 – Retirement Housing and Specialist Care	+	+	0	0	0	0	0	0	0
Policy 21 – Rural Workers' Accommodation	0	0	0	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
Policy 23 – Ancillary Accommodation	+	+	0	0	0	0	0	0	0
Policy 24 – Gypsy and Traveller Accommodation	0	0	0	0	0	+	0	0	0

Policy 14 sets out options for the quantum of housing to be provided over the plan period. Requirements for how new housing should be provided in terms achieving an appropriate mix and high standard of housing are set out through the remaining policies in the 'Housing' chapter of the Local Plan. Requiring a higher level of growth over the plan period is likely to address housing affordability in a more positive manner. This could be of particular benefit to younger people wishing to get on the housing ladder. Given that the level of housing to be provided over the plan period is currently undecided the effect of this policy in relation to **age** is uncertain.

Policy 15 sets out overarching principles for the delivery of strategic scale sites, which includes a requirement that they should provide a range of housing types to meet the needs of young families, older people and Gypsies and Travellers. Development is also expected to deliver supporting services and facilities which is to include community buildings. As such, a positive effect is identified for this policy in relation to **age, pregnancy and maternity, race and religion or belief**.

Policy 17 seeks to support development that will provide a mix of housing sizes and types. Delivering an appropriate mix of housing is expected to help meet the needs of younger people seeking to buy their first home as well as the needs of housing needs of an increasingly elderly population. Therefore, a positive effect is identified in relation to **age**.

Appendix C

Equalities Impact Assessment

SA of Horsham Local Plan Review (Regulation 18)

February 2020

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
<p>Policies 18, 20 and 23 also include provisions that will benefit the residential needs of elderly and disabled people in the District. Policy 18 requires that new development meets housing standards that will ensure that there is delivery of homes that are suitable for wheelchair users; Policy 20 supports the delivery of retirement homes and specialist care housing; and Policy 23 provides support for annexes to properties that might be used by elderly family members or staff supporting a dependent or family member. As such, these policies are likely to have a positive effect in relation to age and disability.</p> <p>Policy 19 supports the delivery of affordable housing in rural areas in exceptional circumstances where there is an identified local need for homes. The policy may result in a mixed effect (positive and negative) in relation to pregnancy and maternity and religion or belief. Support for this type of development is encouraged where the need is from people whose work provides important services to residents in the parish. This could support the functioning of community services at more rural locations, allowing for benefits in relation to groups such as pregnant women or faith groups. However, the delivery of housing outside of larger settlements may result in people living in locations where they have poor access to places of worship and/or community buildings which support meetings/services related to pregnancy and maternity.</p> <p>A positive effect is identified for Policy 24 in relation to race as it directly supports the delivery of development to meet the identified current and future accommodation needs of Gypsies, Travellers and Travelling Showpeople.</p>									
Conserving and Enhancing the Natural Environment									
Policy 25 – Environmental protection	+	+	0	0	+	0	0	0	0
Policy 26 – Air Quality	+	+	0	0	+	0	0	0	0
Policy 27 – The Natural Environment and Landscape Character	0	0	0	0	0	0	0	0	0
Policy 28 – Countryside Protection	0	0	0	0	+	0	+	0	0
Consideration of potential Green Belt designation in the District	0	0	0	0	+/-?	0	+/-?	0	0

