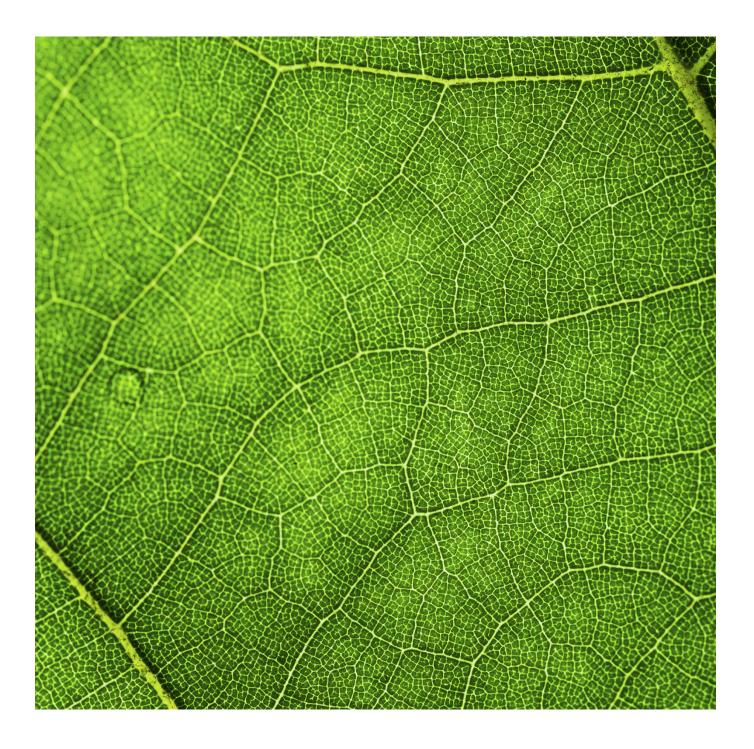


# **Horsham District Council**

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

**Final report** 





## **Horsham District Council**

### Sustainability Appraisal of the Horsham District **Local Plan**

**Regulation 19 Consultation - Appendices** 

# Project Number 10660

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Appendix A Consultation comments SA of Horsham District Local Plan (Regulation 19) July 2021

### Consultation comments on the SA Report for the Regulation Local Plan

A.1 This appendix sets out the consultation comments received on the SA work undertaken for Horsham District Local Plan. This includes comments received on the SA work completed by LUC for the Regulation 18 Horsham District Local Plan in February 2020. That work comprises the Interim Sustainability Appraisal of Growth Options Interim Sustainability Appraisal documents. This section provides a record of the consultee, the comments raised, and LUC's response to the consultation comments including any action arising. The subsequent section includes the comments received on the SA Scoping Report which was also prepared by LUC in September 2019.

A.2 At the Regulation 18 stage, many comments received relate to the allocation of sites and/or the 'scores' assigned to the SA objectives for a particular site. The following points relate to all comments and demonstrate how the SA has ensured robustness and consistency throughout the process:

- The allocation of specific sites and the formulation of the development strategy for the plan are outside of the scope of the SA Report which LUC has produced. The decision making process has been undertaken by the Council and reasons for selections are presented in Appendix G of this SA Report. The SA forms only part of the evidence base which has informed the selection of the options taken forward in the Regulation 19 Local Plan.
- The SA appraisals of policies, sites and their reasonable alternatives have been undertaken in line with the agreed SA framework and with regard for the associated assumptions, which are detailed in Appendix C of the SA Report. These are in keeping with the SEA Regulations and have been consulted upon at previous iterations of the SA Report (i.e. at the Regulation 18 and Scoping stages). These reflect the key sustainability issues which have been identified for Horsham District as presented in Chapter 3 of the SA Report. The methodology used for the SA Report has been set out in Chapter 2. This presents the stages of consultation involved in the previous iterations of the SA Report. This approach has been taken to ensure consistency between the SA findings in relation to sites and policies which have been subject to appraisal.
- For the appraisal of the large site options, information available from the Council about the type of development and infrastructure which are being promoted and are expected to be provided to support new growth at each site has been used to inform the appraisal process. Where updated information has been made available between the Regulation 18 and Regulation 19 Local Plan documents in relation to these potential provisions, the appraisals have been updated to reflect this updated information. This work is presented in Appendix D of this SA Report.
- The Council's Site Assessment Report concluded that the combined RAG rating for a number of site options is 'Very Negative Impacts (unlikely to be mitigated)'. As very negative impacts were identified for these sites they are not considered suitable for development by the Council. These sites have not been appraised through the SA Report.
- The SA Report has been undertaken as a statutory requirement of the Planning and Compulsory Purchase Act 2004. In line with the National Planning Practice Guidance the document has been prepared as a joint SA/SEA process. It is therefore required to address the SEA Regulations which are detailed in Table 1.1 of the SA Report. The table shows where these regulations have been met in the SA Report.

**A.3** At Regulation 18 stage three figures for the quantum of housing growth for the District were tested through the SA. These were 1,000, 1,200 and 1,400 dwellings per annum. These used the 'local housing need' as derived from the MHCLG Standard Methodology (which at the time was 965 dpa) as the starting point. The rationale for each option was included in the Regulation 18 Local Plan. As noted in the Regulation 18 SA Report, the quanta of employment for each of these options was proportionately scaled from the Economic Growth Assessment baseline 'labour supply' assessed need. A number of responders to the Regulation 18 consultation on the SA suggested that a higher level of development than that tested through the SA should have been appraised. These responses have been framed in the context of there being significant unmet housing need in neighbouring/close by districts, boroughs and unitary authorities. In response, the

Appendix A Consultation comments SA of Horsham District Local Plan (Regulation 19) July 2021

Council considers that the figure of 1,400 is a sufficiently ambitious potential 'stretch' target. This figure represents a very high level of housing growth within a single District Council authority. Based on experience of market performance, and of environmental and infrastructure capacity, it was considered to be the highest level of growth that could in reality be achieved in Horsham District. This level of growth would represent a 45% uplift on the objectively assessed Local Housing Need. It would furthermore be a 75% uplift on the currently adopted target for Horsham District of 800 dwellings per annum, which was found to be a sound and robust target by the Inspector examining the HDPF in October 2015."

Table A.1: Comments and Responses on the Regulation 18 Local Plan SA Report Consultation

Consultee	Comment ID	Summary of Comment	SA team response
Environment Agency	/5251	States that a number of potential sites include river corridors or watercourses with associated flood zones within their boundary and therefore the application of the Sequential Test should be undertaken. This might be done as part of the SA Report process.	The SA has considered the flood risk of sites through SA objective 12 "To manage and reduce the risk of flooding". Sites have been appraised to consider whether they lie within flood zones 1, 2 or 3.
Historic England	/6256	States that the Council should have regard to potential impacts on the historic environment when assessing sites for allocation for development. Expects the policies and proposals of local plans, including development site allocations and the methodology for selecting these, to be based on an adequate, up-to- date and relevant evidence base for the historic environment.	The Council has now undertaken heritage impact assessment work for the site options considered for allocation through the Local Plan. This work has been drawn upon to inform the appraisal of the site options through the SA Report for SA objective 8: historic environment.
Natural England	/5834	Comments on the relevance to the SA framework (and SA objective 6: Biodiversity and geodiversity in particular) stating that reference to restoration or enhancement of biodiversity is limited to 'ecological networks', with effects on designated biodiversity assets referring only to avoiding adverse effects. Natural England advises that the SA ascertains how restoration and enhancement of designated sites/assets and wider ecological networks is secured through the plan, in line with the NPPF. States that it may also be beneficial to clarify how the provision of new (additional) green infrastructure is included in the assessment. With regards to net gain, states that it is unclear how an informed appraisal can be made when assessing the plan's 'promotion of net gain where possible'. The comment is generally supportive of the SA appraisal questions but advises that outcomes may need to be reconsidered in light of the potential impacts on water resources in the Arun Valley SPA/SAC/Ramsar occurring as a result of development proposed in this plan. There may be implications in relation to the findings for SA objective 6. The SA is to be used to test for housing numbers. A critical test of this must be the availability of water in the region to supply the new homes. Of further note is that Horsham District is within the Gatwick sub-region Water Cycle Study – this strategy has concluded	<ul> <li>The SA framework has been updated to contain the following appraisal questions (updates are shown with underlined text):</li> <li>SA 6.1: Does the Plan avoid adverse effects on <u>and seek to enhance</u> internationally and nationally designated biodiversity and geodiversity assets within and outside the District?</li> <li>SA 6.2 Does the Plan avoid adverse effects on <u>and seek to enhance</u> locally designated biodiversity and geodiversity assets within and outside the District?</li> <li>SA 6.2 Does the Plan avoid adverse effects on <u>and seek to enhance</u> locally designated biodiversity and geodiversity assets within and outside the District, including ancient woodland?</li> <li>SA 6.3 Does the Plan seek to protect and enhance ecological networks, promoting the achievement of net gain where possible, whilst taking into account the impacts of climate change?</li> <li>The Regulation 19 Local Plan seeks to address these issues through Strategic Policy 30: Green Infrastructure and Biodiversity.</li> <li>In line with the PPG, the level of detail in the SA is proportionate to the level of detail in the plan. Given large number of small site options considered through the SA and that the specific level of green infrastructure provision which could be achieved at each site is unlikely to be demonstrated to the consistent level this type of assessment is considered to be outside of the scope of the SA.</li> </ul>

Consultee	Comment ID	Summary of Comment	SA team response
		<ul> <li>sufficient water to be available to the District. Furthermore, some of the SA findings may require revision in the suggested changes to some policy wording in the Reg 18 Local Plan.</li> <li>Suggests some additional indicators, which have been adopted by other local authorities: <ol> <li>Measure of habitat creation/green infrastructure provision/net gain secured through planning consents</li> <li>Amount of development affecting designated landscapes, with commentary on likely impact</li> <li>Percentage of the population having access to a natural greenspace within 400 metres of their home</li> <li>Hectares of accessible open space per 1,000 population</li> </ol> </li> </ul>	The SA has incorporated the findings of the HRA in relation to the potential impacts on the Arun Valley SPA/SAC/Ramsar and other European sites. This incorporates the potential the impacts on water resources. Furthermore, all elements of the Local Plan have been appraised against SA objective 11 which considers potential impacts water resources and water quality. The Gatwick sub-region Water Cycle Study forms part of the baseline evidence for the SA and is presented in the review of plans, programmes and policies (see Appendix B of this SA Report). This iteration of the SA has appraised the versions of the policies that have been included in the Reg 19 Local Plan. The monitoring indicators suggested by the consultee have been considered. Where this information is available to the Council and significant effects have been identified for the plan in relation to relevant SA objectives, these have been incorporated into the monitoring framework for the Horsham Local Plan.
West Sussex County Council & A2 Dominion	/5839	In relation to the SA, states that the options put forward that increase the housing numbers taking unmet need from neighbouring authorities (options 2 and 3) cannot be considered appropriate without meaningful Duty to Cooperate meetings and evidence. Horsham District cannot understand the District's and Housing Market Areas' true housing need without undertaking duty to cooperate meetings, and then providing options on housing numbers on this basis. States that without exploring the actual unmet need of neighbouring authorities, the draft Plan cannot be considered positively prepared. States that the SA should also consider options for housing to reflect meeting the standard method calculation for housing and all of the unmet need from neighbouring authorities and meeting the standard method calculation for housing authorities with planned growth.	See Introductory Notes in relation to selection of options for the Regulation 19 Local Plan. The Introductory Notes also explain the approach to testing the varying levels of growth over the plan period. The Reg 18 Local Plan does not contain a detailed development strategy but presents the development principles in the Key Diagram for the plan. This contains all the potential strategic sites with decisions being made on which site options to be taken forward being made at the Reg 19 stage. These sites are presented in Chapter 6 (of the Reg 18 Local Plan) as Potential Housing Allocation Options with no allocations presented as being preferred. The SA tested six overall strategy options for the Local Plan and indicated that the Council should consider an approach which takes forward a hybrid of options which includes development in line with the existing development hierarchy, one or more large growth points (with many of the urban extensions noted to perform more sustainably in relation to a number of objectives) and a sizeable proportion of growth delivered at a location which makes best use of the District's strong relationship with Crawley. Drawing on this work as well as the SA findings for the three quanta of growth, and the appraisal of the large-scale and small-scale sites, the Council prepared nine more spatially specific growth scenarios that could be included in the Local Plan Review which were appraised through Chapter 6 of the Interim SA of Growth Options. These scenarios included different combinations of large site and small site options to ensure that all reasonable alternative options relating to approach to the distribution of growth

Consultee	Comment ID	Summary of Comment	SA team response
		tested down to two, yet at this early stage of plan production, the Council has chosen to lead with the settlement hierarchy approach.	in the District were appraised. The Reg 19 Local Plan contains the Council's preferred spatial strategy and this has been appraised through this SA Report (see Chapter 8).
		Also states that the Council has not appropriately reacted to the recommendations of the SA in some of its policy commentary. It will be appropriate for the Council to evidence where the SA recommendations have been included or rejected. Indicates that the appraisal of policies where no alternative options are considered, such as more development management centric policies, is somewhat muddled in its analysis and conclusions. It is normally expected that each policy has a standalone assessment against the sustainability objectives.	The Interim SA highlights that the plan-making process comprised a review of the adopted Local Plan (HDPF) with the existing policies of the HDPF forming 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. Where alternatives were considered for the development management policies these have been appraised through the SA.
Ashington PC	/1803	<ul> <li>States that the Interim SA is flawed. Furthermore, states that the SA has not taken into account the Paris Agreement 2015 and the Government's responsibilities as a signatory to it. It is argued that failure to include this document in the sustainability context means that the preferred strategy has not been appraised in terms of it will address Horsham District's contribution towards meeting the requirements of the Paris Agreement and the Government net zero carbon 2050 target.</li> <li>Also includes comments in relation to development which might be delivered to Ashington. Different sections of the Interim SA of Growth Options are referred to (Chapter 2: Spatial strategy options, Chapter 4: Large site options and Chapter 6: Growth scenario options), to argue against development at the settlement.</li> <li>A number of points highlighted in the SA are contested namely that:</li> <li>New housing development at Storrington has been recognised as having potentially to affect the AQMA there, but Ashington is also dependent on Storrington as a 'hub' for facilities/services and housing here would affect the AQMA also.</li> <li>States that the SA indicates that Ashington has strong access to existing sustainable transport links, town centres or key employment areas. It is stated that this is not supported by evidence.</li> <li>Disagrees with the SA's statement that Ashington contains healthcare facilities.</li> </ul>	See Introductory Notes in relation to selection of options for Regulation 19 Local Plan. The review of Plan, Policies and Programmes relating to climate change adaptation and mitigation is presented in Appendix B of the Interim SA for the Reg 18 Local Plan and Appendix B of this SA Report. This presents an overview of the documents which have informed the preparation of the SA objectives against which all elements of the Local Plan have been appraised. The United Nations Paris Climate Change Agreement has been included in the review for the Interim SA and is presented again in this SA Report. The SA framework (Table 3.2 of the Interim SA for the Reg 18 Local Plan and Table 3.2 of this SA Report) includes SA objective 15 'To minimise the District's contribution to climate change and adapt to unavoidable climate change'. The Local Plan has thereby been appraised in terms of its ability to contribute to District's role in climate change mitigation and adaptation. In terms of air quality (SA objective 14), development has been considered in terms of the potential to lead to a higher number of vehicle trips within AQMAs where development lies within or is directly connected by a road to that area. Development at Ashington would not result in development occurring in this manner; however development sites at Storrington would. Journeys made from sites at Ashington would be made for employment as well as to access services and facilities which is likely to mean journeys would not be made to Ashington only. It is appropriate to assume that development at Storrington is likely to have more significant effects in relation to air quality than development at Ashington and the findings of the SA reflect this. Further detail of the appraisal of the Ashington Cluster site (SA085/SA520/SA524/SA539/SA790) is provided in Appendix B of the Interim SA of Growth Options for the Reg 18 Local Plan. This shows, that in relation to SA objective 17: employment, the site is within 1.5km of Wiston Business Park key employment area, but th

Consultee	Comment ID	Summary of Comment	SA team response
		Disagrees with the detail presented in the SA which states that while Ashington does not contain a key employment area, one is located in close	further afield using sustainable modes of transport. This includes bus stops at Lodge Gates, Downham Road and The Sands.
	proximity to the south. The consultee states this is not accessible using sustainable transport options and is wholly reliant upon access by private car.	The Interim SA reported that development at Ashington would be in close proximity to a healthcare facility. This has been checked and the facility identified is a chiropractor and therefore the effects recorded for development at Ashington have been corrected to remove reference to this facility in this SA Report (please see Appendix D for the appraisal of the large site at Ashington and Appendix E for the appraisal of the small sites at Ashington).	
			While it accepted that the key employment site (Wiston Business Park) in close proximity to the Ashington cluster site is not accessible by existing public transport links and that access via foot would currently be difficult via the A24, the relatively short distance to the site means that there is potential for some journeys to be made by bicycle. It is, however, accepted that the presence of the dual carriageway is likely to discourage some site users from making use of bicycle to access the site. Any journeys which are made by car from the site to the business park would be shorter than where development is provided further afield. It is therefore considered reasonable for the commentary in the SA to note this.
Bellway Homes & Crest Nicholson	/5809	Contests the SA effects recorded for site Land East of Billingshurst (SA118). Consultee adds additional text to the justification for SA objective 2: Access to services and facilities, which states that the site will deliver a central hub as part of its development, with a flexible community building overlooking a green space in close proximity to a proposed primary school, and therefore considers that the effect will be a significant positive. Consultee adds additional text to the justification for SA objective 3: Inclusive communities, which highlights the proximity of the site to a flexible community space, central hub and primary school and therefore considers that the effect will be a significant positive. Consultee adds additional text to the justification for SA objective 5: Health and wellbeing, which states that the site will include provisions such as trim trails and green corridors, and that the nearby railway will encourage the use of sustainable transport and therefore considers that the effect will be a significant positive. Suggests a significant positive effect is more appropriate for SA objective 6: biodiversity and geodiversity than the significant negative effect recorded through the SA. Highlights that the proposal is to retain the Local Wildlife Site (Wilden's Meadow) and would seek to achieve biodiversity net gain. Suggests a positive effect (it is unclear whether significant or minor) is more appropriate in relation to SA objective 7: Landscape and townscape as key	See Introductory Notes in relation to sites not subject to SA and also approach to the appraisal of large site options. The level of detail provided in this appraisal work has been undertaken to be proportionate to the level of detail of the plan in line with the PPG. In the interests of achieving a consistent approach, the more detailed design considerations of proposals and supporting studies have not been taken into consideration given that this level of detail is not available for all site options. This accounts for many of the differences the consultee has highlighted in terms of the sustainability effects expected for the site. Further commentary is provided as follows. In relation to SA objective 6, it is considered appropriate to identify the potential for significant negative effects as the site lies within the Bat Sustenance Zone and in close proximity of the areas of Ancient Woodland and local biodiversity designations. The design of the site has the potential to achieve biodiversity net gain, however, impacts in terms of habit fragmentation and disturbance are invariably likely to occur and in line with a precautionary approach adverse effects are identified. Similarly, the loss of greenfield land and the presence of some land within the site which has been assessed as having no/low landscape capacity for large scale housing development means that a significant negative effect is also considered appropriate in relation to SA objective 7. Furthermore, the presence of Grade II listed buildings adjacent to the site and Billingshurst Conservation Area within 500m of the site means there is potential for significant adverse impacts in relation to the settings of nearby designated heritage assets.

Consultee	Comment ID	Summary of Comment	SA team response
		characteristic elements, such as the existing vegetation pattern and field boundaries will be retained within the proposed development.	patterns of commuting which might occur if development occurs at various locations in the District. Therefore, it is considered appropriate to identify the adverse effects set out through
		Contests the significant negative effect recorded in relation to SA objective 8: historic environment given that the proposal has been informed by a heritage impact assessment and the developers are looking at providing a buffer to complement to protect the setting of the heritage assets. A positive effect is suggested as being appropriate instead.	the SA in relation to SA objectives 13, 14, 15 and 17.
		In relation to SA objective 12: Flooding the minor negative effects recorded in the SA is suggested for replacement with a minor positive effects given that the design of the development is to incorporate a drainage strategy which limits peak proposed flows to the existing greenfield rates and provides additional long term storage to mitigate against climate change.	
		Suggests that the significant positive and minor negative effect in relation to SA objective 13: Transport should be adjusted to significant positive as the potential for increased traffic in the village centre along the A272 and commuting patterns established from 2011 census data have been disregarded through the consultees response.	
		In relation to SA objective 14: Air quality the minor negative effect recorded through the SA in combination with a significant positive effect is suggested for removal given that the consultee has disregarded the potential for commuting patterns out of the area (as set out through the 2011 census) to persist as development occurs.	
		Suggests a significant positive effect to replace the minor positive and minor native recorded in the SA in relation to SA objective 15: Climate change. It is highlighted that the site is close to local high street and facilities at Billingshurst and that the development will incorporate electric vehicle charging points, and ground source heat pumps.	
		It is stated that a minor positive effect should be recorded in relation to SA objective 17: Access to employment opportunities instead of the minor positive and minor negative effect set out in the SA. The consultee has disregarded the data from the 2011 census which shows that many people commute out of Billingshurst to other destinations to access jobs, which might otherwise indicate that new growth at this location may not provide new residents with immediate access to an offer of higher quality jobs.	
BigSTAND Mr Julian Trumper		Objecting to site Land at Adversane (SA597). Highlights the potential adverse impacts identified through the Interim SA of Growth Options for the Reg 18 Local Plan in relation to a number of issues. This includes the potential more	See Introductory Notes in relation to appraisal of large site options and selection of options for Regulation 19 Local Plan.

Consultee	Comment ID	Summary of Comment	SA team response
		<ul> <li>limited access to existing jobs in the area (compared to Horsham or Crawley), the potential for long lead in times for new settlements and the requirement for a certain critical mass to be achieved before self-containment can be fully achieved. With regards this point the text of the SA is highlighted in terms of the potential implications for social cohesion in relation to the delivery of new settlements. Impacts identified through the SA in relation to the surrounding landscape, flood risk, traffic in the area and air quality are also referenced. The consultee also states that the deliverability should also be taken into account as part of the SA</li> <li>Furthermore, the consultee also contests a number of effects recorded in the Interim SA of Growth Options for the Reg 18 Local Plan:</li> <li>States that reference in the Interim SA to access to improved transport should be disregarded;</li> <li>States that the effect recorded in relation to provision of services should be 'reduced'</li> <li>States that it would be more sustainable to provide development close to existing jobs, such as at Horsham or Crawley.</li> <li>rejects the appraisal that the Adversane site will contribute to economic growth</li> </ul>	Comments in relation to the findings of the SA noted. The consideration of the potential effects of development at the site on transport has been reflected through SA objective 13. A mixed significant negative and minor positive effect has been recorded given that there is no immediate access to train services and existing services and facilities from the site and there is potential for increased traffic. The mixed effect also reflects the new services and facilities at the site which may reduce the need for residents to travel. The promotion of the site suggests that this is to include enhanced and additional shuttle buses as well as safeguarded land for a new railway station although there is currently no agreement with Network Rail for this. The consideration of the potential effects of development at the site in relation to access to services and facilities has been reflected through SA objective 2. An uncertain mixed significant positive and minor negative effect has been recorded given that the development of the site is to provide financial contributions towards a new primary school and a new through school as well as a number of additional services and facilities such as a GP practice. The minor negative effect reflects the relative isolation of the site, with Billingshurst town centre 3.0km to the north, although existing education facilities (a primary school and a college) are located within close proximity to the south west of the site to the north of Pullborough. The consideration of the potential effects of development at the site in relation to access to jobs has been reflected through the appraisal of SA objective 17. A mixed minor positive and minor negative has been recorded given that the site is within relatively close proximity of a number of key employment area (Gillmans Industrial Estate and Huffwood Trading Estate and Star Road) but is not within close proximity of a town centre or railway station. The site is also expected to have a significant positive effect in r
Campaign to Protect Rural England	/4348	Objecting to site Land at Buck Barn, West Grinstead (SA716). Makes reference to the Council's Site Assessment Report querying the findings reported. Also highlights that the SA Report states that the effects of development in relation biodiversity and geodiversity assets (SA objective 6) will depend in part on the design and specific location of development as well as the sensitivities of nearby biodiversity designations and other undesignated habitat areas which are currently unknown and therefore all effects recorded are uncertain for this SA objective. Comment has not queried any of the SA's findings.	Comment noted. No implications for SA work.

Consultee	Comment ID	Summary of Comment	SA team response
Catesby Estates PLC	/5838	Consultee includes the same queries as those set out through consultee comment ID /5839 which is addressed above.	Please see response in relation to consultee comment ID /5839 which is addressed above.
		Consultee is also promoting site Land at Rascals Farm, Shipley Road, Southwater (SA701). States that no other options have been considered at this settlement other than the extension to the allocation from the current Local Plan of Land West of Southwater. Argues that this is a failure of the Council and the SA in terms of considering reasonable alternatives, and that this suggests that the SA is now seeking to retrofit its findings to a preferred approach by the Council.	<ul> <li>This SA Report now includes an appraisal of site SA701 (please see Appendix E for its detailed appraisal).</li> <li>The Interim SA of Growth Options for the Reg 18 Local Plan considered two additional sites for development at Southwater (SA644/SA645 and SA703 both for employment use). This appraisal was original presented in the Interim SA in Appendix C. It is represented in this SA Report alongside the additional site options now considered for Southwater (SA725 and SA743) presented in this SA Report (Appendix E).</li> </ul>
Clarion Housing Group	/6228	States that the SA does not provide any clarity on the housing numbers assessed in the various growth options and appears to have assessed only the principle of development at this stage. It is furthermore stated that growth at Storrington is present in a number of the options tested, but it is not clear the scale or quantum of growth anticipated. The comment argues that the next iteration of the SA needs to test various growth scenarios for each of the settlements particularly the small towns and larger villages and that the current assessment of small-scale site options is premature until the SA has comprehensively assessed the capacity of the settlements to accommodate growth.	The Interim SA of Growth Options at the Reg 18 stage first tested a number of principles for the distribution of development in the District through six spatial strategy options in Chapter 2. Three different quantum of growth options have also been appraised alongside this (Chapter 3), as well as the appraisal of ten large scale sites options and 66 small site options (Chapters 4 and 5, respectively). Drawing on this work the Council prepared nine more spatially specific growth scenarios that could be included in the Local Plan Review (Chapter 6). This allowed for testing of reasonable alternative which accounted for varying levels of development across different areas of the District. The testing of the growth scenarios has been undertaken in line with the level of development to be provided at each location (including at Storrington) set out in Table 6.1 of the SA of Growth Options. Further detail on the distribution of development (at small sites in particular) has been provided from paragraph 6.4 of that report. No large scale sites have been considered for Storrington given that these have not been promoted for development. Figure 1.3 identifies the sites at Storrington which have been appraised (SA361, SA639 and SA732) through the appraisal of small sites (Appendix C of the Interim SA of Growth Options at the Reg 18 stage) and considered through the appraisal of the growth scenarios. This iteration of the SA contains the appraisal of the Council's preferred spatial strategy in Chapter 7. In line with the PPG, the level of detail in the SA is proportionate to the level of detail in the plan. The testing of various growth scenarios for each of the settlements with regard for differing options for their capacity for growth is considered to go beyond what is considered to be proportionate. This approach would result in a very high number of variations given the large number of settlements in the District.
Crest Nicholson	/5817	Contests the SA effects recorded for site Land West of Kilnwood Vale (SA291). Consultee states that the uncertainty attached to the significant	See Introductory Notes in relation approach to the appraisal of large site options.

Consultee	Comment ID	Summary of Comment	SA team response
		<ul> <li>positive effect given in relation to SA objective 2: Access to services and facilities should be removed. Highlights that extant planning permission for the wider Kilnwood Vale site to the east will provide a range of services and facilities which can immediately serve the site, as well the site's connections to services and facilities in the existing Kilnwood Vale neighbourhood and Crawley to the east.</li> <li>Consultee considers that the effect for SA objective 3: Social inclusion should be significant positive due to the inclusion of a mixture of housing types and tenures, the provision of a range of transport routes and access, the incorporation of onsite green infrastructure and key local facilities.</li> </ul>	The mixed significant positive and minor negative effect recorded for the site through the SA for the Reg 18 Local Plan in relation SA objective 2 already reflects the extant planning permission for the wider Kilnwood Vale site. The appraisal of the site at the Reg 19 stage to account for the updated information in terms of the expected infrastructure to be provided at the site updated the effect to include only a minor positive effect. The site was initially expected to provide a new healthcare facility but this provision is no longer expected to be made. The minor negative effect recorded at both the Reg 18 and Reg 18 stages reflects the lack of access for residents by foot to the wider range of services and facilities in Crawley in the early stages of development in particular. Uncertainty is attached to the overall effect recorded given that it is unknown whether provisions at the site and the surrounding area will be sufficient to support the level of growth proposed.
		Consultee recommends a positive effect for SA objective 4: Crime with consideration for the design changes across the later stages of the Local Plan Review.	Score for SA objective 3: Social inclusion is negligible because the site is located on greenfield land and is not within a 40% most socially deprived area. In line with the SA assumptions this SA objective has focussed on the potential for to achieve regeneration in the plan area.
		Recommends the removal of the uncertainty attached to the effect for SA objective 5: Health and wellbeing due to extant planning consent for a primary healthcare facility to the east of the site as well as various opportunities for recreation and community engagement for social interaction and mental health stimulation.	Score for SA objective 4: Crime is negligible given that for all sites in line with the SA assumptions the effects of new development on levels of crime and fear of crime will depend on factors such as the design of development and the use of lighting. The consultee has stated in their response that no details are provided at this stage to enable the site higher on this objective and this is approach is agreed with.
		Consultee recommends a positive effect for SA objective 6: Biodiversity and geodiversity as biodiversity net gain will be achieved through enhancement of retained habitats within the site and the creation of new habitats within areas of landscaping.	Uncertainty is attached to the effects identified for SA objective 5 Health and wellbeing considering the potential for existing healthcare facilities to be overburdened as a high amount of new development is to be delivered or is potentially to be delivered at each location.
		Consultee contests that the score for SA objective 7: Landscape should be positive as "residential development could be accommodated without particularly adverse impacts in terms of setting", given that it would be possible to protect the most sensitive landscape areas and implement appropriate	An uncertain major negative effect is expected for this site because it is located within an Impact Risk Zone (IRZ) which identifies residential or employment development as a potential risk. The appraisal of the site has recognised that the proposal would incorporate mitigation measures and this has been reflected in the uncertainty attached the negative effect recorded.
		mitigation where necessary. States that through more detailed design and site-specific policies, minor positive effects could be delivered for SA objective 8: Historic Environment.	Score for SA objective 7: Landscape is an uncertain major negative because the site is located within a Local Landscape Area (LLA) that is assessed as having No/Low or Low/Moderate landscape capacity to accommodate large-scale residential and/or employment development. The site has been appraised at a strategic scale and it is considered that the landscape
		Contests that the effect for SA objective 10: Natural resources, stating that it should be is negligible instead of significant negative. States that development of the site would be supported by a Mineral Resource Assessment and it is considered that the potential for sterilisation is low.	assessment work available in the Draft Landscape Capacity Assessment for the District provides an appropriate level of detail which allows for comparison between the site options considered.
		Consultee considers that the effect for SA objective 11: Water should be negligible as the site is not located in a source water protection zone.	The effect recorded for SA objective 8: Historic environment is an uncertain minor negative because the site has the potential to cause harm to heritage assets but that this might be mitigated given that the nearest heritage asset is located within 500m of the site. The specific design or layout of the site has not been considered given that this type of approach might be

Consultee	Comment ID	Summary of Comment	SA team response
		Furthermore, upgrades needed to the strategic network and sewage treatment work upgrades are outlined in the Council's Infrastructure Delivery Plan (IDP).	taken for any site thereby meaning many of the adverse effects identified for any of the site options might be discounted.
		Consultee considers that the effect for SA objective 12: Flooding should be positive rather than negative as there is no land within the site that is located within flood zone 2 or 3, and flooding risk can be mitigated. Contests the minor positive effect recorded for SA objective 16: Economy and SA objective 17: Employment. It is stated that the wider strategic development opportunity increases the potential for the site to contribute positively towards economic objectives within the area, including the opportunity to better align local housing and employment needs and the provision of employment floorspace and a range of housing types. The development would also support the future expansion of major employment areas and increase the local workforce. The consultee therefore suggests that the effect for both SA objectives should be recorded as significant positive. The consultee has highlighted that there are potential opportunities that could be explored as part of a wider strategic growth area rather than site SA291 in isolation in relation to SA objective 13: Transport, but that no changes to the effect would result.	The effect recorded for SA objective 10: Natural resources is an uncertain significant negative because the site is located within a Mineral Safeguarding Area. Therefore, in line with the SA assumptions this site is considered more likely than sites outside of Mineral Safeguarding Areas to result in the sterilisation of mineral resources. The effect recorded for SA objective 11: Water is an uncertain minor negative and not an uncertain significant negative. The effect reflects information from the Council which indicates that both Thames Water and Southern Water have advised that the scale of development proposed West of Crawley would likely need upgrades to the wastewater network and sewage treatment infrastructure. This is to be informed by further work in the Crawley area relating to existing capacity. The IDP highlights that the importance of this infrastructure to the plan strategy is critical and that the potential risk to delivery is high. This indicated that there are key constraints to the delivery of the infrastructure project, for example, no clear sources of funding or issues with the land. The uncertain minor negative is still considered applicable. The effect recorded for SA objective 12: Flooding is minor negative because while the site falls outside the higher risk flood areas, it would result in the development of greenfield land and would therefore contribute to an increase in the overall area of impermeable surfaces in Horsham. The effects recorded for both SA objective 16: Economy and SA objective 17: Employment are minor positive because the site is within 1km of Crawley which provides access to jobs as well as being in relatively close proximity of a railway station, bus stops and cycle routes which could improve this access. These points considered the sites is not within easy walking distance of existing employment sites and as the consultee has stated the site itself would not provide any new employment use. Development of the site for residential uses could help support the local econo
Henfield PC	/2139	Objecting to site Land North East of Henfield (Mayfield) (SA414). States that the appraisal ratings shown for all the strategic sites are not consistent, either on an actual or comparative basis, with the assessments in the Interim SA Report.	See Introductory Notes in relation to appraisal of large site options. The assessment work undertaken by the Council and presented in the Local Plan and the Reg 18 Site Assessment Report is not directly comparable to the appraisal work for the SA given different criteria headings used for the different pieces of work and considering that the site assessment work was rated only red, amber or green. The SA on the other hand was appraised in terms of the likelihood of effects ranging from significant positive to significant negative.

Consultee	Comment ID	Summary of Comment	SA team response
	/2161	Objecting to site Land North East of Henfield (Mayfield) SA414. Highlights that	Comment noted. No implications for SA work.
		the SA, when considering SA objective 7: Landscape, states that much of the proposed site has no/low capacity for large scale development.	The SA Report forms only part of the evidence base for the selection of site options and policy options for inclusion in the Local Plan. The constraints the consultee has highlighted in relation to the site with reference to the SA form part of the wider evidence. The Council's reasons for selecting and rejecting of sites have been presented in Appendix F of this SA Report.
Homes England	/5815	Contests the following SA effects recorded for site Land West of Ilfield (SA101):	See Introductory Notes in relation to sites not subject to SA and also approach to the appraisal of large site options.
		SA objective 3: Inclusive communities - Considers that the site will have a significant positive effect as it in close proximity to areas that are within an area of deprivation as per IMD 2019. It would also deliver housing that meets identified long term need alongside a greater range of local services and community facilities.	In relation to SA objective 5 it is considered appropriate to identify a significant negative effect given that the development of the site could result in the loss of an existing sports facility (Ifield Golf Club). Adopting a precautionary approach, a significant negative effect has been recorded in relation to SA objectives 6, 7 and 8 to reflect the close proximity of the site to biodiversity assets, potentially sensitive landscapes and heritage assets. A significant negative effect is also considered appropriate in relation to SA objective 10 given that the site would perform
		SA objective 4: Crime - states that a minor positive effect should be recorded as the site would be designed to reflect the Building for Life criteria.	less favourably than sites that are not within an MSA in terms of potential impacts on mineral resources. Similarly the site would perform less favourably than sites at which there are no
		SA objective 5: Health and wellbeing - argues that a mixed significant positive and minor negative is more applicable than the significant positive and significant negative identified through the SA. It is stated that the open space would be provided at the development and that the noise contour of Gatwick Airport is of reduced importance as a southern runway expansion of Gatwick is not currently supported by the Government.	existing capacity issues in terms of WwTW infrastructure and potential loss of greenfield land which could result in increases in local flood risk, which account for the effects recorded in the SA in relation to SA objectives 11 and 12. Adverse impacts identified through the SA in relation to SA objective 13, 14 and 15 reflect the realities of established travel habits in the area as well as air quality issues in the area considering the presence of the Hazelwick AQMA. The development of the site could lead to increasing number of journeys being made through this area along the A2011.
		SA objective 6: Biodiversity and geodiversity – states that a minor positive effect is more appropriate than the significant negative effect recorded. The site would seek to achieve 10% biodiversity net gain and a detailed constraints maps has been prepared using detailed sites assessment and survey work to show the developable areas of the site.	
		SA objective 7: Landscapes and townscapes – recognises the findings of the Horsham Landscape assessment which states that parts of the site have no/low landscape capacity. The design of the proposal is achieved so that sensitive landscape areas can be protected and to maximise the capacity for housing development. Detailed surveys support this element of the consultee's argument.	
		SA objective 8: Historic environment – recognises that there are assets of historical importance on the western edge of Crawley but states that a minor negative effect is more appropriate than the SA effect of significant negative	

Consultee	Comment ID	Summary of Comment	SA team response
		given that a detailed understanding of the landscape character, setting and heritage appraisal is to be undertaken.	
		SA objective 10: Natural resources – disagrees with the significant negative effect recorded stating that a negligible effect is more appropriate as a Minerals Resource Assessment is to be undertaken to ensure any potential resource will not be unnecessarily sterilised.	
		SA objective 11: Water resources- disagrees with the minor negative effect given that the developer is engaged with Thames Water on the potential for upgrades to Crawley Wastewater Treatment Works (WwTW). It stated that deliverable solutions are possible for upgrades to the WwTW and therefore a significant positive effect should be recorded.	
		SA objective 12: Flood risk – the minor negative effect recorded is disagreed with and a significant positive effect is suggested as the development would be directed to areas of Flood Zone 1 and SuDS are to be incorporated.	
		SA objective 13: Transport – states that minor negative effect identified in combination with the significant positive effect through the SA is not appropriate. The provisions of sustainable transport measures though the development and the uses provided at the site to reduce the need to travel for new residents and accessibility of the site to the town of Crawley and employment opportunities are also highlighted.	
		SA objective 14: Air quality – argues that a significant positive and minor negative effect instead of the significant positive and significant negative effect is more appropriate. Recognises the presence of the AQMA at Hazelwich but states that the locational advantages in combination with associated infrastructure investment can have a positive impact on the existing situation.	
		SA objective 15: Climate change – highlights the location advantages of the site and that there is potential for alternative energy sources to be explored. Therefore, a minor positive effect is expected by the consultee in place of the minor positive and minor negative effect set out in the SA.	
Horsham District Council (as Landowner)	/5168	<ul> <li>Promoting site Rookwood (SA394). Queries some of the SA findings requesting that site specific evidence provided as part of the submission to the Call-for-Sites exercise and representations on the Reg 18 consultation are given consideration. The consultee suggests the following changes:</li> <li>SA objective 5: health and wellbeing – states that the effect should be</li> </ul>	See Introductory Notes in relation to appraisal of large site options. With regards to SA objective 6, the large size of the site and the large amount of greenfield land take involved means that an uncertain significant negative effect is applicable. This reflects the potential for disturbance, increased recreational pressures and habitat and fragmentation loss at the Warnham Mill Pond Local Wildlife Site (see Appendix D of this SA
		recorded as a minor positive effect as although the golf course would be	Report). While the promoter of the site indicates that 10% Biodiversity net gain, at the time of

Consultee	Comment ID	Summary of Comment	SA team response
		<ul> <li>lost to development it provides benefits to a limited number of people. Argues that road noise at the site could be mitigated and that planning obligations will prevent healthcare facilities in Crawley from becoming over-capacity as development is occupied.</li> <li>SA objective 6: Biodiversity and geodiversity – states that a mixed minor positive and minor negative is more appropriate than the significant negative effect recorded given that the site would seek to achieve 10% biodiversity net gain. The SA assumptions are also referred to highlight that sites within 400m of local biodiversity designations would have a minor negative effect.</li> <li>SA objective 7: Landscapes and townscapes – disputes the significant negative effect recorded stating that a minor negative effect is appropriate with reference to landscape character work undertaken specifically for the site.</li> <li>SA objective 8: Historic environment – States that the site is separated from the closest heritage assets by the course of the A24 and woodland.</li> <li>SA objectives 11: Water resources and 12: Flooding – disagrees with the respective negligible and minor negative effects recorded in relation these objectives. Highlights the provision of SuDS scheme and design of the site to address local flood risk issues and states that a minor positive effect should be recorded for each objective.</li> <li>SA objective 12: Transport - states that the minor negative effect recorded as part of the overall mixed significant positive and minor negative effect should be removed given that the travel plans for the site will ensure that future travel habits are more sustainable.</li> <li>SA objective 13: Climate change – disagrees with the minor negative effect recorded for the site as part of the overall mixed minor positive and minor negative effect. States that the District's population will increase regardless, and the highly accessible location of the state should be recognised.</li> </ul>	appraisal of the site for consideration for the Reg 19 Local Plan no plans were provided to show how this would be achieved. At the Reg 19 stage the Council undertook heritage impact work for all site options. For site SA394, this work indicated that only potentially significant change is expected to result in relation to designated heritage assets in the surrounding area. The magnitude of the effects recorded in relation to these designated assets was low. Effects were also identified in relation to non-designated heritage asset Sussex Barn, however, the sensitivity of this asset was recorded as low and magnitude of change was recorded as medium. Considering this additional information, an uncertain minor negative effect was recorded in relation to SA objective for site SA394 at the Reg 19 Local Plan stage.

Consultee	Comment ID	Summary of Comment	SA team response
Horsham Golf and Fitness	/6364	Promoting site Horsham Golf & Fitness Club (SA754). The site has not been included in the Local Plan as a reasonable alternative and has not been subject to SA. The consultee states that the landscape impacts identified through the Site Assessment Report do not represent an absolute constraint that justifies the red RAG rating or the exclusion of the site as a reasonable alternative within the Draft Local Plan and accompanying SA. States that it is unclear how or whether the Council applied a 'threshold' to the inclusion of these large sites within the draft Local Plan. If some threshold has been applied to the sifting of sites, this should be clearly set out and justified. If this has not been the case, then there needs to be an explanation of why these strategic sites have been segregated within the SA and during the site selection process. SA will need to be clear on what basis the assessment has taken place. Where only development within the Plan period is considered, there will need to be robust evidence to demonstrate that infrastructure will be delivered within this timeframe, including phasing and viability evidence. The consultee has suggested a reappraisal of all large site options alongside site SA754 with new effects presented in their detailed response.	See Introductory Notes in relation to sites not subject to SA and also approach to the appraisal of large site options. As explained at paragraph 4.1 of the Interim SA of Growth Options for the Reg 18 Local Plan, the large sites which have been deemed capable by the Council of making a significant contribution to the future housing needs for the District have been appraised separately from the small site options.
Ifield Society	/3773	Contests the potential allocation of site Land at Rookwood (SA394) by Horsham. Highlights the potential conflict of allocating this site with SA objective 6: biodiversity but does not refer to the specific findings of the SA.	An uncertain significant negative effect is expected for site SA394, Land at Rookwood, in relation to SA objective 6: Biodiversity as it is within close proximity of a biodiversity designation (Warnham Mill Pond Local Wildlife Site) and falls within an Impact Risk Zone (IRZ) which identifies residential or employment development as a potential risk.
Keep Southwater Green	/5516	Contests the allocation of site West of Southwater (SA119) and questions the links between the RAG assessment presented in Reg 18 Consultation document and the SA Report. The consultee has contested the significant positive effect recorded through the SA in relation to SA objective 1: Housing. While the SA states that a positive contribution would be made to meeting the area's housing need, with 35% of these being expected to be affordable, the consultee states that the provision of affordable housing is questionable. The comment also highlights that the Council's site assessment work questions what level of affordable housing would be provided. The consultee also queries the accessibility of Christ's Hospital Railway Station from the site saying that this is only true in respect of its northern end and highlights that the SA Report states that Southwater is an exception in not having good access to a railway station. It is not clear which part of the SA	See Introductory Notes in relation to approach to the appraisal of large site options. The assessment work undertaken by the Council and presented in the Local Plan and the Reg 18 Site Assessment Report is not directly comparable to the appraisal work for the SA given the different criteria headings used for these pieces of work. Furthermore, the Council's site assessment work only made use of a RAG rating (i.e. recording scores of red, amber or green) while the SA was appraised in terms of the likelihood of effects ranging from significant positive to significant negative. The appraisal of the site at the Reg 19 stage as presented in this SA report includes uncertainty in relation to SA objecitve1: Housing. The uncertainty recorded reflects updated information from the Council which clarifies that the amount of affordable housing is uncertain at this time due to the impact of Covid-19.