Appendix C
 Equalities Impact Assessment

SA of Horsham Local Plan Review (Regulation 18)
 February 2020

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policy 29 – Settlement Coalescence	0	0	0	0	+	0	+	0	0
Policy 30 – Protected Landscapes	0	0	0	0	0	0	0	0	0
Policy 31 – Green Infrastructure and Biodiversity	0	0	0	0	0	0	0	0	0
Policy 32 – Local Greenspace	0	0	0	0	0	0	0	0	0
<p>Elderly, and younger residents can be the more susceptible to poor air quality than other groups of people in the District. People with disabilities relating to cardiovascular and respiratory conditions and pregnant women are also particularly vulnerable to air pollution. As such, a positive effect is identified for Policies 25 and 26 in relation to age, disability and pregnancy and maternity. Policy 25 requires that development ensures the minimisation of air pollution in order to protect human health. The management of air quality as new proposals are delivered is directly addressed through Policy 26. Measures detailed in the policy include requiring development to contribute to the implementation of local Air Quality Action Plans, minimisation of traffic and encourage the use of cleaner fuels including through the provision of electric car charging points.</p> <p>Policy 28 and Policy 29 seek to restrict development outside of built-up areas that could disrupt the rural and undeveloped nature of the countryside and contribute to settlement coalescence. This may reduce the potential for development to take place in areas with poor access to community facilities, including those that may provide space for meetings for pregnant women and/or faith groups. As such, a positive effect is identified for these policies in relation to pregnancy and maternity and religion or belief.</p> <p>The designation of Green Belt land in the District could help to provide a more compact distribution of development which supports access to services which might benefit pregnant women and/or faith groups in particular. This approach would provide less flexibility in addressing development in the countryside, however, and may ultimately lead to some development ‘jumping’ the Green Belt. Development at these locations is likely to be less well related to existing community facilities. As such, an uncertain mixed effect (positive and negative) is expected for the designation of a Green Belt in the District in relation to pregnancy and maternity and religion or belief.</p>									
Development Quality, Design and Heritage									
Policy 33 – Development Quality	0	0	0	0	0	0	0	0	0

Appendix C
 Equalities Impact Assessment

SA of Horsham Local Plan Review (Regulation 18)
 February 2020

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policy 34 – Development Principles	0	0	0	0	0	0	0	0	0
Policy 35 – Heritage Assets and Managing Change within the Historic Environment	0	0	0	0	0	0	0	0	0
Policy 36 – Shop Fronts and Advertisements	0	0	0	0	0	0	0	0	0
Policies 33 to 36 do not include any direct or indirect references to any of the protected characteristics against which they have been assessed. A negligible effect has therefore been recorded for all protected characteristics.									
Climate Change and Flooding									
Policy 37 – Climate Change	0	0	0	0	0	0	0	0	0
Policy 38 – Appropriate Energy Use	0	0	0	0	0	0	0	0	0
Policy 39 – Sustainable Design and Construction	0	0	0	0	0	0	0	0	0
Policy 40 - Flooding	0	0	0	0	0	0	0	0	0
Policies 37 to 40 do not include any direct or indirect references to any of the protected characteristics against which they have been assessed. A negligible effect has therefore been recorded for all protected characteristics.									

Appendix C
 Equalities Impact Assessment

SA of Horsham Local Plan Review (Regulation 18)
 February 2020

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Infrastructure, Transport and Healthy Communities									
Policy 41 – Infrastructure Provision	0	0	0	0	0	0	0	0	0
Policy 42 – Sustainable Transport	0	0	0	0	0	0	0	0	0
Policy 43 - Parking	+	+	0	0	0	0	0	0	0
Policy 44 – Gatwick Airport Safeguarded Land	0	0	0	0	0	0	0	0	0
Policy 45 – Inclusive Communities, Health and Wellbeing	+	+	+	+	+	+	+	+	+
Policy 46 – Community Facilities, Leisure and Recreation	0	0	0	0	+	0	+	0	0

Older people and members of the community with disabilities are particularly likely to benefit from the provision of safe and convenient parking that improves access to Horsham's town centres and other built-up areas. As such, Policy 43 is likely to have a positive effect in relation to **age** and **disability**.

Policy 45 is likely to have a positive effect in relation to all of the protected characteristics. This policy seeks to ensure developments address the requirements of all members of the community in new development, including the specific needs of older and younger people, minority groups, faith and other community groups within the district. Development is required by this policy to be designed to be healthy, inclusive and safe to meet the long-term needs of a range of occupiers.

The provision of new or improved community facilities and services will contribute to providing buildings that benefit specific groups of the community. This type of provision is likely to provide space for meetings for pregnant women and/or faith groups in the area. As such, Policy 46 is expected to have a positive effect in relation to **pregnancy and maternity** and **religion or belief**.