Consultee	Comment ID	Summary of Comment	SA team response
		Report the consultee is referring to in this regard given that reference is included to paragraph 6.152 but the SA Report paragraph numbering does not go up to that number.	It is considered relevant to comment on the accessibility of the site to Christ's Hospital Railway Station even if only part of the site is accessible to that feature given that it could have benefits for some new residents at the site.
Landowner of Land at Highfield	/5910	Promoting site Land at Highfields, Codmore Hill (SA556). Disputes the SA findings for the site in relation to SA objectives 6: Biodiversity and geodiversity, 7: Landscapes and townscapes, 9: Efficient land use and 10: Mineral resources for which significant negative effects have been recorded.	See Introductory Notes in relation to appraisal of site options. Uncertain significant negative effects are expected for this site in relation to SA objective 6: Biodiversity and geodiversity as it is located within an SSSI Impact Risk Zone (IRZ) that identifies residential planning applications as a potential risk. An uncertain significant negative effect is expected in relation to SA objective 7: Landscapes and townscapes as the area in which the site is located has been identified has having 'No/Low' landscape capacity for medium scale housing development. An uncertain significant negative effect is expected in relation to SA objective 9:Efficient land use, as the site is located on greenfield land most of which is classed as Grade 3 agricultural quality, although it is not known if it is Grade 3a or 3b land. An uncertain significant negative effect is expected in relation to SA objective 10: Mineral resources as the site is located within a Mineral Safeguarding Area (MSA) (for building stone), and therefore development may result in the sterilisation, or loss, of access to mineral resources.
Legal and General Strategic Land	/5109	States that the growth options tests through the SA considered an additional 500 units on Land at North Horsham (SA296), through densification on the site and that this is supported. The comment suggests that any future allocation should increase the housing to be delivered at the site to 3,250 dwellings.	Scenarios 1, 3a, 3b, 3c, 5, 6 and 7 all tested the potential to deliver of 500 additional homes at the site through densification. This is in addition to the allocation of the adopted HDLF which allocated the area for at least 2,500 homes (Policy SD1). No implications for SA work.
Locals Against Mayfield	/5042	Highlights that the SA has appraised a number of different spatial strategy options for meeting the District's housing need and that a that a combination of these options may be taken forward. Comment considers that a combined approach is likely to be the most appropriate strategy but that focussing on urban extensions would be a preferable first approach for the reasons indicated in the SA. In relation to the Mayfield site (SA414), which the consultee objects to, it is stated that the SA assumes between 2,000 and 3,000 units could be delivered within the Plan period, but it is not clear how this has been calculated. Also states that the SA notes that the site contains large areas of land with no/low capacity or low-moderate capacity for large scale development and the consultee states that it should also be emphasised that the site is clearly visible in views from the South Downs National Park (SDNP) and falls within the setting of the Park. Highlights the SA's text which states that the success of new settlements in their early stages will often rely on public transport accessibility and being located within close enough proximity to existing	See Introductory Notes in relation to selection of options for Regulation 19 Local Plan. Comment noted. No implications for SA work. Additional information gathered by the Council about the proposal for the site indicates that between 5,000 and 7,000 dwellings would be provided at the site, with 5,000 dwellings delivered during the plan period. The appraisal of the site has been undertaken to reflect this information.

Consultee	Comment ID	Summary of Comment	SA team response
		settlements to share infrastructure and access to jobs. Furthermore, highlights that the SA notes that a large number of homes is needed to support the provision of new health centres, schools and other facilities. Also highlights that the SA flags the ability of new towns to deliver affordable homes to be dependent upon viability issues and that infrastructure required at these types of development could have adverse impacts.	
Mayfield Market Towns	/5424	<ul> <li>In relation to the spatial strategy options, states that the SA incorrectly considers an option of focusing development within a new settlement as an alternative to other options, rather than forming part of an overall strategy. Furthermore, seeks to differentiate the development of larger new settlements from other types of development. Highlights differences from the development of smaller scale new "villages" which the consultee argues necessarily rely on travel to other locations for the needs of their residents and continued urban extensions which place new housing remote from the town centre and tend to rely on the use of stretched services which were designed for a smaller population. It is stated that the SA has not reflected this point.</li> <li>It is also argued that quantum of growth options tested through the SA are artificially limited by a self-imposed cap (1,400 homes per annum) and that no evidence has been provided as to how this substantial residual unmet need will be addressed. Furthermore, no justification has been provided for why higher housing options have not been considered and it is stated that the growth scenarios tested should reflect an increased level of development. States that the SA has not taken account of the potential for any mitigation where appraising the quantum of growth options.</li> <li>The individual SA effects recorded for site Mayfield (SA414) in relation to all SA objectives with the exception of SA objectives 1: Housing, 9: Efficient land use and 16: Economic growth have been challenged by the consultee who has provided additional evidence and supporting technical notes to justify the suggested changes:</li> <li>SA objective 2: Services and facilities - argues that a significant positive effect is most suitable as the site would provide a range of services and facilities when developed.</li> <li>SA objective 3: Social inclusion – makes reference to the appraisal questions stating that the appraisal has not considered the potential or the site to provide fa</li></ul>	See Introductory Notes in relation to approach to the appraisal of large site options. The testing of spatial strategy options through the Interim SA of Growth Options for the Reg 18 Local Plan initially tested potential options for the approach to the distribution of growth through the Local Plan. Option 3 was to consider the delivery of new settlements. This initial work then informed the preparation of differing growth scenarios which took forward the various elements for potential development (including new settlements, urban extensions and smaller scale development) in different combinations to test how these could come forward with consideration for the spatial realities of the District. The SA recognises that new settlements can provide new services and facilities to allow for the creation of relatively self-sustaining communities. However, importantly, it also highlights that the creation of new communities 'from scratch' is likely to pose challenges in terms of placemaking and the accessibility of a wide range of services and facilities in the early stages of development in particular. The Interim SA of Growth Options for the Reg 18 Local Plan tested 1,000dpa housing development to meet the standard methodology calculation for Local Housing Need plus a slight uplift in provision to ensure flexibility in housing supply. It also tested 1,200dpa and 1,400dpa which meet the standard methodology calculation for Local Housing Need for the District and some but not all and significant additional growth to contribute to Duty to Cooperate cross-boundary need from a number of neighbouring districts, respectively. These are the options the Council has considered appropriate to considered for inclusion in the Local Plan and are therefore the options tested through the SA. The effects identified through the SA which the consulte disagrees with partly reflects the more isolated location of the site from existing development and services and facilities. The appraisal of the site recognises that

Consultee	Comment ID	Summary of Comment	SA team response
		meet the needs of specific groups in the District and that a significant positive effect should be identified.	precautionary approach to the appraisal it is also not considered appropriate to disregard the potential for adverse impacts on natural and built assets as well natural resources which lie within the site. The site includes areas of ancient woodland, Listed Buildings and part of an
		SA objective 4: Crime – argues that the site should be recorded as having a minor positive effect given that it is to be designed to a high-quality design and would include new social infrastructure.	MSA. The loss of greenfield land to development is also reflected in the appraisal of the site in terms of potential increases in local flood risk associated with the proliferation of impermeable surfaces (SA objective 12).
		SA objective 5: Health and wellbeing – states that the mixed significant positive and minor negative effect should be revised to a significant positive effect as the site is within close proximity of existing sports facilities and would be designed to provide sports hub, open space and active travel corridors.	
		SA objective 6: Biodiversity and geodiversity – disagrees with the significant negative effect identified, highlighting that the assessment contained within the draft Local Plan is neutral. States that a minor positive effect is more suitable as 10% biodiversity net gain would be achieved and that the two areas of Ancient Semi-Natural Woodland within the site are small in size and would be retained within wide corridors of open space.	
		SA objective 7: Landscapes and townscapes – contests the significant negative effect stating that a minor positive effect would be more appropriate. The suggested revision to this effect is to reflect that the development it is to be provided to be considerate of natural features and this sis supported by an additional analysis of the proposals against the Council's landscape character assessment.	
		SA objective 8: Historic environment – states that a negligible effect is more appropriate than the significant negative effects given that the design of the development is to retain the Listed Buildings within the development and the masterplanning approach is to protect heritage assets and their settings.	

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		SA objective 10: Natural resources – disagrees with the significant negative effect recorded stating that a minor negative is more appropriate as although the site is within an MSA it only forms a small part of the total area of that designation and investigations would occur in advance of the development. Furthermore, the site performs positively in relation to waste management.	
		SA objective 11; water resources – states that a minor positive effect is more appropriate than the negligible effect recorded as the development is to be designed to incorporate sustainable construction techniques and would incorporate water efficiency measures and per capita consumption of water.	
		SA objective 12: Flooding – states that the site should be recorded as having a minor positive effect instead of a minor negative effect as the proposal would provide an opportunity to manage and control surface water runoff from a large part of the catchment.	
		SA objective 13: Transport – consultee argues that the site should be recorded as having a significant positive and minor negative effect and not a minor positive effect significant negative effect. It would include a significant mix of uses including employment, leisure, schools and retail, which would limit the need to leave the settlement and the potential for benefits are supported by a detailed supporting document.	
		SA objective 14: Air quality – it is stated that the site would have a minor positive and minor negative effect and not the significant negative and minor positive effect recorded through the SA. It is stated that the development would seek to minimise increases in traffic through the AQMA at Cowfold. Great emphasis is to be placed on electric travel through measures for residents to use electric vehicles and slow modes.	
		<ul> <li>SA objective 15: Climate change – disagrees with the significant positive and significant negative effect recorded through the SA stating that the</li> </ul>	

Consultee	Comment ID	Summary of Comment	SA team response
		<ul> <li>critical mass of the development would support a mix of uses that will be accessible by more sustainable modes at the development. The development is also to incorporate a wide range of energy generation, building fabric and sustainability measures and overall a significant positive effect should be recorded.</li> <li>SA objective 17: Access to employment – the significant negative and minor positive effect recorded is disputed stating that a significant positive effect is more appropriate as accessible employment opportunities and are to be provided at the site from the early stages of development.</li> </ul>	
Millwood Designer Homes	/6157	<ul> <li>Includes comments in relation to site Land at Glayde Farm, West of Church Lane, Lower Beeding (SA567). Requests that the SA is updated to accord with the site boundaries provided by the consultee.</li> <li>Highlights that through the SA, the Glayde Farm site is assessed similarly, if not higher, to the alternative sites in Lower Beeding. Contests a number of effects recorded in relation to SA objectives 2: Access to services and facilities, 3: Inclusive communities, 6: Biodiversity and geodiversity, 10: Mineral resources, 12: Flooding and 14: Air quality:</li> <li>SA objective 2 – states that the uncertain minor positive effect should be 'positive' as the site is adjacent to the built up area boundary, within 450m of the primary school and within 200m of a bus stop which would provide access to services and facilities further afield.</li> <li>SA objective 3 – states that the negligible effect should be updated to a 'positive' effect as the proposal will be fully inclusive and will provide policy compliant affordable housing.</li> <li>SA objective 6 – states that the uncertain minor negative effect should be updated to a negligible effect given that there are no areas of ancient woodland within or adjoining the sites.</li> <li>SA objective 10 – states that the uncertain minor negative effect should be changed to negligible given that the site is of small scale (2.5 Ha) and</li> </ul>	See Introductory Notes in relation to the appraisal of site options in line with the SA assumptions. Site SA567 has been reappraised in line with the updated boundary. Each spatial strategy option (as well as the quantum of growth options and the growth scenarios) has been considered using a 'policy-off' approach without consideration for mitigation which might be achieved through planning policy. This allows for all options to be appraised on equal footing in a consistent manner. It is recognised that a proportionate approach to the spatial strategy (Option 2) would help to support some local employment opportunities but it would also result in a higher number of residents being placed in locations where they do not benefit from immediate access to the largest employment areas, sustainable transport links and widest range of services and facilities which would increase the need to travel and have implications in terms of air quality and the District's contribution to climate change. These areas also currently accommodate lower levels of development meaning they are likely to include those which are more sensitive to change in terms of landscape character and the built environment as well as biodiversity. The effects of the three options considered without regard for the potential spatial distribution of the development have been set out through Table 3.1 in the Interim SA Report for the Growth Options. This shows that where the lower growth option (Quantum Option 1) is taken forward positive effects would be less significant in relation to SA objectives 1: housing, 2: services and facilities, 13: transport, 15: climate change, 16: economic growth and 17: employment than for the medium and higher growth options in particular. Similarly, the negative effects would be less significant for the lower growth option in relation to SA objectives 6: biodiversity, 7: landscape, 12: flooding, 13: transport, 14: air quality and 15: climate change. Option 3 is shown to potentially have a higher number of both significant p
		be changed to negligible given that the site is of small scale (2.5 Ha) and	The reasons for these variations in effects have been provided from paragraph 3.4 of the Interim SA Report for the Growth Options. The growth scenario options appraised in Chapter 6

Consultee	Comment ID	Summary of Comment	SA team response
		is located adjacent to the existing settlement boundary meaning there is reduced potential for mineral extraction.	of the Interim SA Report for the Growth Options have considered differing levels of development which might be taken forward across different potential spatial strategies. These have been tested through the inclusion of different site options considered for allocation
		SA objective 12 – states tat the minor negative effect should be updated to negligible given that the site is in Flood Zone 1 and considering that SuDS would maintain run off rates at current levels.	through the nine growth scenario options. In this manner further nuance has been provided in relation to potential effects of providing differing levels of growth across different locations in Horsham District.
		SA objective 14 – states that the site should be recoded as having a positive effect as it is not within an AQMA.	
		States that the options for the spatial strategy, should not have been independently assessed without consideration for the development management policies that will support the strategic policies of the emerging Local Plan and could provide mitigation for any harm that could be caused. Furthermore, contests the findings of the options for the spatial strategy that Option 2 should perform the strongest as proportionate development across the settlements in the area will support the local employment and existing services whilst also allowing for new opportunities to come forward.	
		In relation to the quantum options, it is stated that Option 3 (High growth - 1,400 dwellings per annum is assessed reasonably positively against the SA Objectives. It is also argued that the appraisal of these options should not have been undertaken in isolation from the development management policies as mitigation could significantly reduce the impact.	
	/6225	Highlights that the SA sets out the six overall strategies that the Council are considering. States that it is not obvious how these growth options relate to the options presented in the Reg 18 Local Plan or how they fit into Stage B of the Sustainability Appraisal process. It is stated that the SA should provide clarity on the reasoning for these options. Contests the negative effects identified for Option 2 (Proportionate growth) in comparison to the other options in terms of biodiversity, heritage and landscape stating that without development across a range of settlements, it is unlikely that this inclusive transport system and services and facilities can be	The Reg 18 Local Plan does not set out a detailed preferred spatial strategy for the District. It maps the options for large scale strategic sites (see Key Diagram page 17) which might be taken forward to form that strategy as well as an overview of what the strategy would achieve. The potential housing allocations (strategic and smaller sites) have been set out from page 57 of the Reg 18 Local Plan with the potential employment allocations set out through Strategic Policy 6 on page 33 of that document. The SA has appraised all these options separately (see Appendices B and C of the Interim SA of Growth Options at the Reg 18 stage). It has also considered nine differing variations of how these site options in Chapter 6 of the Interim SA of Growth Options at the Reg 18 stage). The formation of the these growth scenarios built on
		accessed by all existing residents. States that the spatial strategy options should be reassessed to consider the options in light of the Draft Local Plan rather than subjectively assessing unrelated growth options. Also states that the appraisal in isolation of the quantum options from the development management policies leads to overly negative effects where mitigation could significantly reduce the impact. Furthermore, increased requirement for	the appraisal of the individual site options as well as the appraisal of the spatial strategy options (Chapter 2 of the Interim SA of Growth Options at the Reg 18 stage) and the appraisal of the quantum of growth options (Chapter 3 of that document). The Interim SA of Growth Options in effect presents the findings of Stage B of the SA process, with particular focus on the options for growth being considered by the Council.

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		biodiversity net gain through Government policy means that the impact identified on biodiversity and other constraints is incorrect.	The connection the consultee makes between Option 2 and the maintenance of a sustainable transport system does not limit the potential for a higher number of more rural and less developed locations to be required for development through a more proportionate spatial strategy. This type of approach is likely to result in more development being spread to locations which currently do not accommodate high levels of development and therefore may be susceptible to change. Therefore, it is considered appropriate to highlight the potential for adverse impacts relating to biodiversity, heritage and landscape.
			Each spatial strategy option has been considered using a 'policy-off' approach without consideration for mitigation which might be achieved through planning policy. This allows for all options to be appraised on equal footing in a consistent manner. The mandate for biodiversity net gains is set out through the Environment Bill which is yet to be passed. In any case it is considered appropriate to highlight the potential for adverse effects relating to habit loss, fragmentation and disturbance which is likely to occur as a result of greenfield land take required for development. Option 2 could potentially result in high levels of growth occurring at locations which presently do not accommodate a high level of development and therefore may have adverse impacts on numerous natural environment designations across the District. This accounts for the significant negative effect recorded.
Mr Alan Pettitt	/576	States that text from the SA for the adopted Local Plan (HDPF 2015) should be included in the SA in relation to the Land East of Billingshurst (SA118) site. Highlights the adverse impacts identified through that document in relation to biodiversity, environmental quality (including air quality) and transport.	See Introductory Notes in relation to appraisal of site options in line with the SA assumptions. The 2015 SA reported "large potential for negative impact" in relation to biodiversity for the site due to the potential for impacts in relation to Wilden's Meadow and Rosier Wood biodiversity sites as well as nearby ancient woodland, the Mens SAC bat sustenance zone and the Upper Arun SSSI. The Interim SA of Growth Options for the Reg 18 Local Plan reported on these potential effects and recorded a significant negative effect in relation to SA objective 6: Biodiversity and geodiversity for the site which is considered to be equivalent to the effect recorded for the site in 2015. In relation to transport and air quality the 2015 SA reported that "negative impact cannot be ruled out" and there is potential for "some negative effect", respectively. A potential for increased journeys to services and facilities or employment was identified and furthermore the site is a larger distance from major employment centres in the Gatwick diamond. The Interim SA of Growth Options identified significant positive effects, but this effect is expected to be combined with a minor negative effect for SA objectives 13: Transport and 14: Air pollution. These effects recognised that although there is a railway station and existing bus stops within the settlement, the development could increase the number of car journeys being made through the village of Billingshurst. Furthermore, commuting patterns for the area (based on 2011 census data) indicate that private car trips are the most used mode of transport travel used for commuting. The potential to make use of the rail services from the site and given that the site is not close to an air quality management area (AQMA) it is not considered appropriate to record a significant negative effect for this site.

Consultee	Comment ID	Summary of Comment	SA team response
Mr Alastair Macaskill	/40354835	Objecting to site Land at Adversane (SA597). States that reference in the Interim SA Report to access to improved transport should be disregarded and that the lack of infrastructure currently at this location renders the proposal unsustainable. Furthermore, disagrees with the appraisal work for the site in relation to provision of services and employment opportunities and therefore suggests that the effects recorded should be reduce. Also notes the commentary of the SA which highlights that there could be a long lead in time for the development and that sudden large-scale growth can result in adverse impacts relating to social cohesion. The consultee highlights the findings of the SA in relation to the relationship of the site to an AQMA, landscape capacity, biodiversity and potential flooding issues at the site and the lack of relationship between the site and existing larger settlements.	See Introductory Notes in relation to appraisal of large site options. Comments noted in relation to the findings of the SA which the consultee concurs with. As the consultee highlights the summary text for the large sites previously highlighted that development at Adversane could increase traffic and air pollution at an AQMA. Correctly, a minor negative effect instead of a significant negative effect was recorded in the detailed matrix for that site as the site is not linked to a nearby AQMA by the road network. The summary text has been corrected in this SA Report to remove reference to the AQMA and a significant negative effect in relation to the Adversane site.
Mrs Elaine Goodyear	/4059	Objecting to site Land at Mayfield, North East of Henfield (SA414). In relation to the SA, to strengthen this argument it is highlighted that the site performs poorly in relation to SA objective 7 (landscape) as the landscape assessment evidence highlights that much of the proposed site has no/low capacity for large development. The remaining sections of the comment relate to the Council's Site Assessment Report.	Comment noted. No implications for SA work.
Mr Elliot Fielding	/2450	Consultee is supportive of the potential for site SA700 to provide C2 uses (i.e. dementia care home space), highlighting that no allocations have been considered for this use through the Reg 18 Local Plan. In relation to the Interim SA Report, it is stated that there is no reference, detail or inclusion for dementia care. Highlights SA objectives 1: housing, 3: social inclusion and 5: health and wellbeing in relation to the proposed monitoring framework and indicators relating to the "number of retirement dwellings/care home permitted". It is stated that these indicators should be split so that needs of dementia sufferers will not be missed.	The baseline evidence (see Appendix B of this SA Report) has been updated to include further details in relation to dementia sufferers in the District. The monitoring framework and relevant indicators included in the Interim SA Report for the Reg 18 consultation used the monitoring framework from the adopted HDPF as the starting point for future monitoring of the Local Plan. These are indicators that are known to be available to the Council. The updated monitoring framework is included in Chapter 10 of this SA Report.
	/3466	Objecting to site Land North east of Henfield (Mayfield) (SA414). Highlights aspects identified in the LUC assessment of the site along with other negative aspects set out in the evidence base of the plan. In relation to the SA, queries whether the site contributes positively to SA objectives 13: Transport and 14: Air pollution.	See Introductory Notes in relation to selection of options for Regulation 19 Local Plan. Comment noted. No implications for SA work. The Interim SA of Growth Options for the Reg 18 Local Plan has identified potential significant negative effects for site SA414 in relation to the two SA objectives in question. These effects are combined with a minor positive effect, given the likelihood for the delivery of sustainable transport links as part of development as well as services and facilities onsite which could prevent the need to travel by private vehicle.

Consultee	Comment ID	Summary of Comment	SA team response
	/4242	Objecting to site Land at Buck Barn, West Grinstead (SA716). States that the Interim SA of Growth Options demonstrates that the site is remote, has limited access to services and will increase pollution in the District and negatively impact AQMAs. Furthermore, that the strategic sites and other sites should be reviewed against the SA report to ensure that the Council in a position to meet its vision, aims, objectives and policies as set out in the Local Plan	See Introductory Notes in relation to selection of options for Regulation 19 Local Plan. Comment noted. No implications for SA work.
	/5305	States that the site Land West of Crawley (SA101) should not be taken forward considering the negative impacts identified in its assessment by the Council through their Site Assessment Report and assessment included in the Local Plan and also through the SA Report. The consultee has queried some findings of the RAG assessment applied by the Council but not the SA findings.	See Introductory Notes in relation to selection of options for the Regulation 19 Local Plan. In relation to potential differences between the findings of the Site Assessment Report and the SA it should be noted that the appraisal of the strategic site options has been undertaken in line with the SA assumptions (see Appendix A of the Interim SA of Growth Options and Appendix C of this SA Report) and with regard for information of infrastructure the Council has considered reasonable to be delivered as part of the proposal for the sites in question. The assessment work undertaken by the Council and presented in the Local Plan and the Reg 18 Site Assessment Report is not directly comparable to the appraisal work for the SA given the different criteria headings used for these pieces of work. Furthermore, the Council's site assessment work only made use of a RAG rating (i.e. recording scores of red, amber or green) while the SA was appraised in terms of the likelihood of effects ranging from significant positive to significant negative.
Mrs Georgina Henley	/2368	<ul> <li>Objecting to site Land North East of Henfield (Mayfield) (SA414). Highlights the following SA appraisal questions which it is stated that the development of the site would not be in line with:</li> <li>SA2.1 Does the Plan support the existing town and village centres?</li> <li>SA2.2 Does the Plan provide for additional services and facilities centres that are sufficient to support new and growing communities?</li> <li>SA 3.1 Does the Plan facilitate the integration of new neighbourhoods with existing neighbourhoods</li> <li>SA 4.3 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?</li> </ul>	See Introductory Notes in relation to selection of options for Regulation 19 Local Plan. Comment noted. No implications for SA work. The SA sub questions sit below each of the SA objectives in the SA framework as a means of coming to decisions on the likely effects of the options considered for the plan. For the strategic site options considered, a number of SA assumptions have been agreed to inform their appraisal through a consistent approach. These are presented in Appendix A of the Interim SA of Growth Options for the Reg 18 Local Plan and Appendix C of this SA Report.

Consultee	Comment ID	Summary of Comment	SA team response
Mrs Gillian Muncey	/1135	<ul> <li>Highlights Table 3.1 in the Interim SA which set out the key sustainability issues for the District. The following issues are highlighted to support the consultee's argument that the District does not benefit from good road and rail links:</li> <li>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 on London services are due to increase. Population growth has the potential to exacerbate these problems.'</li> <li>In 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'.</li> </ul>	The Interim SA Report set out the detailed baseline evidence for the Local Plan in relation to transport from page B-21 (this is presented in this report from page B-23). This has been used to identify the key sustainability issues for the District (i.e. Table 3.1 which the consultee has referred to). This showed that while the District benefits from frequent rail and bus services in some areas, some areas (including some in more rural locations) have capacity issues or lack access to regular public transport provision. It is not considered that there is a direct conflict between the Local Plan's overview of the transport infrastructure and the further detail provided through the baseline evidence in the SA.
Mrs Jennifer Bennett	/5573	The consultee has indicated that the comment relates to the SA however there is no specific reference to any of the findings of the Interim SA Report for the Reg 18 Local Plan or any specific development site being considered for allocation. Contests development at Billingshurst stating that there are existing pressures on schools and healthcare provision. Also highlights that the accessibility of train services from Billingshurst results in a high number of people making use of the village for parking and that development could have implications in terms of loss of countryside and habitats as well as increased levels of flooding.	See Introductory Notes in relation to selection of options for the Regulation 19 Local Plan. The Interim SA of Growth Options for the Reg 18 Local Plan has appraised the large and small sites options being considered for allocation at Billingshurst. This work is now represented and updated to account for new information provided in Appendix D of this SA Report. Both large sites (SA118 and SA744(includes SA225)/SA668) have been appraised in terms of the ability for residents to access services and facilities (including schools and healthcare). For site SA118 a minor positive effect was recorded given the relatively close proximity of town centre of Billingshurst. For site SA744(includes SA225)/SA668 a mixed significant positive and
			the ability for residents to access services and facilities (including schools and healthcare). For site SA118 a minor positive effect was recorded given the relatively close proximity of town
			reflected the path of the A29 which currently acts as a potential barrier between the site and the existing urban edge at Billingshurst. For both sites the effects are uncertain considering that the close proximity of large sites to the settlement could potentially result in existing facilities becoming overcapacity.
			Both large site options were appraised as having potential for significant negative effects in relation to SA objective 6: Biodiversity and geodiversity and SA objective 7: Landscape and townscape considering the close proximity of designated biodiversity sites and the limited landscape capacity for large scale development as identified through the Horsham District Landscape Capacity Assessment. For site SA118, the significant negative effect identified in relation to SA objective 6 was identified in combination with a minor positive effect given that proposals for the site include reinstatement of woodland and wetlands and the strengthening of the Green Infrastructure network. For both sites, a minor negative effect was recorded in relation to SA objective 12: flood risk as the development of greenfield land would increase the proliferation of impermeable surfaces in the plan area.

Consultee	Comment ID	Summary of Comment	SA team response
Mrs Karen Dare	/1646	States that there are mistakes in the SA and that this and the Site Assessments are desk-top exercises and do not take into account any local information/knowledge.	See Introductory Notes in relation to appraisal of large site options and selection of options for Regulation 19 Local Plan. Issues relating to the accuracy of the appraisal of sites through the SA are considered in the row below.
	/1681	<ul> <li>Objecting to site Ashington Cluster (SA085/SA520/SA524/SA539/SA790).</li> <li>Contests the significant positive effect recorded in relation to SA objective 5:</li> <li>Health and wellbeing as it is stated that the site is not in close proximity to a healthcare facility. It is also suggested that the appraisal of the site should be considerate of road noise from the A24.</li> <li>States that benefits relating to access to employment opportunities should be removed given that no employment sites near Ashington are allocated.</li> <li>Questions why the SA document identifies 'Ashington Cluster' as a large site but this is not reflected in the Infrastructure Delivery Plan documents. There are no detailed infrastructure plans for Ashington, the community has not been consulted on any new infrastructure.</li> <li>Has also queried the reasons for the effects presented for the site in the Non-Technical Summary SA document.</li> </ul>	The Interim SA reported that development at Ashington would be in close proximity to a healthcare facility. This has been checked and the facility identified is a chiropractor and therefore the effects recorded for development at Ashington have been corrected to remove reference to this facility in this SA Report (please see Appendix D for the appraisal of the large site at Ashington and Appendix E for the appraisal of the small sites at Ashington). The appraisal of large site options has considered the potential for road noise from A-roads, motorways and Gatwick Airport to adversely affect site users. The Ashington site is not adjacent to the A24 and therefore no adverse effect has been identified. The Reg 18 Local Plan states that Key Employment Areas will be protected for business, manufacturing, storage and distribution uses. This includes site Wiston Business Park (SA818) which is within 1.5km of the Ashington Cluster site. The decision was made for the Interim SA of Growth Options for the Reg 18 Local Plan that the Ashington cluster site should appraised at a similar level of detail as the ten strategic site options, considering the high amount of development which could be provided at the site. The decision also reflects that delivery of some parcels at the Ashington Cluster is dependent on the whole cluster coming forward. The Non-Technical Summary presents a summary of the effect recorded for all elements of the Reg 18 Local Plan. The detailed findings for the Local Plan (including large site options such as the Ashington Cluster) were originally presented in the Interim SA Report and are represented in Appendix D of this SA Report. This includes detailed justification for the effects recorded.
Mr Matthew Woolley	/4407	States that 1,400 homes per annum figure should be a starting point and significant work through an updated SA will likely be required to ensure a sound plan can be demonstrated in this regard. Is supportive of Growth Option 3 and the delivery of 1,400 dwellings per annum to accommodate a level of unmet need from both Crawley and the Coastal Sussex Area. Furthermore, argues that there is a need to identify a range of sites for allocation, rather than relying on a small number of large strategic sites that often take a significant amount of time to deliver.	See Introductory Notes in relation to selection of options for Regulation 19 Local Plan. The Interim SA of Growth Options for the Reg 18 Local Plan has tested the potential for the Local Plan to provide between 1,000 and 1,400 homes per year. This amount of housing would provide enough development to at least 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 development considered (1,000 and 1,200 dwellings per annum respectively) would allow for some of the unmet need of the Crawley and the Coastal Sussex Area to be delivered in Horsham. The range of small and large sites considered through the Reg 18 Local Plan was appraised with no decision made at that time as to which sites would be included for development. This SA

Consultee	Comment ID	Summary of Comment	SA team response
			Report has considered the Council's preferred site options for allocation in the Reg 19 Local Plan.
Mr Michael Elrick	/6109	Opposed to the allocation of site Land North East of Henfield (Mayfield) (SA414). Comments that the Interim SA for the Reg 18 Local Plan does not rank of the large site options. Furthermore, highlights the findings of the SA in relation to SA objective 12: flood risk for the site for which a minor negative effect is recorded. It is stated that the SA Report is does not come to a meaningful conclusion in relation to the site options to take forward.	See Introductory Notes in relation to appraisal of large site options and selection of options for the Regulation 19 Local Plan. As paragraph 2.22 of the Interim SA for the Reg 18 Local Plan states "there will often be an equal number of positive or negative effects identified for each option [in this case site], such that it is not possible to 'rank' them based on sustainability performance in order to select a preferred option". It is not the SA report's purpose to present a ranking of sites or recommendation of sites to be included in the final Local Plan document. The SA report instead forms part of the evidence base for the decision-making process in terms of the selection of options from all reasonable alternatives considered.
Mr Michael Green	/5176	Cites the findings of the Interim SA of Growth Options for the Reg 18 Local Plan to set out which option for the level of housing for the District performed most favourably. Reference is made to the SA findings that the higher housing growth options could have a more significant benefit in relation to the provision of housing although the lower growth option still has a positive impact on housing provision and would meet the local need. Furthermore, providing a higher level of growth over the plan period would require a higher amount of greenfield land take, which could have a range of environmental impacts. The delivery of a higher amount of growth could also place more development in closer proximity to sensitive environmental receptors, higher value landscapes and heritage assets. It is also expected that an approach which includes a higher amount of development would greatly increase the number of private vehicle journeys being made regularly, which is likely to be to the detriment of air quality and the District's contribution to climate change. The consultee states that this makes the selection of the lower growth option a highly sustainable approach for the District.	See Introductory Notes in relation to selection of options for Regulation 19 Local Plan. Comment noted. No implications for SA work.
	/5269	Objects to the allocation of the strategic site Land West of Billingshurst (SA744 (includes SA225)/SA668) stating that many of the effects identified for site SA409 apply to this site. Contests the variation of effects identified through the SA Report and site assessment work undertaken by the Council as presented in the Local Plan and the Site Assessment Report.	See Introductory Notes in relation to sites not subject to SA (given that site SA409 has not been subject to SA) and also approach to the appraisal of large site options.

Consultee	Comment ID	Summary of Comment	SA team response
Mrs Nicola Hanley	/5219	Opposes the allocation of site Buck Barn, West Grinstead (SA716) highlighting that it performs poorly in relation to SA objectives 13: road congestion and 14: air quality.	See Introductory Notes in relation to selection of options for the Regulation 19 Local Plan. Comment noted in relation to highlighting of SA findings and no further implications for SA work.
		<ul> <li>Consultee is promoting site Land north of Melton Drive (SA361). Contests some of the findings of the SA in relation to SA361 and the other two sites appraised at Storrington (SA639 and SA732). Notes overall that the three site perform very similarly and are evenly balanced with similar advantages and disadvantages. Commentary is provided in relation to the following SA objectives:</li> <li>SA objective 2: Access to services and facilities – states that the site is located the same distance from a primary school and secondary as site SA732 and the same effect should be recorded for both sites. Highlights that CIL or S106 would be applicable to secure appropriate mitigation.</li> <li>SA objective 5: Health – states that all three sites are not within 720m of a healthcare facility and therefore should be recorded as having the same effect. Highlights that CIL or S106 would be applicable to secure appropriate mitigation.</li> <li>SA objective 8: Historic environment – accept that site SA361 is within close proximity to West Wantley House which is a Grade II* Listed Building but that mitigation and enhancement of heritage assets would be</li> </ul>	See Introductory Notes in relation to the appraisal of site options in line with the SA assumptions. The detail the consultee has supplied for site SA361 in relation to the potential to agree planning obligations is not demonstratable for all sites and therefore has not been considered for small site options. All proximity-based assumptions have been calculation 'as the crow flies'.
			In relation to the sites' proximity to school facilities, site SA732 is located within 1km of a second school (Steyning Grammar School) to the south east while site SA361 is not within 1km of a secondary school or within 450m of a primary school. Therefore, a minor negative effect has been identified for this site as part of the overall mixed significant positive and minor negative effect.
			In relation to the sites' proximity to healthcare facilities and open spaces/sports facilities, all sites are within 720m of open spaces/sports facilities. However, only site SA639 is within 720m of healthcare facilities at The Glebe Surgery. In error site SA732 was identified as being within the required distance of healthcare provisions but these were the Chiropody Surgery at Wisteria Cottage. Reference to this facility has been removed and the appraisal of site SA732 has been revised in this iteration of the SA to reflect this correction.
			The historic environment has been considered for small site options at the Reg 19 stage using for the detailed heritage impact work assessment work the Council has now been able to provide. The appraisal for all site options has been updated in this SA Report using the detail of this work.
		<ul> <li>achieved by the development.</li> <li>SA objective 9: Efficient Land use – states that Gas site SA361 abuts or is partly within an area of Grade 4 Agricultural Land Quality and therefore is more likely that SA361 will be lower grade 3b land than 3a quality.</li> </ul>	In the absence of more detailed surveys and adopting the precautionary principle it is considered appropriate to record the site as having the potential to contain either Grade 3a or 3b Agricultural Land and therefore an uncertain significant negative effect in line with the SA assumptions.
Mrs T Wilson	/3711	Objecting to site Rookwood (SA394). Disagrees with the findings of the SA in relation to this given that there is no significant effective in relation to SA objective 3: inclusive communities. Cites the potential loss of green space and recreational facilities (including the golf course and hall space for the community) as potentially having detrimental impacts in this regard.	The potential loss of green spaces and recreational facilities have been identified through the SA of this site in relation to SA objective 5: Health and wellbeing for which a mixed significant positive and significant negative effect has been recorded in the Interim SA of Growth Options for the Reg 18 Local Plan. The effects recorded reflects the close proximity of the site to recreational facilities and open spaces in Crawley, as well as the new uses of this type to be provided at the site through development. It also reflects the potential loss of Rookwood Golf Course to development.

Consultee	Comment ID	Summary of Comment	SA team response
Mrs Tatiana Milne- Skillman	/5228	<ul> <li>Agrees with the conclusion of the SA for the different levels of potential development in terms of the potential for higher levels of development to have more adverse impacts in terms of the natural environment, air quality and climate change. Additional commentary is provided in relation to the growth scenarios appraised and the SA objectives against which it they have been appraised. The following objectives have been critiqued in more detail by the consultee:</li> <li>SA objective 2: Access to services and facilities – disagrees that the medium and higher growth options will result in a greater positive effect than the lower growth option.</li> <li>SA objective 14: Air pollution – disagrees that the highest growth option could bring about sustainable transport provision stating that there is no evidence provided to substantiate the argument.</li> <li>SA objective 15: Climate change – states that residential schemes of all scales can be designed to mitigate against the impact on climate change and believes there is no reason to conclude that larger schemes would perform more positively.</li> </ul>	Comment noted. The positive effects the consultee contests for the medium and higher quanta of growth in relation to SA objective 2, 14 and 15 have been identified given the greater potential for these options to secure funding for larger amounts of infrastructure. This could include new services and facilities which could reduce the need to travel in the plan area. The delivery of higher levels of development is also considered more likely to support existing services in the plan area. Furthermore, higher levels of development would likely help to ensure the viability of sustainable transport links in the plan area. Connections to renewable energy infrastructure are also likely to be more viable at larger developments than at smaller developments where a lower number of homes could be connected.
	/5283	Objecting to site Land at Adversane (SA597). Contests the variation of effects identified through the SA Report and site assessment work undertaken by the Council as presented in the Local Plan and the Site Assessment Report.	See Introductory Notes in relation to approach to the appraisal of large site options. The assessment work undertaken by the Council and presented in the Local Plan and the Reg 18 Site Assessment Report is not directly comparable to the appraisal work for the SA given the different criteria headings used for these pieces of work. Furthermore, the Council's site assessment work only made use of a RAG rating (i.e. recording scores of red, amber or green) while the SA was appraised in terms of the likelihood of effects ranging from significant positive to significant negative.
Rydon Homes Ltd	/6351	States that the SA should test a higher growth option of 1,600 dwellings per annum (dpa). It is stated that the SA shows that there is no great differentiation of effects between the three options tested, no threshold of acceptability has been breached and therefore there may be capacity for more growth which should be tested. Highlights that site SA317 performs well through the SA and that this suggests that there is potential for new employment and local retail to be provided to the south west of Henfield to enhance the sustainability of the area.	Comment noted with regard to the positive effects identified for SA274 and SA317. See Introductory Notes in relation to selection of options for the Regulation 19 Local Plan. The Introductory Notes also explain the approach to testing the varying levels of growth over the plan period.

Consultee	Comment ID	Summary of Comment	SA team response
		States that the SA does not identify any clear preference of sites at Partridge Green but that site SA274 does present some advantages over other options considered. No overriding adverse impacts would prevent its allocation.	
Savills on behalf of the Westons Farm Trust	/6083	Promoting site Land at Westons Farm, Horsham (SA325). States that the site was not appraised in the SA, as the SA has only appraised the sites that are included within the Reg 18 Local Plan. States that this indicates that there is no assessment of reasonable alternatives for commercial development sites. Indicates that the Council has been provided with a considerable amount of information for the site, to allow for an appraisal of its suitability for development. It is stated that the information was not available when the SHELAA was published and therefore resulted in a "red" rating for site and a conclusion that it was not developable. However, given that the land owners are promoting the site, there are plans progressed for its development, technical assessments have been undertaken, and there is a commitment for the future occupation of one of the main buildings that can be delivered as a first phase, it is developed and deliverable.	Sites included in the Reg 18 Local Plan in relation to economic growth (Strategic Policy 6) were not allocated but potential options for allocation, given that the policy states sustainable economic growth is to be achieved through the allocation of sufficient sites from land identified in the table included in that policy. Through the appraisal of these site options the SA has considered a number of reasonable alternatives for sites with potential of economic growth. Site SA325 has now been appraised alongside all other reasonable alternative site options. The appraisal is presented in Appendix E of this SA Report.
Savills on behalf of anonymous consultee	/6068	Representation in relation to site Land South West of Hop Oast Roundabout (SA703). Provides further details in relation to the site which the consultee states means the effects recorded in relation to SA objectives 6: Biodiversity and geodiversity, 7: Landscape and townscape, 9: Efficient land use, 10: Natural resources and 12: Flooding should be positive or neutral instead of the negative effects recorded in the Interim SA for the Reg 18 Local Plan.	See Introductory Notes in relation to appraisal of site options in line with the SA assumptions and selection of options for the Regulation 19 Local Plan. The level of detail the consultee has supplied for site SA703 is not available across all sites considered. This means that including the consultee's suggestions could result in inconsistencies in the appraisal of options.
		In relation to SA objective 6 the consultee recognises that the site lies within 400m of an ancient woodland / local wildlife site but states that a separate ecology report has been instructed.	
		The consultee also highlights that for SA objective 7: Landscape and townscape, the site has been recorded as having a significant negative effect due to the findings of the Landscape Capacity Study which identified the wider area as having a low – moderate capacity for employment development. It is argued by the consultee that this area was identified as having a moderate – high capacity for medium scale housing development. The consultee states that the score recorded showed potential for a smaller scale employment development which would be equivalent to a residential height. It is also stated that the site itself is enclosed by main roads and is located in an area already characterised by commercial / quasi commercial uses.	
		In relation to SA objective 9 the consultee accepts that the site contains Grade 3 agricultural land but states that given its size location and separation from	

Consultee	Comment ID	Summary of Comment	SA team response
		other potential agricultural land by roads, that it is unlikely that the land would ever be farmed. For SA objective 10 it is recognised by the consultee that the site lies within a Minerals Safeguarding Area but that the road network separating the site from the surrounding area would mean that it is highly likely that the mineral resource at the site has already been sterilised. It is also argued that mineral extraction from site of such a relatively small size would be unviable. The consultee furthermore states that for SA objective 12 the site lies within flood zone 1 and that the incorporation of SuDS would mitigate any flooding impacts that may arise from the development of greenfield land. In addition to the suggested changes to the appraisal work for the site, the consultee concludes that the current appraisal of the site demonstrates that the site is sustainable and therefore should be taken forward as an allocation.	
Seaward Properties & Horsham	/5033	States that when considering the SA, they support Growth Option 3 and the delivery of 1400 dwellings per annum to accommodate a level of unmet need from both Crawley and the Coastal Sussex Area.	Comment noted. No implications for SA work.
Storrington and Sullington PC	/6190	Contests the allocation of site land north of Melton Drive (SA361). States that the site would have a negative effect on the sustainability objectives in the SA framework but does not highlight any specific SA objectives. However, does highlight the potential for effects in relation to a listed building, landscape character and an AQMA.	The SA highlights that although site SA361 is partly located within the built-up area of Storrington, the majority of this site lies within an area that has been identified as having no/low landscape capacity for medium scale housing development and therefore a significant negative effect in relation to SA objective 7: landscapes and townscapes is expected. The SA also identifies that the site lies within close proximity to a Grade II* Listed Building and a Grade II Listed Building and therefore an uncertain significant negative effect in relation to SA objective 8: historic environment is expected. Furthermore, the SA identifies that the site is directly connected via a road to Horsham AQMA No1 which covers parts of West Street, the High Street, and School Hill and Manleys Hill in Storrington and therefore a significant negative effect has also been recorded in relation to SA objective 14: air quality.
Sussex Wildlife Trust	/6192	States that the assessment of sites and potential growth options is very generalised. Several of the SA objectives such as wellbeing (SA5) and crime reduction (SA objective 4) are not capable of differentiation between sites, whilst others, such as minimising travel (SA objective 13), air pollution (SA objective 14) and climate change (SA objective 15) overlap considerably. Argues that the sites therefore have differences only on a few actors and the SA does not help the Council make an informed decision about the most sustainable spatial strategy.	The SA includes the SA framework to appraisal the potential effects of the Local Plan. SA objectives have been worked to form this framework by identifying the key sustainability issues for the District and considering the policy context for the preparation of the Local Plan and the SA as described in Chapter 3 of the Interim SA Report for the Reg 18 Local Plan. While some of the SA objectives overlap the appraisal questions included for each SA objective (see the Table 1.1 - SA Framework for the Horsham Local Plan Review of the Interim SA Report for the Reg 18 Local Plan) allow for consideration of different elements of the potentially overlapping themes.
		Highlights text at paragraph 1.138 of the Interim SA NTS that states 'No one overall quantum of growth or spatial strategy stands out as being markedly superior in sustainability terms when compared to the others'. Paragraph 32 of the NPPF states that SAs should demonstrate how plans have addressed the	The SA has identified nuanced differences between the different spatial strategy options considered. It included initial recommendations for the approach to the spatial strategy for the Local Plan (see from paragraph 2.208 of the Interim SA of Growth Options) which then informed the preparation of the nine more spatially specific growth scenarios that could be

Consultee	Comment ID	Summary of Comment	SA team response
		relevant economic, social and environmental objectives and that significant adverse impacts on these objectives should be avoided. Looking at the Interim SA it is stated that this has not been done for SA objective 6: Biodiversity. States that all 6 spatial strategy options in chapter 2 come out as an overall significant negative effect likely. In chapter 3, the lower growth option results in minor negative effects whilst the medium and higher growth options result in a significant negative effect likely. For the large site options in chapter 4, 10 of the 11 sites considered have significant negative effects likely, whilst one further site is expected to a mixed significant negative and minor positive effect (although these are uncertain). Also highlights that paragraph 5.15 states that the majority of the 66 small site options are expected to have negative effects in relation to SA objective 6 and finally all growth scenario options in chapter 6 result in uncertain significant negative effects. States that the plan should not be taken forward as the significant effects on biodiversity remain unquantified and poorly understood. Whilst any level of development has the potential to negatively impact on biodiversity, SWT believes that the conclusions of the SA are heavily influenced by the generalised nature of the assessment. Argues that the lack of sufficient up to date information on the District's ecological assets and particularly the wider networks exacerbates this issue.	included in the Local Plan Review. These were subsequently appraised as part of Interim SA of Growth Options report. In relation to the appraisal of biodiversity included through the SA work, as the consultee has stated, any level of development has the potential to negatively impact on biodiversity and the SA has reflected this. The appraisal of site options has reflected the SA assumptions (Appendix A of the SA of Growth Options) and the potential for development to have implications in relation to nearby international, national and local biodiversity sites. This work has reflected Natural England's Impact Risk Zones (IRZs) making use of details of the types of proposals which could pose potential risks to these designations. The findings of the HRA have been reflected in this iteration of the SA to ensure findings in relation to European sites are also incorporated.
The Gibson Trust	/6159	<ul> <li>Promoting sites Land at Bax Close and Clay Lane, Storrington (SA485 and SA486, respectively). States that one of the sites is not assessed as part of this SA but it is unclear which site is being referred to in the comment received.</li> <li>States that the options for the spatial strategy, should not have been independently assessed without consideration for the development management policies that will support the strategic policies of the emerging Local Plan and could provide mitigation for any harm that could be caused.</li> <li>Furthermore, contests the findings of the options for the spatial strategy stating that Option 2 (Proportionate growth) should perform the strongest as proportionate development across the settlements in the area will support the local employment and existing services whilst also allowing for new opportunities of these types to come forward.</li> <li>Highlights that the SA has appraised three separate options of delivering 1,000, 1,200 or 1,400 dwellings per annum and states that no option was appraised as performing markedly better and therefore that SA needs to be reconsidered in order to ensure that it can be used to justify the Local Plan approach and Policies.</li> </ul>	See Introductory Notes in relation to sites not subject to SA. The Council's Site Assessment Report concluded that sites SA485 and SA486 have potential for 'Very Negative Impacts (unlikely to be mitigated)' or 'Unfavourable Impacts (With potential for mitigation)'. As negative impacts were identified the site is not considered suitable for development by the Council and has not been appraised through the SA Report. Each spatial strategy option has been considered through the SA using a 'policy-off' approach without consideration for mitigation which might be achieved through planning policy. This allows for all options to be appraised on equal footing in a consistent manner. It is recognised that a proportionate approach to the spatial strategy (Option 2) would help to support some local employment opportunities but it would also result in a higher number of residents being placed in locations where they do not benefit from immediate access to the largest employment areas, sustainable transport links and widest range of services and facilities which would increase the need to travel. This could also have implications in terms of air quality and the District's contribution to climate change. These areas also currently accommodate lower levels of development meaning they are likely to include those which are more sensitive to change in terms of landscape character and the built environment as well as biodiversity.

Consultee	Comment ID	Summary of Comment	SA team response
			The three options tested for the quantum of growth that the Local Plan is to provide are those which are presented in the Reg 18 Local Plan. These use the minimum local housing need (as determined using the Government's standard formula) plus a 5% buffer for flexibility as the starting point (Option 1 - 1,000 homes per annum). The provision of an additional 200 homes and 400 homes per annum to meet some of the needs of Crawley and the Coastal Sussex area have also been considered (Options 2 and 3 respectively).
			The effects of the three options considered without regard for the potential spatial distribution of the development have been set out through Table 3.1 in the Interim SA of Growth Options. This shows that where the lower growth option (Quantum Option 1) is taken forward positive effects would be less significant in relation to SA objectives 1: housing, 2: services and facilities, 13: transport, 15: climate change, 16: economic growth and 17: employment than for the medium and higher growth options in particular. Similarly, the negative effects would be less significant for the lower growth option in relation to SA objectives 6: biodiversity, 7: landscape, 12: flooding, 13: transport, 14: air quality and 15: climate change. Option 3 is shown to potentially have a higher number of both significant positive and significant negative effects. T
			The reasons for these variations in effects have been provided from paragraph 3.4 of the Interim SA Report for the Growth Options. The growth scenario options appraised in Chapter 6 of the Interim SA Report for the Growth Options have considered differing levels of development which might be taken forward across different potential spatial strategies. These have been tested through the inclusion of different site options considered for allocation through the nine growth scenario options. In this manner further nuance has been provided in relation to potential effects of providing differing levels of growth across different locations in Horsham District.
The Steyning Society	/1743	States that the SA criteria need to be applied with reference to guidance in the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG) on sustainability appraisal and strategic environment assessment. In relation to Strategic Policy 3 - Settlement Expansion the consultee states that the SA recognises the impact on neighbouring settlements, transport infrastructure and landscape.	Chapter 3 (with further detail provided in Appendix B) of the Interim SA at the Reg 18 stage (and Chapter 3 and Appendix B of this SA Report) details how the NPPF and PPG have informed the undertaking of the SA and the drafting of the SA objectives. The SA objective have subsequently been used as the basis to undertake appraisal of the options considered for the Local Plan.
			The appraisal of Strategic Policy 3 from paragraph 5.11 in the Interim SA Report for the Reg 18 stage explains that while this policy addresses settlement expansion, it does not specify how much development will take place, or specific sites for development. These issues were still being considered by the Council at that stage and were appraised for the Reg 18 consultation through the accompanying Interim SA Report of Growth Options. This appraisal addressed the issues highlighted by the consultee (i.e. impacts on neighbouring settlements and the capacities of services and facilities at these locations, transport infrastructure and landscape).

Wates Developments Limited /5847	States that the assertion in the Interim SA of Growth Options for the Reg 18 Local Plan that scenario 7 will, in promoting a high proportion of homes on small sites, be less likely to support affordable housing delivery should be revisited. Contests that there is no evidence to support this claim and states that it conflicts with the finding of other sections of the SA. Also, in arguing that the District needs to establish what its needs are as well as those of its neighbour, highlights the text of the SA NTS which suggests that the higher growth option is most likely to result in significant environmental effects in the district, but that the lower growth option will result in less likelihood of significant environmental effects. However, the lower growth option only will make a very modest contribution to providing homes and jobs for the unmet needs of neighbouring authorities, some of which are highly constrained environmentally too. It is stated in the consultee's response that the SA does not say that the higher growth option would result in unacceptable environmental effects. Drawing on the findings of the SA it is argued that a hybrid approach to the development strategy is taken forward. The response also draws on the findings of the SA in relation to its argument against the option for the designation of a Green Belt in the plan area. The consultee draws on the RPS Horsham Housing Requirements Analysis to set out its argument in relation to the level of housing which should be considered for the District. It is stated that the SA indicates that a high level of employment land set out through quantum option 3 (1,400 dwellings per annum and 50.7 hectares employment and) can and should be supported through the Local Plan. Highlights the significant positive effect expected through the Local Plan. Highlights the significant positive effect expected through the Local Plan. Highlights the significant positive effect expected through the Local Plan. Highlights the significant positive effect expected through	It is unclear which sections the consultee is referring in relation to the potential conflict of the SA in terms of the potential for delivery of affordable housing. However, it is expected that at smaller sites affordable homes will be more difficult to deliver given potential viability issues. The PPG stipulates that local authorities should not seek affordable housing contributions from smaller housing developments (i.e. providing 10 or fewer homes, and comprise no more than 1,000sqm of floor space) <sup>1</sup> . The rationale set out by the government <sup>2</sup> is the 'disproportionate burden of developer contributions' on small-scale development which might stop the development of any homes at all. While the Planning Inspectorate clarified that this policy can be overridden if local authorities can produce strong evidence that supports the establishment of a lower threshold, it is still considered reasonable to make the assumption that smaller sites will be less likely to deliver affordable housing based on government guidance. It is accepted that the SA does not state that the higher growth option would result in unacceptable environmental effects, however significant negative effects (some in combination with positive effects) have been identified in relation to a number of the SA objectives including SA objectives 6: Biodiversity and geodiversity, 7: Landscape, 8: Historic environment, 9: Land use, 10: Mineral resources, 12: Flooding, 13: Transport, 14: Air pollution, and 15: Climate change. It should be noted that in relation to the arguments the consultee has included on the selection of options to be included in the Local Plan, the SA objectives A more susfainable pattern of movement might be achieved through this higher level of development, however, a higher number of car journeys is also likely to result through this SA Report. While option 3 is expected to have significant positive effect in relation to SA objective 16: Economic growth and SA objective 17 as highlighted in the preceding paragraph it is also likel
	the Reg 19 consultation stage is on the basis of 25% of the total current unmet need from Crawley and the Coastal Sussex HMA which is 500 dwellings per annum. It is furthermore stated that evidence published by the Council does not suggest that Horsham is not capable of accommodating this level of	

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Consultee	Comment ID	Summary of Comment	SA team response
		additional housing to support an option over and above the higher option currently being considered (Option 3).	
		Drawing further on the RPS report the consultee states that it is encouraging that options 2 and 3 make contributions towards meeting the unmet needs of Crawley and the Coastal Sussex area through an additional 200dpa and 400dpa, respectively but that unmet needs are not entirely met. Options 2 and 3 are not supported on the basis that they do not address the current and future unmet needs of the Sussex Coast and North West Sussex HMAs or the wider area. It is concluded that there does not appear to be rational link to reasonable alternatives and the SA as the evidence available does not make it clear why the figures for growth have been taken forward.	

<sup>1</sup> MHCLG (2019) Planning Practice Guidance. Planning obligations Paragraph: 023 Reference ID: 23b-023-20190901. Available online at: https://www.gov.uk/guidance/planning-obligations <sup>2</sup> DCLG (2014) Written Statement made by: The Minister of State for Housing and Planning. Available online at: https://www.parliament.uk/documents/commons-vote-office/November%202014/28%20Nov%202014/2.%20DCLG-SupportForSmallScaleDevelopersCustomAndSelf-Builders.pdf

/6125	Promoting site land west of Worthing Road, Tower Hill (SA784). States that the assertion in the Interim SA of Growth Options for the Reg 18 Local Plan, that scenario 7 will, in promoting a high proportion of homes on	See Introductory Notes in relation to sites not subject to SA. The Introductory Notes also explain the selection of options for the Regulation 19 Local Plan and the approach to testing the varying levels of growth over the plan period.
	small sites, be less likely to support affordable housing delivery should be revisited. Asserts that there is no evidence to support this claim and it conflicts with the finding of other sections of the SA. Also in arguing that the District needs to establish what its needs are as well as those of its neighbour, highlights the text of the SA NTS which suggests that the higher growth option is most likely to result in significant environmental effects in the district, but that the lower growth option will result in less likelihood of significant environmental effects however only will make a very modest contribution to providing homes and jobs for the unmet needs of	It is unclear which sections the consultee is referring in relation to the potential conflict of the SA in terms of the potential for delivery of affordable housing. However, it is expected that at smaller sites affordable homes will be more difficult to deliver given potential viability issues. The PPG stipulates that local authorities should not seek affordable housing contributions from smaller housing developments (i.e. providing 10 or fewer homes, and comprise no more than 1,000sqm of floor space) <sup>3</sup> . The rationale set out by the government <sup>4</sup> is the 'disproportionate burden of development of any homes at all. While the Planning Inspectorate clarified that this policy can be overridden if local authorities can produce strong evidence that supports the establishment of a lower threshold, it is still considered reasonable to make the assumption that semaller sites.
	neighbouring authorities, some of which are highly constrained environmentally too. It is stated in the consultee's response that the SA does not say that the higher growth option would result in unacceptable environmental effects. Drawing on the findings of the SA it is argued that a hybrid approach to the development strategy is taken forward. The response also draws in the findings of the SA in relation to its argument against the option for the designation of a Green Belt in the plan area.	of a lower threshold, it is still considered reasonable to make the assumption that smaller sites will be less likely to deliver affordable housing based on government guidance. It is accepted that the SA does not state that the higher growth option would result in unacceptable environmental effects, however significant negative effects (some in combination with positive effects) have been identified in relation to a number of the SA objectives including SA objectives 6: Biodiversity and geodiversity, 7: Landscape, 8: Historic environment, 9: Land use, 10: Mineral resources, 12: Flooding, 13: Transport, 14: Air pollution, and 15: Climate change.
	The consultee draws on the RPS Horsham Housing Requirements Analysis to set out its argument in relation to the level of housing which should be considered for the District. It is stated that the SA indicates that a high level of employment land set out through quantum option 3 (1,400 dwellings per annum and 50.7 hectares employment land) can and should be supported through the Local Plan. Highlights the significant positive effect expected through the SA in relation to SA objective 16: Economic growth and SA objective 17: Access to employment opportunities. Furthermore states that it is considered that the higher growth quantum (option 3) would present a better synergy between housing and employment and would help to reduce the need to commute across the District's boundaries, in a less sustainable pattern of movement.	While option 3 is expected to have significant positive effect in relation to SA objective 16: Economic growth and SA objective 17 as highlighted in the preceding paragraph it is also likely to have significant negative effects in relation to a number of other SA objectives. A more sustainable pattern of movement might be achieved through this higher level of development, however, a higher overall number of car journeys is also likely to result through this option.
	States that an additional reasonable alternative for the quantum of growth should be tested. This should be an option which provides 500 dwellings per annum over existing option 3 in the Reg 18 Local Plan. Providing reasoning for this reasonable alternative it is stated that within the Sussex HMAs only Horsham and Mid Sussex can make a meaningful contribution to the unmet need from Crawley and the Coastal Sussex HMA. A constructive and 'meaningful' contribution that the consultee suggests should be tested prior to the Reg 19 consultation stage is on the basis of 25% of the total current unmet need from Crawley and the Coastal Sussex HMA which is 500 dwellings per annum. It is furthermore stated that evidence published by the Council does	

a	not suggest that Horsham is not capable of accommodating this level of additional housing to support an option over and above the higher option currently being considered (Option 3).	
	Drawing further on the RPS report the consultee states that it is encouraging that options 2 and 3 make contributions towards meeting the unmet needs of	
	Crawley and the Coastal Sussex area through an additional 200dpa and 400dpa, respectively but that new unmet needs are not entirely met. Options 2	
f	and 3 are not supported on the basis that they do not address the current and future unmet needs of the Sussex Coast and North West Sussex HMAs or the wider area. It is concluded that there does not appear to be rational link to	
r r	reasonable alternatives and the SA as the evidence available does not make it clear why the figures for growth have been taken forward.	

Consultee	Comment ID	Summary of Comment	SA team response
	/6126	<ul> <li>Consultee is promoting site Land north of Melton Drive (SA361). Contests some of the findings of the SA in relation to SA361 and the other two sites appraised at Storrington (SA639 and SA732). Notes overall that the three site perform very similarly and are evenly balanced with similar advantages and disadvantages. Commentary is provided in relation to the following SA objectives:</li> <li>SA objective 2: Access to services and facilities – states that the site is located the same distance from a primary school and secondary as site SA732 and the same effect should be recorded for both sites. Highlights that CIL or S106 would be applicable to secure appropriate mitigation.</li> <li>SA objective 5: Health – states that all three sites are not within 720m of a healthcare facility and therefore should be applicable to secure appropriate mitigation.</li> <li>SA objective 8: Historic environment – accept that site SA361 is within close proximity to West Wantley House which is a Grade II* Listed Building but that mitigation and enhancement of heritage assets would be achieved by the development.</li> <li>SA objective 9: Efficient Land use – states that Gas site SA361 abuts or is partly within an area of Grade 4 Agricultural Land Quality and therefore is more likely that SA361 will be lower grade 3b land than 3a quality.</li> </ul>	See Introductory Notes in relation to the appraisal of site options in line with the SA assumptions. The detail the consultee has supplied for site SA361 in relation to the potential to agree planning obligations is not demonstratable for all sites and therefore has not been considered for small site options. All proximity-based assumptions have been calculation 'as the crow flies'. In relation to the sites' proximity to school facilities, site SA732 is located within 1km of a second ary school or within 450m of a primary school. Therefore, a minor negative effect has been identified for this site as part of the overall mixed significant positive and minor negative effect. In relation to the sites' proximity to healthcare facilities. However, only site SA639 is within 720m of healthcare facilities and open spaces/sports facilities, all sites are within 720m of open spaces/sports facilities. However, only site SA639 is within 720m of healthcare facilities are provisions but these were the Chiropody Surgery at Wisteria Cottage. Reference to this facility has been removed and the appraisal of site SA732 has been revised in this iteration of the SA to reflect this correction. The historic environment has been considered for small site options at the Reg 19 stage using for the detailed heritage impact work assessment work the Council has now been able to provide. The appraisal for all site options has been updated in this SA Report using the detail of this work.
West Sussex County Council Asset Management and Estates Department	/5092	States that when considering the SA, they support Growth Option 3 and the delivery of 1,400 dwellings per annum to accommodate a level of unmet need from both Crawley and the Coastal Sussex Area.	Comment noted. No implications for SA work.
West Sussex County Council Officer Level Response	/5872	Highlights key issues and suggested changes for the Local Plan some of which are of relevance to the SA Report.	Reference to the West Sussex Joint Health and Wellbeing Strategy and the information provided on the background to the plan is now incorporated into the SA Report. Please see Appendix C which presents the detailed review of plans, programs and plans and baseline evidence.

Consultee	Comment ID	Summary of Comment	SA team response
		Refence is made to the West Sussex Joint Health and Wellbeing Strategy and what the priorities are. Information is also provided to support the preparation of the Local Plan.	
Welbeck Strategic Land IV LLP	/6040	Representation in relation to site Land North of Guildford Road (SA574). States that the SA concludes that the most sustainable approach to growth would be through development in line with the existing settlement hierarchy and the provision of urban extensions. However, there is a requirement to update the evidence on which the settlement hierarchy is based. In relation to site SA574 it is stated that the site has been identified as having a significant or minor positive effect in relation to a number of objectives, including: SA objectives 1: Housing provision, 5: Health and wellbeing, 13: Transport and 15: Climate change. However, the potential significant or minor negative effects identified in relation to SA objectives 7: Landscapes and townscapes, 8: Historic environment, and 17: Access to employment are contested with more detailed commentary provided for these objectives. In relation to SA objective 7, it is stated by the consultee that the Council's Landscape Capacity Study 2020 includes SA574 within a larger parcel which is assessed as having low-moderate capacity for small scale development. However, site specific landscape and visual appraisal concludes the site has low-moderate landscape value and sensitivity, and overall moderate capacity to accommodate new residential development. For SA objective 8 it is stated by the consultee that a heritage assessment has concluded the impact of development is expected to have a negligible-limited impact on the setting of nearby heritage asset which accounted for the significant negative effect identified through the SA. In relation to SA objective 17, it is stated that there are range of potential employment opportunities within Rudgwick, although the site is not within close proximity to a Key Employment Area or Horsham town for which the significant negative effect has been recorded.	Commentary on the appraisal of potential approaches to the distribution of development noted. See Introductory Notes in relation to appraisal of site options in line with the SA assumptions. The level of detail the consultee has supplied for site SA574 is not available across all sites considered. This means that including the consultee's suggestions could result in inconsistencies in the appraisal of options.

Appendix A Consultation comments SA of Horsham District Local Plan (Regulation 19) July 2021

## **Consultation comments on the SA Scoping Report**

Horsham District Council undertook a five week period of consultation on the SA Scoping Report from 3<sup>rd</sup> 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.	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.
		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.	

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> <li>Green infrastructure strategies</li> <li>Biodiversity plans</li> <li>Rights of Way Improvement Plans</li> <li>Shoreline management plans</li> <li>Coastal access plans</li> <li>River basin management plans</li> <li>AONB and National Park management plans.</li> <li>Relevant landscape plans and strategies</li> </ul>	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.

#### National

**B.3 National Planning Policy Framework (NPPF)**<sup>5</sup>: 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 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.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment\_data/file/779764/NPPF\_Feb\_2019\_web.pdf

<sup>&</sup>lt;sup>5</sup> Ministry of Housing, Communities and Local Government (2019) National Planning Policy Framework [online] Available at:

- 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.4 National Planning Practice Guidance (PPG)**<sup>6</sup>: 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.5 Select Committee on Public Service and Demographic Change Report: Ready for Ageing?**<sup>7</sup>: 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.6 Fair Society, Healthy Lives**<sup>8</sup>: 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.7 Planning Policy for Traveller Sites**<sup>9</sup>: 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.8 Laying the foundations: a housing strategy for England**<sup>10</sup>: Aims to provide support to deliver new homes and improve social mobility.

**B.9 Healthy Lives, Healthy People: Our strategy for public health in England**<sup>11</sup>: 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 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

https://publications.parliament.uk/pa/ld201213/ldselect/ldpublic/140/140.pdf <sup>8</sup> The Marmot Review (2011) Fair Society, Healthy Lives. [online] Available at: http://www.parliament.uk/documents/fair-society-healthy-lives-full-report.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/21 6096/dh\_127424.pdf

<sup>&</sup>lt;sup>6</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at:

https://www.gov.uk/government/collections/planning-practice-guidance <sup>7</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] Available at:

<sup>&</sup>lt;sup>9</sup> 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/45 7420/Final\_planning\_and\_travellers\_policy.pdf <sup>10</sup> HM Government (2011) Laying the Foundations: A Housing Strategy for

<sup>&</sup>lt;sup>10</sup> 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/75 32/2033676.pdf

<sup>&</sup>lt;sup>11</sup> HM Government (2010) Healthy Lives, Healthy People: Our strategy for public health in England [online] Available at:

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.10 Public Health England Strategy 2020-25**<sup>12</sup>: Identifies PHE's priorities upon which to focus over this five-year period to protect people and help people to live longer in good health.

**B.11 A Green Future: Our 25 Year Plan to Improve the Environment**<sup>13</sup>: 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.

**B.12 The Environmental Noise Regulations**<sup>14</sup> apply to environmental noise, mainly from transport. The regulations require regular noise mapping and action planning for road, rail and aviation noise and noise in large urban areas. They also require Noise Action Plans based on the maps for road and rail noise and noise in large urban areas. The Action Plans identify Important Areas (areas exposed to the highest levels of noise) and suggest ways the relevant authorities can reduce these. Major airports and those which affect large urban areas are also required to produce and publish their own Noise Action Plans separately. The Regulations do not apply to noise from domestic activities such as noise created by neighbours; at work places; inside means of transport; or military activities in military areas.

**B.13 National Design Guide**<sup>15</sup>: sets out the Government's priorities for well-designed places in the form of ten characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

## **Sub-national**

**B.14 Gatwick Diamond Local Strategic Statement 2016** (2017)<sup>16</sup>: 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.

<sup>&</sup>lt;sup>12</sup> Public Health England (2019) PHE Strategy 2020-25 Available at: https://www.gov.uk/government/publications/phe-strategy-2020-to-2025#:~:text=The%20PHE%20Strategy%202020%20to,over%20the%20next% 205%20years.

<sup>&</sup>lt;sup>13</sup> Department for Environment, Food and Rural Affairs (2018) A Green Future: Our 25 Year Plan to Improve the Environment [online] Available at: <u>https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/67</u> <u>3203/25-year-environment-plan.pdf</u>

 <sup>&</sup>lt;sup>14</sup> HM Government (2018) The Environmental Noise (England) Regulations
 <sup>15</sup> Ministry of Housing, Communities and Local Government (January 2021) National Design Guide [online] Available at:

https://www.gov.uk/government/publications/national-design-guide <sup>16</sup> The Gatwick Diamond authorities (2016) Gatwick Diamond Local Strategic

Statement [Online] Available at: <u>http://crawley.gov.uk/pw/web/PUB344429</u>

To identify priority themes for joint working.

B.15 Horsham Town Community Partnership 5 Year Plan 2017-2022<sup>17</sup>: 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.16 Housing Strategy (2013-2015)<sup>18</sup>: 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 appropriate housing for vulnerable people and create thriving rural communities in the plan area.

B.17 Housing to Meet Local Needs- Future Delivery (2014)<sup>19</sup>: 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.18 Strategic Quality Improvement Plan (2014-2019)<sup>20</sup>: 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 pace and closer to home.

**B.19 Crawley and Horsham Market Housing Mix Report** (2016)<sup>21</sup>: 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.

<sup>17</sup> Horsham Town Community Partnership (2011) 5 Year Action Plan <sup>18</sup> Horsham District Council (2013) Housing Strategy 2013-2015 [Online] Available at:

reports/strategies/2017/quality-improvement-plan.pdf

The document related to the findings of the Northern West Sussex SHMA.

## **B.20 Crawley and Horsham Starter Homes Report**

(2016)<sup>22</sup>: 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.21 Northern West Sussex Housing Market Assessment -Affordable Housing Needs Model Update (2014)<sup>23</sup>: 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.22 Northern West Sussex Strategic Housing Market** Assessment (2019)<sup>24</sup>: Explores the potential for different levels of housing for the West Sussex Housing Market Area, considering in particular the rail service enhancements through the Thameslink Programme and potential implications of the growth of Gatwick Airport.

**B.23 Horsham District Strategic Housing and Economic** Land Availability Assessment (SHELAA) - Housing Report (2018)<sup>25</sup>: 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.24 Homelessness Prevention Action Plan (2013** (Updated in 2014))<sup>26</sup>: The Action Plan commits to preventing

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

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

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 <sup>20</sup> NHS Sussex Community (2013) Strategic Quality Improvement Plan 2014/2019 [Online] Available at:

https://www.sussexcommunity.nhs.uk/downloads/about-us/trust-

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

<sup>&</sup>lt;sup>22</sup> Chilmark Consulting (2016) CBC and HDC Starter Homes Needs and Implications [Online] Available at:

http://www.crawley.gov.uk/pw/web/PUB311638

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

Iceni on behalf of Crawley Borough Council and Horsham District Council (2019) Northern West Sussex Strategic Housing Market Assessment Online] Available at:

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Asessment.pdf

Horsham District Council (2018) SHELAA Housing Report [Online] Available at: https://www.horsham.gov.uk/ data/assets/pdf\_file/0005/55787/SHELAA-

<sup>2018-</sup>FINAL-v7-App1MSDC.pdf <sup>26</sup> Horsham District Council (2014) Homelessness Prevention Action Plan [Online] Available at:

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.25 Horsham Infrastructure Delivery Plan (2014)27: 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.26 Horsham Green Infrastructure Strategy (2014)28: 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.27 Horsham Green Space Strategy 2013 – 2023<sup>29</sup>: Focusses on the management and improvement of green spaces in the Horsham District. The strategy details publicly accessible areas which are owned and maintained by the Council.

**B.28 Sport, Open Space and Recreational Assessment** (2014)<sup>30</sup>: 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.29 Contaminated Land Inspection Strategy (January** 2017)<sup>31</sup>: The strategy outlines how the Council will meet its statutory duties to investigate potentially contaminated land in Horsham District.

B.30 Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (2014)<sup>32</sup>: 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.

B.31 West Sussex Joint Health and Wellbeing Strategy 2019 - 2024<sup>33</sup>: Sets out the vision and ambitions for making the county healthier and a better place to live and work. To achieve these ambitions it sets out priorities across three themes - Starting Well, Living and Working Well and Ageing well.

#### Current baseline

#### **Population**

Appendix B

July 2021

Detailed sustainability context

SA of Horsham District Local Plan (Regulation 19)

B.32 Horsham District covers 53,000 hectares and is of predominantly rural character with 85% of its landmass falling within the rural classification<sup>34</sup>. 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 hectare<sup>35</sup>.

B.33 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

- https://www.horsham.gov.uk/ data/assets/pdf file/0005/55787/SHELAA-2018-FINAL-v7-App1MSDC.pdf <sup>27</sup> Horsham District Counc
- Horsham District Council (2014) Infrastructure Delivery Plan [Online] Available at: https://www.horsham.gov.uk/\_ \_data/assets/pdf\_file/0017/3743/CIL-InfrastructureDelivervPlan.pdf

https://www.horsham.gov.uk/ data/assets/pdf file/0003/66504/Sport-Open-Space-Recreation-Assessment-February-2014.pdf

<sup>31</sup> Horsham District Council (2017) Contaminated Land Strategy [Online] Available at:

<sup>35</sup> UK Census Data (2011) [online] available at:

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

Horsham District Council (2013) Green Space Strategy 2013 - 2023 [Online] Available at:

https://www.horsham.gov.uk/ data/assets/pdf file/0009/9396/Green-Space-Strategy.pdf

Kit Campbell Associates (2014) Sport, Open Space and Recreation Assessment [Online] Available at:

https://www.horsham.gov.uk/ data/assets/pdf file/0014/53411/Contaminated-Land-Strategy-2017.pdf

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-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf 33 West Sussex Health and Wellbeing Board (2018) West Sussex Joint Health

and Wellbeing Strategy 2019 - 2024 [Online] Available at https://jsna.westsussex.gov.uk/assets/core/FINAL-JHWS-2019-2024.pdf

<sup>&</sup>lt;sup>34</sup> 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

http://www.ukcensusdata.com/west-sussex-e10000032#sthash.S5dqgBXz.dpbs

day, or share the living accommodation, that is, a living room or sitting room<sup>36</sup>.

**B.34** 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 years<sup>37</sup>.

**B.35** 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.36 The population of Horsham in mid-2019 was 143,791<sup>38</sup> compared to the 2011 Census, when 131,300 people lived in the District, across 54,900 households<sup>39</sup>. The resident population has an older age profile compared with England, with 18% aged 0 to15 years (England, 19%) and 22% aged 65 and over years (England, 18%)<sup>40</sup>. It is reported that of those residents over 65 years of age, 7,500 live alone and are therefore at greater risk of loneliness<sup>41</sup>. 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%<sup>42</sup> to 6.2% from 2001 to 2011. A similar trend has been experienced in West Sussex and in the South East in general. The average age in Horsham is 46.1, which is higher than the average for England as a whole which is 39.8<sup>43</sup>. 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.44

B.37 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 inmigration was slightly lower than the 2016 figure of 1,780<sup>45</sup>.

#### Housing

**B.38** 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 target<sup>46</sup>.

**B.39** 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

 <sup>36</sup> Gov.uk (2012) Definitions of general housing terms [Online] Available at: <u>https://www.gov.uk/guidance/definitions-of-general-housing-terms#household</u>
 <sup>37</sup> Horsham District Council (2019) The Horsham District Economic Profile [Online] Available at: <u>http://thinkhorsham.co.uk/wp-content/uploads/Drafting-</u>

Horsham-Economic-Profile-December-2019.pdf <sup>38</sup> ONS (2020) Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland: Mid-2019 using April 2020 local authority district codes [Online] Available at:

https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/ populationestimates/datasets/populationestimatesforukenglandandwalesscotlan dandnorthernireland

http://www.ukcensusdata.com/horsham-

e07000227#sthash.1PuT0ZfZ.zziHvNnt.dpbs

Available at: https://jsna.westsussex.gov.uk/assets/core/Horsham-People-and-Challenges-JSNA-April-2019.pdf  <sup>43</sup> Horsham District Census Demographics (2011) [Online] Available at: <u>http://localstats.co.uk/census-demographics/england/south-east/horsham</u>
 <sup>45</sup> Horsham District Council (2019) The Horsham District Economic Profile [Online] Available at: <u>http://thinkhorsham.co.uk/wp-content/uploads/Drafting-</u> Horsham-Economic-Profile-December-2019.pdf

dandnorthernireland <sup>39</sup> UK Census Data (2011) Horsham [Online] Available at:

<sup>&</sup>lt;sup>40</sup> West Sussex JSNA (2018) Horsham District - People and Places [Online]

 <sup>&</sup>lt;sup>41</sup> West Sussex JSNA (2018) Horsham District- People and Places [Online] Available at: <u>https://jsna.westsussex.gov.uk/assets/core/Horsham-People-and-Challenges-JSNA-April-2019.pdf</u>
 <sup>42</sup> Horsham District Council (2018) The Horsham District Economic Profile

<sup>&</sup>lt;sup>42</sup> 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

 <sup>&</sup>lt;sup>45</sup> Horsham District Council (2019) The Horsham District Economic Profile
 [Online] Available at: <u>http://thinkhorsham.co.uk/wp-content/uploads/Drafting-</u>

Horsham-Economic-Profile-December-2019.pdf <sup>46</sup> 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 201 9\_CHAPTER\_3\_Housing.pdf

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 England<sup>47</sup>.

B.40 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 prices<sup>48</sup>.

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.41 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.

B.42 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 (62.7%) and Crawley (62.5%)<sup>4950</sup>.

Furthermore, the property price to earnings ratio in Horsham District has increased by more than double in the twenty-year period ending in 2019. In 1999, the property price to earnings ratio in the District was 6.47 compared to 10.05 in 2009 and 12.87 in 2018. The 2019 property price to earnings ratio for Horsham in 2019 was significantly higher than the average for England and Wales, where full-time workers are estimated to pay on average 7.8 times their annual workplace-based earnings on purchasing a home<sup>51</sup>. Median rent for Horsham in 2018 is also higher than the national median, with a figure of £995 recorded locally and £700 at the national level<sup>52</sup>.

B.43 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 fourbedroom 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 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 group<sup>53</sup>.

B.44 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 1<sup>st</sup> 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,

https://www.horsham.gov.uk/ data/assets/pdf file/0011/41897/Crawley-and-Horsham-Market-Housing-Mix-Report-Final-FCA081216.pdf

<sup>&</sup>lt;sup>47</sup> Horsham District Council (2019) The Horsham District Economic Profile [Online] Available at: http://thinkhorsham.co.uk/wp-content/uploads/Drafting-Horsham-Economic-Profile-December-2019.pdf

Horsham District Council (2019) The Horsham District Economic Profile [Online] Available at: http://www.horshamblueprint.org/wp-

content/uploads/2017/05/Horsham-Economic-Profile-December-2016.pdf 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 201 8\_CHAPTER\_3\_Housing.pdf

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 201 <u>9 CHAPTER 3 Housing pdf</u>
 <sup>51</sup> Office of National Statistics (2020) Housing Affordability in England and Wales

<sup>[</sup>Online] Available at:

https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housin gaffordabilityinenglandandwales/2019

Iceni on behalf of Crawley Borough Council and Horsham District Council (2019) Northern West Sussex Strategic Housing Market Assessment

<sup>53</sup> Chilmark Consulting (2016) Market Housing Mix - Crawley and Horsham [Online] Available at:

## Land at Junction of Stonepit Lane and West End Lane, Paula Rosa Robell Way and Novartis<sup>54</sup>.

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

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

B.45 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 requirements<sup>55</sup>. Due to a surplus of sites, the Council has been able to 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 identified<sup>56</sup>. 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%<sup>57</sup>. 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.46 The Gypsy and Traveller Study (January 2020)<sup>58</sup> identified that there were 127 pitches across the District. There were 35 pitches at three public sites, 60 pitches at 14 private sites, 24 pitches at 6 authorised sites and 8 pitches at two Travelling Showmen's yards. There are no sites with temporary permission and no tolerated sites.

B.47 The Gypsy and Traveller Study indicates that between 2019 and 2036 there is a need for 93 additional pitches for Gypsy and Traveller households that met the planning definition; 6 pitches for undetermined Gypsy and Traveller households that may meet the planning definition; and 19 pitches for Gypsy and Traveller households who did not meet the planning definition. The latest assessment also shows that there is no need for additional Travelling Showpeople pitches up until 2036.

B.48 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 four plots for Travelling Showpeople were granted planning permission on 1 site during the same period of time<sup>59</sup>.

B.49 The Council published a second draft of the Gypsy, Traveller and Travelling Showpeople Development Plan

<sup>54</sup> 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\_201

8 CHAPTER 3 Housing.pdt 55 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

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

<sup>57</sup> 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\_201

<u>9 CHAPTER 3 Housing.pdt</u> <sup>58</sup> Horsham District Council (2020) Gypsy and Traveller Accommodation

Assessment [Online] Available at:

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0015/80223/Gypsy-and-Traveller-Accommodation-Assessment.pdf

<sup>59</sup> 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 201 9\_CHAPTER\_3\_Housing.pdf

Document (DPD) for consultation in December 2017. The DPD was produced to identify further pitches for Gypsies and Travellers. The Council subsequently decided not to proceed with the Proposed Submission version of the DPD. Instead, it was decided that the updated Gypsy, Traveller and Travelling Showpeople Needs Assessment (January 2020) would be used to inform a new draft Gypsy and Traveller policy to be included in the Local Plan Review.

#### Education

B.50 The most up to date records shows that in 2017 there were 83,500 residents aged 16 and over in the District. For the period January 2019 to December 2019, 92.9% of residents aged 16-64 were found to have NVQ Level 1 gualifications or better, 81.8% were found to have NVQ Level 2 gualifications or better, 62.0% were found to have NVQ Level 3 qualifications or better and 44.2% were found to have NVQ Level 4 qualifications or above. This is considerably higher than the regional and UK average, where 88.8% in the South East and 85.6% 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 is 5.4%, compared to the UK population at 7.7%<sup>60</sup>.

B.51 There are 44 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.52 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 students<sup>61</sup>. Additional early years' provision was also identified as required to 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, three (Billingshurst, Horsham East and Steyning) were identified as being above 95% full, the figure at which the school planning area is deemed to be full<sup>62</sup>. 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.53** 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 town63.

B.54 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 290<sup>th</sup> out of a total of 317 local authorities in England, where 1 is most deprived and 317 is the least<sup>64</sup>.

**B.55** 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 nationally<sup>65</sup>.

B.56 Horham is ranked 139th out of 324 local authority areas in England in terms of social mobility, where 1 is the area with the best social mobility ranking. The social mobility index

<sup>63</sup>Ministry of Housing, Communities and Local Government (2019) Indices of Deprivation: 2019 and 2015 [Online] Available at:

http://dclgapps.communities.gov.uk/imd/iod\_index.html <sup>64</sup> Ministry of Housing, Communities & Local Government (2019) IoD 2019 Interactive Dashboard. Local Authority Focus: Horsham [Online] Available at: https://app.powerbi.com/view?r=evJrlioiOTdjYzIyNTMtMTcxNi00YmQ2LWI1Yzg tMTUvYzMxOWQ3NzQ2liwidCl6ImJmMzQ2ODEwLTliN2QtNDNkZS1hODcvLTl <u>OYTJIZIM5OTVhOCJ9</u> <sup>65</sup> 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

<sup>60</sup> NOMIS Labour Market Profile - Horsham [Online] Available at:

https://www.nomisweb.co.uk/reports/Imp/la/1946157343/report.aspx?town=hors ham#supply <sup>61</sup> 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 West Sussex County Council (2020) Planning School Places [Online] Available at:

https://www.westsussex.gov.uk/media/12383/planning\_school\_places.pdf

ranks local authorities on the prospects of disadvantaged young people in their areas<sup>66</sup>.

B.57 As reported up to October 2020, the District has a lower proportion of residents (4.1%) who receive Universal Credit than at the regional (5.2%) and national level (6.3%). 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 (8.1%), is higher than the proportion of older people (aged 25 to 49) who receive it (4.4%), the figure for young people is lower than the figure for Great Britain (4.0%) but higher than the figure for the South East (7.8%). It must be noted that these figures may have been impacted from spring 2020 due to the impact of the coronavirus pandemic<sup>67</sup>.

B.58 In Horsham in 2018 it was estimated that 7.2% of households (4,258) were classed as being fuel poor. This is lower than the figure for West Sussex at this time which was 7.6%<sup>68</sup>. These figures are reflective of household income, household energy requirements and fuel prices in a given area.

#### Health

B.59 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 care<sup>69</sup>.

B.60 Average life expectancy in Horsham is slightly above the national average, at 82.3 for males and 84.7 for females<sup>70</sup>.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

<sup>66</sup> West Sussex Health and Wellbeing Board (2018) West Sussex Joint Health and Wellbeing Strategy 2019 - 2024 [Online] Available at: https://jsna.westsussex.gov.uk/assets/core/FINAL-JHWS-2019-2024.pdf

<sup>67</sup> NOMIS Labour Market Profile - Horsham [Online] Available at:

https://www.nomisweb.co.uk/reports/Imp/la/1946157343/report.aspx#tabrespop 68 Department for Business, Energy and Industrial Strategy (2020) Sub-regional fuel poverty data 2018 [Online] Available at:

https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2020 69 NOMIS – Local Area Report (2011) –Horsham [online] Available at:

https://www.nomisweb.co.uk/reports/localarea?compare=E07000227 Public Health England (2019) Local Authority Health Profile 2019 -Horsham [Online] Available at: https://fingertips.phe.org.uk/static-reports/healthprofiles/2019/e07000227.html?area-name=horsham

national level. 61.1% of the local population falls within this classification compared to the national figure which is 62.0%.

B.61 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%)<sup>71</sup>. The latest update of the Sport England Active People Survey interviewed 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%<sup>72</sup>.