Appendix C
 Equalities Impact Assessment

SA of Horsham Local Plan Review (Regulation 18)
 February 2020

Table C.2 Likely effects of the sites considered for allocation in the Horsham Local Plan on the nine protected characteristics under the Equality Act 2010

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Large site options*	0	0	0	0	+/-	0	+/-	0	0
<p>The large sites considered for allocation through the Local Plan are at variable locations in the District in relation to existing services and facilities. This includes community facilities which provide space for meetings relating to pregnancy and maternity and faith groups. Sites provided as urban extensions to large settlements (most notably the sites at Ifield, Kilnwood Vale, Rookwood, East of Billingshurst, West of Billingshurst and West of Southwater) would provide more immediate access to existing provisions. The new settlement sites (Adversane, Buck Barn and Land North East of Henfield (Mayfield)), the Kingsfold site and the Ashington cluster site would provide more limited access to services and facilities within the built-up area boundaries. As such, the large site options are expected to have a mixed (positive and negative) effect in relation to pregnancy and maternity and religion or belief.</p> <p><i>* It is expected that development at large sites would be in line with Policy 15 (Strategic Site Development Principles) and therefore would include the delivery of services and facilities to ensure the successful functioning of these sites, which could include new community provisions. Thereby benefits may result in relation to provision of space for meetings relating to pregnancy or maternity and faith groups. The policy also requires the delivery of a range of housing types and tenures to meet the needs of young families, older people and Gypsies and Travellers. As such, the allocation of these sites may result in additional benefits in relation to age, pregnancy and maternity, race and religion or belief.</i></p>									
Small sites options**	0	0	0	0	+/-	0	+/-	0	0
<p>It is not expected that the sites considered for employment use would have a direct impact in relation to any of the protected characteristics.</p> <p>However, where sites are considered for allocation for mixed use which includes new homes or residential use only, proximity to community services and facilities have been considered in relation to the protected characteristics of pregnancy and maternity and religion or belief. Premises such as community halls for example might be used for meetings, classes and activities, thereby providing support and reducing isolation for parents. Community facilities may also include places of worship which would be of benefit for residents in terms of support for religion or belief. Those sites which are located within or at settlement edge of the Main Town (Horsham town) or Small Towns and Larger Villages (Billingshurst, Bramber, Broadbridge Heath, Henfield, Partridge Green, Pulborough and Codmore Hill, Southwater, Steyning, Storrington and Sullington and Upper Beeding) of the District provide access to good range of services and facilities. As such a positive effect has been identified for the following site options:</p> <p>SA055; SA074; SA112; SA274; SA320; SA361; SA386; SA393; SA433; SA445; SA450; SA483; SA486; SA488; SA556; SA560; SA565; SA568 (mixed use site option); SA570; SA634; SA639; SA656; SA732; and SA742.</p> <p>The remaining small sites are being considered for mixed use including new homes or residential use only are located outside of the Main Town and Small Towns and Larger Villages. These sites are less likely to provide access to services and facilities relevant to pregnancy and maternity and religion or belief.</p> <p>As such a mixed (positive and negative) effect is expected for the small sites in relation to pregnancy and maternity and religion or belief.</p> <p>Note that the criteria applied to the appraisal of sites as part of the EqIA differ from the criteria applied to the appraisal of sites as part of the Sustainability Appraisal in the main IIA Report and therefore the effects identified are not the same between the two assessments.</p>									

Appendix C
 Equalities Impact Assessment
 SA of Horsham Local Plan Review (Regulation 18)
 February 2020

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
<p><i>** It is expected that the development of new homes in the District would be in line with Policy 17 (Housing Mix) and Policy 19 (Improving Housing Standards in the District) which will help to ensure that housing to meet the needs of younger and older people as well as people with disabilities are met. As such, the allocation of these sites may result in additional benefits in relation to age and disability.</i></p>									