B.62 West Sussex County Council together with the NHS Clinical Commissioning Group have developed a Joint Dementia Strategy for West Sussex up to 202373. The document seeks to make the County a place to live well with this ailment. It is suggested that this is particularly relevant given that the ageing population of the County is expected to rise exponentially in the 10 years up to 2030. It is predicted that the number of older people living with dementia in England between 2019 and 2040 will increase to 1,352,400 (by 81%), with the most notable rise amongst those suffering from severe forms of dementia. In West Sussex, the total number of people suffering from dementia is expected to rise from 16,650 in 2020 to 22,450 in 2030.

B.63 Dementia specialist care homes in West Sussex is located mostly in Mid Sussex (55%), with Horsham only providing 9% of the total homes of this type. Furthermore, information from West Sussex County Council suggests that although there are existing Extra Care Housing schemes in Horsham District, there remains an undersupply of Extra Care Housing.

#### Open spaces, sports and recreation

B.64 95km<sup>2</sup> land area of the Horsham District is situated within the South Downs National Park<sup>74</sup>, 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

Sport England (December 2016) Active People Survey

73 West Sussex County Council and NHS Clinical Commissioning Group (2020) Joint Dementia Strategy 2020-2023 [Online] Available at:

https://westsussex.moderngov.co.uk/

<sup>74</sup> 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

<sup>&</sup>lt;sup>71</sup> Public Health England (2019) Local Authority Health Profile 2019 -Horsham [Online] Available at: https://fingertips.phe.org.uk/static-reports/healthprofiles/2019/e07000227.html?area-name=horsham

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 Park<sup>75</sup>.

**B.65** 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 allotments<sup>76</sup>.

**B.66** 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 locations<sup>77</sup>. 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.67** A number of strategic recreation routes also pass through the District including the Down's link<sup>78</sup>. 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.68** 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 15.3m<sup>2</sup> per person of neighbourhood space, 2.9m<sup>2</sup> per person of sub-district open space and 2.6m<sup>2</sup> per person of strategic green space<sup>79</sup>.

B.69 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<sup>80 81</sup>. Furthermore, the delivery of new developments across the District could result in increased deficiency in open space provision unless this need is planned for in a sustainable manner.

#### Crime

**B.70** 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 2019<sup>82</sup>. 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. Within the wider area covered by the Sussex Policy, anti-social behaviour, criminal damage and arson and violent crime are the principal

<sup>75</sup> 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 <sup>75</sup> Horsham District Council (2014) Council (2014)

<sup>&</sup>lt;sup>76</sup> Horsham District Council (2014) Green Infrastructure Strategy [Online] Available at:

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0007/50956/CD\_EN\_03\_Gr een-Infrastructure-Study.pdf

<sup>&</sup>lt;sup>77</sup> 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 201 9\_CHAPTER\_6\_Policy\_Indicators.pdf 78\_Horsham District Council (2005) Har the District

<sup>&</sup>lt;sup>78</sup> 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

<sup>&</sup>lt;sup>79</sup> 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

<sup>&</sup>lt;sup>80</sup> Horsham District Council (2014) Green Infrastructure Strategy [Online] Available at:

https://www.horsham.gov.uk/ data/assets/pdf file/0007/50956/CD EN 03 Gr een-Infrastructure-Study.pdf <sup>81</sup> Kit Camphell Associated for Horsham District One of March 2010

<sup>&</sup>lt;sup>81</sup> Kit Campbell Associates for Horsham District Council (2014) Sport, Open Space and Recreation Assessment [Online] Available at: <u>https://www.horsham.gov.uk/\_\_\_data/assets/pdf\_file/0019/31582/Sport-Open-</u>

Space-Recreation-Asesment.pdf 82 Horsham District Council (2019) The Horsham District Economic Profile [Online] Available at: <u>http://thinkhorsham.co.uk/wp-content/uploads/Drafting-</u>

Horsham-Economic-Profile-December-2019.pdf

#### Appendix B Detailed sustainability context

SA of Horsham District Local Plan (Regulation 19) July 2021

contributors to the recorded level of crime and these recorded categories account for over half of all crimes committed<sup>83</sup>.

B.71 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 Horsham<sup>84</sup>.

Table B.3: Horsham District: Selected recorded crime statistics

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%
Total	7,521	7,693	7,416	7,847	7,572	-275	-4%

B.72 Nationally, average crime rates are lower in rural areas than urban areas. In 2019/20, the rate of violence was 23.1 per 1,000 population in predominantly rural areas compared to 30.4 per 1,000 population in predominantly urban areas. This

83 UK Crime Stats (2020) West Sussex Police [Online] Available at:

would suggest that the rural areas of Horsham would similarly have a lower rate of violence than the more built up areas<sup>85</sup>.

B.73 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

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment\_data/file/912406/Crime\_August\_2020.pdf

https://ukcrimestats.com/Subdivisions/CTY/2244/ 84 Horsham District Council (2018) Authority Monitoring Report (2017/18)

<sup>[</sup>Online] Available at:

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0003/55713/AMR\_2017\_201 8 CHAPTER 6 Policy Indicators final.pdf 85 Crime, August 2020 [online] Available at:

#### Appendix B Detailed sustainability context

SA of Horsham District Local Plan (Regulation 19) July 2021

the national rate which was recorded as 40.8 per 100,000 population<sup>86</sup>. 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 in comparison to the regional and national averages. The level of socially rented housing which is currently provided in the District is also significantly lower than the regional and national levels. As a whole, the delivery of affordable housing is considerably lower than the need identified and there are a high number of residents currently on the waiting list for this type of provision. There is also continued need in the District for housing suitable for the elderly, families and the Gypsy and Traveller community.	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 Horsham. A number of wards are within the 40% most deprived in the UK.	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 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.	SA objective 1 SA objective 2 SA objective 3 SA objective 5
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 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	SA objective 2 SA objective 3 SA objective 5

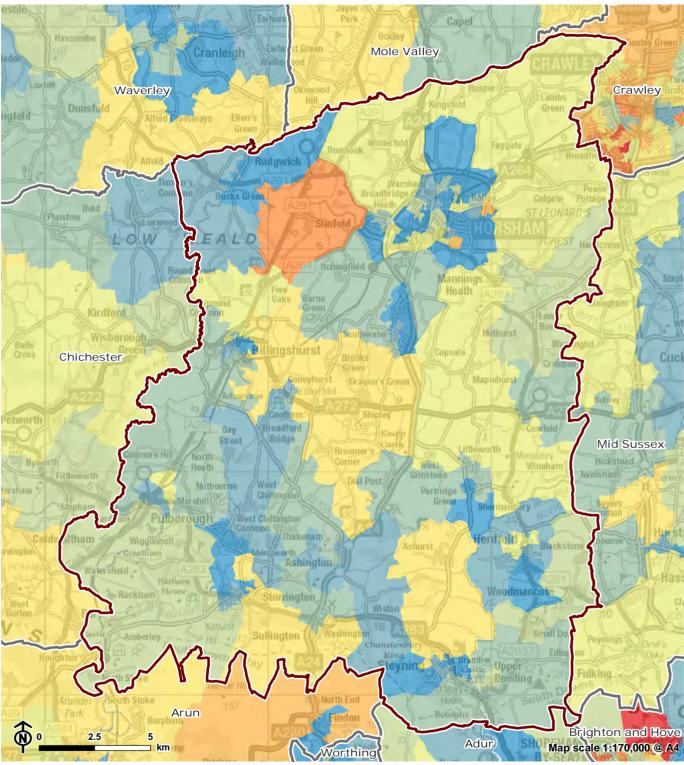
<sup>&</sup>lt;sup>86</sup> West Sussex JSNA (2018) Horsham District- People and Places [Online] Available at: <u>https://jsna.westsussex.gov.uk/assets/core/Horsham-People-and-</u>

Challenges-JSNA-April-2019.pdf

SA of Horsham	District	Local	Plan	(Regulat	101
July 2021					

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objectives
the most and least deprived areas of the District in terms of health.	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.	SA objective 14
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	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.	SA objective 2 SA objective 7
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.	spaces to be planned and incorporated alongside new development.	
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.	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.	SA objective 4





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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



 Horsham
 Index of Multiple Deprivation: overall deprivation

 Neighbouring authority
 0 - 10% (most deprived)
 50

 0 - 10% (most deprived)
 50 - 60%

 10 - 20%
 60 - 70%

 20 - 30%
 70 - 80%

 30 - 40%
 80 - 90%

 40 - 50%
 90 - 100% (least deprived)



## Economy

## **Policy context**

## International

**B.74** There are no specific international 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 with other nations.

## National

# **B.75 National Planning Policy Framework (NPPF)**<sup>87</sup> 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.76 National Planning Practice Guidance (PPG)<sup>88</sup>:

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.77 LEP Network Response to the Industrial Strategy Green Paper Consultation (2017)**<sup>89</sup>: 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.

**B.78 Industrial Strategy: building a Britain fit for the future** (2017)<sup>90</sup>: Sets out a long-term policy framework for how Britain will be built to be fit for the future in terms of creating successful, competitive and open economy. It is shaped around five 'foundations of productivity' – the essential attributes of every successful economy: Ideas (the world's most innovative economy); People (good jobs and greater earning power for all; Infrastructure (a major upgrade to the UK's infrastructure); Business Environment (the best place to start and grow a business); Places (prosperous communities across the UK).

**B.79 National Infrastructure Delivery Plan 2016-2021**<sup>91</sup>**:** Brings together the Government's plans for economic infrastructure over this five year period with those to support delivery of housing and social infrastructure.

**B.80 Build Back Better: Our Plan for Growth**<sup>92</sup>: Sets out a plan to 'build back better' tackling long-term problems to deliver growth that delivers high-quality jobs across the UK while supporting the transition to net zero. This will build on three core pillars of growth: infrastructure, skills and innovation.

<sup>&</sup>lt;sup>87</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment\_data/file/779764/NPPF\_Feb\_2019\_web.pdf 8 Department for Community and the service of the service of

<sup>&</sup>lt;sup>88</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at:

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

<sup>&</sup>lt;sup>89</sup> LEP Network (2017) Response to the Industrial Strategy Green Paper Consultation [Online] Available at: <u>https://www.lepnetwork.net/media/1470/lep-network-industrial-strategy-response-april-2017-final.pdf</u>

<sup>&</sup>lt;sup>90</sup> HM Government (2017) Industrial Strategy: building a Britain fit for the future [Online] Available at: https://www.gov.uk/government/publications/industrialstrategy-building-a-britain-fit-for-the-future

strategy-building-a-britain-fit-for-the-future <sup>91</sup> Infrastructure and Projects Authority (2016) National Infrastructure Delivery Plan 2016 to 2021 [Online] Available at:

https://www.gov.uk/government/publications/national-infrastructure-deliveryplan-2016-to-2021

<sup>&</sup>lt;sup>92</sup> HM Treasury (2021) Build Back Better: Our Plan for Growth [online] available at: https://www.gov.uk/government/publications/build-back-better-our-plan-forgrowth/build-back-better-our-plan-for-growth-html

#### Sub-national

**1.2 West Sussex Economic Growth Plan (2018)**<sup>93</sup>: 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.81 Gatwick Diamond Strategic Business Plan 2018-2021**<sup>94</sup>: 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.82 Gatwick Revised Business Plan to 2024**<sup>95</sup>: 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.83 The Coast to Capital Strategic Economic Plan (2018-2030)**<sup>96</sup>: 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.84 Horsham Infrastructure Delivery Plan (May 2014)**<sup>97</sup>: 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.85 Horsham Corporate Plan (2016-19)**<sup>98</sup>: 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.86 Horsham Economic Strategy 2017-2027**<sup>99</sup>: 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.

Corporate-Plan-2016-19-Final-220216.pdf <sup>99</sup> Horsham District Council (2017) [Online] Available at:

<sup>&</sup>lt;sup>93</sup> 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 <sup>94</sup> 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

<sup>&</sup>lt;sup>95</sup> Gatwick Airport (2013) A New Deal at London Gatwick Revised Bused Business Plan to 2024

<sup>&</sup>lt;sup>96</sup> 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

<sup>&</sup>lt;sup>97</sup> Horsham District Council (2014) Infrastructure Delivery Plan [Online] Available at: <u>https://www.horsham.gov.uk/\_\_\_data/assets/pdf\_file/0017/3743/CIL-</u> InfrastructureDeliveryPlan.pdf

<sup>&</sup>lt;sup>98</sup> Horsham District Council (2016) Cooperate Plan [Online] Available at: https://www.horsham.gov.uk/ data/assets/pdf\_file/0005/31478/HDC-Corrected Plan 2046 40 Final 202046 of Final 202046

https://www.horsham.gov.uk/business/economic-strategy

ps.//www.horsnam.gov.uk/business/economic-strategy

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

**B.87 Horsham Visitor Economic Strategy 2018-2023**<sup>100</sup>: 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.88 Horsham Town Centre Vision (Consultation Draft)<sup>101</sup>:

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.89** 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.90** 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 drink<sup>102</sup>.

**B.91** The Coast to Capital LEP<sup>103</sup> 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  $\pounds 25,889$  which is slightly below the average for the LEP area  $(\pounds 26,202)^{104}$ .

**B.92** These points considered, the effects of COVID-19 are likely to impact the economic growth in the LEP area. Effects of the pandemic are expected to have effects on Britain's economy which are more pronounced than any country in the developed world according to the OECD, with the country's GVA estimated to contract by 11% to 15% in 2020. The Coast to Capital area could lose up to 17% GVA during 2020. Approximately a third (33.7%) of the Coast to Capital's economically active population has been impacted by the implementation of the lockdown and in Horsham the figure is slightly higher at 35.9%.

**B.93** Recovery is likely to differ greatly by region however ,it may be that the Coast to Capital area is better placed than many others. The LEP area is well diversified, has a highly educated workforce, vibrant town centres and low unemployment numbers<sup>105</sup>.

**B.94** The future projected growth to Gatwick Airport is likely to have an influence on employment opportunities accessible to the residents of Horsham. The airport was planning to accommodate growth in air traffic from the 2013 figure of around 34 million passengers, to around 37 million passengers towards 2020. Furthermore, it was predicted that £1bn of capital expenditure will result at the airport between 2014 to 2020 and the Masterplan indicates that by 2020 the maximum possible throughput for Gatwick could be 40 million passengers per annum<sup>106</sup>. However, as a result of COVID-19, in May 2020 Gatwick saw 1% of flights made compared to the same time the previous year. It has been predicted that up to 50 million jobs in the global aviation industry could be lost due to the pandemic and redundancies have already been made at major airlines<sup>107</sup>.

**B.95** While the impact of COVID-19 has resulted in some uncertainty, the growth of Gatwick Airport and the Thameslink Programme for improved services from London are expected to create in additional jobs and result in additional demand for housing in the plan area. The pre-COVID-19 expectation for the Airport's expansion was for up to 70 million passengers per annum being accommodated at the airport. This was

<sup>107</sup> Coast to Capital Local Enterprise Partnership (2020) Coronavirus Economic Impact Assessment [Online] Available at:

<sup>&</sup>lt;sup>100</sup> 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

<sup>&</sup>lt;sup>101</sup> Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision)

<sup>&</sup>lt;sup>102</sup> Gatwick Diamond Initiative (2018) Gatwick Diamond Strategic Business Plan 2018-2021 [Online] Available at: http://www.oatwickdiamond.co.uk/media/95386/Gatwick-Diamond-Business-

Plan-2018-to-2021.pdf

<sup>&</sup>lt;sup>103</sup> 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.

<sup>&</sup>lt;sup>104</sup> The Coast to Capital LEP (2018) The Coast to Capital Strategic Economic Plan 2018-2030

<sup>&</sup>lt;sup>105</sup> Coast to Capital Local Enterprise Partnership (2020) Coronavirus Economic Impact Assessment [Online] Available at:

https://www.coast2capital.org.uk/storage/downloads/coronavirus\_covid-19\_economic\_impact\_assessment-1603375323.pdf

<sup>&</sup>lt;sup>106</sup> Gatwick Airport (2013) A New Deal at London Gatwick Revised Business Plan to 2024

https://www.coast2capital.org.uk/storage/downloads/coronavirus\_covid-

<sup>19</sup>\_economic\_impact\_assessment-1603375323.pdf

expected to create around 9,000 additional jobs, which would draw around 700 new commuters from Horsham<sup>108</sup>.

**B.96** The Coast to Capital LEP is currently preparing a Local Industrial Strategy (LIS) to support the development of the area and a set of 'logic chains' have been submitted to the Governments LIS Analytical Panel for review. These set out the rationale for and description of the LIS draft interventions which have been set out to address key challenges and opportunities at the local level. This will help inform further development of the LIS, leading to a draft LIS document<sup>109</sup>.

B.97 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 provision<sup>110</sup>.

**B.98** 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 however significantly lower than the pre-recession level at £105 psf<sup>111</sup>.

**B.99** The decline of British High Streets is reported to be *"getting faster"* and 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 thriving<sup>112</sup>.

**B.100** Based on information from the 2011 census, 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%<sup>113</sup>.

**B.101** 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 (25.4%) followed by associate professional and technical occupations (17.9%) and manager, directors and senior officials (15.9%). Horsham has a higher average wage (£34,788) than that recorded for the South East region (£32,853) and nationally (£30,529)<sup>114</sup>.

**B.102** Horsham District's economically active population rose from 80.8% to 82.9% between March 2020 to June 2020.The figure is higher than that for the region and nation. The percentage of economically active women feel slightly, while the percentage of economically active men rose slightly during this period. The percentage of economically active men and women were both higher than at the regional and national level in June 2020<sup>115</sup>.

**B.103** 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

<sup>&</sup>lt;sup>108</sup> Crawley Borough Council and Horsham District Council (2019) Northern West Sussex Strategic Housing Market Assessment [Online] Available at: https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0020/79130/Northern-West-Sussex-Strategic-Housing-Market-Asessment.pdf

<sup>&</sup>lt;sup>109</sup> Coast to Capital. (2020) Industrial Strategy [Online] Available at: https://www.coast2capital.org.uk/LIS-Development

<sup>&</sup>lt;sup>110</sup> Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision

<sup>&</sup>lt;sup>111</sup> Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision

 <sup>&</sup>lt;sup>112</sup> Horsham District Council (Consultation Draft) (2017) Horsham Town Centre Vision
 <sup>113</sup> NOMIS – Local Area Report (2018) – Horsham [online] Available at:

<sup>&</sup>lt;sup>113</sup> NOMIS – Local Area Report (2018) – Horsham [online] Available at: <u>https://www.nomisweb.co.uk/reports/localarea?compare=E07000227</u> <sup>114</sup> NOMIS Labour Market Profile - Horsham [Online] Available at:

https://www.nomisweb.co.uk/reports/lmp/la/1946157343/report.aspx#tabrespop <sup>115</sup> NOMIS Labour Market Profile - Horsham [Online] Available at:

https://www.nomisweb.co.uk/reports/Imp/Ia/1946157343/subreports/ea\_time\_ser ies/report.aspx?

London and the South Coast via M23, M25, A24 and A29. Furthermore over 80 rail services are available to London daily<sup>116</sup>. 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 Crawley<sup>117</sup>.

**B.104** In total, the gross and net employment floorspace developed within the District for the year 2017/18 was 25,070 m<sup>2</sup> (the net figure is 20,788 m<sup>2</sup>). This is substantially higher than that recorded for the 2016/17 year, which was 19,352 m<sup>2</sup>. 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 2018/19<sup>118119</sup>.

**B.105** 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. <sup>120</sup>.

B.106 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 indicator<sup>121</sup>.

**B.107** 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 averages. It forms part of the Gatwick Diamond and Coast to Capital LEP, which allows for links to important economies in the surrounding area. The rural character of the District and close proximity of employment centres such as Crawley, London and Brighton and Hove further afield mean that the area sees a significant net outflow of commuters.	the growth of new economic and employment opportunities including those for tourism and rural amployment and also to protect existing Key Employment Areas	SA objective 3 SA objective 16 SA objective 17

<sup>116</sup> Horsham District Council (2019) The Horsham District Economic Profile [Online] Available at: <u>http://thinkhorsham.co.uk/wp-content/uploads/Drafting-Horsham-Economic-Profile-December-2019.pdf</u> <sup>119</sup> Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at:

<sup>120</sup> NOMIS – Local Area Report (2011) – Horsham [online] Available at: https://www.nomisweb.co.uk/reports/localarea?compare=E07000227

<sup>121</sup> 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

<sup>&</sup>lt;sup>117</sup> 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 118 Horsham District Council (2018) Authority Monitoring Report (2017/18)

<sup>[</sup>Online] Available at:

https://www.horsham.gov.uk/ data/assets/pdf file/0003/55713/AMR 2017 201 8\_CHAPTER\_6\_Policy\_Indicators\_final.pdf

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0007/78379/AMR\_2018\_201 9\_CHAPTER\_6\_Policy\_Indicators.pdf

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
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.		
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

# **Transport connections and travel habits**

## **Policy context**

## International

**B.108 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.109 National Planning Policy Framework (NPPF)**<sup>122</sup>: 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.110 National Planning Practice Guidance (PPG)**<sup>123</sup>: Reiterates the requirement for local planning authorities to undertake an assessment of the transport implications of reviewing their Local Plan.

**Door to Door: A strategy for improving sustainable transport integration**<sup>124</sup>: Focuses on four core areas which need to be addressed so that people can be confident in choosing greener modes of transport. There are as follows:

- Accurate, accessible and reliable information about different transport options.
- Convenient and affordable tickets.
- Regular and straightforward connections at all stages of the journey and between different modes of transport.
- Safe and comfortable transport facilities.

The strategy also includes details on how the Government is using behavioural change methods to reduce or remove barriers to the use of sustainable transport and working closely with stakeholders to deliver a better-connected transport system.

<sup>122</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at:

<sup>123</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: <u>https://www.gov.uk/government/collections/planning-practice-guidance</u> https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/14 2539/door-to-door-strategy.pdf

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment\_data/file/779764/NPPF\_Feb\_2019\_web.pdf <sup>123</sup> Department for Communities and Local Government (2016) National

<sup>&</sup>lt;sup>124</sup> Department for Transport (2013) Door to Door: A strategy for improving sustainable transport integration [online] Available at:

#### B.111 Department for Transport, The Road to Zero

(2018)<sup>125</sup>: 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

1.3 West Sussex Transport Plan 2011-2026<sup>126</sup>: 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.112 West Sussex Walking and Cycling Strategy 2016-2026<sup>127</sup>: 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.113 West Sussex Rights of Way Management Plan** (2018-2021)<sup>128</sup>: The plan sets out the vision to "enable people to enjoy the countryside on foot, by horse and by bicycle, for heath, recreation and to access services" in the county. The 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.

outline how and when these will be delivered.

B.114 Horsham Infrastructure Delivery Plan (May 2014)<sup>129</sup>: 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

**B.115 Horsham Transport and Development Study** (2015)<sup>130</sup>: The study assessed the relative impact associated with the strategic development sites set out in the HDPF and

<sup>125</sup> Department for Transport, The Road to Zero (2018) [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment\_data/file/739460/road-to-zero.pdf <sup>126</sup> 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

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

<sup>&</sup>lt;sup>128</sup> West Sussex Country Council (2018) Rights of Way Management Plan (2018-2028) [Online] Available at:

https://www.nomisweb.co.uk/reports/Imp/la/1946157343/report.aspx#tabempune mp 129 Horsham District Council (2014) Infrastructure Delivery Plan [Online]

Available at: https://www.horsham.gov.uk/ data/assets/pdf file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf

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 Hor sham-Transport-Study-Rpt-Apr2014.pdf

proposes mitigation measures to accommodate traffic associated with such development.

**B.116 Network Rail South East Route: Sussex Area Route Study (May 2015)**<sup>131</sup>: 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.117 Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (May 2014)**<sup>132</sup>: 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.118** Horsham is located in the central northern part of West Sussex County and covers a large area of the county (250km<sup>2</sup>) of which the majority is rural. Currently, 88% of the population have one car or van or more<sup>133</sup>. 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 issues<sup>134</sup>.

**B.119** 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 periods<sup>135</sup>. 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 on North Street and Queen Street<sup>136</sup>. 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 hourlies at least five days a week<sup>137</sup>.

**B.120** 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 junction<sup>138</sup>.

**B.121** 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

<sup>&</sup>lt;sup>131</sup> 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 Hor sham-Transport-Study-Rpt-Apr2014.pdf

<sup>&</sup>lt;sup>132</sup> 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-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-<u>GUIDANCE.pdf</u>

<sup>&</sup>lt;sup>133</sup> 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 <sup>134</sup> Gatwick Diamond Local Strategic Statement Sustainability/Strategic Environmental Assessment Statement [Online] Available at:

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0018/3717/GatwickDiamond LSS\_SEA.pdf 135 Network Rail (2015) South East Pourter Sussey Asset Pourter Control of Asset

<sup>&</sup>lt;sup>135</sup> 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

 <sup>&</sup>lt;sup>136</sup> West Sussex County Council (2015) Getting Around Horsham
 <sup>137</sup> West Sussex County Council (2017) Bus route maps and guides [Online]
 Available at: <u>https://www.westsussex.gov.uk/roads-and-travel/travel-and-public-transport/bus-and-coach-travel/plan-your-journey/bus-route-maps-and-guides/</u>
 <sup>138</sup> 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

Appendix B Detailed sustainability context

SA of Horsham District Local Plan (Regulation 19) July 2021

central London. Routes into London are particularly busy, with limited capacity to operate additional services<sup>139</sup>.

**B.122** 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 work<sup>140</sup>. 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 work<sup>141</sup>. 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 population<sup>142</sup>.

**B.123** As shown in **Figure B.2** and **Figure B.3** <sup>143</sup>, Horsham sees a higher number of residents travelling out of, than into the District for work. There are particularly strong links with Crawley and a high proportion of the overall trips made, are made by private vehicle.

Figure B.2: Commuting to and from Horsham District (Travel by all modes)



**B.124** 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.

Figure B.3: Commuting to and from Horsham District (Driving car or van)



B.125 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 town144.

<sup>139</sup> Network Rail (2015) South East Route: Sussex Area Route Study [online] Available at: <u>https://cdn.networkrail.co.uk/wp-content/uploads/2016/11/South-East-Route-Sussex-Area-Route-Study-FINAL.pdf</u>

<sup>140</sup> 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

https://www.horsham.gov.uk/ data/assets/pdf file/0007/78379/AMR 2018 201 9\_CHAPTER\_6\_Policy\_Indicators.pdf <sup>142</sup> 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 <sup>143</sup> Nomis and ONS (2011) Location of usual residence and place of work by method of travel to work [Online] Available at:

https://www.nomisweb.co.uk/census/2011/wu03uk/chart

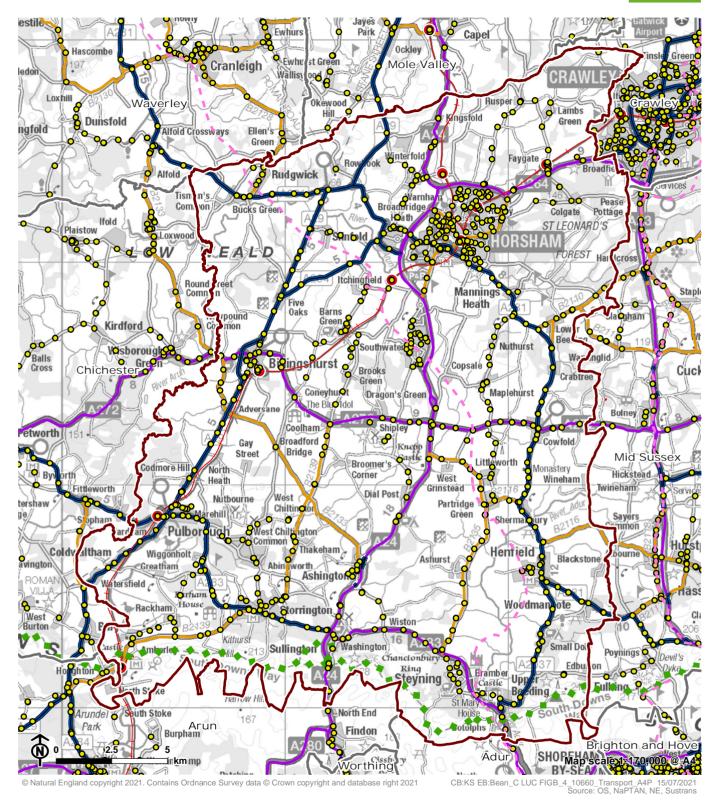
<sup>144</sup> West Sussex County Council (2017) West Sussex Walking and Cycling Strategy 2016-2026

<sup>&</sup>lt;sup>141</sup> Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at:

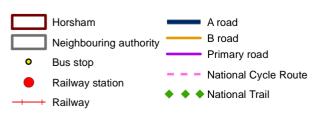
Table B.6: Key sustainability issues for Horsham and likely evolution without the Local Plan Review

Key Sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
Parts of the highway network in the District experiences high levels of congestion and delays. Rail capacity is also currently stretched, and capacity pressures on London services are expected to increase. Population growth has the potential to exacerbate these problems.	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.	
Given the rural character of much of the District, a large proportion of the District's residents drive to work, and some have access to only limited bus services and other public transport links.	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.	SA objective 13





#### Figure B.4: Transport Links in Horsham District





# Air, land and water quality

## **Policy context**

## National

## **B.126 National Planning Policy Framework (NPPF)**<sup>145</sup> 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.127 National Planning Practice Guidance (PPG)**<sup>146</sup>: 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.128 Waste Management Plan for England<sup>147</sup>: 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.129 National Planning Policy for Waste (NPPW)<sup>148</sup>: 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.
- Ensure the design and layout of new development supports sustainable waste management.

B.130 Safeguarding our Soils – A Strategy for England<sup>149</sup>: 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.131 Water White Paper**<sup>150</sup>: 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.132 Managing Water Abstraction<sup>151</sup>: Is the overarching document for managing water resources in England and Wales and links together the abstraction licensing strategies.

B.133 Water for Life White Paper<sup>152</sup>: 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

Planning Practice Guidance [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/26 5810/pb14100-waste-management-plan-20131213.pdf

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/36 4759/141015\_National\_Planning\_Policy\_for\_Waste.pdf

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/69 261/pb13297-soil-strategy-090910.pdf <sup>150</sup> Department for Environment, Food and Rural Affairs (2012) The Water White

<sup>152</sup> 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/22 8861/8230.pdf

<sup>&</sup>lt;sup>145</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att

achment data/file/779764/NPPF Feb 2019 web.pdf <sup>146</sup> Department for Communities and Local Government (2016) National

https://www.gov.uk/government/collections/planning-practice-guidance 147 Department for Environment, Food and Rural Affairs (2013) Waste management plan for England [online] Available at:

<sup>&</sup>lt;sup>149</sup> Department for Environment, Food and Rural Affairs (2009) Safeguarding our Soils: A Strategy for England [online] Available at:

Paper [online] Available at:

https://publications.parliament.uk/pa/cm201213/cmselect/cmenvfru/374/374.pdf <sup>151</sup> Environment Agency (2016) Managing Water Abstraction [online] Available at: https://www.gov.uk/government/publications/managing-water-abstraction

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.134 The Air Quality Strategy for England, Scotland, Wales and Northern Ireland**<sup>153</sup>: 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.135 Future Water: The Government's Water Strategy for England**<sup>154</sup>: 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.136 A Green Future: Our 25 Year Plan to Improve the Environment**<sup>155</sup>: 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; 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.137 UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations**<sup>156</sup>: 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

<sup>&</sup>lt;sup>153</sup> 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/69 336/pb12654-air-quality-strategy-vol1-070712.pdf <sup>154</sup> HM Government (2008) Future Water: The Government's water strategy for

<sup>&</sup>lt;sup>154</sup> 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/69 346/pb13562-future-water-080204.pdf

<sup>&</sup>lt;sup>155</sup> Department for Environment, Food and Rural Affairs (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/67

<sup>3203/25-</sup>year-environment-plan.pdf <sup>156</sup> 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/63 3269/air-quality-plan-overview.pdf

Strategy and £100 million to help improve air quality on the National road network.

**B.138 Clean Air Strategy 2019**<sup>157</sup>: 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.139 Department for Transport, The Road to Zero** (2018)<sup>158</sup>: 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.

**B.140 The Waste (Circular Economy) Regulations**<sup>159</sup> seek to prevent waste generation and to monitor and assess the implementation of measures included in waste prevention programmes. They set out requirements to justify not separating waste streams close to source for re-use, recycling or other recovery operations, prohibit incineration and landfilling of waste unless such treatment process represent the best environmental outcome in accordance with the waste hierarchy. The Regulations set out when waste management plans and in waste prevention programmes are required. The Regulations focus on the circular economy as a means for businesses to maximise the value of waste and waste treatment.

#### Sub-national

**B.141 West Sussex Joint Minerals Local Plan (2018-2033)**<sup>160</sup>: 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.142 Horsham Infrastructure Delivery Plan (May 2014)<sup>161</sup>:

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.143 Horsham Green Infrastructure Strategy (April** 

**2014**)<sup>162</sup>: 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.144 Sport, Open Space and Recreational Assessment

(2014)<sup>163</sup>: The purpose of the assessment is to ensure that the 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.145 Contaminated Land Inspection Strategy (January**

**2017**)<sup>164</sup>: The strategy outlines how the Council will meet its statutory duties to investigate potentially contaminated land in Horsham District.

**B.146 Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (May 2014)**<sup>165</sup>: 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.

https://www.westsussex.gov.uk/media/11736/mlp\_adoption.pdf <sup>161</sup> Horsham District Council (2014) Infrastructure Delivery Plan [online] Available at: https://www.horsham.gov.uk/ data/assets/pdf\_file/0017/3743/CIL-InfrastructureDeliveryPlan.pdf https://www.horsham.gov.uk/ data/assets/pdf file/0007/66544/Green-Infrastructure-Study.pdf

https://www.horsham.gov.uk/ data/assets/pdf file/0003/66504/Sport-Open-Space-Recreation-Assessment-February-2014.pdf

<sup>164</sup> Horsham District Council (2017) Contaminated Land Strategy [online] Available at:

<sup>&</sup>lt;sup>157</sup> DEFRA, Clean Air Strategy 2019 [online] Available at:

 $https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment_data/file/770715/clean-air-strategy-2019.pdf$ 

<sup>&</sup>lt;sup>158</sup> Department for Transport, The Road to Zero (2018) [online] Available at: <u>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attl</u> <u>achment\_data/file/739460/road-to-zero.pdf</u> [<sup>35</sup> HM Government/2020]. The Work Consults 5.

 <sup>&</sup>lt;sup>159</sup> HM Government (2020) *The Waste (Circular Economy) Regulations* <sup>160</sup> Wessex County Council and South Downs National Park Authority (2018)
 West Sussex Joint Minerals Local Plan [online] Available at:

<sup>&</sup>lt;sup>162</sup> Horsham District Council (2014) Green Infrastructure Strategy [online] Available at:

<sup>&</sup>lt;sup>163</sup> Kit Campbell Associates (2014) Sport, Open Space and Recreation Assessment [online] Available at:

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0014/53411/Contaminated-Land-Strategy-2017.pdf

<sup>&</sup>lt;sup>165</sup> Horsham District Council (2014) Air Quality Action Plan [online] Available at: <u>https://www.horsham.gov.uk/ data/assets/pdf file/0011/15131/HDC-Planning-Advice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-GUIDANCE.pdf</u>

**B.147 Cowfold Air Quality Action Plan**<sup>166</sup>: 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.148 Storrington Air Quality Action Plan**<sup>167</sup>: 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.149 Water for life and livelihoods Part 1: South East River Basin District- River Basin Management Plan (2015)<sup>168</sup>: 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

**B.150 River Adur Catchment Flood Management Plan** (2009)<sup>169</sup>: The management plan aims to promote more sustainable approaches to managing flood risk.

and providing a framework for action and future regulation.

**B.151 Arun and Western Streams Catchment Flood Management Plan (2009)**<sup>170</sup>: The management plan aims to promote more sustainable approaches to managing flood risk.

**B.152 Marine Management Organisation Evidence Strategy 2015 to 2020**<sup>171</sup>: 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.

**B.153 Gatwick Sub-Region Water Cycle Study (2020)**<sup>172</sup>: Provides strategic level advice on water infrastructure and

environmental capacity to inform the development plans and strategic site allocations for the four sub-regional authorities.

#### **Current baseline**

#### **Air quality**

**B.154** 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.155** 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.156** 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 AQMAs<sup>173</sup>.

**B.157** There are several locations, within Horsham, where levels of (NO<sub>2</sub>) exceed the UK and EU air quality standards. Horsham District Council has identified parts of two villages, Storrington and Cowfold, where NO<sub>2</sub> levels exceed the annual mean air quality objective. At high concentrations NO<sub>2</sub> 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<sup>174175</sup>. Both AQMAs are located along busy 'A' road routes which accommodate high traffic volumes and have residential properties situated close

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment data/file/293867/Adur Catchment Flood Management Plan.pdf <sup>170</sup> Environment Agency (2009) Arun and Western Streams Catchment Flood

Management Plan [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att

achment data/file/293864/Arun and Western Streams Catchment Flood Man agement\_Plan.pdf <sup>171</sup> Marine Management Organisation (2019) Evidence Strategy 2015 to 2020 [online] Available at: <u>https://www.gov.uk/government/publications/evidence-strategy-for-the-marine-management-organisation-mmo/evidence-strategy-</u> 2015-to-2020

<sup>&</sup>lt;sup>166</sup> Horsham District Council (2013) Cowfold Air Quality Action Plan [online] Available at: <u>https://www.horsham.gov.uk/environmental-health/air-guality/cowfold-air-guality/comfold-a</u>

<sup>&</sup>lt;sup>167</sup> Horsham District Council (2012) Storrington Air Quality Action Plan [online] Available at: <u>https://www.horsham.gov.uk/environmental-health/air-</u> <u>quality/storrington-air-quality-management</u>

<sup>&</sup>lt;sup>168</sup> 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 199 Environment Agency (2000) River Advir Catchment Elect Management Plan.

<sup>&</sup>lt;sup>169</sup> Environment Agency (2009) River Adur Catchment Flood Management Plan [online] Available at:

<sup>&</sup>lt;sup>2015-to-2020</sup> <sup>172</sup> JBA Conulting on behalf of Crawley Borough Council, Mid Sussex District Council, Horsham District Council and Reigate and Banstead Borough Council (2020) Gatwick Sub Region Water Cycle Study [online] Available at: https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0010/89299/CIN-JBAU-XX-XX-RP-EN-0001-A1-C03-WCS\_Report\_red.pdf

<sup>&</sup>lt;sup>173</sup> 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-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-

GUIDANCE.pdf 174 Horsham District Council (2013) Cowfold Air Quality Action Plan [Online] Available at: <u>https://www.horsham.gov.uk/environmentalhealth/environmentalhealth/air-quality/cowfold-air-quality</u> 175 Lageners District Council Counci

<sup>&</sup>lt;sup>175</sup> Horsham District Council (2012) Storrington Air Quality Action Plan [Online] Available at: <u>https://www.horsham.gov.uk/environmentalhealth/environmentalhealth/air-quality/storrington-air-quality</u>

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.158** 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.159** A number of measures have been taken forward by Horsham District Council in the reporting year of 2019 to help improve local air quality. These include progression of a scheme for prohibition of goods vehicles over 7.5 tonnes on School Hill; promotion of prohibition of loading and waiting sections of road in Storrington; progression of the Clean Burn Sussex project; integration of wider Sussex emissions mitigation guidance; and approval of the Electric Vehicle (EV) Charge Point Strategy in March 2020<sup>176</sup>.

#### **Geology and minerals**

**B.160** 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 District<sup>177</sup>.

**B.161** 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)<sup>178</sup>. 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.162** 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.163** 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 alluvium<sup>179</sup>.

**B.164** 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 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 town<sup>180</sup>.

<sup>&</sup>lt;sup>176</sup> Horsham District Council (2020) 2020 Annual Status Report (ASR) [Online] Available at:

https://www.horsham.gov.uk/ data/assets/pdf file/0005/58829/2020-Annual-Status-Report-for-Horsham-District-Council.pdf

 <sup>&</sup>lt;sup>177</sup> 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
 <sup>178</sup> Wessex County Council and South Downs National Park Authority (2018)

<sup>&</sup>lt;sup>178</sup> Wessex County Council and South Downs National Park Authority (2018) West Sussex Joint Minerals Local Plan [Online] Available at: <u>https://www.westsussex.gov.uk/media/11736/mlp\_adoption.pdf</u>

<sup>&</sup>lt;sup>179</sup> Horsham District Council (in association with Chris Bland Associates) (2003) Horsham District Landscape Character Assessment [Online] Available at: <u>https://www.horsham.gov.uk/ data/assets/pdf file/0020/31349/Landscape-</u>

Character-Assessment-2003.pdf <sup>180</sup> Natural England (2010) Agricultural Land classification Map- London and the South East [Online] Available at:

http://publications.naturalengland.org.uk/publication/141047?category=5954148 537204736

#### Contaminated land

B.165 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 Steyning<sup>181</sup>. These areas are recognised as those at which past use may have resulted in contamination.

B.166 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 substances<sup>182</sup>.

#### Water

B.167 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.168 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 west<sup>183</sup>.

B.169 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<sup>184</sup> <sup>185</sup>.

B.170 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 B.8. 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 grounds<sup>186</sup>.

Table B.7: Ecological and Chemical Classification for surface waters in Adur and Ouse catchment

	Ecological status or potential				Chemical status		
Number of water bodies	Bad	Poor	Moderate	Good	High	Fail	Good
46	6	17	21	2	0	0	46

<sup>181</sup> 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 <sup>182</sup> Horsham District Council (2017) Contaminated Land Strategy [Online]

Available at:

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/att

achment data/file/718337/South East RBD Part 1 river basin management plan.pdf

Environment Agency (accessed 2019) Adur and Ouse - Summary [Online] Available at: https://environment.data.gov.uk/catchment-

planning/ManagementCatchment/3000/Summary <sup>5</sup> Environment Agency (accessed 2019) Arun and Western Streams -

Summary [Online] Available at: https://environment.data.gov.uk/catchmentplanning/ManagementCatchment/3004/Summary

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 201 9\_CHAPTER\_6\_Policy\_Indicators.pdf

https://www.horsham.gov.uk/ data/assets/pdf file/0014/53411/Contaminated-Land-Strategy-2017.pdf

Table B.8: Ecological and chemical classification for surface waters in Arun and Western Streams catchment

	Ecological status or potential				Chemical status		
Number of water bodies	Bad	Poor	Moderate	Good	High	Fail	Good
40	2	12	24	2	0	0	40

**B.171** 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 Zone<sup>187</sup>.

#### Waste

**B.172** 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 time<sup>188</sup>.

**B.173** 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 recycled<sup>189</sup>.Climate Change Adaptation and Mitigation

**B.174** 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 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.	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 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.	SA objective 14

<sup>187</sup> DEFRA (2019) Magic Map [Online] Available at:

https://magic.defra.gov.uk/MagicMap.aspx

<sup>188</sup> Recycle for West Sussex (2019) [Online] Available at:

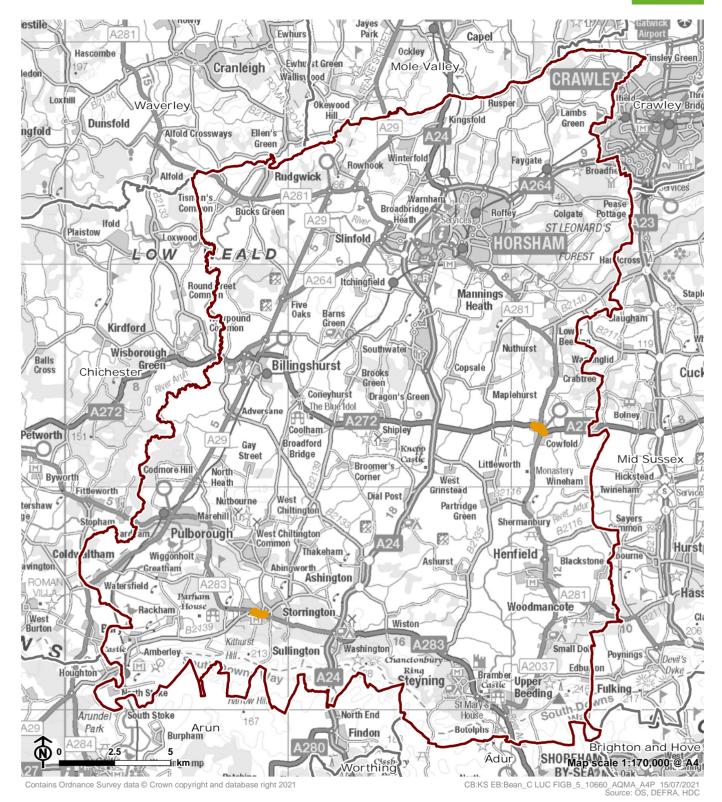
<sup>189</sup> Horsham District Council (2019) Authority Monitoring Report (2018/19) [Online] Available at:

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0007/78379/AMR\_2018\_201 9\_CHAPTER\_6\_Policy\_Indicators.pdf

http://www.recycleforwestsussex.org/home-recycling/your-recyclingbin/horsham/

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
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.	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.	SA objective 9
The District contains safeguarded mineral resources which, where possible, should not be lost or compromised by future growth.	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.	SA objective 10
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.	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. It will also provide further certainty in terms of planning for adequate wastewater infrastructure to address development requirements over the plan period.	SA objective 11





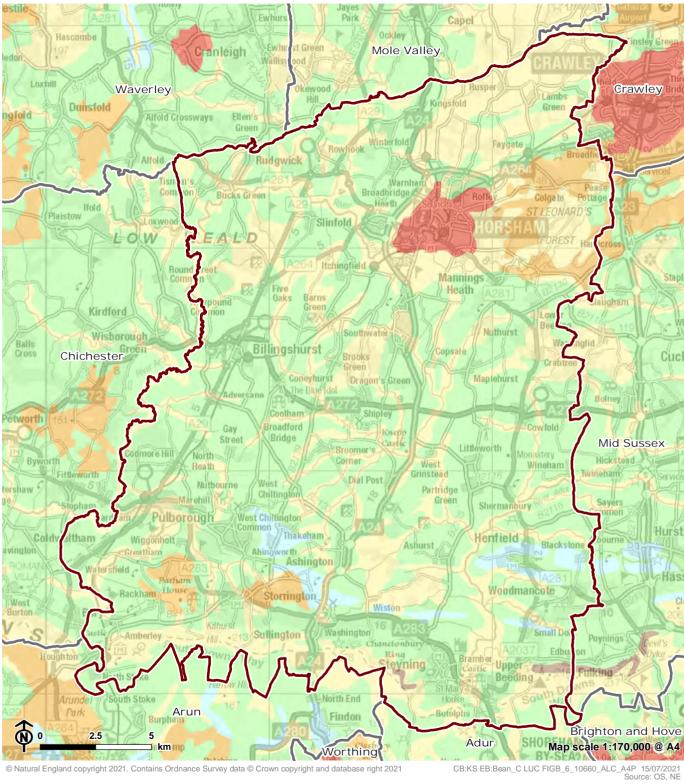
#### Figure B.5: Air Quality Management Areas in Horsham District

Horsham

Neighbouring authority Air Quality Management Area







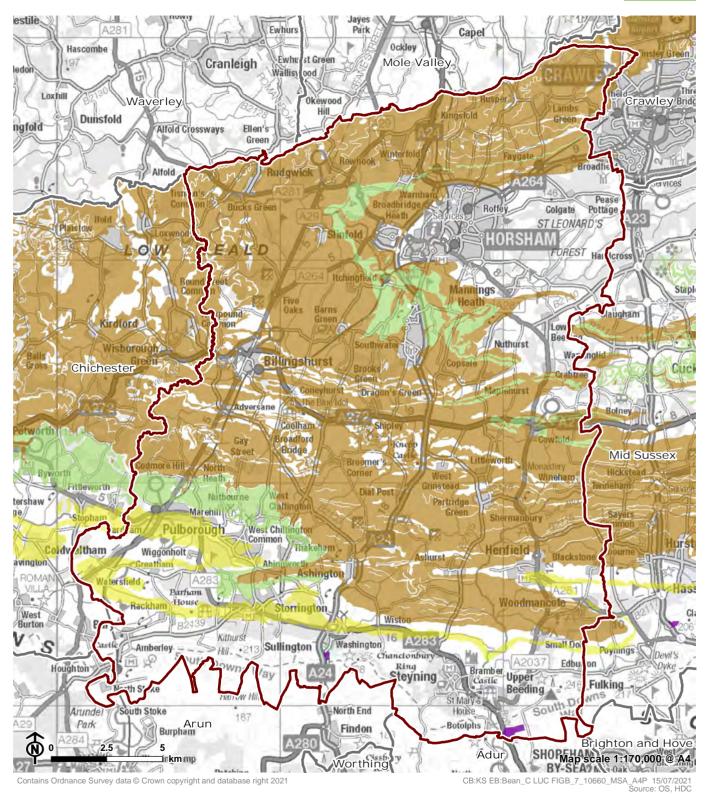
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#### Figure B.6: Agricultural Land Classification in Horsham District



Horsham District Council



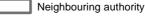


#### Figure B.7: Mineral Safeguarding Areas in Horsham District



#### Horsham

Chalk



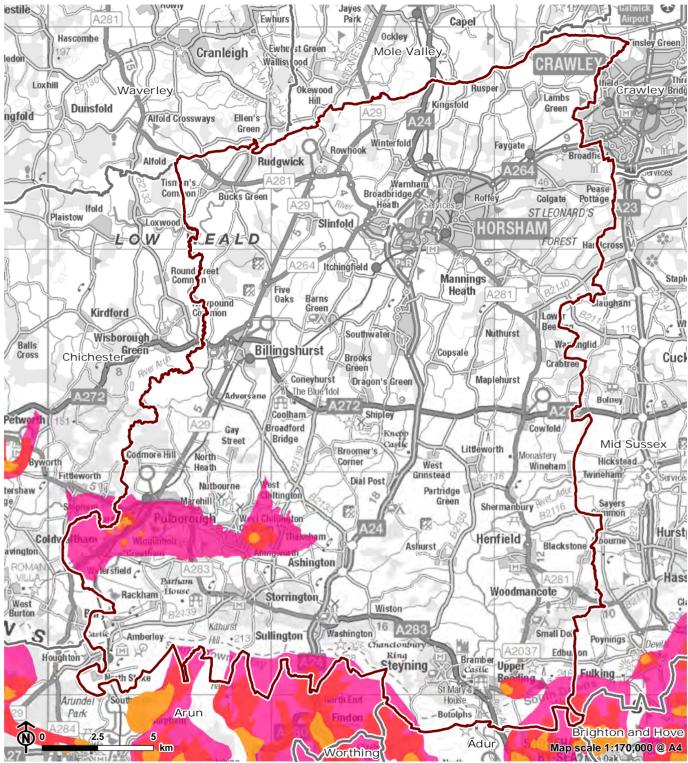
**Building stone** 

#### Minerals Safeguarding Area (MSA)









Contains Ordnance Survey data © Crown copyright and database right 2021

CB:KS EB:Bean\_C LUC FIGB\_8\_10660\_WaterQuality\_A4P\_15/07/2021 Source: OS, EA

#### Figure B.8: Water Quality in Horsham District



Horsham Neighbouring authority



#### Source Protection Zone

Zone 1 Zone 1c Zone 2



#### Climate change adaptation and mitigation

#### **Policy context**

#### International

**B.175 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.176 National Planning Policy Framework (NPPF)**<sup>190</sup>: 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.177 National Planning Practice Guidance (PPG)**<sup>191</sup>: 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.178 Climate Change Act 2008**<sup>192</sup>: Sets targets for UK greenhouse gas emission reductions of at least 80% by 2050

and  $CO_2$  emission reductions of at least 26% by 2015, against a 1990 baseline.

**B.179 Flood and Water Management Act (2010)**<sup>193</sup>: 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.180 The UK Renewable Energy Strategy**<sup>194</sup>: Sets out the ways in which we will tackle climate change by reducing our CO<sub>2</sub> emissions through the generation of a renewable electricity, heat and transport technologies.

**B.181 The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK**<sup>195</sup>: Aims to realise the wider energy efficiency potential that is available in the UK economy by maximising the potential of existing dwellings by implementing 21<sup>st</sup> century energy management initiatives on 19<sup>th</sup> century homes.

# **B.182 The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting: Making the country resilient to a changing climate**<sup>196</sup>: 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 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

<sup>&</sup>lt;sup>190</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment\_data/file/779764/NPPF\_Feb\_2019\_web.pdf <sup>191</sup> Department for Communities and Local Government (2016) National

<sup>&</sup>lt;sup>131</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at: http://www.apu.uk/government/collections/olapping\_practice\_guidance\_

https://www.gov.uk/government/collections/planning-practice-guidance <sup>192</sup> HM Government (2008) Climate Change Act 2008 [online] Available at: https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga\_20080027\_en.pdf <sup>193</sup> HM Government (2000) Elocal and Wyter Managament Act 2010

<sup>&</sup>lt;sup>193</sup> 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

<sup>&</sup>lt;sup>194</sup> Department of Energy and Climate Change (2009) The UK Renewable Energy Strategy [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/22 8866/7686.pdf <sup>195</sup> Department of Energy & Climate Change (2012) The Energy Efficiency

<sup>&</sup>lt;sup>135</sup> Department of Energy & Climate Change (2012) The Energy Efficiency Strategy: The Energy Efficiency Opportunity in the UK [online] Available at: <u>https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/65</u> <u>602/6927-energy-efficiency-strategy--the-energy-efficiency.pdf</u> <sup>196</sup> Department for Environment, Food and Rural Affairs (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/att achment\_data/file/727252/national-adaptation-programme-2018.pdf

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.183 The Clean Growth Strategy (2017)**<sup>197</sup>: Sets out the approach of the government to secure growth of the national income while cutting greenhouse gas emissions. The key policies and proposals of the Strategy sit below a number of overarching principles: acceleration of clean growth including through recommendations for private and public investment to meet carbon budgets; providing support to improve business and industry energy efficiency; improving energy efficiency in the housing stock including through low carbon heating; accelerating the shift to low carbon transport; delivering clean, smart, flexible power; enhancing the benefits and value of our natural resources; leading in the public sector to meet emissions targets; and ensure Government leadership to drive clean growth.

**B.184 Understanding the risks, empowering communities, building resilience: The national flood and coastal erosion risk management strategy for England**<sup>198</sup>: 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.185 A Green Future: Our 25 Year Plan to Improve the Environment**<sup>199</sup>: 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.

#### B.186 The Energy Performance of Buildings

**Regulations**<sup>200</sup> seeks to improve the energy efficiency of buildings, reducing their carbon emissions and lessening the impact of climate change. The Regulations require the adoption of a standard methodology for calculating energy performance and minimum requirements for energy performance, reported through Energy Performance Certificates and Display Energy Certificates.

#### Sub-national

**1.4 West Sussex Sustainability Strategy**<sup>201</sup>: 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.187 Horsham Climate Change Strategy**<sup>202</sup>: 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:

 <sup>&</sup>lt;sup>197</sup> HM Government 2017 The Clean Growth Strategy [online] Available at: https://www.gov.uk/government/publications/clean-growth-strategy
 <sup>198</sup> Environment Agency (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/22 8898/9780108510366.pdf 199 Department for Environment\_Ecod and Purol Affairs (2018) A Cross Environment

<sup>&</sup>lt;sup>199</sup> Department for Environment, Food and Rural Affairs (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/67 3203/25-year-environment-plan.pdf <sup>200</sup> HM Government (2021) *The Energy Performance of Buildings Regulations* 

 <sup>&</sup>lt;sup>200</sup> HM Government (2021) *The Energy Performance of Buildings Regulations* <sup>201</sup> West Sussex County Council (2015-2019) Sustainability Strategy [online]
 Available at:

https://www.westsussex.gov.uk/media/7357/sustainability\_strateqy.pdf <sup>202</sup> 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 Clim ate-Change-Strategy-2009.pdf

- 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.188 Horsham Short Term Organisational Carbon** Reduction Action Plan 2020 - 2022 (2020)<sup>203</sup>: Sets out actions to support the Council's aims to become carbon neutral by encouraging staff action.

B.189 Energy South to East Local Energy Strategy (2019)<sup>204</sup>: Sets out the approach to enable the Coast to Capital, Enterprise M3 and South East LEPs of England to achieve clean growth up to 2050 in energy across the power, heat and transport sectors.

B.190 Horsham Green Infrastructure Strategy (April

2014)<sup>205</sup>: 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.

B.191 Horsham Air Quality Action Plan: Air Quality and Emissions Reduction Guidance (May 2014)<sup>206</sup>: 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.192 River Adur Catchment Flood Management Plan** (2009)<sup>207</sup>: The management plan aims to promote more sustainable approaches to managing flood risk.

**B.193 Arun and Western Streams Catchment Flood** Management Plan (2009)<sup>208</sup>: The management plan aims to promote more sustainable approaches to managing flood risk.

#### **Current baseline**

#### **Climate change adaptation**

B.194 Climate change presents a global risk, with a range of different impacts that are likely to be felt within Horsham across numerous receptors. The 2018 Intergovernmental Panel on Climate Change (IPCC) identified a reduced timeframe to act to keep world temperature rises to 1.5 degrees Celsius before 2050 in line with the Paris Agreement .

**B.195** The Tyndall Centre<sup>209</sup> has undertaken work to calculate the 'fair' contribution of local authorities towards the Paris Climate Change Agreement. Based on the analysis undertaken the following recommendations have been made for Horsham:

- The District should stay within a maximum cumulative carbon dioxide emissions budget of 4.5 million tonnes (MtCO2) for the period of 2020 to 2100. It should be noted that at 2017 carbon dioxide emission levels, Winchester would use this entire budget within 7 years from 2020.
- The District should also initiate an immediate programme of carbon dioxide mitigation to deliver cuts in emissions averaging a minimum of -13.9% per year to secure a Paris aligned carbon budget.
- The District should reach zero or near zero carbon no later than 2041.

B.196 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

action-plan.pdf 204 Coast to Capital, Enterprise M3 and South East Local Enterprise

Horsham District Council (2014) Air Quality Action Plan [online] Available at: https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0011/15131/HDC-PlanningAdvice-Document-AIR-QUALITY-and-EMISSIONS-REDUCTION-

<sup>203</sup> Horsham District Council (2020) Horsham Short Term Organisational Carbon Reduction Action Plan 2020 - 2022 [online] Available at: https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0008/89108/Short-term-

Partnerships (2019) Energy South to East Local Energy Strategy [online] Available at: https://www.southeastlep.com/app/uploads/2019/03/Local-Energy-Strategy-FINAL.pdf

<sup>&</sup>lt;sup>205</sup> 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

GUIDANCE.pdf Environment Agency (2009) River Adur Catchment Flood Management Plan [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment data/file/293867/Adur Catchment Flood Management Plan.pdf 208 Environment Agency (2009) Arun and Western Streams Catchment Flood

Management Plan [online] Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment\_data/file/293864/Arun\_and\_Western\_Streams\_Catchment\_Flood\_Man agement Plan.pdf

Tyndall Centre (2020) Setting Climate Commitments for Winchester:

Quantifying the implications of the United Nations Paris Agreement for Horsham [online] Available at: https://carbonbudget.manchester.ac.uk/reports/E07000227/

warmer, with up to 35% more rainfall by 2070. 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 day<sup>210</sup>.

**B.197** 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.198** 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.199 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 winters<sup>211</sup>. 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%

SA of Horsham District Local Plan (Regulation 19)

Climate change mitigation

Detailed sustainability context

Appendix B

July 2021

**B.200** West Sussex is committed to a target of reducing the County's emission from the 2011/12 baseline by 50% by 2025. In February 2019, Full Council for West Sussex passed a motion pledging to try to reach net zero carbon emissions by 2030. 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 in June 2019. Horsham District Council have publicly acknowledged their ambition to work towards a net zero carbon target. The Council has agreed two targets for carbon emissions:

- An aspirational target for direct emissions which covers emissions as a result of the fuel used in fleet vehicles and to power and heat the Council buildings - to be carbon-neutral by 2030; and
- Indirect emissions which covers emissions outside Council control such as from buildings that it leases and from the goods and services that procures - to be carbon-neutral by 2050.

**B.201** It should be noted that in the reporting year 2018/19, the Council's total carbon emissions came to 18,351 tCO2. Emissions resulting from the District's functions account for 2% of the District's total carbon footprint. In Horsham District, buildings account for 56% of all carbon emissions, with transport accounting for 35% of all emission.

**B.202** As the table below demonstrates there has been a year on year reduction in the total CO<sub>2</sub> emissions for the County of West Sussex between 2014 and 2018. 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 habits<sup>212</sup>. These points considered, Horsham District has the second highest total tonnage of carbon dioxide emissions in the County (703.3kt CO<sub>2</sub>) after Chichester (765.0kt CO<sub>2</sub>), and also has the second highest per capita emissions at 4.9 tonnes of CO<sub>2</sub> emissions per capita. This compares 6.3 tonnes of CO<sub>2</sub> emissions per

<sup>&</sup>lt;sup>210</sup> Met Office (2018) UKCP18 Factsheet: Derived projections [Online] Available at:

https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/researc h/ukcp/ukcp18-fact-sheet-derived-projections.pdf

<sup>&</sup>lt;sup>211</sup> 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

<sup>&</sup>lt;sup>212</sup> 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

## capita for Chichester which is the district with the highest figure in the County<sup>213</sup>.

Table B.11: Total CO2 Emissions percentage change from previous year in West Sussex

Year	2014	2015	2016	2017	2018
Total Emission % Reduction	-9%	-2%	-3%	-3%	-2%

**B.203** For the year 2005 Horsham had an average rate of 8.0 tonnes of CO<sub>2</sub> emissions per capita, however in 2018 the rate decreased to 4.9 tonnes per capita. **Table B.12** shows CO<sub>2</sub> (kilotonne) emissions for Horsham for 2005 and 2018 across industrial, domestic and transport sectors. There has been a reduction between 2005 and 2018 across all sectors and transport accounts for the largest amount of CO<sub>2</sub> emissions.

Table B.12: CO2 emissions in Horsham (shown as kt)

Year	Industrial and Commercial	Domestic	Transport	Total
2005	322.8	340.6	343.3	1006.7
2018	177.4	227.8	298.1	703.3

**B.204** 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 Performance Sustainable Buildings' which provides advice and information for architects, designers, engineers, developers and builders on creating sustainable buildings<sup>214</sup>.

**B.205** Data from the Department for Business, Energy & Industrial Strategy (BEIS) found that in 2019 the south east of England generated 8,657.8 GWh of renewable energy, with offshore wind producing the most energy at 4,302.3 GWh,

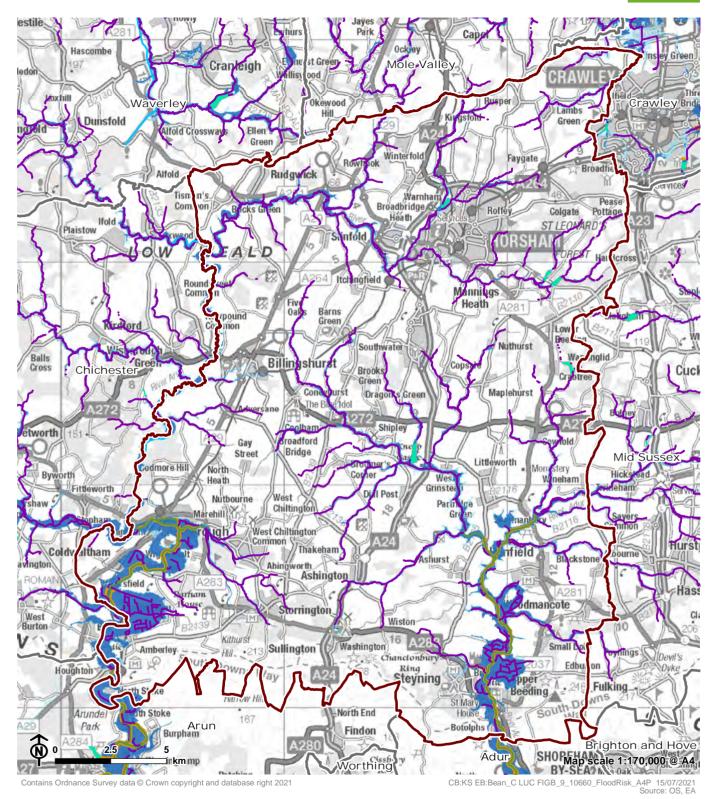
<sup>213</sup> Department for Business, Energy & Industrial Strategy (2020) Emissions of carbon dioxide for Local Authority areas: [Online] Available at: <u>https://data.gov.uk/dataset/723c243d-2f1a-4d27-8b61-cdb93e5b10ff/emissions-</u>

of-carbon-dioxide-for-local-authority-areas <sup>214</sup> Horsham District Council and Sussex Building Control (2009) Creating High Performance Sustainable Buildings [Online] Available at: followed by solar photovoltaic at 2119.9 GWh. In 2019, the south east had installed capacity for 4,268.2MWe from renewable sources. Furthermore, BEIS also found that in 2019 across Horsham there were 2,165 photovoltaic installations, two onshore wind, two anaerobic digestion and five landfill gas sites<sup>215</sup>.

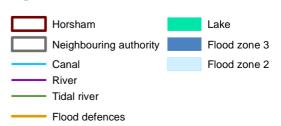
https://www.horsham.gov.uk/ data/assets/pdf file/0019/3484/Sustainability Bo oklet\_Low\_Res.pdf <sup>215</sup> BEIS (2020) Regional Renewable Statistics [Online] Available at:

<sup>215</sup> BEIS (2020) Regional Renewable Statistics [Online] Available at: https://www.gov.uk/government/statistics/regional-renewable-statistics Table B.13: 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
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 (and the third highest in the County per capita). The Council has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings.	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.	SA objective 15
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.	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.	SA objective 12 SA objective 15
Flood risk in Horsham is dominated by fluvial flooding which. 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.	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.	SA objective 12 SA objective 15



#### Figure B.9: Flood Risk in Horsham District





#### **Biodiversity**

#### **Policy context**

#### International

**B.206 International Convention on Wetlands (Ramsar Convention)** (1976): International agreement with the aim of conserving and managing the use of wetlands and their resources.

B.207 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.208 International Convention on Biological Diversity** (1992): International commitment to biodiversity conservation through national strategies and action plans.

**B.209 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.210 National Planning Policy Framework (NPPF)**<sup>216</sup>:

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.211** 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

<sup>216</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment\_data/file/779764/NPPF\_Feb\_2019\_web.pdf <sup>217</sup> Department for Communities and Local Government (2016) National

<sup>217</sup> Department for Communities and Local Government (2016) National Planning Practice Guidance [online] Available at:

http://www.legislation.gov.uk/ukpga/2006/16/pdfs/ukpga\_20060016\_en.pdf <sup>219</sup> Department for Environment, Food and Rural Affairs (2011) Biodiversity 2020: A strategy for England's wildlife and ecosystem services [online] Available natural capital at a catchment or landscape scale across local authority boundaries.

**B.212 National Planning Practice Guidance (PPG)**<sup>217</sup>: Supports the NPPF by requiring Local Plans to include strategic policies that conserve and enhance the natural environment through sustainable development.

**B.213 Natural Environment and Rural Communities Act 2006**<sup>218</sup>: Places a duty on public bodies to conserve biodiversity.

**B.214 Biodiversity 2020: A strategy for England's wildlife and ecosystem services**<sup>219</sup>: 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.215 Biodiversity offsetting in England Green Paper**<sup>220</sup>: Biodiversity offsets are conservation activities designed to compensate for residual losses. The Green Paper sets out a framework for offsetting.

**B.216 A Green Future: Our 25 Year Plan to Improve the Environment**<sup>221</sup>: 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; 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 reintroduce species that have been lost from the countryside.

#### at:

<sup>220</sup> 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\_docum ents/20130903Biodiversity%20offsetting%20green%20paper.pdf <sup>221</sup> Department for Environment, Food and Rural Affairs (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/67 3203/25-year-environment-plan.pdf

https://www.gov.uk/government/collections/planning-practice-guidance 218 HM Government (2006) Natural Environment and Rural Communities Act 2006 [online] Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/69 446/pb13583-biodiversity-strategy-2020-11111.pdf <sup>220</sup> Department for Environment\_Ecod and Purel Affairs (2012) Piodiversity

- 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 wellmanaged 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.217 A Living Landscape for the South East<sup>222</sup>: 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.218 West Sussex Minerals Sites - Biodiversity Action** Plan<sup>223</sup>: 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.219 West Sussex Road Verges Habitat Action Plan<sup>224</sup>: 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.220 Horsham Green Infrastructure Strategy (April**

2014)<sup>225</sup>: 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.221 South Downs National Park Partnership**

Management Plan (2014-2019)<sup>226</sup>: 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.

#### **Current baseline**

**B.222** 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.

<sup>&</sup>lt;sup>222</sup> 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 223 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
 <sup>224</sup> Sussex Biodiversity Partnership (2003) West Sussex Road Verges Habitat

Plan [online] Available at:

file:///C:/Users/field\_I/Downloads/West%20Sussex%20Road%20Verges%20Hab itat%20Action%20Plan.pdf

<sup>&</sup>lt;sup>225</sup> 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

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

**B.223** 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 WSCC<sup>227</sup>.

**B.224** 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 condition<sup>228</sup>. In addition, monitoring of local designations, shows that 76% of SNCIs and 64% or RIGS are in positive conservation management.

**B.225** 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%<sup>229</sup>.

**B.226** 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 Adur<sup>230</sup>. This approach is to be linked to the targeted landscape-scale approach to conserving biodiversity in Sussex.

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
The District contains and is in close proximity to a wide variety of both designated and non-designated natural habitats and biodiversity features. This includes those designated for their national and international importance.	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.	SA objective 6

http://www.highweald.org/downloads/publications/project-reports/weald-a-downancient-woodland-survey/1061-west-sussex-ancient-woodlandinventory/file.html

<sup>230</sup> 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

<sup>&</sup>lt;sup>227</sup> 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 228 Horsham District Council (2019) Authority Monitoring Report (2018/2011)

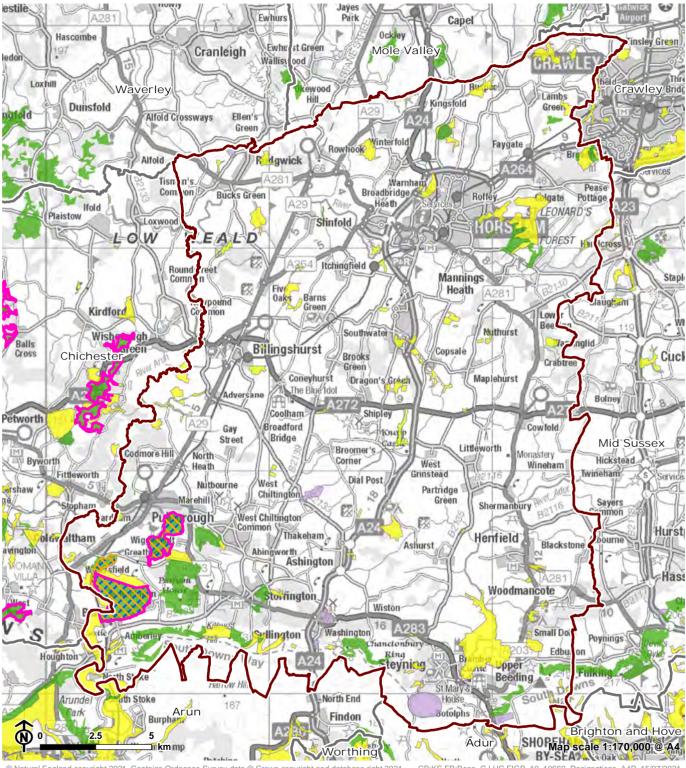
<sup>&</sup>lt;sup>228</sup> Horsham District Council (2019) Authority Monitoring Report (2018/2019) [Online] Available at:

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0007/78379/AMR\_2018\_201 9 CHAPTER 6 Policy Indicators.pdf

<sup>&</sup>lt;sup>229</sup> Weald and Downs Ancient Woodland Survey (2010) A revision of the Ancient Woodland Inventory for West Sussex [Online] Available at:

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
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.	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.	SA objective 6 SA objective 15





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#### Figure B.10: Biodiversity and Geodiversity Designations in Horsham District



Horsham District Council

#### Historic environment

#### **Policy context**

#### International

#### **B.227 UNESCO World Heritage Convention** (1972):

Through the convention, countries are required to ensure that measures are taken for the protection, conservation and presentation of cultural and natural heritage. They should also adopt a general policy that gives cultural and natural heritage a function in the life of the community and integrate the protection of heritage into comprehensive planning programmes. The convention also sets out for the designation of UNESCO World Heritage Sites.

**B.228 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.229 Valletta Treaty (1992) formerly the European Convention on the Protection of the Archaeological Heritage (Revisited)<sup>231</sup>: 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.230 National Planning Policy Framework (NPPF)<sup>232</sup>: 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:

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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.231 National Planning Practice Guidance (PPG)**<sup>233</sup>:

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.232 The Government's Statement on the Historic** Environment for England 2010<sup>234</sup>: 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.233 The Heritage Statement 2017<sup>235</sup>: 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.

The Heritage Alliance, Heritage 2020<sup>236</sup>: Sets out the historic environment sector's plan for its priorities between 2015 and 2020.

Historic England, Corporate Plan 2020-2023<sup>237</sup>: Contains the action plan which sets out how the aims of the corporate plan will be delivered. The plan includes six strategic objectives to demonstrate how Historic England will continue to work towards delivering the heritage sector's priorities for the historic environment.

#### **B.234 Sustainability Appraisal and Strategic** Environmental Assessment, Historic England Advice Note 8<sup>238</sup>: Sets out Historic England's guidance and expectations for the consideration and appraisal of effects on the historic

<sup>231</sup> Council of Europe (1992) Valletta Treaty [online] Available at: https://rm.coe.int/168007bd25 232 Department for Communities and Local Government (2019) National

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment\_data/file/779764/NPPF\_Feb\_2019\_web.pdf

https://www.gov.uk/government/collections/planning-practice-guidance 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-thehistoric-environment-for-england

https://www.gov.uk/government/uploads/system/uploads/attachment\_data/file/66 4657/Heritage Statement 2017 final - web version .pdf

The Heritage Alliance (2020) Heritage 2020

<sup>237</sup> Historic England (2020) Corporate Plan 2020-2023 [online] Available at: https://historicengland.org.uk/about/what-we-do/corporate-strategy/ <sup>238</sup> 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/sustainabilityappraisal-and-strategic-environmental-assessment-advice-note-8/heag036sustainability-appraisal-strategic-environmental-assessment.pdf/

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Planning Policy Framework [online] Available at:

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

<sup>&</sup>lt;sup>235</sup> Department for Digital, Culture Media and Sport (2017) Heritage Statement 2017 [online] Available at:

environment as part of the Sustainability Appraisal/Strategic Environmental Assessment process.

#### Sub-national

**B.235 West Sussex Local Design Guide**<sup>239</sup>: 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.236 Billingshurst Village Centre Supplementary**

**Planning Document (2017)**<sup>240</sup>: 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 provides a framework and point of focus for HDC and the key community partners in taking forward projects in the village centre.

#### **B.237 Horsham Town Plan Supplementary Planning**

**Document (2012)**<sup>241</sup>: 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.238 West of Horsham Masterplan Supplementary**

**Planning Document (2008)**<sup>242</sup>: 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.239 Land West of Horsham Design Principles and Character Areas Supplementary Planning Document (2009)<sup>243</sup>: This document aims to provide guidance on design matters for developers and others preparing or considering planning applications. Site specific design guidance reinforces

<sup>239</sup> West Sussex County Council (2008) Local Design Guide [online] Available at: <u>https://www.westsussex.gov.uk/media/1840/2910602.pdf</u> 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.240 Storrington Old Mill Drive Diamond Planning Brief

**Supplementary Planning Document (2008)**<sup>244</sup>: 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.241** 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.242** 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 period<sup>245</sup>.

**B.243** 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 20<sup>th</sup> Century.

**B.244** 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

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

<sup>&</sup>lt;sup>240</sup> 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 <sup>241</sup> 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 242 Harsham District Council (2008) Land Wort of Horsham Masterplan SPD

<sup>&</sup>lt;sup>242</sup> 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

<sup>&</sup>lt;sup>243</sup> Horsham District Local Development Framework (2009) Land West of Horsham Design Principles and Character Areas SPD [online] Available at: <u>https://www.horsham.gov.uk/\_\_\_\_\_\_data/assets/pdf\_\_file/0003/50961/WoH-Design-</u> Principles-SPD.pdf

Principles-SPD.pdf <sup>244</sup> Horsham District Local Development Framework (2008) Storrington Old Mill Drive Diamond Planning Brief SPD [online] Available at: http://www.barbhom.gov.uk/u.dt//costat/cdf.file/0010/50050/Old/Mill/Drive.odd

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0010/50959/OldMillDriveAdo pt.pdf <sup>245</sup> West Sussex County Council, East Sussex County Council, Brighton & Hove

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.245 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, two listed places of worship, two Scheduled Monuments, and a Scheduled Monument/Registered Park and Garden<sup>246</sup>. Preservation works to these structures are actively encouraged by the Council and would be given priority for renovation works<sup>247</sup>. Horsham in comparison with other local planning authorities in West Sussex, has the joint third highest number of assets on the Heritage at Risk Register, after South Downs and Chichester<sup>248</sup>.

B.246 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 search<sup>249</sup>.

B.247 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.248 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.249 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'250.

Table B.15: 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	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	SA objective 8

<sup>246</sup> Historic England (2020) Heritage at Risk: London & South East Register [online] Available at: https://historicengland.org.uk/images-

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

District-Planning-Framework-2015.pdf 248 Historic England (2020) Heritage at Risk London and South East Register [Online] Available at: https://historicengland.org.uk/images-

books/publications/har-2020-registers/lon-se-har-register2020/

<sup>249</sup> West Sussex County Council (2016) Historic Environment Record (HER): HER Search Threshold Guidance for Archaeological Notification Areas (ANAs) [Online] Available at:

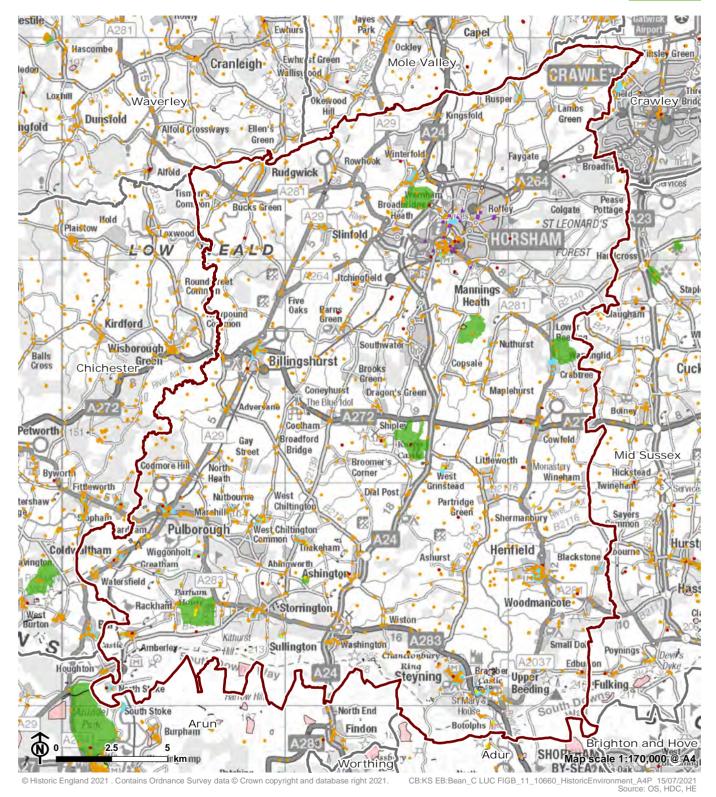
https://www.westsussex.gov.uk/media/7590/her\_thresholds\_april2016.pdf West Sussex Country Council (2020) Archaeological Notification Areas Map [Online] Available at : https://www.westsussex.gov.uk/land-waste-andhousing/landscape-and-environment/historic-environment-record/archaeological-notification-areas-1/ [Accessed 27<sup>th</sup> January 2020]

books/publications/har-2019-registers/lon-se-har-register2019/

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0006/28563/Horsham-

Key sustainability issues for Horsham	Likely evolution without the Local Plan Review	Relevant SA objective
vulnerable to development which is poorly located or designed.	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.	





#### Figure B.11: Horsham District's Historic Environment

#### Horsham

- Neighbouring authority
- Locally Listed Building
- Registered Park and Garden
- Scheduled Monument
- **Conservation Area**
- Grade I Listed Building
- Grade II Listed Building
- Grade II\* Listed Building

Horsham District Council

#### **Policy context**

#### International

B.250 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.251 National Planning Policy Framework (NPPF)**<sup>251</sup>: 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.252 A Green Future: Our 25 Year Plan to Improve the Environment<sup>252</sup>: 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.

Appendix B Detailed sustainability context SA of Horsham District Local Plan (Regulation 19) July 2021

#### Sub-national

**B.253 High Weald Area of Outstanding Natural Beauty:** Management Plan 2019-2024<sup>253</sup>: 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.254 South Downs National Park Partnership**

Management Plan (2014-2019)<sup>254</sup>: 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.255 South Downs Green Infrastructure Framework<sup>255</sup>:

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.256 A Strategy for the West Sussex Landscape<sup>256</sup>: 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.

<sup>&</sup>lt;sup>251</sup> Department for Communities and Local Government (2019) National Planning Policy Framework [online] Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/att achment\_data/file/779764/NPPF\_Feb\_2019\_web.pdf

Department for Environment, Food and Rural Affairs (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/67

<sup>3203/25-</sup>year-environment-plan.pdf 253 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

<sup>254</sup> 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 <sup>255</sup> South Downs Authority (2016) South D

South Downs Authority (2016) South Downs Green Infrastructure Framework [online] Available at: https://www.southdowns.gov.uk/wpcontent/uploads/2016/12/South-Downs-Green-Infrastructure-Framework-March-

<sup>2016.</sup>pdf 256 West Sussex County Council (2005) A Strategy for the West Sussex

https://www.westsussex.gov.uk/media/1771/landscape\_strategy.pdf

**B.257 Horsham Green Infrastructure Strategy (April** 

2014)<sup>257</sup>: 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.258 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 woodlands<sup>258</sup>.

B.259 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 Horsham<sup>259</sup>.

B.260 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.261** Areas identified as having low sensitivity to development were generally areas that had already

<sup>257</sup> Horsham District Council (2014) Green Infrastructure Strategy [online] Available at:

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.262 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 Footslope 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)<sup>260</sup>.

B.263 The findings of the Horsham District Landscape Character Assessment were built upon by the Council through the Landscape Capacity Assessment which will inform the Local Plan Review<sup>261</sup>. The landscape capacity work also drew

https://www.horsham.gov.uk/\_\_data/assets/pdf\_file/0007/66544/Green-Infrastructure-Study.pdf

<sup>&</sup>lt;sup>3</sup> 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 <sup>259</sup> 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 260 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 281Horsham District Council (2020) Horsham District Landscape Capacity Assessment [Online] Available at:

https://www.horsham.gov.uk/ data/assets/pdf file/0015/80502/Landscape-Capacity-Study-2020.pdf

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.264** 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.265** 6.77% of land within Horsham is located within the High Weald AONB<sup>262</sup>. 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 2018/19 reporting period and identified that there were 73 planning application consultations received from local authorities across the AONB during this period. During the same period of time the AONB body also completed 17 pre-application discussions and consultations, as well as providing input for four planning appeal<sup>263</sup>.

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

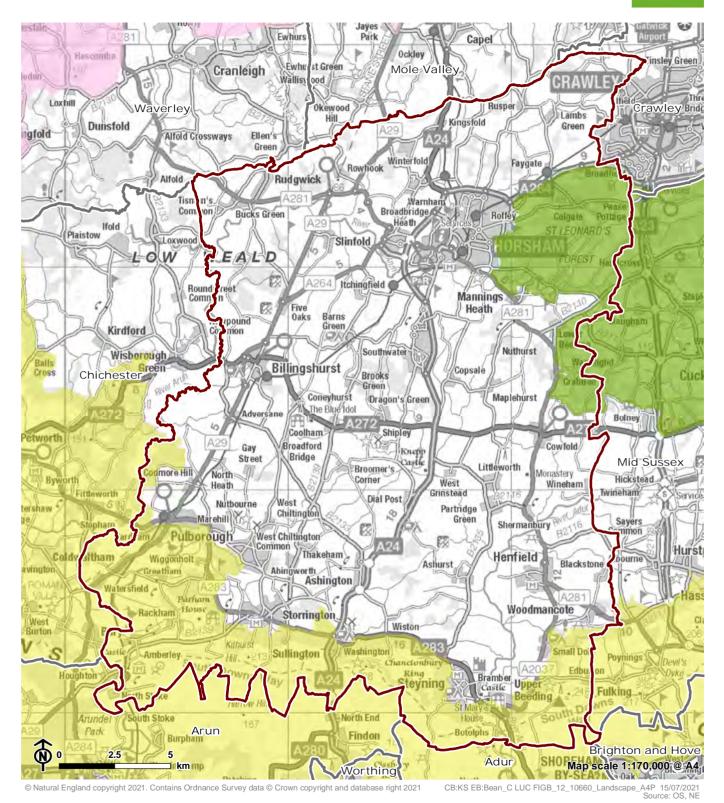
<sup>262</sup> High Weald Joint Advisory Committee (2019) The High Weald AONB Management Plan 2019-2024 [Online] Available at:

http://www.highweald.org/downloads/publications/high-weald-aonb-

management-plan-documents/2291-high-weald-managment-plan-4th-edition-2019-2024/file.html http://www.highweald.org/about-the-high-weald-unit/annual-reviews/2308-high-weald-aonb-partnership-annual-review-2018-2019/file.html

<sup>&</sup>lt;sup>263</sup> High Weald Joint Advisory Committee (2019) High Weald Joint Advisory Committee Annual Review [Online] Available at:





#### Figure B.12: Landscape Designations in Horsham District

- Horsham Neighbou High Wea Surrey Hi
  - Neighbouring authority High Weald Area of Outstanding Natural Beauty Surrey Hills Area of Outstanding Natural Beauty

South Downs National Park



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#### Assumptions regarding distances

**C.1** Reference is made to 'easy walking distance' in the appraisal assumptions. There are a number of pieces of research that give a variety of recommended guidance distances for walking. For example, the Institute of Highways and Transportation found that the average length of a walk journey is one kilometre. The Institute of Highways and Transportation categorises distances depending upon location and purpose of the trip, and 'desirable', 'acceptable', and 'preferred maximum':

	Town centres (m)	Commuting/School/ Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred maximum	800	2,000	1,200

**C.2** For the purposes of the appraisal, distances in the appraisal will be measured as the straight line distance from the edge of the site option to existing services and facilities, and therefore actual walking distances are likely to be greater (e.g. depending on the house location within a larger site and the availability of a direct route).

**C.3** It is recognised that many journeys to services and facilities will not be made in a straight line. When applying the Institute of Highways and Transportation distances for the appraisal of site options to each of the relevant distances a 10% buffer has therefore been applied to account for the potential difference between the straight line distance and the actual distance involved in a journey to services and facilities. For example, the relevant distance applied for walking distance for town and local centres has been decreased from 800m to 720m, and so on.

**C.4** It is considered that this is a reasonable approach, and professional judgement will be used when applying these distances to each site option and the range of services and facilities considered by the appraisal (e.g. where there are significant barriers to straight-line movement, such as railway lines). The distances used in the appraisal will vary depending upon the type of destination being accessed and the mode of transport:

450m walking distance for primary schools on the basis that parents with young children are unlikely to want long distances with young children.

- 900m walking distance for secondary schools.
- ■720m walking distance for town and local centres.
- 450m to a bus stop, as many people are unlikely to want to walk much further and then catch a bus to their destination.
- 1,800m walking distance to a train station.

In terms of access to cycle route, a distance of 450m will be used in the appraisal on the assumption that links to cycle routes are likely to use road carriageways.

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**C.5** The SA assumptions include analysis of the proximity of residential areas to key employment areas. Although there is no guarantee that people will find jobs at the employment areas closest to them, it is considered that provision of homes close to major sources of employment would support people in making shorter journeys to work. The following walking assumption has been applied:

■1,800m walking distance to key employment areas.

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SA Objectives		Criteria and assumptions		
1.	To provide affordable, sustainable and decent housing to meet local needs.	Residential site options         All of the residential site options are expected to have positive effects on this objective, due to the nature of the proposed development. Planning Practice Guidance <sup>264</sup> states that affordable housing should only be sought for residential development 10 or more homes. It is expected that sites of this size or larger could potentially provide affordable homes and so will have significant positive effects. Therefore:            Sites with capacity for more than 10 homes will have a significant positive (++) effect.             Sites with capacity for fewer than 10 homes will have a minor positive (+) effect.             Gypsy and Traveller site options          All of the Gypsy and Traveller site options are expected to have positive effects on this objective, due to the nature of the proposed development which would help to meet local need. Therefore, all sites are considered to have a significant positive (++) effect.             Employment site options             The location of employment sites is not considered likely to affect this objective; therefore the score for all site options will be negligible (0).		
2.	To maintain and improve access to centres of services and facilities and education.	All site options         Larger scale development could potentially incorporate the provision of new services. The location of all types of development sites could affect this objective by influencing people's ability to access existing services and facilities (both for local residents and employees during breaks and after work).         The Development Hierarchy for the District provides an indication of the range of services and facilities including education at a given settlement. The Main Town of Horsham provides a large range of employment, services and facilities and leisure opportunities, with the town of Crawley outside of the District also playing an important role for residents. The Small Towns and Larger Villages are noted to provide a good range of services and facilities. Strong community networks and local employment provision. Settlements below these settlements in the Development Hierarchy provide more limited access to existing services and facilities. The appraisal of sites reflects the most up to date order of settlements in the Development Hierarchy.         The proximity of sites to these areas can therefore be used to establish the potential accessibility to a wider number of services and facilities. Therefore:         Sites that are within 720m of the built-up area of the Main Town (Horsham), the town of Crawley or a Small Town or Larger Village will have a significant positive (++) effect.         Sites that are within 720m of the built-up area of a Medium Village will have a minor positive (+) effect.         Sites that are within 720m of the built-up area of a Smaller Village will have an uncertain negligible (0?) effect.         Sites that are not located within 720m of the built-up areas of any of the settlements noted above will have an uncertain minor negative (-?) effect.		

<sup>264</sup> Ministry of Housing, Communities & Local Government (2019) Planning Practice Guidance Paragraph: 023 Reference ID: 23b-023-20190315

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SA Objectives	Criteria and assumptions
	Residential and Gypsy and Traveller site options For sites which support residential use it will be necessary to consider access to education facilities. It is recognised that educational facilities are often not located within the town and village centres and are instead provided to meet the needs of specific catchment areas. Sites which provide a good level of access to services and facilities at centre locations may not always be those which provide a good level of access to educational facilities. The effects of sites on the educational element of this objective will depend on the access that they provide to existing educational facilities, although there are uncertainties as the effects will depend on there being capacity at those schools to accommodate new pupils, and there are no further education facilities in the District. New residential development could stimulate the provision of new schools/school places, particularly larger sites, but this cannot be assumed at this stage. Therefore, for residential and Gypsy and Traveller sites, in addition to the assumptions set out to consider access to service and facilities centres: <ul> <li>Sites that are within 1km of a secondary school and within 450m of a primary school (but not both) will have an uncertain significant positive (+?) effect.</li> <li>Sites that are within 1km of a secondary school or within 450m of a primary school (but not both) will have an uncertain primary for the first of t</li></ul>
	<ul> <li>Sites that more than 1km of a secondary school and 450m of a primary school will have an uncertain minor negative (-?) effect.</li> <li>This will mean some residential and Gypsy and Traveller sites may be recorded as having an overall mixed (++/-?) or (+/-?) effect.</li> </ul>
3. To encourage social inclusion, strengthen community cohesion and a respect for diversity.	All types of site options         The proximity of development to services and facilities may help to address issues of social inclusion. These issues (including access to facilities such as education and healthcare) are considered under SA objective 2 and SA objective 5 in the SA framework.         Achieving local regeneration may help to promote a sense of ownership and community cohesion among residents. It is recognised that this will depend in part on the detailed proposals for sites and their design, which are not known at this stage. However, development which occurs on brownfield land is likely to help promote the achievement of regeneration in the District. Therefore:         • Sites that are on brownfield land will have a minor positive (+) effect.         • Sites that are on greenfield land will have a negligible (0) effect.         The location of new developments will also affect social deprivation and economic inclusion by influencing how easily people are able to access job opportunities and access to decent housing in a given area. Areas which are identified as most deprived in the District are often also those which could benefit most from the achievement of regeneration. The delivery of housing or employment sites within a 40% most deprived area <sup>265</sup> will therefore have a minor positive (+) effect.

<sup>265</sup> According to the Index of Multiple Deprivation 2019

SA	Objectives	Criteria and assumptions
		The town centre and village centre locations of Horsham help to support community networks in the District. Development which contains appropriate uses (such as retail and/or community uses) and is to occur within the defined town centres and village centres could help to maintain the vitality and viability of these locations. As such where site options to be delivered within the defined town centres and village centres would contain a use of this type, a significant positive (++) effect is expected.
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.	All types of site options The effects of new development on levels of crime and fear of crime will depend on factors such as the incorporation of open space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites (rather they will be determined through the detailed proposals for each site). Therefore, the effects of all of the site options on this SA objective will be negligible (0).
5.	To improve public health and wellbeing and reduce health inequalities.	<ul> <li>All types of site options</li> <li>Sites that are within walking distance (720m) of existing healthcare facilities (i.e. GP surgeries or hospitals) and areas/features which promote physical activities (open spaces, or sports facilities) among residents will ensure that residents have good access to healthcare services and are provided which opportunities for healthy lifestyle choices. This includes employment sites, which are will provide employees access to these types of features outside of working hours and during break times. Therefore:</li> <li>Sites that are within 720m of a healthcare facility and an area of open space/sports facility will have a significant positive (++) effect.</li> <li>Sites that are within 720m of either healthcare facility or an area of open space/ sports facility (but not both) will have a minor positive (+) effect.</li> </ul>
		• Sites that are not within 720m of either a healthcare facility or an area of open space/ sports facility will have a minor negative (-) effect. If sites come forward within an area of open space or a site which currently accommodates an outdoor sports facility it is recognised that that this use may be lost as a result of development. As such where site options contain such features a significant negative () effect is recorded. This will mean some sites may be recorded as having an overall mixed (++/) or (+/) effect.
		If a number of sites are allocated within close proximity of one another, this could lead to existing healthcare facilities becoming overloaded. If at any point information becomes available regarding the capacity of existing healthcare facilities, this will be taken into account in the SA as relevant. If development at a site is likely to incorporate new healthcare facilities, open space/sports facilities, it will be scored in accordance with the assumptions listed above.
6.	To conserve, enhance, restore and connect wildlife, habitats, species and/or	All types of site options Development sites that are within close proximity of an international, national or local designated conservation site have the potential to affect the biodiversity or geodiversity of those sites/features, e.g. through habitat damage/loss, fragmentation, disturbance to species, air pollution, increased recreation pressure etc. Conversely, there may be opportunities to promote habitat connectivity if new developments include green infrastructure. Therefore, while proximity to designated sites provides an indication of the potential for an adverse effect, uncertainty exists, as appropriate mitigation may avoid adverse effects and may even result in beneficial effects. The potential impacts on undesignated

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SA Objectives	Criteria and assumptions
sites of biodiversity or geological interest.	habitats and species adjacent to the potential development sites cannot be determined at this strategic level of assessment. This would be determined once more specific proposals are developed and submitted as part of a planning application.
	<ul> <li>Sites that are within Natural England's Impact Risk Zones (IRZs) of one or more internationally or nationally designated biodiversity or geodiversity sites may have an uncertain significant negative (?) effect.</li> <li>Sites that are within 400m of a locally biodiversity or geodiversity designated site or area of ancient woodland may have an uncertain minor negative (-?) effect.</li> <li>Sites that not within of an IRZ of one or more internationally designated biodiversity or geodiversity sites, and are over 400m from a locally designated site could have a negligible (0?) effect.</li> <li>A bat sustenance zone has also been identified in the District. This zone is reflective of the potential for new development to impact upon flight paths of Barbastelle associated</li> </ul>
	<ul> <li>with the Mens SAC which lies outside of Horsham District. Therefore:</li> <li>Sites that lie within the bat sustenance zone may have an uncertain minor negative (-?) effect.</li> </ul>
<ol> <li>To conserve and enhance the character and distinctiveness of the District's landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place.</li> </ol>	All types of site options The effects of new development on the character and quality of the landscape will depend in part on its design, which is not yet known; therefore all effects will be to some extent uncertain at this stage. The Horsham District Landscape Capacity Assessment <sup>266</sup> is being updated as part of the evidence base for the Local Plan Review. It assesses the Local Landscape Areas (LLA) in the District in terms of their capacity to accommodate new development. Therefore, in addition to the above:      Sites that are within an LLA that is assessed as having 'No/Low' or 'Low-Moderate' landscape capacity could have a significant negative effect (?).     Sites that are within an LLA that is assessed as being of 'Moderate' or 'Moderate-High' landscape capacity could have a minor negative effect (-?).     Sites that are within an LLA that is assessed as being 'High' landscape capacity or are within the existing built up area boundary could have a negligible effect (0?).     This element of the appraisal will also reflect the type of development (i.e. residential or employment) which the Landscape Capacity Assessment considered for each area.
<ol> <li>To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.</li> </ol>	All types of site options The NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset "great weight should be given to the asset's conservation irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance". However, development could also enhance the significance of the asset (provided that the development preserves those elements of the setting that make a positive contribution to or better reveals the significance of the asset).

<sup>266</sup> Horsham District Council (November 2019) Draft Landscape Capacity Assessment

SA Objectives	Criteria and assumptions
	In all cases, effects will be uncertain at this stage as the potential for negative or positive effects on historic and heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect).
	The findings for this SA objective have been informed by the heritage impact work undertaken by the Council as follows:
	<ul> <li>Sites for which a significant effect has been identified in relation to one or more heritage assets could have a significant negative effect (?).</li> <li>Sites for which an effect which only has the potential to be significant or is not likely to be significant has been identified in relation to one or more heritage assets could have a minor negative effect (-?).</li> <li>Sites for which a negligible effect has then identified in relation to heritage assets could have a negligible effect (0?).</li> </ul>
9. To make efficient use of the	All types of site options
District's land resources through the re-use of	The effects of new development on soils will depend on its location in relation to the areas of highest quality agricultural land in the District, and whether the land has previously been developed. Therefore:
previously developed land and conserve its soils.	<ul> <li>Sites that are mainly or entirely on greenfield land which is classed as being of Grade 1, Grade 2 or Grade 3a agricultural quality would have a significant negative () effect.</li> <li>Sites that are mainly or entirely on greenfield land which is classed as being of Grade 3 agricultural quality (but where it is not known if it is Grade 3a or 3b land) could have a significant negative effect although this is uncertain (?).</li> <li>Sites that are mainly or entirely on greenfield land that is classed as Grade 3b, Grade 4, Grade 5, non-agricultural or urban land would have a minor negative (-) effect.</li> <li>Sites that are mainly or entirely on brownfield land would have a minor positive (+) effect.</li> <li>Sites that would result in the remediation of contaminated land would have a significant positive (++) effect.</li> </ul>
10. To conserve natural	All types of site options
resources, including mineral resources in the District.	The effects of new development on mineral resources will depend on its location in relation to areas which have been identified for their importance for mineral reserves in the District. The West Sussex Joint Minerals Local Plan (2018) identifies Mineral Safeguarding Areas (MSAs) and development within or in close proximity to these areas can result in sterilisation of mineral resources. Therefore:
	• Sites that are located directly within an MSA would have a significant negative effect on mineral resources although this is uncertain (?) dependent upon whether extraction could be achieved prior to any development.
	• Sites that are located within 250m of an MSA would have a minor negative effect on mineral resources although this is uncertain (-?) dependent upon whether extraction could be achieved prior to any development.
	Sites located more than 250m from MSAs are expected to have a negligible (0) effect.

SA Objectives	Criteria and assumptions
11. To achieve sustainable	All types of site options
water resource management and promote the quality of	The effects of new development in terms of promoting more sustainable use of water resources will depend largely on people's behaviour as well as the design of new developments. However, where development takes place within Source Protection Zones (SPZs), there may be potential risks relating to contamination to result. Therefore:
the District's waters.	<ul> <li>Sites that are within an SPZ could have a minor negative (-) effect.</li> <li>Sites that are not within an SPZ could have a negligible (0) effect.</li> </ul>
	Any issues regarding supply of water resources, and wastewater treatment capacity, are more appropriately appraised at the Local Plan scale, rather than through as assessment of each individual site.
12. To manage and reduce the	All types of site options
risk of flooding.	The effects of new development on this SA objective will depend to some extent on its design, for example whether it incorporates SuDS, which cannot be assessed at this stage. Where site options are located in areas of high flood risk, it could increase the risk of flooding in those areas (particularly if the sites are not previously developed) and would increase the number of people and assets at risk from flooding. As such:
	• Sites that are entirely or mainly within flood zone 3a or flood zone 3b are likely to have a significant negative () effect.
	<ul> <li>Sites that are entirely or mainly within flood zone 2 are likely to have a minor negative (-) effect.</li> <li>Sites that are entirely or mainly within flood zone 1 are likely to have a negligible (0) effect.</li> </ul>
	Furthermore:
	<ul> <li>Sites that are on greenfield land are expected to have a minor negative (-) effect.</li> <li>Sites that are on brownfield land are expected to have a negligible (0) effect.</li> </ul>
	Adopting a precautionary approach the scores for this SA objective reflect the most adverse effect identified. For example a site which lies within flood zone 3a and brownfield land would score a significant negative () effect overall.
13. To reduce congestion and	All types of site options
the need to travel by private vehicle in the District.	The proximity of residential and employment sites to public transport links will affect the extent to which residents are able to make use of non car-based modes of transport to access services and facilities as well as job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. It is possible that new transport links such as bus routes or cycle paths may be provided as part of larger-scale housing developments or employment development but this cannot be assumed.
	It is assumed that people would generally be willing to travel further to access a railway station than a bus stop. It is also recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to do so will depend on factors such as the availability of cycle storage facilities at their end destination,

SA Objectives	Criteria and assumptions
	which are not determined by the location of sites. How safe or appealing particular roads are for cyclists cannot be determined at this strategic level of assessment. However, the proximity of site options to existing cycle routes can be taken as an indicator of how likely people are to cycle to or from a development site. Therefore:
	<ul> <li>Sites that are within 1.8km of a railway station are likely to have a significant positive (++) effect.</li> <li>Sites that are more than 1.8km from a railway station but within 450m of a bus stop and/or cycle route are likely to have a minor positive (+) effect.</li> <li>Sites that are more than 1.8km from a railway station and 450m from a bus stop and cycle route could have a minor negative (-) effect.</li> </ul>
14. To limit air pollution in the	All types of site options
District and ensure lasting improvements in air quality.	Development sites that are within, or directly connected via road, to one of the Air Quality Management Areas (AQMAs) in the District, or in AQMAs in surrounding Districts, could increase levels of air pollution in those areas as a result of increased vehicle traffic. Therefore:
	<ul> <li>Residential, employment and mixed use sites that are within or directly connected via road to an AQMA are likely to have a significant negative () effect.</li> <li>Gypsy and Traveller sites that are within or directly connected via road to an AQMA are likely to have a minor negative (-) effect (due to a lower number of vehicle movements likely to be associated with these sites).</li> <li>All sites that are not within or directly connected via road to an AQMA are likely to have a negligible (0) effect on air quality.</li> </ul>
15. To minimise the District's	All types of site options
contribution to climate change and adapt to	The effects of new development in terms of climate change and how development will respond to this issue will depend to some extent on its design, for example whether it incorporates renewable energy generation on site or includes SuDS.
unavoidable climate change.	However, the proximity of development sites to sustainable transport links will affect the extent to which people are able to make use of non-car based modes of transport to access services, facilities and job opportunities, although the actual use of sustainable transport modes will depend on people's behaviour. It is possible that new transport links such as bus routes or cycle paths may be provided as part of new developments, particularly at larger sites, but this cannot be assumed.
	It is assumed that people would generally be willing to travel further to access a railway station than a bus stop. It is also recognised that many cyclists will travel on roads as well as dedicated cycle routes, and that the extent to which people choose to do so will depend on factors such as the availability of cycle storage facilities at their end destination, which are not determined by the location of sites. How safe or appealing particular roads are for cyclists cannot be determined at this strategic level of assessment. However, the proximity of site options to existing cycle routes can be taken as an indicator of how likely people are to cycle to or from a development site. Therefore:
	<ul> <li>Sites that are within 1.8km of a railway station are likely to have a significant positive (++) effect.</li> <li>Sites that are more than 1.8km from a railway station but within 450m of a bus stop and/or cycle route are likely to have a minor positive (+) effect.</li> <li>Sites that are more than 1.8km from a railway station and 450m from a bus stop and cycle route could have a minor negative (-) effect.</li> </ul>

SA Objectives	Criteria and assumptions
16. To facilitate a sustainable and growing economy.	<ul> <li>Employment site options</li> <li>All of the employment site options are expected to have positive effects on this objective, due to the nature of the proposed development. Larger sites will provide opportunities for the creation of more new jobs and so would have significant positive effects. Therefore: <ul> <li>Sites that are more than 5ha in size will have a significant positive (++) effect.</li> <li>Sites that are smaller than 5ha in size will have a minor positive (+) effect.</li> </ul> </li> <li>Residential and Gypsy and Traveller site options</li> <li>The specific location of residential and Gypsy and Traveller sites within the District will not directly influence sustainable economic growth. Therefore a negligible (0) effect is expected for these types of site options.</li> </ul>
17. To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.	Employment site options         The provision of new employment sites within the District is likely to benefit the highest number of residents where are accessible by sustainable transport links. Therefore:         Sites that are within 1.8km of a train station or likely to have a significant positive (++) effect.         Sites that are within 450m of a bus stop and/or cycle path are likely to have a minor positive (+) effect.         Sites that are within 1.8km of a train station or within 450m of a bus stop and cycle path are likely to have a minor negative (-) effect.         Residential and Gypsy and Traveller site options         The location of residential and Gypsy and Traveller sites will influence the achievement of this objective by determining how easily residents would be able to access job opportunities at existing employment sites.         The settlement hierarchy set out in the HDFP identified that the Main Town of Horsham provides access to a large range of employment opportunities. The remaining settlements in the District have been identified through the settlement hierarchy as providing local or more limited employment provision. The proximity of site options to key employment areas also serves as an indicator of the level of employment opportunities which are likely to be accessible. Therefore:         Sites that are within 1.8km of a key employment area and that are within 720m of Horsham town would have a significant positive (+) effect.         Sites that are within 1.8km to 2.7km of a key employment area and are not within 720m of Horsham town would have a significant negative (-) effect.         Sites that are within 1.8km to 2.7km of a key employment area and are not within 720m of Horsham town would

SA Objectives	Criteria and assumptions
	Therefore (which could result in mixed effects overall):
	• Sites that are currently in employment use would have a significant negative () effect.

# Appendix D

SA matrices for the large site options

SA of Horsham District Local Plan (Regulation 19) July 2021

### Site SA101: Land West of Ifield

SA Objective	SA Score		Justification						
	Reg 18	Reg 19							
SA 1: To provide affordable, sustainable and decent housing to meet local needs.			Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. It is proposed that the site has the potential to deliver around 3,500 dwellings within the plan period, largely within the Horsham District, but also partially within the administrative area of Crawley Borough. The site is expected to delivery more than 10,000 dwellings beyond the plan period over 35 years. The site will deliver at least 35% affordable housing as part of development.						
	++	++	A significant positive effect is expected for the site in relation to this SA objective due to the contribution to the area's identified housing need, including affordable housing. The close proximity of the site to Crawley means that it could potentially contribute to unmet housing need within that local authority.						
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. It is expected that the site has the potential to deliver around 3,250 homes in the plan period up to 2038 and 10,000 dwellings in the longer term. The site is to provide Gypsies and Travellers accommodation as part of its development. A significant positive effect is therefore still expected.						
SA 2: To maintain and improve access to centres of services and facilities including health centres and	++?		Effects at Regulation 18 stage: The site is greenfield and therefore there are no existing services and facilities within the site. The site is not within walking distance of any town centre locations in the District or Crawley Town Centre which is to the east. However, it is adjacent to the urban edge of Crawley and within close proximity of a number of neighbourhood centres within this settlement including those at Ifield, West Green and Langley Green. The neighbourhood centre of Gossops Green is also within 800m of the site, but pedestrian access is more limited to this area due to the presence of a railway line. The site is also located within close proximity to multiple education facilities and healthcare centres within Crawley. As such, residents in the early stages of development are likely to have access to some services and facilities.						
education.		++?							As part of the development, the site proposes to deliver two primary schools and early years facilities, one secondary school (with 6th form), a health and wellbeing centre and retail provision including a pub and restaurant/café. These provisions are expected to be delivered during the plan period and would contribute to the accessibility of services and facilities in the area. In the long term, during the 35 year period over which the entirety of the site is to be built out a total of five primary schools and early years facilities and six secondary schools are expected to be delivered at the site.
			++?	A significant positive effect is expected for the site in relation to this SA objective considering the existing services and facilities which are accessible from the site and the proposals at the site which deliver a range of additional provisions. Uncertainty is attached to the effect considering that the close proximity of this large site to Crawley could potentially result in existing facilities becoming overcapacity.					
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. However, this has not resulted in a change to the distance of the site to nearby service and facilities and town centres locations. The updated proposal indicates that a four form-entry secondary school and two, two form-entry primary schools would be provided at the site and provisions would also be made for early years, special educational needs (SEND), and further education. Furthermore, the development could include the provision of healthcare facilities, although this is uncertain. New community facilities and a retail centre are expected to be provided for each new neighbourhood created as part of the development. A significant positive effect is therefore still expected. The effect is uncertain given that the issue of services and facilities in Crawley becoming overcapacity may still result.						
SA 3: To encourage social inclusion,	+?	+?	Effects at Regulation 18 stage: The site is not within a 40% most socially deprived area. As such, there is limited potential for the site to contribute to local regeneration.						

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
strengthen community cohesion and a respect for diversity.			The site is located adjacent to the existing urban edge of Crawley and is in close proximity to a number of neighbourhood centres in the town. As such there is potential for the new development and services provided to complement existing uses and contribute to the vitality of these existing neighbourhood centres.
respection unversity.			As such, a minor positive effect is expected for the site in relation to this SA objective. The effect is uncertain as the impact of delivering new services and facilities will be dependent in part on their phasing which is unknown at this stage.
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. However, this has not resulted in a more socially deprived area being included for development. While the size of the development may pose challenges in terms of securing its successful integration with existing communities, there is no change in terms of the accessibility from the site to existing neighbourhood centres. A minor positive effect is therefore still expected. The effect is still uncertain given that the exact phasing of new services and facilities is still uncertain.
SA 4: To support the creation of safe			Effects at Regulation 18 stage: The potential for the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.
communities in which levels of crime, anti- social behaviour and disorder and the fear of crime are reduced.	0?	0?	Effects at Regulation 19 stage: An uncertain negligible effect is still expected given that the detailed design of development is still unknown.
SA 5: To improve public health and wellbeing and reduce			Effects at Regulation 18 stage: There are several health centres to the east within walking distance of the site in Crawley as well as multiple outdoor and indoor sports facilities. There are also multiple PROWs in the area that provide access to the surrounding countryside. There is potential for these existing assets to contribute positively to resident's health in the new development by increasing uptake of physical activity.
health inequalities.			The site takes in the Ifield Golf Club and development could lead to the loss of this facility. However, as part of development, the site proposes to deliver approximately 50% green space, parts of which could be used by residents for recreational purposes. A health and wellbeing centre is also proposed for delivery at the site.
	++/ 2	++/ ?	Part of the northernmost part of the site is located within the noise contour for Gatwick Airport. The site promoters plan to locate housing and education facilities to the south of the site to avoid impacts of aircraft noise on residents. However, there may still be potential for negative impacts from aircraft noise particularly considering the potential for growth at Gatwick in the future.
			Overall, an uncertain mixed significant positive and significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain as the high number of homes to be provided at the site could result in the potential for existing healthcare facilities to become overburdened.
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. However, this has not changed the area of open space which lies within the site boundary and has not affected the distance from the site to nearby existing health centres and outdoor and indoor sports facilities. Part of the site stil falls within the noise contour for Gatwick Airport. The development of the site is expected to incorporate new sports/leisure facilities, and new public open space which is to cover at 50% of the site area. Furthermore, the development could include the provision of healthcare facilities, although this is uncertain. A mixed significant positive and significant negative effect is still expected. The effect is uncertain given that there is still potential for local healthcare facilities to become overburdened.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of			Effects at Regulation 18 stage: The southern half of the site is located within Impact Risk Zones (IRZs) for two SSSIs (House Copse and Buchan Hill Ponds). However, these IRZs are for industrial/aviation planning applications and not for residential use, office use or any of the other provisions associated with the development proposals. There is a large Local Wildlife Site (Ifield Brook Wood and Meadows) in the eastern half of the site, which the site promoter has indicated would be protected as part of development. The site is also adjacent to several areas of Ancient Woodland and there is an area of deciduous woodland priority habitat adjacent to the watercourse that passes through the site.
biodiversity or geological interest.	?	?	A significant negative effect is expected for the site in relation to this SA objective considering that there is a local designation within the site and areas of Ancient Woodland adjacent to the site. The greenfield land take within the site may result in increased habitat disturbance as well as potential for fragmentation and loss. There is also potential for recreational pressures, increases in noise and light as the site is occupied. However, the effect is uncertain as the site proposals include provision and enhancement of Green Infrastructure. These measures could help to mitigate adverse effects on the natural environment.
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. However, this has not affected the proximity of the site to biodiversity designations. The Local Wildlife Site and areas of Ancient Woodland still lie within the site boundaries. The site promoters have indicated that they will protect lfield Brook Meadows and has also committed to achieving 10% biodiversity net gain. A significant negative effect is still expected. The effect is uncertain given that the site promoters have committed to achieving biodiversity net gain which may help to offset the effects relating to the Local Wildlife Site and Ancient Woodland.
SA 7: To conserve and enhance the			Effects at Regulation 18 stage: Land to the west of Ifield has been assessed in the Horsham District Landscape Capacity Assessment. The site is comprised of a number of Local Landscape Character Area (LLCAs) with varying degrees of landscape capacity.
character and distinctiveness of the District's landscapes and townscapes,			The land in the south of the site which in close proximity to the urban edge of Crawley has been identified as being of low-moderate and high-moderate landscape capacity for large scale housing development and low-moderate capacity for large scale employment development. The northern portion of the site falls on land that has been identified as having no/low landscape capacity for large scale residential or employment development.
maintaining and strengthening local distinctiveness and sense of place.	?	?	As such, a significant negative effect is expected for the site in relation to this SA objective as there are substantial areas of the site where it is unlikely that residential or employment development could be accommodated without particularly adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. This has resulted in a comparatively small area of land with no/low landscape capacity for large scale residential or employment development now lying within the site. The development proposal now confirms that no built development is proposed in the northern part of the site which has been identified as having the most limited capacity for new development. In all the landscape within the site is sensitive at many locations. A significant negative effect is still expected. The effect is uncertain as the design of new development may present opportunities to mitigate impacts. The landscape-led approach to development may help to secure benefits in this regard.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the	?	?	Effects at Regulation 18 stage: The north-eastern part of the site overlaps with around half of Ifield Conservation Area, which contains multiple Grade II listed buildings and the Grade I listed Parish Church of St Mary. The majority of listed buildings within the Conservation Area lie outside of site boundaries with only one Grade II listed building (Old Pound Cottage) lying within the site boundaries on Rusper Road. The northernmost part of the site encircles a Scheduled Monument (Medieval moated site at Ifield Court). There are two Listed Buildings adjacent to the south-east boundary of the site. Further designated assets within 500m of the site include a cluster of Grade II Listed Buildings to the south-west and several Grade II Listed Buildings to the west.

SA Objective	SA Score		SA So	core	Justification			
	Reg 18	Reg 19						
District's historic environment.			As well as nationally designated heritage assets, the site is also in close proximity to Locally Listed Buildings. The Barn Theatre lies within the site boundaries and there are six further Locally Listed Buildings in close proximity to the site within Ifield Conservation Area. In addition, the majority of the site is located within a West Sussex Archaeological Notification Area (ANA) in relation to the Iron Ore industry and Medieval Moated Site, Rusper.					
			The Ifield Conservation Area Statement (2018) states that the Conservation Area's rural setting contributes strongly to its character and that the surrounding fields and open space within and adjacent should be protected from development that would be out of scale with the existing character. There is potential for development at the site to result in impacts on the existing character and setting of the Conservation Area. As such, a significant negative effect is expected for the site in relation to this SA objective.					
			The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.					
			Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA101. The findings of the assessment work note that there are 13 Listed Buildings (within the Horsham District boundary), and a scheduled ancient monument within the wider 1km study area set out for the site. This area also contains nine ANAs (all of which are categorised as red or amber and are therefore very sensitive or sensitive areas for archaeology) and four archaeological sites. The assessment work concluded that development could result in one Listed Building (Grade II Listed Old Pound Cottage) being subject to significant change, with two Listed Buildings (Grade II Listed Pockneys Farm and Oak Lodge) being subject to potentially significant change. Given that significant change is expected to result in relation to a designated heritage asset overall a significant negative effect is expected for the site in relation to this SA objective.					
			The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.					
SA 9: To make efficient use of the			Effects at Regulation 18 stage: The site is located on greenfield land. The majority of the site is comprised of grade 4 agricultural land with some smaller areas of grade 3 agricultural land also within the site.					
District's land resources through the re-use of previously	-	-	A minor negative effect is expected for the site in relation to this SA objective considering that the site is greenfield land which is primarily classed as being of grade 4 agricultural quality.					
developed land and conserve its soils.			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. This land is mostly undeveloped and comprises grade 3 and grade 4 agricultural soils. A minor negative effect is still expected.					
SA 10: To conserve natural resources, including mineral	?	?	?	?	?	?	?	Effects at Regulation 18 stage: The whole of the site is located within a Mineral Safeguarding Area (MSA) for Brick Clay and therefore a significant negative effect is expected due to the potential for development to result in the sterilisation of finite mineral resources. The effect is uncertain as there may be opportunities to extract mineral resources prior to development.
resources in the District.			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. This land also falls within a MSA for Brick Clay. A significant negative effect is still expected. The effect remains uncertain as there may be opportunities to extract mineral resources prior to development.					
SA 11: To achieve sustainable water	-2	-?	-?	Effects at Regulation 18 stage: There are a number of watercourses (including Ifield Brook and the River Mole) that pass through the site. It is assumed that the potential for any water pollution in these watercourses as a result of development will be mitigated by the delivery of SuDS.				
resource management and promote the			The site is not located in a Source Protection Zone (SPZ). Through discussions with the Council, Thames Water has indicated that Crawley wastewater treatment works may present issues for accommodating large scale development without upgrading. Development in close proximity to Crawley is to be informed by flow monitoring and site					

SA of Horsham District Local Plan (Regulation 19) July 2021

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
quality of the District's waters.			surveys across the Crawley catchment to refine the hydraulic model. This in turn will enable a more detailed assessment of the network reinforcement required to accommodate growth.
			As such an uncertain minor negative effect is expected in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. This land is also not within a SPZ. The capacity at wastewater treatment works is still an identified constraint. The Water Cycle Study identifies potential capacity issues at WwTW infrastructure towards Crawley <sup>267</sup> New wastewater infrastructure could be required to support the development, although this is subject to further work.
			A minor negative effect is expected in relation to this SA objective. The effect is uncertain given that new infrastructure supported through development of the site would help to mitigate the effect.
SA 12: To manage and reduce the risk of			Effects at Regulation 18 stage: There are a number of watercourses (including Ifield Brook and the River Mole) that pass through the site. Land adjacent to Ifield Brook is located within flood zone 2 and 3 and land adjacent to the River Flood is mostly located within flood zone 2. However, the majority of the site is within flood zone 1.
flooding.	-?	-?	As the majority of the site being greenfield, development is likely to increase the overall amount of impermeable surfaces in the area, which may increase flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective. The proposals for the site include a flood alleviation scheme which is likely to help address issues of flood risk and therefore uncertainty is attached to the score.
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. This land is mostly free from risk of fluvial flooding. The site remains mostly greenfield with some areas of higher flood risk present. The proposal for the site indicates that development is not to be included any area of land to higher risk of fluvial flooding. A minor negative effect is still expected. The effect is uncertain given that the proposal is to include the incorporation of SuDs, together with other flood risk management measures.
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	++/- ?	++/- ?	Effects at Regulation 18 stage: In terms of access to existing sustainable travel options, the site located within walking distance of Ifield Railway Station to the south-east and a number of bus stops including those to the west on Ifield Drive and to the south on Hyde Drive. The site is also within walking distance of a number of neighbourhood centres within Crawley including those at Ifield, West Green and Langley Green. The neighbourhood centre of Gossops Green is also within 800m of the site, but pedestrian access is more limited to this area due to the presence of a railway line. As such, there is potential for future residents of the site to avoid using private vehicles, reducing congestion in the area. In addition, the site proposes to include a range of services and facilities onsite, which is likely to contribute to meeting resident's needs without travelling further afield by private car. Commuting patterns for the area based on 2011 census data indicate that, despite the site being within 1km of a railway station, few people commute to work using the train. The majority of people in the area commute via private car and new development at this location has the potential result in new residents adopting similar travel habits.
			The scale of development to be delivered may result in an overall increase of traffic on roads in the area. Furthermore, proposals for the site includes the Crawley Western Relief Road with the middle section to be delivered during the plan period. While this new route may help to alleviate congestion in the area it is also likely to reduce the potential for the achievement of modal shift.

<sup>267</sup> JBA Consulting on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Reigate and Banstead District Council (2020) Gatwick Sub-Region Water Cycle Study

SA Objective	SA So	core	Justification
	Reg 18	Reg 19	
			Overall, a mixed significant positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely commuting patterns following development.
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. This does not affect the distance from the site to nearby existing sustainable transport links and centres. There is still potential for new residents to adopt the travel habits currently prevalent in the area, although the site is relatively well related to existing employment within Crawley and Gatwick Area. The proposal is to include the delivery of the new relief road, although the route is proposed to be used for public transport access rather than to address existing private vehicle congestion. The proposal is also set out as a location where residents can access all essential needs within 15 minutes to help limit the use of private vehicles. Furthermore, the development is to be served by the extension of Crawley Fastway bus service to link to Gatwick Airport and Crawley Town Centre. In all, a mixed significant positive and minor negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.			Effects at Regulation 18 stage: The scale of residential and employment development proposed could give rise to an increase in the level of traffic in the Hazelwich AQMA, which is located to the east of the site in Crawley in close proximity to the town centre. This effect is particularly likely considering commuting patterns for the area (based on 2011 census data) which indicate that private car trips are the most used mode of transport in the area adjacent to the site. New development at this location therefore has the potential result in new residents adopting similar travel habits. Proposals for the site include the Crawley Western Relief Road (with the middle section to be delivered during the plan period) which may help to alleviate congestion in AQMA, which is likely to be beneficial to air quality at this location.
	++/ ?	++/	The site is in close proximity to Ifield Railway Station to the south-east and multiple bus stops to the west. The provision of a range of services and facilities to be provided as part of the development is likely to further reduce the need for residents to travel longer distances. The aforementioned considerations have the potential to contribute to improved air quality in the District.
		?	Overall, a mixed significant positive and significant negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely commuting patterns following development.
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. This does not affect the distance from the site to nearby existing sustainable transport links and centres. There is still potential for development at the site to result in increased traffic within the Hazelwich AQMA. Proposals for the site include the delivery of the relief road, although the route is proposed to be used for public transport access rather than to address existing private vehicle congestion. Overall, a mixed significant positive and significant negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.
SA 15: To minimise the District's contribution to climate change and adapt to	+/-?	+/-?	Effects at Regulation 18 stage: The site is in good proximity to multiple existing sustainable travel links (including Ifield railway station and a number of bus stops) and site proposals include the delivery of a range of services and facilities as part of development. As such the development ay result in a limited increase in the need to travel by private car and therefore potentially reduced carbon emissions in the District. The site proposals do not currently include any consideration for onsite renewable energy generation that could further contribute to reduced carbon emissions.
unavoidable climate change.			The scale of the development at the site may result in increased traffic on roads in the area, contributing to increased carbon emissions. Furthermore, it is expected that while the delivery of the Crawley Western Relief Road at the site may help to alleviate issues of congestion in the area, but it may also limit the potential for modal shift to be

SA Objective	SA So	ore	Justification	
	Reg 18	Reg 19		
			promoted. Current commuting patterns (based on 2011 census data) indicate that private car trips are the most used mode of transport in the area adjacent to the site. New development at this location therefore has the potential result in new residents adopting similar travel habits.	
			Overall, a mixed minor positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.	
			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. This does not affect the distance from the site to nearby existing sustainable transport links and centres. Proposals for the site include the delivery of the relief road, although the route is proposed to be used for public transport access rather than to address existing private vehicle congestion. A proposed low-carbon and future-proofed energy strategy is to be produced only when the scale of development and mix of uses is confirmed for the site. Overall, a mixed minor positive and minor negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.	
SA 16: To facilitate a sustainable and growing economy.			Effects at Regulation 18 stage: The site is large and proposes to deliver a high number of dwellings within the plan period, which is likely to make a significant contribution to the local economy due to increased expenditure in the area, an increased workforce and the potential for new construction jobs. Site proposals during the plan period include 3,000m2 of B1 office space, retail and a pub and restaurant/café, which will create around 750 jobs. In addition, development at this location is likely to complement growth at Gatwick airport where new jobs are likely to result in the longer term.	
	++	++	As such, the site is expected to result in a significant positive effect in relation to this SA objective.	
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet	++	++	Effects at Regulation 18 stage: Development at the site is expected to support the creation of a high number of jobs, which are likely to benefit existing residents in the area. Furthermore, the site is adjacent to existing urban edge of Crawley, where a range of employment opportunities are accessible. The site, however, is not located within walking distance of any of the key employment areas in Horsham or any of the main employment areas in Crawley. The closest of these are Three Bridges Corridor, Lowfield Heath and Broadfield Business Park within Crawley, however, they are all more than 2.0km from the site. The site is in close proximity to existing sustainable travel links (including Ifield railway station and a number of bus stops) which are likely to provide opportunities for residents to access these employment opportunities.	
both current and future needs in the			As such, a significant positive effect is expected for the site in relation to this SA objective.	
District.			Effects at Regulation 19 stage: The boundary of the site now extends to include land to the north of Rusper Road. This does not affect the distance from the site to the nearest employment opportunities and sustainable transport links. A significant positive effect is still expected.	

SA of Horsham District Local Plan (Regulation 19) July 2021

## Site SA118: Land East of Billingshurst

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	++	++	Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. It is proposed that the site would deliver 1,200 dwellings in two phases with Phase 1 delivering up to 800 dwellings north of the railway and Phase 2 delivering up to 500 dwellings south of the railway. The site is expected to deliver 35% affordable housing. A significant positive effect is expected for the site in relation to this SA objective due to the contribution to the area's identified housing need, including affordable housing. Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. The proposal is being put forward for around 650 dwellings by 2038. No change is expected to the number of affordable homes at the site. The site is also expected to provide five pitches for Gypsy and Traveller accommodation. The site may allow for some self-build homes. While the site is now only expected to deliver 650 homes up to 2038, it would still make a substantial contribution to the local housing need (including affordable homes) and a significant positive effect is therefore still expected.
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.			Effects at Regulation 18 stage: The site is greenfield and therefore there are no existing services and facilities within the site. However, the site is within walking distance of the town centre of Billingshurst to the west, which has a range of services and facilities that could serve the site. It furthermore adjoins the eastern edge of the settlement's built up area boundary. The site is also within close proximity to multiple existing education facilities as well as existing healthcare provisions to the west in Billingshurst. As such, residents in the early stages of development are likely to have good access to existing services and facilities. The site would not include the delivery of a new neighbourhood centre as part of the development. It may however deliver a limited range of services and facilities, such as a pub/restaurant, contributions to the provision of a new primary school and contributions to the provision of health care facilities. There is uncertainty present concerning the delivery of the aforementioned.
	+?	+/-?	Overall, a minor positive effect is expected for the site in relation to this SA objective. Uncertainty is attached to the effect considering that the close proximity of this large site to Billingshurst could result in existing facilities becoming overburdened. Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. However, this has not resulted in a change to the distance of the site to nearby service and facilities and town centres locations. The updated proposal indicates land for a new primary school will be provided as well as a new community hub. The proposal also included funding to help deliver a one form entry primary school which can be expandable to two form entry. It is known that the secondary school within Billingshurst is coming close to capacity and therefore this issue may need to be addressed before any housing is delivered. The proposal does not include new health facilities. Overall a mixed minor positive and minor negative effect is expected. The effect is uncertain given that the issue of services and facilities in Billingshurst becoming overcapacity may still result. This may particularly be the case in relation to secondary school facilities and healthcare facilities.
SA 3: To encourage social inclusion, strengthen community	+?	+?	Effects at Regulation 18 stage: The site is greenfield and is not within a 40% most socially deprived area. As such, there is limited potential for the site to result in local regeneration.

SA Objective	SA So	core	Justification
	Reg 18	Reg 19	
cohesion and a respect for diversity.			The site is located directly adjacent to the settlement of Billingshurst and will potentially deliver health/education facilities as well as a pub/restaurant. As such, there is potential for the development to contribute to the vitality of the existing town centre.
			Overall, a minor positive effect is expected for the site in relation to this SA objective. The effect is uncertain as the impact of delivering new services and facilities will be dependent in part on their phasing which is unknown at this stage.
			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. However, this has not resulted in a more socially deprived area being included for development. No change has resulted in terms of the accessibility from the site to existing neighbourhood centres. The site is still expected to provide some new services and facilities, including a new community hub and funding for a new primary school. A minor positive effect is therefore still expected. The effect is still uncertain given that the exact phasing of new services and facilities is still uncertain.
SA 4: To support the creation of safe			Effects at Regulation 18 stage: The potential for the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.
communities in which levels of crime, anti- social behaviour and disorder and the fear of crime are reduced.	0?	0?	Effects at Regulation 19 stage: An uncertain negligible effect is still expected given that the detailed design of development is still unknown.
SA 5: To improve public health and wellbeing and reduce			Effects at Regulation 18 stage: There is a health centre to the west in Billingshurst as well as multiple outdoor facilities, all within a suitable walking distance of the site. There are also multiple PROWs in the area that provide access to the surrounding countryside. There is potential for these existing assets to contribute positively to resident's health in the new development by increasing uptake of physical activity.
health inequalities.			As part of development, it is proposed that the site would prioritise pedestrian and cycle connectivity with the existing village/facilities to encourage active travel and healthier lifestyles. Proposals for the site do not include a new healthcare centre but contributions are proposed for health facilities.
	++/-	++/-	There is a railway that passes through the site and therefore residents may be adversely affected by noise. Furthermore, part of the eastern boundary of the site is adjacent to the A272 meaning there is potential for detrimental impacts relating to road noise.
	?	?	Overall, a mixed uncertain significant positive and minor negative effect is expected for the site in relation to this SA objective. The effect is uncertain as there may be potential to mitigate railway related noise. It is also noted that the high number of homes to be provided at the site could potentially result in existing healthcare facilities to become overburdened.
			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. However, this does not impact the distance from the site to healthcare facilities and outdoor sports facilities within the settlement, as well as to the surrounding countryside via PROWs. The boundary change has resulted in a lesser number of new residents potentially being affected by noise from the railway line and A272. The proposal is still set out to promote allow for good access by cycle and foot. Approximately 50% of the site is to be

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			maintained as open space and is to include play space and a trim trail/outdoor gym. The proposal does not include new health facilities. A mixed significant positive and minor negative effect is still expected. The effect is uncertain given that there is still potential for local healthcare facilities to become overburdened.
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species			Effects at Regulation 18 stage: The entirety of the site is located in the Impact Risk Zone (IRZ) for the Upper Arun SSSI that is located approximately 2.2km to the west of the site. However, the IRZ is for industrial/aviation planning applications and does not include residential development applications. The whole of the site is also located within the Bat Sustenance Zone. The north-east region of the site is also adjacent to a Local Wildlife Site (Wilden's Meadow) and there is a further Local Wildlife Site (Rosier Wood) to the immediate south, as well as Ancient Woodland (Lime Kiln Wood).
and/or sites of biodiversity or geological interest.	?	?	A significant negative effect is expected for the site in relation to this SA objective due to it being located within the Bat Sustenance Zone, and within close proximity of the areas of Ancient Woodland and local biodiversity designations. There is also potential for development at the site to result in increased recreational pressure and increased noise and light disturbance in relation to habitats in the area. While the proposals for the site do not include any reference to delivering biodiversity enhancements, the effect is uncertain as there may be potential for mitigation in relation to minimise habitat loss or disturbance.
	?		Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. The site still falls within the bat sustenance zone and there is no change in terms of the SSSI IRZ it falls within. Wilden's Meadow Local Wildlife Site is now surrounded by land within the site boundary, however, the Rosier Wood Local Wildlife Site and the Ancient Woodland are now approximately 400m to the south of the site and separated from the boundary by the railway line. Wilden's Meadow Local Wildlife Site is proposed to be enhance by the development and the development is also proposed to achieve biodiversity net gain. A significant negative effect is still expected given the potential for impacts relating to the Local Wildlife Site surrounded by land within the site boundaries and bat sustenance zone. Effects relating to the Local Wildlife Site include the potential for noise, light and air pollution as well as increased recreational pressures. The effect is uncertain given that the site promoters have committed to achieving biodiversity net gain which may help to offset the effects relating to the Local Wildlife Site.
SA 7: To conserve and enhance the			Effects at Regulation 18 stage: Land to the east of Billingshurst has been assessed in the Horsham District Landscape Capacity Assessment. The site is comprised of a number of Local Landscape Character Area (LLCAs) with varying degrees of landscape capacity.
character and distinctiveness of the District's landscapes and townscapes,			The land within the site to the south of the railway line has been identified as having no/low landscape capacity for large scale housing development. Land immediately to the north of the railway line has been identified as having moderate landscape capacity for large scale residential development. The northern portion of the site falls on land which has been identified as having no/low landscape capacity for large scale residential development. The northern portion of the site falls on land which has been identified as having no/low landscape capacity for large scale residential development.
maintaining and strengthening local distinctiveness and sense of place.	?	-?	As such, a significant negative effect is expected for the site in relation to this SA objective as there are parts of the site where it is unlikely that residential development could be accommodated without particularly adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.
			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Both areas have no/low landscape capacity for large scale housing development. Some additional land to the south of East Street is now included within the site. Some area of land directly to the south of East Street still included within the site and this has no/low landscape capacity for large scale housing development. The changes to the site boundary mean that the majority of the site falls on land with moderate landscape capacity for large scale residential development. Therefore, a minor negative effect is expected. The

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			effect is uncertain as the design of new development may present opportunities to mitigate impacts. The landscape-led approach to development may help to secure benefits in this regard.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the			Effects at Regulation 8 stage: The site is adjacent to three Grade II listed buildings and Billingshurst Conservation Area, which contains multiple listed buildings, is within 500m to the north-west of the site. The Billingshurst Conservation Area Appraisal and Management Plan (January 2018) states that development should be avoided if it would be harmful to the setting or character of the Conservation Area or would adversely affect important views, open spaces, tree cover or boundary features within the Conservation Area. Considering the large scale of development to be delivered it is expected that there may be some potential for adverse impacts in relation to these elements/
District's historic environment.			An uncertain significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain considering that the design of the new development may present opportunities to mitigate adverse impacts in terms of the significance of the setting of heritage assets in the area.
	?	?	Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA118. The findings of the assessment work note that there are 50 Listed Buildings and a Conservation Area within the wider 1km study area set out for the site. This area also contains six ANAs (one of which is categorised as red, very sensitive for archaeology and the remainder of which are categorised as amber, sensitive for archaeology) and three archaeological sites. The assessment work concluded that development could result in three Listed Buildings (Grade II Listed Little Daux Farm, Great Daux Farmhouse and Rosier Farmhouse) being subject to significant change, with two Listed Buildings (Grade II Listed Termhouse and barn to north west of Fewhurst Farmhouse) and Billingshurst Conservation Area being subject to potentially significant change. Six other Listed Buildings have also been identified through this assessment work as potentially being vulnerable to change as result of development of the site, however, these effects are recorded as not significant. Given that significant change is expected to result in relation to a number of designated heritage assets overall a significant negative effect is expected for the site in relation to this SA objective.
			The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.
SA 9: To make efficient use of the District's land			Effects at Regulation 18 stage: The site is greenfield and the entirety is comprised of grade 3 agricultural land. There is potential for development to result in the loss of high quality agricultural land.
resources through the re-use of previously	?	?	As such, a significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain as it is unknown whether these soils are grade 3a or the lower quality grade 3b.
developed land and conserve its soils.			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. This land is mostly undeveloped and comprises grade 3 agricultural soils. The majority of the site is still greenfield comprising grade 3 agricultural soils. A significant negative effect is still expected. The effect is uncertain as it is unknown whether these soils are grade 3 a or the lower quality grade 3b.
SA 10: To conserve natural resources, including mineral	?	?	Effects at Regulation 18 stage: The whole of the site is located within a Mineral Safeguarding Area (MSA) for Brick Clay and therefore a significant negative effect is expected in relation to this SA objective due to the potential for development to result in the sterilisation of finite mineral resources. The effect is uncertain as there may be opportunities to extract mineral resources prior to development.

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SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
resources in the District.			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. The entirety of the site still falls within a MSA for Brick Clay. A significant negative effect is still expected. The effect remains uncertain as there may be opportunities to extract mineral resources prior to development.
SA 11: To achieve sustainable water resource management			Effects at Regulation 18 stage: The site is not located in a Source Protection Zone. The site lies in a portion of the District that is served by Southern Water for its water infrastructure. Discussions between the Council and Southern Water indicate that the site would drain to wastewater treatment works which has Dry Weather Flow (DWF) permit capacity to accommodate growth up to 2035.
and promote the quality of the District's			A negligible effect is therefore expected for the site in relation to this SA objective.
waters.	0	-?	Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. This change to the boundary has not resulted in any change in relation to SPZs. Southern Water have now indicated that existing the local sewerage has limited capacity meaning that there will be a need for some reinforcement of the wastewater network. The Water Cycle Study identifies potential capacity issues at WwTW infrastructure towards Billingshurst <sup>268</sup> .
			A minor negative effect is expected in relation to this SA objective. The effect is uncertain given that new infrastructure supported through development of the site would help to mitigate the effect.
SA 12: To manage and reduce the risk of			Effects at Regulation 18 stage: There is a small area in the south-western part of the site that is located within flood zone 2 and 3. However, the majority of the site is located in flood zone 1.
flooding.	-	-?	Due to the site being greenfield, development will increase the overall amount of impermeable surfaces in the area, which may result in increased flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. This change to the boundary has resulted in all areas of higher flood risk being removed from the site boundary. Furthermore, the proposal indicates that development within the site is to be located outside of areas identified as at medium to high risk of surface water flooding. The site remains mostly greenfield. A minor negative effect is still expected. The effect is uncertain given that the proposal is to include the incorporation of SuDs.
SA 13: To reduce congestion and the need to travel by	++/-	++/-	Effects at Regulation 18 stage: In terms of access to sustainable travel options, Billingshurst Railway Station is located to the immediate west of the site and there are also several bus stops within close proximity to the site. As such, there is potential for future residents of the site to avoid private car trips, reducing congestion in the area. The site is within walking distance of the town centre of Billingshurst, which provides residents with the opportunity to meet every day needs without private car trips.
private vehicle in the District.	?	?	However, the scale of development proposed could also lead to increased traffic in the village centre particularly along the A272. Furthermore, commuting patterns for the area (based on 2011 census data) indicate that private car trips are the most used mode of transport to travel to work. Providing more development at this location may result similar travel habits being adopted.

<sup>268</sup> JBA Consulting on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Reigate and Banstead District Council (2020) Gatwick Sub-Region Water Cycle Study

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
			Overall, a mixed significant positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. This does not affect the distance from the site to nearby existing sustainable transport links and centres. There is still potential for new residents to adopt the travel habits currently prevalent in the area and impacts on the village centre along the A272. The proposal may include the delivery of a new car park for the train station to support increased use of rail travel, although this is not confirmed. The proposal is also set out as a location where a high level of accessibility for pedestrians and cyclists is supported. Furthermore, the development is to allow for the integration of bus services if required. In all, a mixed significant positive and minor negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.
SA 14: To limit air pollution in the District and ensure lasting improvements in air			Effects at Regulation 18 stage: The site is not directly connected via road to one of the Air Quality Management Areas (AQMAs) in the District or in the surrounding Districts. Although the site is within walking distance of Billingshurst, there is potential for the scale of development to increase congestion along the A272 through the village. Furthermore, commuting patterns for the area (based on 2011 census data) indicate that private car trips are the most used mode of transport travel to work. Providing more development at this location may result similar travel habits being adopted and further adverse impacts in terms of air quality.
quality.	++/-	++/-	The site is within close proximity to Billingshurst Railway Station to the immediate west and there are several bus stops in the area. In addition, the site proposals include prioritisation of pedestrian and cycle access to the existing village. Access to these sustainable travel options has the potential to decrease private car trips, which may result in reduced adverse impacts on air quality.
	?	?	Overall, a mixed significant positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. This does not affect the distance to nearby existing sustainable transport links and centres. There is still potential for development at the site to result in increased congestion within the village. Proposals for the site could support a new car park to allow for increased use of the rail services in the area, although this provision is uncertain. Overall, a mixed significant positive and minor negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.
SA 15: To minimise the District's contribution to climate change and adapt to	+/-?		Effects at Regulation 18 stage: The site is within close proximity to Billingshurst Railway Station and several bus stops. There is potential for residents to use these sustainable modes of transport, which may result in reduced carbon emissions from the new development. However, current commuting patterns (based on 2011 census data) indicate that private car trips are the most used mode of transport to travel to work. Providing more development at this location may result similar travel habits being adopted.
unavoidable climate change.		+/-?	The scale of development proposed also has the potential to increase traffic through the village, contributing to increased carbon emissions. It is not expected that the site would include renewable energy infrastructure.
			As such, a mixed minor positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. This does not affect the distance from the site to nearby existing sustainable transport links and centres. Proposals for the site could support a new car park to allow for increased use of the rail services in the area, although this provision is uncertain. The potential for low carbon technology and renewable energies is to be investigated for the site, however, there is no inclusion of these types of provisions as part of the existing proposal at this stage. Overall, a mixed minor positive and minor negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.
SA 16: To facilitate a sustainable and			Effects at Regulation 18 stage: It is proposed that the site would deliver of high number of dwellings which is likely to make a contribution to the local economy due to increased expenditure and an increased workforce.
growing economy.			The site proposals include housing and potentially a new pub/restaurant subject to viability concerns and no further employment uses. As such, the economic potential of the new development may be limited due to proposals to provide business/employment space.
	+?	++	Therefore, uncertain minor positive effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. The site would still deliver a high number of homes and provide benefits in terms of increased expenditure and an increased workforce. The site is being promoted for mainly residential uses, however, it is also to incorporate 2,200sqm of B2/B8 and former B1 uses (around 0.5ha). A significant positive effect is now expected.
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and			Effects at Regulation 18 stage: The site is within walking distance of key employment areas to the south-west in Billingshurst including Eagle Industrial Estate and Daux Road Industrial Estate. The site is also located within close proximity of Billingshurst town centre, but not Horsham town centre. The site is also within close proximity of Billingshurst town centre, but not Horsham town centre. The site is also within close proximity of Billingshurst town centre, but not Horsham town centre. The site is also within close proximity of Billingshurst Railway Station to the immediate west and several bus stops in the area. As such, there is potential for future residents at the site to have access to some employment opportunities using sustainable modes of transport. However, current commuting patterns show that many existing residents commute out of Billingshurst to other destinations to access jobs, suggesting that new growth at this location may not provide new residents with immediate access to an offer of higher quality jobs.
future needs in the	+/-?	+/-?	Therefore, an uncertain mixed (minor positive and minor negative) effect is expected.
District.			Effects at Regulation 19 stage: The boundary of the site now does not include the land to the south of the railway track as well as land to the north of East Street. Some additional land to the south of East Street is now included within the site. This does not affect the distance from the site to the nearest employment opportunities and sustainable transport links. There is still potential for existing commuting patterns to be strengthened as development occurs at the site. An uncertain mixed minor positive and minor negative effect is still expected.

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## Site SA119: West of Southwater

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	++	++?	Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. The site is expected to deliver 1,200 dwellings (including the 450 in the draft Neighbourhood Plan). The site is also expected to deliver 35% affordable housing. A significant positive effect is expected for the site in relation to this SA objective due to the contribution to the area's housing need, including affordable housing. Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. The site is now expected to deliver 800 dwellings during the plan period with 820 dwellings provided in the longer term; however the amount of affordable housing is uncertain at this time due to the impact of Covid-19. In addition, the site seeks to provide a range of 1 to 3 bedroom homes and 4 to 5 Gypsy and Traveller pitches. Therefore, a significant positive effect is still expected. The effect is uncertain considering the unknown ability to provide affordable homes.
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.			Effects at Regulation 18 stage: The site is greenfield and therefore there are no existing services and facilities within the site. However, the site is within walking distance of Southwater town centre, which has a range of services and facilities that could serve the site. It furthermore adjoins the western edge of the settlement's built up area boundary. There are also a number of education facilities within Southwater which are within walking distance of the site including two primary schools and a secondary school. Furthermore, new community facilities are currently being provided at land adjoining the site. As such, it is expected that residents at the site in the early stages of development are likely to have good access to existing services and facilities.
			The site is expected to include the delivery of one all through school, leisure facilities, a new community facility and a neighbourhood centre.
	++?	++?	Overall, a significant positive effect is expected for the site in relation to this SA objective. Uncertainty is attached to the effect considering that the close proximity of this large site to Southwater could result in existing facilities becoming overburdened.
			Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. The site is still greenfield and therefore there are no existing services and facilities within the site. However, the site is within walking distance of Southwater town centre, which has a range of services and facilities that could serve the site.
			The site is expected to include the delivery of one all through school, leisure facilities, a new community facility and a neighbourhood centre. A significant positive effect with uncertainty is still expected.
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.	+?	+?	Effects at Regulation 18 stage: The site is greenfield and is not within a 40% most socially deprived area. As such, there is limited potential for the site to result in local regeneration. The site is located directly adjacent to the settlement of Southwater and will potentially deliver a multi-functional community facility and neighbourhood centre. As such, there is potential for the development to complement and contribute to the vitality of the existing town centre.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
			Overall, a minor positive effect is expected for the site in relation to this SA objective. The effect is uncertain as the impact of delivering new services and facilities will be dependent in part on their phasing which is unknown at this stage.
			Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. The site is still greenfield and is not within a 40% most socially deprived area. The site is located directly adjacent to the settlement of Southwater and will potentially deliver a multi-functional community facility and neighbourhood centre. As such, there is potential for the development to complement and contribute to the vitality of the existing town centre. Overall, a minor positive effect with uncertainty is still expected for the site in relation to this SA objective
SA 4: To support the creation of safe			Effects at Regulation 18 stage: The potential for the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.
communities in which levels of crime, anti- social behaviour and disorder and the fear of crime are reduced.	0?	0?	Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. An uncertain negligible effect is still expected as the exact design and layout of the development are still unknown at this stage.
SA 5: To improve public health and wellbeing and reduce health inequalities.			Effects at Regulation 18 stage: There is a health centre to the east of the site within Southwater which is within walking distance. There are also multiple public outdoor open spaces, recreation facilities and playgrounds, all within a suitable walking distance of the site. There are also multiple PROWs in the area that provide access to the surrounding countryside. There is potential for these existing assets to contribute positively to resident's health in the new development by increasing uptake of physical activity.
			As part of development, it is proposed that new sports and leisure facilities be delivered.
			The A24 is adjacent to the northern boundary of the site and therefore residents may be adversely affected by noise.
	++/- ?	++/- ?	Overall, an uncertain significant positive and uncertain minor negative effect is expected for the site in relation to this SA objective. The negative effect is uncertain as there may be potential to mitigate noise pollution from the A-road. The positive effect is uncertain as the high number of homes to be provided at the site could result in the potential for existing healthcare facilities to become overburdened.
			Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, there is still a health centre to the east of the site within Southwater which is within walking distance. There are also multiple public outdoor open spaces, recreation facilities and playgrounds, all within a suitable walking distance of the site. There are also multiple PROWs in the area that provide access to the surrounding countryside. There is potential for these existing assets to contribute positively to resident's health in the new development by increasing uptake of physical activity. In addition, as part of development, it is still proposed that new sports and leisure facilities be delivered.
			However, the A24 is adjacent to the northern boundary of the site and therefore residents may be adversely affected by noise. As such, an uncertain significant positive and uncertain minor negative effect is still expected.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.	?	?	Effects at Regulation 18 stage: The site contains a number of areas of ancient woodland and Courtland Wood Local Wildlife Site. Sparrow Copse Local Wildlife Site is also located within close proximity of the site to the north west. The majority of the site is also located within the Bat Sustenance Zone. A significant negative effect is expected for the site in relation to this SA objective considering the potential for adverse impacts to result on the areas of ancient woodland and Local Wildlife Sites identified as well as the location of the site within the Bat Sustenance Zone. There is also potential for development at the site to result in habitat disturbance, fragmentation and loss as well increased recreational pressure, noise and light in relation to habitats in the area. The effect is uncertain as there may be potential for mitigation to be achieved at the site. The site would include space for wildlife habitat and new development is to be delivered to achieve biodiversity net gain. Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, the site still contains a number of areas of ancient woodland and Courtland Wood Local Wildlife Site. Sparrow Copse Local Wildlife Site is also located within the Bat Sustenance Zone. There is the possibility of 8% gain in habitat biodiversity and a 38% gain in linear feature biodiversity, but this isuncertain at this stage. A significant negative effect with uncertainty is still expected.
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.	?	?	Effects at Regulation 18 stage: Land to the west of Southwater has been assessed in the Horsham District Landscape Capacity Assessment. The site is comprised of a number of Local Landscape Character Area (LLCAs) with varying degrees of landscape capacity. Land immediately adjacent to the existing urban edge of Southwater (the Land West of Southwater and Land North West of Southwater LLCAs) has been identified as having moderate landscape capacity for large scale residential development. Land in the western half of the site that is further from Southerwater (the Two Mile Ash and Environs LLCAs) has been identified as having no/low landscape capacity for large scale residential development. As such, a significant negative effect is expected for the site in relation to this SA objective as there are parts of the site where it is unlikely that residential development could be accommodated without particularly adverse impacts on the landscape. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape. Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, the land immediately adjacent to the existing urban edge of Southwater (the Land West of Southwater and Land North West of Southwater LLCAs) has been identified as having moderate landscape capacity for large scale residential development. Land in the western half of the site that is further from Southerwater (the Two Mile Ash and Environs LLCAs) has been identified as having no/low landscape capacity for large scale residential development. As such, a significant negative effect with uncertainty is still expected.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.	?	?	Effects at Regulation 18 stage: The site is adjacent to 15 Listed Buildings which are all Grade II listed apart from one Grade II* Listed Building (Great Farm Farmhouse) that the site boundary excludes to the south. The site is also within 500m of three Grade II Listed Buildings to the east within Southwater, two Grade II Listed Buildings to the south-west and just over 500m from two Grade II* Listed Buildings to the west at Christ's Hospital. There is potential for development at the site to result in adverse effects on the historic environment assets. In the wider area, the site is also 2.2km from Sedgwick Park (Registered Park and Garden) to the east, which contains a Scheduled Monument (Medieval Moated Site).

leg Re 8 19	Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA119. The findings of the assessment work note that there are 38 Listed Buildings within the wider 1km study area set out for the site. The site boundaries also contain a non-designated heritage asset (Disused Railway (Downs Link) & Old Railway Bridges). The 1km study area for the site also contains three Archaeological Notification Areas (ANAs) (all of which are categorised as amber, sensitive for archaeology) and one archaeological site. The assessment work concluded that development could result in 13 Listed Buildings (including Grade II* Listed Great House Farmhouse) being subject to significant change, with one Listed Building (Grade II* Listed Christs Hospital School) being subject to potentially significant change. Given that significant change is expected to result in relation to a number of designated heritage assets overall a significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain significant negative effect is expected in relation to this SA objective considering that the close proximity of site to numerous heritage assets may mean that the development has the potential to adversely impact upon their respective settings. The effect is uncertain considering that the design of the new development may
	Buildings within the wider 1km study area set out for the site. The site boundaries also contain a non-designated heritage asset (Disused Railway (Downs Link) & Old Railway Bridges). The 1km study area for the site also contains three Archaeological Notification Areas (ANAs) (all of which are categorised as amber, sensitive for archaeology) and one archaeological site. The assessment work concluded that development could result in 13 Listed Buildings (including Grade II* Listed Great House Farmhouse) being subject to significant change, with one Listed Building (Grade II* Listed Christs Hospital School) being subject to potentially significant change. Given that significant change is expected to result in relation to a number of designated heritage assets overall a significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development. Overall, an uncertain significant negative effect is expected in relation to this SA objective considering that the close proximity of site to numerous heritage assets may mean
	Overall, an uncertain significant negative effect is expected in relation to this SA objective considering that the close proximity of site to numerous heritage assets may mean
	present opportunities to mitigate adverse impacts in terms of the significance of the setting of heritage assets in the area.
	Effects at Regulation 18 stage: The site is greenfield and is mostly comprised of grade 3 agricultural land. There is potential for development to result in the loss of high quality agricultural land.
?	As such, a significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain as there is no data distinguishing whether it is grade 3a or the lower quality grade 3b.
	Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, it is still greenfield and is mostly comprised of grade 3 agricultural land. There is potential for development to result in the loss of high quality agricultural land. As such, an uncertain significant negative effect is expected.
	Effects at Regulation 18 stage: The whole of the site is located within a Mineral Safeguarding Area (MSA) for Building Stone and therefore a significant negative effect is expected in relation to this SA objective due to the potential for development to result in the sterilisation of finite mineral resources. The effect is uncertain as there may be opportunities to extract mineral resources prior to development.
?	Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, the majority of the site is still located within a Mineral Safeguarding Area (MSA) for Building Stone, however the southern section of the site is also within an MSA for Brick Clay. Therefore, a significant negative effect with uncertainty is still expected in relation to this SA objective due to the potential for development to result in the sterilisation of finite mineral resources.
0 (	Effects at Regulation 18 stage: The site is not located in a Source Protection Zone. The site lies in a portion of the District that is served by Southern Water for its water infrastructure. Discussions between the Council and Southern Water indicate that the site would drain to wastewater treatment works which has Dry Weather Flow (DWF) permit capacity to accommodate growth up to 2035. A negligible effect is therefore expected for the site in relation to this SA objective.
?	? ? 0

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
			Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, the site is still not within a Source Protection Zone. Therefore, a negligible effect is still expected.
SA 12: To manage			Effects at Regulation 18 stage: The site is entirely located within flood zone 1.
and reduce the risk of flooding.			Due to the site being greenfield, development will increase the overall amount of impermeable surfaces in the area, which may result in increased flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective.
	-	-?	Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, the site is still fully within flood zone 1. However, as the sit is entirely greenfield land, a minor negative effect is still expected. The effect is uncertain given that the proposal is set out to include the provision of SuDS which would help to mitigate any adverse effects relating to increased flood risk.
SA 13: To reduce congestion and the need to travel by private vehicle in the District.			Effects at Regulation 18 stage: In terms of access to sustainable travel options, Christ's Hospital Railway Station is located within walking distance of the site to the north west and there are also several bus stops within close proximity to the site including those on Worthing Road. As such, there is potential for future residents of the site to make more sustainable transport decisions, which is likely to help limit the potential for congestion in the area. The site is within walking distance of the Southwater town centre, which will provide residents with the opportunity to access services and facilities without the need to travel by private car. However, commuting patterns from Southwater (based on 2011 census data) indicate that most trips are by car to Horsham and to Crawley, with a lower but still significant number travelling to Horsham by bus. Providing more development at this location may result similar travel habits being adopted.
			The site is expected to provide link roads to Hop Oast and Two Mile Ash Road, and full signalisation of the Hop Oust roundabout which may limit the potential for modal shift in the area. Furthermore, the scale of development proposed also has the potential to increase traffic through the village, contributing to increased congestion.
	++/- ?	++/- ?	An overall mixed (significant positive and minor negative) effect is therefore expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			EEffects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, Christ's Hospital Railway Station is still located within walking distance of the site to the north west and there are also several bus stops within close proximity to the site including those on Worthing Road. As such, there is potential for future residents of the site to make more sustainable transport decisions, which is likely to help limit the potential for congestion in the area. The site is within walking distance of the Southwater town centre, which will provide residents with the opportunity to access services and facilities without the need to travel by private car.
			The proposal for development is expected to provide walking and cycling lanes throughout as well as cycle storage at each dwelling. In addition, a new link is expected to connect the community with Christ's Hospital railway station. Llink roads to Hop Oast and Two Mile Ash Road, and full signalisation of the Hop Oust roundabout are also expected which may limit the potential for modal shift in the area. A mixed (significant positive and minor negative) effect is therefore still expected.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 14: To limit air pollution in the District and ensure lasting improvements in air			Effects at Regulation 18 stage: The site is not directly connected via road to one of the Air Quality Management Areas (AQMAs) in the District or in the surrounding Districts. The site is located within close proximity to Southerwater town centre which may encourage residents to undertake journeys by sustainable transport to this location. However, commuting patterns from Southwater (based on 2011 census data) indicate that most trips are by car to Horsham and to Crawley, with a lower still significant number travelling to Horsham by bus. Providing more development at this location may result similar travel habits being adopted.
quality.			The site is within close proximity to Christ's Hospital Railway Station to north west and there are several bus stops in the area. In addition, the site proposals include a footbridge across the A24. Access to these sustainable travel options has the potential to decrease private car trips, which may result in reduced adverse impacts on air quality.
	/	++/-	The site is expected to provide link roads to Hop Oast and Two Mile Ash Road, and full signalisation of the Hop Oust roundabout which may limit the potential for modal shift in the area. Furthermore, the scale of development proposed also has the potential to increase traffic through the village, contributing to increased localised air pollution.
	++/- ?	++/- ?	An overall mixed (significant positive and minor negative) effect are expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, the site is still not directly connected via road to one of the Air Quality Management Areas (AQMAs) in the District or in the surrounding Districts. The site is located within close proximity to Southerwater town centre which may encourage residents to undertake journeys by sustainable transport to this location. Christ's Hospital Railway Station is within close proximity to the north west and there are several bus stops in the area.
			The site is expected to provide walking and cycling lanes throughout the development as well as cycle storage at each dwelling. In addition, a new link is expected to connect the community with Christ's Hospital railway station. Link roads to Hop Oast and Two Mile Ash Road, and full signalisation of the Hop Oust roundabout are also expected which may limit the potential for modal shift in the area. A mixed (significant positive and minor negative) effect is therefore still expected
SA 15: To minimise the District's contribution to climate change and adapt to			Effects at Regulation 18 stage: The site is located within walking distance of Christ's Hospital Railway Station which is to the north west and several bus stops, including those along Worthing Road. There is potential for residents to use these sustainable modes of transport, which may result in reduced carbon emissions from the new development. However, commuting patterns from Southwater (based on 2011 census data) indicate that most trips are by car to Horsham and to Crawley, with a lower still significant number travelling to Horsham by bus. Providing more development at this location may result similar travel habits being adopted.
unavoidable climate change.	+/-?	+/-?	The site is expected to provide link roads to Hop Oast and Two Mile Ash Road, and full signalisation of the Hop Oust roundabout which may limit the potential for modal shift in the area. Furthermore, the scale of development proposed also has the potential to increase traffic through the village, contributing to increased carbon emissions.
			As such, a mixed minor positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, the site is still located within close proximity to Southerwater

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
			town centre which may encourage residents to undertake journeys by sustainable transport to this location. Christ's Hospital Railway Station is within close proximity to the north west and there are several bus stops in the area. The site is expected to provide EV charging points and cycle storage at each dwelling and 50 acres of green infrastructure. In addition, the site aims to be 'zero carbon' by 2030 and hope to achieve water neutrality. However, link roads to Hop Oast and Two Mile Ash Road, and full signalisation of the Hop Oust roundabout are also expected which may limit the potential for modal shift in the area. A mixed (minor positive and minor negative) effect is therefore still expected.
SA 16: To facilitate a sustainable and growing economy.	+	++	Effects at Regulation 18 stage: It is proposed that the site would deliver a high number of dwellings which is likely to make a contribution to the local economy due to increased expenditure and an increased workforce. It would also provide a new neighbourhood centre which may provide employment opportunities at any new services and facilities delivered. While the site would not include a substantial delivery of new employment floorspace, it is expected to provide working space for home workers and small businesses which may help to encourage entrepreneurship in the area. Therefore, a minor positive effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, the site would still deliver a high number of dwellings. The site is also to incorporate 18,000sqm B2/B8 and former B1 uses (c.4.0ha) and therefore a significant positive effect is now expected.
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.	+/-?	+/-?	Effects at Regulation 18 stage: The site is within walking distance of Southwater Business Park and Oakhurst Business Park which are defined as key employment area. The site is also located within walking distance to Southwater town centre, but not within walking distance of Horsham town centre. The site is also located within close proximity of Christ's Hospital Railway Station is to the north west as well as several bus stop. As such, there is potential for future residents at the site to have access to employment opportunities using sustainable modes of transport. However, current commuting patterns show that many existing residents commute out of Southwater to other destinations to access jobs, suggesting that new growth at this location may not provide new residents with immediate access to an offer of higher quality jobs. Therefore, an uncertain (minor positive and minor negative) effect is expected. Effects at Regulation 19 stage: The boundary of the site has been slightly amended to contain less land to the east in the northern and southern sections and now includes a section of greenfield land in the south eastern area of the site. Although the boundary of the site has changed, the site is still within walking distance of Southwater Business Park and Oakhurst Business Park which are defined as key employment area. The site is also located within close proximity of Christ's Hospital Railway Station is to the north west as well as several bus stop. As such, there is potential for future residents at the site to have access to employment area. An uncertain minor positive and minor negative between the step and within close proximity of Christ's Hospital Railway Station is to the north west as well as several bus stop. As such, there is potential for future residents at the site to have access to employment apportunities using sustainable modes of transport, although it may be that new residents follow similar commuting patterns to those already established in the area. An uncertain minor positive and mino

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## Site SA291: West of Kilnwood Vale extension

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 1: To provide affordable, sustainable and decent housing to			Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. It is proposed that the site would deliver 800 dwellings, with a policy compliant level of affordable housing (35%).
meet local needs.	++	+	A significant positive effect is expected for the site in relation to this SA objective due to the contribution to the area's identified housing need, including affordable housing. The close proximity of the site to Crawley means that it could potentially contribute to unmet housing need within that local authority.
			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. The proposal is being put forward for around 350 dwellings by 2038. No change has been identified in the expected proportion of affordable homes to be provided at the site. A minor positive effect is therefore still expected.
SA 2: To maintain and improve access to centres of services and facilities including health			Effects at Regulation 18 stage: The site is greenfield and therefore there are no existing services and facilities within the site. The site is around 1km from the urban fringe of Crawley and therefore existing services and facilities are not within easy walking distance. However, existing bus links in the area (including those on Crawley Road and Calvert Link) may allow residents of the site to access multiple education and healthcare facilities to the east in Crawley. However, as existing services and facilities in Crawley are not within walking distance of the site, there is potential for residents to have poor access during the early stages of development.
centres and education.			Although the site proposals do not include the delivery of new education facilities, the site is adjacent to the Kilnwood Vale development to the immediate east which includes the delivery of a new two form entry primary school that currently has extant consent and reserved land to extend to three form entry in the future. In addition, the Kilnwood Vale development site will also include the delivery of a community centre and new healthcare facility that could support the site.
	++/- ?	+/-?	Overall, a mixed significant positive and minor negative effect is expected in relation to this SA objective. Uncertainty is attached to the overall effect as it is not clear whether the provisions will be sufficient to support the level of growth proposed.
			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. However, this change has not resulted in a change to the distance of the site to nearby service and facilities and town centres locations. The site is also still in close proximity to the facilities which would be provided at the KIIndwood Vale extension. This development originally was to provide a new healthcare facility but this provision is no longer expected to be made. The updated proposal for the extension site, does not include new health facilities, community facilities or school provision. While Kilnwood Vale is classified as a 'Small Town/Larger Village', the development of this neighbourhood is ongoing meaning that access to some services and facilities is still dependent on planned for new provisions coming forward to this location. Overall a mixed minor positive and minor negative effect is expected. The effect is uncertain given that the issue of services and facilities in Kilnwood Vale and towards Crawley may become overburdened as a result of development.
SA 3: To encourage social inclusion, strengthen community	0	0 0	Effects at Regulation 18 stage: The site is on greenfield land and is not within a 40% most socially deprived area. As such, there is limited potential for the site to result in local regeneration.
cohesion and a respect for diversity.			As such, a negligible effect is expected for the site in relation to this SA objective.

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. However, this change has not resulted in a more socially deprived area being included for development. No change has resulted in terms of the accessibility from the site to existing neighbourhood centres. A negligible effect is still expected overall.
SA 4: To support the creation of safe			Effects at Regulation 18 stage: The potential for the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.
communities in which levels of crime, anti- social behaviour and disorder and the fear of crime are reduced.	0?	0?	Effects at Regulation 19 stage: An uncertain negligible effect is still expected given that the detailed design of development is still unknown.
SA 5: To improve public health and wellbeing and reduce health inequalities.			Effects at Regulation 18 stage: The site is not within walking distance of an existing healthcare centre, but there are multiple health care centres within 2km to the east of the site that could be accessed using bus links around the site. In terms of recreation opportunities, there are outdoor sports facilities within 1km to the south-west of the site in Faygate and also to the south. Although there are no PROWs that connect directly to the site, there are two within close proximity to the west that could provide access to the surrounding countryside.
			Although the site itself will not deliver new healthcare or recreation facilities, alongside the Kilnwood Vale development it forms part of an urban extension to Crawley which will deliver a new healthcare centre and outdoor sports facilities that could support the site.
	++/-		There is a railway that passes through the site and therefore residents may be adversely affected by noise. Furthermore, the southern boundary of the site is formed by the A264 meaning there is potential for some residents to be adversely affected by road noise.
	?	+/-?	Overall, a mixed significant positive and minor negative effect is expected for the site in relation to this SA objective. The effect is uncertain as there may be potential to mitigate railway related noise. Uncertainty is also attached to the overall effect as it is not clear whether the new healthcare provision will address any emerging capacity issues to support the level of growth proposed.
			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. However, this change has not resulted in a change to the distance of the site to nearby service and facilities and town centres locations. The site is also still in close proximity to the facilities which would be provided at the Kilnwood Vale extension. This development originally was to provide a new healthcare facility but this provision is no longer expected to be made. The updated proposal for the extension site now does not include new health facilities, community facilities or school provision. A new village green and play/sports areas are to be incorporated however no further leisure facilities are expected to be provided. Overall a mixed minor positive and minor negative effect is expected. The effect is uncertain given that there is still potential for local healthcare facilities to become overburdened.
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or	?	?	Effects at Regulation 18 stage: The site is located partially within Impact Risk Zones (IRZs) associated with the House Copse SSSI to the north and Buchan Hill Ponds to the south east of the site. The IRZs for House Copse are for industrial/waste infrastructure planning applications and do not list residential use as a potential risk. However, the IRZ for Buchan Hill Ponds lists residential development of over 100 homes as a potential risk. In addition, there is also a local wildlife site adjacent to the northern boundary of the site and there are areas of Ancient Woodland within 400m to the west and east.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
sites of biodiversity or geological interest.			A significant negative effect is expected in relation to this SA objective given the close proximity of a national and local designations in the area. The greenfield land take within the site may result in increased habitat disturbance as well as potential for fragmentation and loss. There is also potential for development at the site to result in increased recreational pressure and increased noise and light disturbance in relation to habitats in the area. The overall effect is uncertain as the proposals include mitigation measures in the form of a 15m buffer along the northern and western boundaries to protect the Kilnwood Copse and Fuller Shaw areas of Ancient Woodland. Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. However there is no
			change in terms of the SSSI IRZs it falls within. House Copse SSSI is still in close proximity to the north of the site as are the Local Wildlife Site to the north and the area of Ancient Woodland to the east. The area of Ancient Woodland to the west now abuts the site. The proposal for the site is to incorporate buffer zones to protect areas of Ancient Woodland and Kilnwood Copse Local Wildlife Site. The development is also proposed to achieve biodiversity net gain. A significant negative effect is still expected given the potential for impacts relating to the Local Wildlife Site and Ancient Woodland. Effects relating to these areas include the potential for noise, light and air pollution as well as increased recreational pressures. The effect is uncertain given that the site promoters have committed to achieving biodiversity net gain which may help to offset the effects relating to the Local Wildlife Site.
SA 7: To conserve and			Effects at Regulation 18 stage: Land to the south-west of Crawley has been assessed in the Horsham District Landscape Capacity Assessment.
enhance the character and distinctiveness of			The land within the site has been identified as having no/low capacity for large scale housing development.
the District's landscapes and townscapes,			The site is also almost immediately adjacent to the High Weald AONB. It is separately from this designated landscape by the path of the A264.
maintaining and strengthening local distinctiveness and	?	?	As such, a significant negative effect is expected for the site in relation to this SA objective as it is unlikely that residential development could be accommodated without particularly adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.
sense of place.			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. The site still falls on land that has no/low capacity for large or medium scale residential development. It is also still relatively close to the AONB. Furthermore, development at this location could contribute to coalesce between towns of Horsham and Crawley in addition to Faygate village. The site promoter indicates that landscaping at the site could be provided between the edge of the site and Faygate. A significant negative effect is still expected. The effect is uncertain as the design of new development may present opportunities to mitigate impacts.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic	-?	-?	Effects at Regulation 18 stage: There are no designated heritage assets within the site boundaries or in close proximity to the site. The nearest historic environment assets are a Grade II Listed Building approximately 500m to the west and a Grade II* Listed Building approximately 760m to the south. There is also a Scheduled Monument (Moated site at Bewbush Manor) around 1km to the east, which is adjacent to two Grade II Listed Buildings. Considering the large scale of development to be delivered, it is possible that there could be adverse impacts on the setting of these heritage assets. The scale of development proposed may also have impacts in relation to the established character of the area.
environment.			As such, a minor negative effect is expected for the site in relation to this SA objective. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.
			Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA291. The findings of the assessment work note that there are two Listed Buildings, namely Grade II* Listed Carylls Lea Farm House and Grade II* Listed Holmbush House, within the wider 1km study area set out for the site and one Archaeological site located 1km to the east. The 1km study area for the site also contains three Archaeological Notification Areas (ANAs). Two of these are categorised as

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SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			Amber, sensitive for archaeology, while one is categorised as Red, very sensitive. The assessment work concluded that while both of the nearby Listed Buildings are highly sensitive to change, the new development would not result in a magnitude of effects that could cause significant change to the settings of these heritage assets.
			As such, a minor negative effect is still expected for the site in relation to this SA objective and archaeology in particular. The effect is uncertain considering that the proposal for the development may present opportunities to mitigate adverse impacts by supporting appropriate investigations into potential archaeological remains in the area.
SA 9: To make efficient use of the District's land resources through the			Effects at Regulation 18 stage: The site is greenfield and the majority is comprised of mostly grade 3 agricultural land. However, there is portion of land in the central region of the site that is comprised of grade 4 agricultural land. As such the development of the site is likely to result in loss of access to a large amount of high quality agricultural land. I and.
re-use of previously developed land and conserve its soils.	?	?	As such, a significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain as it is unknown whether the higher value soils are grade 3a or the lower quality grade 3b.
			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. This land is greenfield and comprises mostly grade 3 agricultural soils. A significant negative effect is still expected. The effect is uncertain as it is unknown whether these soils are grade 3a or the lower quality grade 3b.
SA 10: To conserve natural resources, including mineral	?	?	Effects at Regulation 18 stage: The whole of the site is located within Mineral Safeguarding Areas (MSAs) for Brick Clay and Building Stone and therefore a significant negative effect is expected in relation to this SA objective due to the potential for development to result in the sterilisation of finite mineral resources. The effect is uncertain as there may be opportunities to extract mineral resources prior to development.
resources in the District.	:	:	Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west but now does not cross the railway line to the north. The entirety of the site still falls within a MSA for Brick Clay or Building Stone. A significant negative effect is still expected. The effect remains uncertain as there may be opportunities to extract mineral resources prior to development.
SA 11: To achieve sustainable water resource management and promote the quality			Effects at Regulation 18 stage: The site is not located in a Source Protection Zone. Through discussions with the Council, Thames Water has indicated that Crawley wastewater treatment works may present issues for accommodating large scale development without upgrading. Development in close proximity to Crawley is to be informed by flow monitoring and site surveys across the Crawley catchment to refine the hydraulic model. This in turn will enable a more detailed assessment of the network reinforcement required to accommodate growth.
of the District's waters.		-?	As such an uncertain minor negative effect is expected in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. However, this change has not resulted in any of the site falling within a SPZ. Information from the Council indicates that both Thames Water and Southern Water have advised that the scale of development proposed West of Crawley would likely need upgrades to the wastewater network and sewage treatment infrastructure. The Water Cycle Study identifies potential capacity issues at WwTW infrastructure towards Crawley <sup>269</sup> An uncertain minor negative effect is still expected in relation to this SA objective.

<sup>269</sup> JBA Consulting on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Reigate and Banstead District Council (2020) Gatwick Sub-Region Water Cycle Study

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 12: To manage and reduce the risk of flooding.	-	-?	Effects at Regulation 18 stage: There is no land in the site that is located within flood zone 2 or flood zone 3. Due to the site being greenfield, development will increase the overall amount of impermeable surfaces in the area, which may result in increased flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. However all of the site still lies outside of areas of higher fluvial flood risk. The site remains almost entirely greenfield. A minor negative effect is still expected. The effect is uncertain given that the proposal is to include the incorporation of SuDs which could help to address an increased flood risk which might result given the increase in impermeable surfaces.
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	++/-	++/-	Effects at Regulation 18 stage: In terms of access to sustainable travel options, the site is less than 1km from Faygate Railway Station to the west. There are no cycle routes in close proximity to the site but there are a number of bus stops within 1km to the west and within 500m to the east. As such, there is potential for future residents of the site to undertake journeys by more sustainable modes and limit the potential further congestion to result as the development is occupied. The site is adjacent will form an extension to Crawley and is expected to provide access to new services and facilities as well as employment opportunities that may reduce the need for residents to travel further afield. There is also an existing consent for a new railway station to the east at Kilnwood Vale for which negotiations are on-going. However, the scale of development proposed could also result in increased traffic into Crawley and Horsham along Crawley Road (A264), resulting in increased congestion. One of the access options being considered for the site would facilitate the introduction of a future Crawley Western Relief Road, which could reduce the potential to encourage modal shift, but also help relieve congestion in the area. Furthermore, commuting patterns (based on 2011 census data) in the area adjacent to the site indicate that private car trips are the most used mode of transport to travel to work. Delivery of growth at this location may result in similar travel patterns occurring following development.
	++/- ?		Overall, a mixed significant positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty present in predicting people's likely travel patterns following development. Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. This change does not greatly affect the distance from the site to nearby existing sustainable transport links and centres. While the Kilnwood Vale site is now not expected to provide healthcare facilities, residents at the extension site would still benefit from nearby access to services and facility to be provided at that site and in the wider Crawley area. The extension site is also to be delivered to achieve transport integration with the adjacent Kilnwood Vale development. Measures proposed include extending existing services at Kilnwood Vale, including the use of bus gates to prioritise buses over cars. New residents at the site could also benefit from access to the new railway station which has extant permission at Kilnwood Vale. There is still potential for congestion to result on the surrounding road network from the development of the site. Furthermore, new residents may adopt the travel habits currently prevalent in the area. The development may support provision of the relief road to the west of Crawley which would help address the issue of congestion, although this is unclear. In all, a mixed significant positive and minor negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.
SA 14: To limit air pollution in the District and ensure lasting	++/ ?	++/ ?	Effects at Regulation 18 stage: The scale of development proposed could give rise to an increase in the level of traffic in the Hazelwich AQMA, which is located near the town centre of Crawley. This effect is particularly likely considering commuting patterns for the area (based on 2011 census data) which indicate that private car trips are the most used mode of transport in the area adjacent to the site. New development at this location therefore has the potential to result in new residents adopting similar travel habits.

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
improvements in air quality.			The site is within 1km of Faygate Railway Station to the west and there are also several bus stop within 1km. Additionally, site proposals include the provision of a network of walking and cycling routes that will provide connections to local amenities in the wider Kilnwood Vale development that is adjacent to the site, as well as further connections to Crawley. There is also an existing consent for a new railway station to the east at Kilnwood Vale for which negotiations are on-going. These sustainable transport options may reduce the potential for development to result in adverse impacts on air quality.
			Overall, a mixed significant positive and significant negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty in predicting resident's likely commuting patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. This does not greatly affect the distance from the site to nearby existing sustainable transport links and centres. There is also potential for residents to benefit from access to the new railway station which has permission at Kilnwood Vale. It is noted that the Kilnwood Vale site is now not expected to provide healthcare facilities although the services and facilities still to be provided at that development would be accessible to new residents. There is still potential for development at the site to result in increased congestion within the surrounding road network as well as higher levels of traffic within the Hazelwich AQMA. Overall, a mixed significant positive and significant negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable			Effects at Regulation 18 stage: The site is with close good proximity to existing sustainable transport links (Faygate Railway Station and several bus stops) and site proposals include the delivery of cycling and walking networks into the adjoining Kilnwood Development and into Crawley. There is also an existing consent for a new railway station to the east at Kilnwood Vale for which negotiations are on-going. The aforementioned have potential to reduce the amount of private car trips residents take which may contribute to minimising the site's contribution to carbon emissions in the District.
climate change.	+/-?	+/-?	However, the scale of development at the site has the potential to increase traffic along the A264 and other roads in the area, contributing to increased carbon emissions. The new Crawley Western Relief Road why development at the site could help facilitate has the potential to limit the achievement of modal shift at this location. Current commuting patterns (based on 2011 census data) indicate that private car trips are the most used mode of transport in the area adjacent to the site and therefore development at this location may result in new residents adopting similar travel habits.
			Overall, a mixed minor positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. This does not greatly affect the distance from the site to nearby existing sustainable transport links and centres. There is also potential for residents to benefit from access to the new railway station which has permission at Kilnwood Vale. The proposal is to be supported by the preparation of an Energy Strategy and Sustainability Strategy, however, there is no inclusion of renewable energy or low carbon provisions as part of the existing proposal at this stage. Overall, a mixed minor positive and minor negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.
SA 16: To facilitate a sustainable and growing			Effects at Regulation 18 stage: The site proposes to deliver a relatively high number of dwellings, which will make a contribution to the local economy due to increased expenditure in the area, an increased workforce and the potential for new construction jobs.
economy.	+	+	The site is residential and does not include any employment or commercial uses as part of development.
			As such, a minor positive effect is expected for the site in relation to this SA objective.

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. The site would still deliver a high number of homes and provide benefits in terms of increased expenditure and an increased workforce. The site is being promoted for mainly residential uses. A minor positive effect is still expected.
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet	+	+	Effects at Regulation 18 stage: The site is 1km from the edge of Crawley, which contains employment opportunities that could be accessed by future residents of the site using public transport. Main Employment Areas (Broadfield Business Park and Tilgate Forest Business Centre) within Crawley are within relatively close proximity of the site to the east. Faygate Railway Station and a number of bus stops are within 1km of the site and proposals include the delivery of pedestrian and cycle routes into Crawley that could be used to access employment opportunities at thee and other locations. Overall, while the site is not within walking distance of any key employment areas in Horsham it would be well related to Crawley which is noted to play an important role in terms of employment provision for residents.
both current and future needs in the District.			As such, a minor positive effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site has been extended slightly to the west, but now does not cross the railway line to the north. This does not affect the distance from the site to the nearest employment opportunities and sustainable transport links, towards Crawley in particular. A minor positive effect is still expected.

SA of Horsham District Local Plan (Regulation 19) July 2021

### Site SA394: Rookwood

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 1: To provide affordable, sustainable and decent housing to meet local needs.			Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. It is proposed that the site would deliver 900 dwellings within the plan period. There is potential for the delivery of up to 1,100 homes beyond the plan period when the site is fully built out. It is expected that a high number of affordable homes will be provided as part of the new development.
	++	++	A significant positive effect is expected for the site in relation to this SA objective due to the contribution to the area's identified housing need, which is expected to include new affordable housing.
			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. There is also a change to the number of proposed dwellings. The proposal is being put forward for around 725 dwellings, 35% of which will be affordable housing. In addition, 5 Gypsy and Traveller pitches are proposed to be delivered. A significant positive effect is therefore still expected.
SA 2: To maintain and improve access to centres of services and facilities including			Effects at Regulation 18 stage: The site is currently occupied by a golf course and therefore there are no existing services and facilities within the site. However, the site is within walking distance of Horsham Town Centre to the south-east, which offers a range of services and facilities that could be used by potential resident of the site. It furthermore adjoins the western edge of the settlement's built up area boundary. The site is within walking distance of primary schools, a secondary school and a healthcare centre. As such, residents in the early stages of development of the site are likely to have access to some services and facilities.
health centres and education.			As part of development, the site is expected to deliver a primary school, and retail and community facilities within a mixed uses area.
			A significant positive effect is expected for the site in relation to this SA objective considering the existing services and facilities that are accessible from the site and the proposals at the site that will further strengthen this provision. Uncertainty is attached to the effect considering that the close proximity of this large site to Horsham could potentially result in existing facilities becoming overcapacity.
	++?	++?	Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. However, the site is still occupied by a golf course, so there are no existing services and facilities within its boundaries. The site is still within walking distance of Horsham Town Centre to the south-east, which offers a range of services and facilities that could be used by potential resident of the site. It furthermore adjoins the western edge of the settlement's built up area boundary. The site is also still within walking distance of primary schools, a secondary school and a healthcare centre. As such, residents in the early stages of development of the site are likely to have access to some services and facilities.
			As part of development, the site is expected to deliver some retail facilities, community uses and open space on site. A primary school is to be provided on site and contributions would be sought for all forms of education provision not provided on site. A significant positive effect is still expected for the site in relation to this SA objective considering the existing services and facilities that are accessible from the site. Uncertainty is attached to the effect considering that the close proximity of this large site to Horsham could potentially result in existing facilities becoming overcapacity.
SA 3: To encourage social inclusion, strengthen community	+?	+?	Effects at Regulation 18: The site is not within a 40% most socially deprived area. As such, there is limited potential for the site to contribute to local regeneration.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
cohesion and a respect for diversity.			The site is located directly adjacent to the settlement of Horsham and will potentially deliver some new retail and community facilities as part of development, which may complement and contribute to the vitality of the existing town centre.
			Overall, a minor positive effect is expected for the site in relation to this SA objective. The effect is uncertain as the impact of delivering new services and facilities will be dependant in part on their phasing, which is unknown at this stage.
			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. The site still does not lie within a 40% most socially deprived area. As such, there is limited potential for the site to contribute to local regeneration.
			The site is still located directly adjacent to the settlement of Horsham and will potentially deliver some retail facilities and a new community facility as part of development, which may complement and contribute to the vitality of the existing town centre. A minor positive effect is still expected for the site in relation to this SA objective. The effect is uncertain as the impact of delivering new services and facilities will be dependent in part on their phasing, which is unknown at this stage.
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.	0?	0?	Effects at Regulation 18 stage: The potential for the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. However, the detailed design of the development is still unknown at this stage. As such, an uncertain negligible effect is still expected.
SA 5: To improve public health and wellbeing and reduce health inequalities.			Effects at Regulation 18 stage: There are several health centres to the east of the site within Horsham as well as multiple indoor/outdoor sports facilities and areas of open space, all within a suitable walking distance of the site. The site takes in the Rookwood Golf Course and development of this land is expected to result in loss of this recreation facility. However, as part of development, the site is expected to provide new pedestrian and cycle links, and amenity open space, which could be used by residents for recreational purposes.
			The site is bordered by the A24 to the west and therefore residents may be adversely affected by noise.
	++/ ?	++/ ?	Overall a mixed significant positive and significant negative effect is expected for the site in relation to this SA objective. The site is likely to be supported by existing health centres and new and existing recreation facilities, but it will result in the loss of an existing outdoor sports facility. Uncertainty is attached to the overall effect as the high number of homes to be delivered could result in existing healthcare facilities becoming overburdened. Furthermore, there may be potential for the impacts relating to noise pollution to be mitigated through appropriate design measures.
			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. There are still several health centres, sport facilities and areas of open space to the east of the site. While development of the site will result in the loss of a recreation facility, the development still aims to provide a large amount of open space and there is potential to provide active travel links with the Riverside Walk and public rights of way, which could be used by residents for recreational purposes. The site is still bordered by the A24 to the west, so residents may be adversely affected by noise pollution. Therefore, a mixed significant positive and significant negative effect with uncertainty is still expected.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species			Effects at Regulation 18 stage: The site is located within an Impact Risk Zone (IRZ) for St Leonard's Forest SSSI that lies on the opposite side of Horsham to the east. However, the IRZ is for industrial/aviation planning applications and not for residential use, or any of the other provisions associated with the development proposals. Warnham Mill Pond Local Wildlife Site is adjacent to north-eastern boundary of the assessment area.
and/or sites of biodiversity or geological interest.	?	?	A significant negative effect is expected for the site in relation to this SA objective given that the site is adjacent to a Local Wildlife Site. There is potential for development to result in the loss and fragmentation of habitats. There is also potential for development to result in increased recreational pressure and increased noise and light disturbance in relation to habitats in the area. The effect is uncertain as site proposals include the provision of open space and enhancement of Warnham Nature Reserve, which could help to mitigate adverse impacts in relation to the natural environment.
			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. The site is still located within an Impact Risk Zone (IRZ) for St Leonard's Forest SSSI that lies on the opposite side of Horsham to the east. However, the IRZ is for industrial/aviation planning applications and not for residential use, or any of the other provisions associated with the development proposals. Warnham Mill Pond Local Wildlife Site is still adjacent to north-eastern boundary of the assessment area. Further information from the Council indicates that the area is considered to be one of the most biodiverse in Sussex. The site proposes to provide 10% Biodiversity net gain, however no plans have been provided to show how this will be achieved. Therefore, a significant negative effect with uncertainty is still expected.
SA 7: To conserve and enhance the			Effects at Regulation 18 stage: Land to the West of Horsham LLCA has been assessed in the Horsham District Landscape Capacity Assessment.
character and			The land that the residential development would lie on within the site has been identified as having low-moderate landscape capacity for large scale housing development.
distinctiveness of the District's landscapes and townscapes, maintaining and	?	?	As such, a significant negative effect is expected for the site in relation to this SA objective as there are substantial areas of the site where it is unlikely that residential development could be accommodated without particularly adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.
strengthening local distinctiveness and sense of place.			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. There is no change to the landscape capacity assessment which relates to the site, as such, the site is still identified as having low-moderate landscape capacity for large scale housing development. A significant effect with uncertainty is still expected.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.	?	-?	Effects at Regulation 18 stage: The site does not contain any designated heritage assets within its boundaries. However, land to the north-east of the residential part of the site is adjacent to Grade II Listed Buildings (Mill House and Warnham Mill). Furthermore, Warnham Court, a Registered Park and Garden is located 100 from the western boundary on the opposite side of the A24. Grade II* Listed Warnham Court is located in close proximity to the site within the Registered Park and Garden. In addition, the site is within 1km of three conservation areas within Horsham to the east. The Horsham Conservation Area Appraisal and Management Plan (January 2018) states that development should be avoided if it would be harmful to the setting or character of the conservation area or would adversely impact important views, open spaces, tree cover or boundary features within the conservation area. Considering the large scale of development to be delivered it is expected that there may be some potential for adverse impacts in relation to these elements.
			An uncertain significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain considering that the design of the new development may present opportunities to mitigate adverse impacts in terms of the significance of the setting of heritage assets in the area.

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA394. The findings of the assessment work note that there are 45 Listed Buildings, a Scheduled Monument, a Registered Park and Garden and three Conservation Areas within the wider 1km study area set out for the site. The 1km study area for the site also contains six Archaeological Notification Areas (ANAs) (three of which are categorised as red, very sensitive for archaeology and the remainder of which are categorised as amber, sensitive for archaeology) and one archaeological site. The assessment work concluded that development could result in three Listed Buildings (Grade II* Listed South East Lodges of Warnham Court School, as well as Grade II Listed Warnham Mill and Mill House) and Warnham Court Registered Park and Garden being subject to potentially significant change. The magnitude of the effects recorded in relation to these designated assets are recorded as low. Additional effects are recorded in relation to Sussex Barn a non-designated heritage asset, however, the sensitivity of this asset is recorded as low and magnitude of change is recorded as medium. Therefore, the overall effect is not likely to be significant. Given that only potentially significant change is expected to result in relation to a number of designated heritage assets and the remaining effects are not likely to be significant, overall a minor negative effect is expected for the site in relation to this SA objective. The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.
SA 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils.	-	-	Effects at Regulation 18 stage: The site is greenfield and the majority is comprised of grade 4 agricultural land. The remainder of the site comprises grade 3 agricultural land. As such, the site is expected to result in a minor negative effect in relation to this SA objective. Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town, but there is no change to the soil composition of the site. Therefore, a minor negative effect is still expected.
SA 10: To conserve natural resources, including mineral resources in the District.	?	?	Effects at Regulation 18 stage: The vast majority of the site is located within a Mineral Safeguarding Area (MSA) for Brick Clay. Therefore, a significant negative effect is expected in relation to this SA objective due to the potential for development to result in the sterilisation of finite mineral resources in the District. The effect is uncertain as there may be opportunities to extract mineral resources prior to development. Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. The majority of the site is still within a Mineral Safeguarding is still expected.
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.	0	0	Effects at Regulation 18 stage: There are three watercourses (Red River, Boldings Brook and Channells Brook) that pass through the site. The site also contains Warnham Mill Pond. It is assumed that the potential for any water pollution in these waterbodies as a result of development will be mitigated by the delivery of SuDS. The site is not located within a Source Protection Zone. The site lies in a portion of the District that is served by Southern Water for its water infrastructure. Discussions between the Council and Southern Water indicate that the site would drain to wastewater treatment works which has Dry Weather Flow (DWF) permit capacity to accommodate growth up to 2035. A negligible effect is therefore expected for the site in relation to this SA objective.

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. However, three watercourses (Red River, Boldings Brook and Channells Brook) still pass through the site. The site is still not located within a Source Protection Zone. As such, a negligible effect is still expected.
SA 12: To manage and reduce the risk of			Effects at Regulation 18 stage: There is some land in the eastern half of the site that is located within flood zone 2 and 3 due to the presence of Boldings Brook. However, the majority of the site is located within flood zone 1.
flooding.	_	-?	Due to the site being greenfield, development will increase the overall amount of impermeable surfaces in the area, which may result in increased flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. However, the majority of the site is still located within flood zone 1 with the eastern boundary of the site located within flood zones 2 and 3 due to the Boldings Brook. Furthermore, the proposal is not to provide development within the areas of higher flood risk within the site. As such, a minor negative effect is still expected. A SuDS strategy is to be incorporated at the site which will help to mitigate the potential increased flood risk as new impermeable surfaces are created and therefore the effect is uncertain.
SA 13: To reduce congestion and the need to travel by private vehicle in the District.			Effects at Regulation 18 stage: In terms of access to sustainable travel options, Horsham Railway Station is located 1.5km to the east in Horsham and there are also a number of bus stops within close proximity to the site. As such, there is potential for future residents of the site to avoid private car trips, reducing congestion in the area. The site is within walking distance of the town centre of Horsham (the District's main town), which provides residents with the opportunity to meet every day needs without private car trips. The proposals for the site to include a range of services and facilities within the new development will reduce to the need for residents to travel further afield in private cars, potentially reducing congestion in the area.
	++/- 2		However, the scale of development proposed could lead to increased traffic along the A24, which is adjacent to the western boundary of the site. Furthermore, commuting patterns for the area (based on 2011 census data) indicate that private car trips are the most used mode of transport to travel to work. Providing more development at this location may result similar travel habits being adopted.
		++/- ?	Overall, a mixed significant positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. In terms of access to sustainable travel options, Horsham Railway Station is still located 1.5km to the east in Horsham and there are also a number of bus stops within close proximity to the site. As such, there is potential for future residents of the site to avoid private car trips, reducing congestion in the area. The site is still within walking distance of the town centre of Horsham (the District's main town), which provides residents with the opportunity to meet every day needs without private car trips. The proposals for the site to include a range of services and a community facility within the new development will reduce the need for residents to travel further afield in private cars, potentially reducing congestion in the area. However, the scale of development proposed is likely lead to increased traffic along the A24, which is adjacent to the western boundary of the site. Furthermore, commuting patterns for the area (based on 2011 census data) indicate that private car trips are the most used mode of transport to travel to work. Providing more development at this location may result similar travel habits being adopted. A mixed significant positive and minor negative effect is still expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 14: To limit air pollution in the District and ensure lasting improvements in air			Effects at Regulation 18 stage: The site is not directly connected via road to one of the Air Quality Management Areas (AQMAs) in the District or in the surrounding Districts. Although the site is within walking distance of Horsham Town Centre, there is potential for the scale of development to increase congestion B2237 and A281 leading into the town. Furthermore, commuting patterns for the area (based on 2011 census data) indicate that private car trips are the most used mode of transport travel to work. Providing more development at this location may result similar travel habits being adopted and further adverse impacts in terms of air quality.
quality.			The site is within a reasonable proximity of Horsham Railway Station in the centre of Horsham to the east and there are a number of bus stops in the area. In addition, the site proposals include the provision of pedestrian and cycle routes. Access to these sustainable travel options has the potential to decrease private car trips, which may result in reduced adverse impacts on air quality.
	++/- ?	++/- ?	As such, a mixed significant positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town, However, the site still not directly connected to one of the AQMAs within the District or surrounding areas. Although the site is within walking distance of Horsham Town Centre, there is potential for the scale of development to increase congestion B2237 and A281 leading into the town. The site is still within a reasonable proximity of Horsham Railway Station in the centre of Horsham to the east and there are a number of bus stops in the area. In addition, the site proposals include the provision of pedestrian and cycle routes, especially regarding the potential to increase access to the riverside walk and public rights of way. As such, a mixed significant positive and minor negative effect is still expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
SA 15: To minimise the District's contribution to climate change and adapt to			Effects at Regulation 18 stage: The site is within a reasonable proximity of Horsham Railway Station in the centre of Horsham to the east and there are a number of bus stops in the area. There is potential for residents to use these sustainable modes of transport, which may result in reduced carbon emissions from the new development. However, commuting patterns (based on 2011 census data) indicate that private car trips are the most used mode of transport to travel to work. Providing more development at this location may result similar travel habits being adopted.
unavoidable climate change.			The scale of development proposed also has the potential to increase traffic on roads in the area (A24, B2237 and A281), contributing to increased carbon emissions. It is not expected that the site would include renewable energy infrastructure.
	+/-?	+/-?	As such, a mixed minor positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified due to the difficulty in predicting people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. However, the site is still within a reasonable proximity of Horsham Railway Station in the centre of Horsham to the east and there are a number of bus stops in the area. The scale of development proposed also has the potential to increase traffic on roads in the area (A24, B2237 and A281), contributing to increased carbon emissions. However, there is potential for the site to provide EV charging points, energy efficient building design and renewable and low carbon technologies. It should be noted that the scheme is not yet finalised meaning some of these measures may not be incorporated. As such, a mixed minor positive and minor negative effect is still expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified due to the difficulty in predicting people's likely travel patterns following development and given that the exact design of the development is unknown at this stage.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 16: To facilitate a sustainable and			Effects at Regulation 18 stage: It is proposed that the site would deliver a relatively high number of dwellings which is likely to make a contribution to the local economy due to increased expenditure and an increased workforce.
growing economy.			The site proposals include the delivery of retail units as part of the mixed use development, which may also make a contribution to the local economy.
	+	+	Therefore, a minor positive effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. The proposal for the site suggested that very little specialist employment provision would be provided on site. However, job creation would be supported through the delivery of 3,000sqm of E uses (start-up or flexible desk space facilities) (totalling around 0.4ha). The relative high number of dwellings is also likely to make a contribution to the local economy due to increased expenditure and workforce. As such, a minor positive effect is still expected.
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet			Effects on Regulation 18 stage: The site is within 1.8km of several key employment areas (including North Heath Lane Industrial Estate, Nightingale Industrial Estate and Foundary Lane Industrial Estate) and is also within walking distance of Horsham Town Centre, which is the largest centre in the District. The site is also within a reasonable distance of Horsham Railway Station and a number of bus stops, which offers potential for residents to access employment opportunities using sustainable modes of transport.
both current and	++	++	Therefore, a significant positive effect is expected for the site in relation to this SA objective.
future needs in the District.			Effects at Regulation 19 stage: The boundary of the site has been extended to the east to take in land towards Redford Avenue within Horsham town. The site is still within 1.8km of several key employment areas (including North Heath Lane Industrial Estate, Nightingale Industrial Estate and Foundary Lane Industrial Estate) and is also within walking distance of Horsham Town Centre, which is the largest centre in the District. The site is also within a reasonable distance of Horsham Railway Station and a number of bus stops; therefore a significant positive effect is still expected.

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# Site SA414: Land North East of Henfield (Mayfield)

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 1: To provide affordable, sustainable and decent housing to			Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. The site is anticipated to deliver 3,000 dwellings within the plan period, with a total of 7,000 dwellings to be developed by 2042. The new homes delivered would include a range of dwelling sizes and at least 35% affordable housing.
meet local needs.	++	++	A significant positive effect is expected for the site in relation to this SA objective considering its substantial contribution to the local housing need, including affordable housing. The close proximity of the site to Mid Sussex means that it could potentially contribute to unmet housing need within that local authority.
			Effects at Regulation 19 stage: The boundary of the site has not changed; however, the site is now anticipated to deliver up to 7,000 dwellings, with 2,000 dwellings delivered during the plan period by 2038. The new homes delivered would include a range of dwelling sizes and at least 35% affordable housing. A significant positive effect is still expected for the site in relation to this SA objective considering its substantial contribution to the local housing need, including affordable housing. The close proximity of the site to Mid Sussex means that it could potentially contribute to unmet housing need within that local authority.
SA 2: To maintain and improve access to centres of services and facilities including health centres and			Effects at Regulation 18 stage: The site is greenfield and is therefore not currently well served by services and facilities. The nearest town centre, Henfield to the west, is not within an easy walking distance of the site. The built up area boundary of Henfield is located within appropriately 900m of the site. The closest education and healthcare facilities are located within Henfield within 1.7km and 1.3km respectively. Albourne outside of the District to the east also contains an education facility. As such, there is potential for new residents to have a poor level of access to services particularly during the early stages of development. Therefore, an uncertain minor negative effect is expected.
education.			As part of the development, it is proposed that the site would include a range of community services and facilities. In terms of education this, includes three nurseries, three primary schools, one through school and potentially an educational facility linked to Plumpton College. In addition, the site also proposes to deliver a main town centre, two neighbourhood centres with community facilities, a health centre and a sports hub. The provision of the aforementioned is likely to ensure that there are sufficient services and facilities to support growth in the area and therefore a significant positive effect is expected.
	++/-	++/-	Overall, a mixed significant positive and uncertain minor negative effect is expected in relation to this SA objective.
	?	?	Effects at Regulation 19 stage: The boundary of the site has not changed. As such the site is still greenfield and is therefore not currently well served by services and facilities. The nearest town centre is still Henfield to the west, and it is not within an easy walking distance of the site. The built up area boundary of Henfield is located within appropriately 900m of the site. The closest education and healthcare facilities are located within Henfield within 1.7km and 1.3km respectively. Albourne outside of the District to the east also contains an education facility. As such, there is potential for new residents to have a poor level of access to services particularly during the early stages of development. Therefore, an uncertain minor negative effect is expected.
			As part of the development, it is proposed that the site would include a range of community services and facilities. In terms of education this, includes three nurseries, three primary schools, a secondary school, a school for special educational needs and potentially an educational facility linked to Plumpton College. In addition, the site also proposes to deliver a main town centre, two neighbourhood centres with community facilities, a health centre and a sports hub. The provision of the aforementioned is likely to ensure that there are sufficient services and facilities to support growth in the area and therefore a significant positive effect is expected.
			Overall, a mixed significant positive and uncertain minor negative effect is still expected in relation to this SA objective.

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.	0	0	Effects at Regulation 18 stage: The site is on greenfield land and is not within a socially deprived area. It is not expected to contribute to the vitality and viability of the town centres and village centres in the District. As such, a negligible effect is expected in relation to this SA objective for the potential of the site to promote local regeneration. Effects at Regulation 19 stage: The boundary of the site has not changed, as such a negligible effect is still expected.
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.	0?	0?	The potential of the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: The boundary of the site has not changed, as such an uncertain negligible effect is still expected.
SA 5: To improve public health and wellbeing and reduce health inequalities.	++/- ?	++/- ?	Effects at Regulation 18 stage: The nearest health centre is not within walking distance of the site within settlement of Henfield which is to the west. However, the site is within walking distance of two outdoor sports facilities to the south and a 20ha area of open access land (also to the south) that could be used for recreational purposes. There are also multiple PROWs in the area of the site, providing access to the surrounding countryside. There is potential for these existing assets to contribute positively to resident's health in the new development by increasing uptake of physical activity. In addition to existing opportunities for physical activity, as part of development it is proposed that the site would deliver a sports hub, open space and active travel corridors. It is proposed that development will also be supported by a 150m <sup>2</sup> building for health practitioners with ancillary/complementary uses in close proximity. As such, while the site would not provide access to existing healthcare facilities, the overall effect is expected to be mixed (significant positive and minor negative) in relation to this SA objective. The effect is uncertain depending on the phasing of delivery of the health centre.
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species	?	?	Effects at Regulation 18 stage: The south of the site is within two Impact Risk Zones for national designations. The IRZs are for industrial/aviation planning applications and impacts from any new employment development will dependent upon the specifics of the use. There are also other areas of Ancient Woodland within the site boundaries (two in the central region and one in the north) as well as multiple areas of deciduous woodland priority habitat in the north.

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
and/or sites of biodiversity or geological interest.			A significant negative effect is expected in relation to this SA objective considering the boundaries of the IRZ and areas of Ancient Woodland which lie within the site. The greenfield land take within the site may result in increased habitat disturbance as well as potential for fragmentation and loss. There is also potential for development at the site to result in increased recreational pressure and increased noise and light disturbance in relation to habitats in the area. The overall effect is uncertain as the site proposals include a net gain in biodiversity through protection and enhancement of existing Green Infrastructure. These measures could help to mitigate adverse impacts in relation to the natural environment.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such, the south of the site is still within two Impact Risk Zones for national designations. The IRZs are for industrial/aviation planning applications and impacts from any new employment development will dependent upon the specifics of the use. There are also other areas of Ancient Woodland within the site boundaries (two in the central region and one in the north) as well as multiple areas of deciduous woodland priority habitat in the north.
			A significant negative effect is still expected in relation to this SA objective considering the boundaries of the IRZ and areas of Ancient Woodland which lie within the site. The greenfield land take within the site may result in increased habitat disturbance as well as potential for fragmentation and loss. There is also potential for development at the site to result in increased recreational pressure and increased noise and light disturbance in relation to habitats in the area. The overall effect is uncertain as the site proposals include a net gain in biodiversity through protection and enhancement of existing Green Infrastructure and creation of new wetland habitats. These measures could help to mitigate adverse impacts in relation to the natural environment.
SA 7: To conserve and enhance the			Effects at Regulation 18 stage: The land within the site has been assessed as part of the Horsham District Landscape Capacity Assessment and falls across a number of Local Landscape Character Areas (LLCAs).
character and distinctiveness of the District's landscapes and townscapes,			Land within the Land West of Wineham Lane Henfield Road and the Land South of the River Arun LLCA has been assessed as having moderate landscape capacity for large scale residential and moderate to low-moderate for employment development. However, much of the site also falls within the Cutlers Brook and surrounds and the Land North of Cutlers Brook LLCAs which have been assessed as having no/low capacity for large scale residential and employment development.
maintaining and strengthening local distinctiveness and sense of place.	?	?	As such, a significant negative effect is expected for the site in relation to this SA objective as it is unlikely that residential development could be accommodated without particularly adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.
			Effects at Regulation 19 stage: The boundary of the site has not changed; therefore the site still has a moderate landscape capacity for large scale residential and moderate to low-moderate for employment development. However, much of the site also falls within the Cutlers Brook and surrounds and the Land North of Cutlers Brook LLCAs which have been assessed as having no/low capacity for large scale residential and employment development.
			As such, a significant negative effect is still expected for the site in relation to this SA objective as it is unlikely that residential development could be accommodated without particularly adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.
SA 8: To conserve and/or enhance the qualities, fabric,	?	?	Effects at Regulation 18 stage: There is one designated heritage asset within the site boundaries, which is a Grade II Listed (Sakeham Farmhouse) Building located in the north-west of the site. The site is adjacent to seven Grade II Listed Buildings and there are also multiple further Listed Buildings within 500m of the site. Considering their close proximity to the site there is potential for development to result in adverse effects in terms of the respective settings of these historic environment assets.

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
setting and accessibility of the District's historic			There is also potential for development at the site to impact upon the rural setting of Henfield Conservation Area, which is located 1.3km to the south-west and contains 60 Listed Buildings. The Henfield Conservation Area Appraisal and Management Plan (2018) suggests development should be avoided that would be harmful to the setting or character of the Conservation Area. Views both into it and out of it the Conservation Area should be taken into account when new development is being considered.
environment.			As such, an uncertain significant negative effect is expected for the site in relation to this SA objective due to the multiple designated heritage assets in close proximity and the potential for development to impact on Henfield Conservation Area to the south-west. The effect is uncertain considering that the design of the new development may present opportunities to mitigate adverse impacts in terms of the significance of the setting of heritage assets in the area.
			Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA394. The findings of the assessment work note that there are 34 Listed Buildings, a Scheduled Monument, and a Conservation Area within the wider 1km study area set out for the site. Of these heritage assets, two Listed Buuilsings fall within the boundary of the site. The 1km study area for the site also contains five Archaeological Notification Areas (ANAs) (two of which are categorised as red, very sensitive for archaeology and the remainder of which are categorised as amber, sensitive for archaeology) and one archaeological site. The assessment work concluded that development could result in five Listed Buildings (all of which are Grade II Listed) being subject to significant change. The assessment work also concluded that nine further Grade II Listed Buildings could be subject to potentially significant effects as a result of development. The magnitude of these effects are, however, recorded as low. Given that significant change is expected to result in relation to a number of designated heritage assets overall a significant negative effect is expected for the site in relation to this SA objective.
			The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.
SA 9: To make efficient use of the District's land			Effects at Regulation 18 stage: The site is wholly greenfield land. The majority of the site is also comprised of grade 3 agricultural land. There is a small area of grade 2 agricultural land in the south of the site.
resources through the re-use of previously	?	?	As such, a significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain as there is no data distinguishing whether it is grade 3a or the lower quality grade 3b.
developed land and conserve its soils.			Effects at Regulation 19 stage: The boundary of the site has not changed. As such, the site is still wholly greenfield land. The majority of the site is still also comprised of grade 3 agricultural land. There is a small area of grade 2 agricultural land in the south of the site. As such, a significant negative effect is still expected for the site in relation to this SA objective. The effect is uncertain as there is no data distinguishing whether it is grade 3 a or the lower quality grade 3b.
SA 10: To conserve natural resources, including mineral			Effects at Regulation 18 stage: The whole of the site is located within Mineral Safeguarding Area for Brick Clay and therefore a significant negative effect is expected due to the potential for development to result in the sterilisation of finite mineral resources. The effect is uncertain as there may be opportunities to extract mineral resources prior to development.
resources in the District.	?	?	Effects at Regulation 19 stage: The boundary of the site has not changed. As such, the whole of the site is still located within Mineral Safeguarding Area for Brick Clay and therefore a significant negative effect is still expected due to the potential for development to result in the sterilisation of finite mineral resources. The effect is uncertain as there may be opportunities to extract mineral resources prior to development.
SA 11: To achieve sustainable water	0	-?	Effects at Regulation 18 stage: There are two rivers (Adur East and Chess Stream) that pass through the site. It is assumed that the potential for any water pollution in these watercourses as a result of development will be mitigated by the delivery of SuDS.

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SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
resource management and promote the quality of the District's			The site is not located in a Source Protection Zone. The site lies in a portion of the District that is served by Southern Water for its water infrastructure. Discussions between the Council and Southern Water indicate that the site would drain to wastewater treatment works which has Dry Weather Flow (DWF) permit capacity to accommodate growth up to 2035.
waters.			A negligible effect is therefore expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such, there are still two rivers (Adur East and Chess Stream) that pass through the site and it is not within a Source Protection Zone. It is assumed that the potential for any water pollution in these watercourses as a result of development will be mitigated by the delivery of SuDS, Discussions with Southwater indicate that the local sewerage has limited capacity and there will be a need for reinforcement of the wastewater network to support new development. Furthermore, the Water Cycle Study <sup>270</sup> identifies that Henfield WwTW does not currently have capacity to serve the level of growth proposed for the Henfield site.
			A minor negative effect is therefore expected for the site in relation to this SA objective. The effect is uncertain given that new infrastructure supported through development of the site would help to mitigate the effect.
SA 12: To manage and reduce the risk of flooding.			Effects at Regulation 18 stage: There are two rivers within the area that pass through the site from west to east in the north (Adur East) and in the central region (Chess Stream). Land directly adjacent to these watercourses is within flood zone 2, with smaller areas of flood zone 3 also present. However, the majority of the site is within flood zone 1.
			Due to the majority of the site being greenfield, development is likely to increase the overall amount of impermeable surfaces in the area, which may increase flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective.
	-	-?	Effects at Regulation 19 stage: The boundary of the site has not changed. As such, the majority of the site is still within flood zone 1. However, land directly adjacent to the two rivers is within flood zone 2, with smaller areas of flood zone 3 also present.
			Due to the majority of the site being greenfield, development is likely to increase the overall amount of impermeable surfaces in the area, which may increase flood risk. As such, a minor negative effect is still expected for the site in relation to this SA objective. The proposal is expected to incorporate SuDS, including wet and dry wetland ponds, green roofs and permeable paving which is likely to help mitigate the adverse impacts in relation to the proliferation of impermeable surfaces. Therefore, the negative effect is uncertain.
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	/+?	/+?	Effects at Regulation 18 stage: In terms of access to sustainable travel options, the site not in close proximity to a railway station (the closest station is at Hassocks approximately 6.0km to the east). The site is also not located within close proximity of existing cycle routes or bus stops. The scale of development at the site has the potential to result in a substantial increase in the number of journeys being made regularly in the area and therefore potentially increased congestion. The relatively close proximity of the A23/M23 could potentially encourage out commuting from the site and there is potential that the proposal for a new link road as part of the site could further encourage this trend.

<sup>270</sup> JBA Consulting on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Reigate and Banstead District Council (2020) Gatwick Sub-Region Water Cycle Study

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
			As part of development, it is proposed that the site would deliver a public transport corridor, active travel corridors and a transport hub. Additionally, the site's proposal to include a range of services and facilities within the new development will also reduce the need for residents to travel further afield in private cars. However, commuting patterns for the surrounding area (based on 2011 census data) indicate that private car trips are the most used commuting mode. Development at this location may result in similar travel habits being adopted.
			Overall, a mixed (minor positive and significant negative) effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such, the site is still not in close proximity to a railway station. The site is also not located within close proximity of existing cycle routes or bus stops. The scale of development at the site has the potential to result in a substantial increase in the number of journeys being made regularly in the area and therefore potentially increased congestion.
			As part of development, it is proposed that the site would deliver a public transport corridor, active travel corridors and a transport hub. Additionally, the site's proposal to include a range of services and facilities within the new development will also reduce the need for residents to travel further afield in private cars. However, commuting patterns for the surrounding area (based on 2011 census data) indicate that private car trips are the most used commuting mode. Development at this location may result in similar travel habits being adopted.
			Overall, a mixed (minor positive and significant negative) effect is still expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
SA 14: To limit air pollution in the District and ensure lasting improvements in air			Effects at Regulation 18 stage: The scale of residential and employment development proposed could give rise to an increase in the level of traffic in the Cowfold AQMA, which is around 4km north of the site connected by the B2116 and A281. The scale of development at the site has the potential to result in commuting substantial increase in local travel and therefore potentially reduced air quality. The relatively close proximity of the A23/M23 and the proposal for a new link road at the site could furthermore encourage out commuting from this location and the proposal for a new link road.
quality.			It is proposed that the site would include the delivery of sustainable transport links as part of development and services and facilities onsite, which have the potential to reduce congestion on local roads and reduce the overall need to travel. This type of provision could potentially result in reduced impacts on air quality. However, commuting patterns for the surrounding area (based on 2011 census data) indicate that private car trips are the most used commuting mode. Providing development at this location may result similar travel habits being adopted.
	/+?	/+?	Overall, a mixed (significant positive and significant negative) effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such, the scale of residential and employment development proposed could still give rise to an increase in the level of traffic in the Cowfold AQMA, which is around 4km north of the site connected by the B2116 and A281. The scale of development at the site has the potential to result in commuting substantial increase in local travel and therefore potentially reduced air quality. The relatively close proximity of the A23/M23 and the proposal for a new link road at the site could furthermore encourage out commuting from this location and the proposal for a new link road.
			It is proposed that the site would include the delivery of sustainable transport links as part of development and services and facilities onsite, which have the potential to reduce congestion on local roads and reduce the overall need to travel. This type of provision could potentially result in reduced impacts on air quality.

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
			Overall, a mixed (significant positive and significant negative) effect is still expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
SA 15: To minimise the District's			Effects at Regulation 18 stage: The closest railway station to the site is located at Hassocks, which is 6.0km to the east. The site is also not within close proximity of a cycle route or bus stop.
contribution to climate change and adapt to unavoidable climate change.			It is proposed that the site would include the delivery of sustainable transport links as part of development and services and facilities onsite, which have the potential to reduce the overall need to travel in the long term. However, commuting patterns (based on 2011 census data) indicate that private car trips are the most used commuting mode from nearby locations. Providing development at this location may result similar travel habits being adopted. Furthermore, the scale of development at the site has the potential to result in increased numbers of journeys being taken in area and therefore a potential increase in carbon emission in the District. This effect is particularly likely to result considering the relatively close proximity of the A23/M23 and the proposal for a new link road.
			The site also proposes to minimise carbon emission through the inclusion of low carbon and sustainable energy generation as part of development. Carbon reducing proposals include electric vehicle charging points, a car club and domestic PV cells.
	++/	++/	Overall, a mixed (significant positive and significant negative) effect is expected for the site in relation to this SA objective.
	?	?	Effects at Regulation 19 stage: The boundary of the site has not changed. As such, the closest railway station to the site is located at Hassocks, which is 6.0km to the east. The site is also not within close proximity of a cycle route or bus stop. As it is proposed that the site would include the delivery of sustainable transport links as part of development and services and facilities onsite, there is still the potential to reduce the overall need to travel in the long term. However, commuting patterns (based on 2011 census data) indicate that private car trips are the most used commuting mode from nearby locations. Providing development at this location may result similar travel habits being adopted. Furthermore, the scale of development at the site has the potential to result in increased numbers of journeys being taken in area and therefore a potential increase in carbon emission in the District. This effect is particularly likely to result considering the relatively close proximity of the A23/M23 and the proposal for a new link road.
			The site aims to be a net carbon neutral/zero carbon town as well as proposes to minimise carbon emission through the inclusion of low carbon and sustainable energy generation as part of development. Carbon reducing proposals include electric vehicle charging points, a car club and domestic PV cells.
			Overall, a mixed (significant positive and significant negative) effect is still expected for the site in relation to this SA objective.
SA 16: To facilitate a sustainable and growing economy.	++?		Effects at Regulation 18 stage: The site is large (310ha) and proposes to deliver a high number of dwellings, which is likely to make a significant contribution to the local economy due to increased expenditure in the area and an increased workforce. The inclusion of a range of services and facilities as part of development, including a hotel and lido, are likely to increase the economic contribution of the site. In addition, it is proposed that the site would create 7,000 new jobs through the provision of employment space, which is likely to attract businesses and commuters to the area, further increasing expenditure.
		++?	As such, the site is expected to result in a significant positive effect in relation to this SA objective. While the site is located as to provide as to the primary road network (at the A281), uncertainty is attached the positive effect identified considering the relative remoteness of the site, which may limit its potential to support the District's economy.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such the site is still 310ha and proposes to deliver a high number of dwellings, which is likely to make a significant contribution to the local economy due to increased expenditure in the area and an increased workforce. The inclusion of a range of services and facilities

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
			as part of development, including a hotel and lido, are likely to increase the economic contribution of the site. In addition, it is proposed that the site would create 7,000 new jobs through the provision of employment space, which is likely to attract businesses and commuters to the area, further increasing expenditure.
			As such, the site is still expected to result in a significant positive effect in relation to this SA objective. While the site is located as to provide as to the primary road network (at the A281), uncertainty is attached the positive effect identified considering the relative remoteness of the site, which may limit its potential to support the District's economy.
SA 17: To deliver, maintain and enhance			Effects at Regulation 18 stage: The site is not within close proximity of a railway station, cycle route or bus stop, which could limit the potential for people to access the new employment land by sustainable travel options.
access to diverse employment opportunities, to meet			As part of development, it is proposed that the site would deliver a public transport corridor, active travel corridors and a transport hub which may also improve sustainable access to employment opportunities once the site is fully built out.
both current and future needs in the District.			The site is not located within close proximity of any key employment areas, the closest being Henfield Business Park, which is approximately 2.4km to the south west. Whilst the new development would include a new town centre, it is not within walking distance of an existing town centre in the District. As such, access to employment opportunities, particularly in the earlier stages of development, may be limited for new residents.
	/+	/+	Overall, an mixed (minor positive and significant negative) effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such the site is still not within close proximity of a railway station, cycle route or bus stop, which could limit the potential for people to access the new employment land by sustainable travel options.
			As part of development, it is still proposed that the site would deliver a public transport corridor, active travel corridors and a transport hub which may also improve sustainable access to employment opportunities once the site is fully built out.
			The site is still not located within close proximity of any key employment areas. Whilst the new development would include a new town centre, it is not within walking distance of an existing town centre in the District. As such, access to employment opportunities, particularly in the earlier stages of development, may be limited for new residents.
			Overall, an mixed (minor positive and significant negative) effect is still expected for the site in relation to this SA objective.

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### Site SA459/SA674/SA846: Land East of Kingsfold

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	++	++	Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion of this that is affordable. It is proposed that the site would deliver 1,300 dwellings. Delivery is proposed to commence in 2025, with 1,000 dwellings completed by the end of the plan period. The site will deliver a policy compliant level of affordable housing. A significant positive effect is expected for the site in relation to this SA objective due to the contribution to the area's identified housing need, including affordable housing. Effects at Regulation 19 stage: The boundary of the site has not changed, but the site is now expected to deliver 1,000 dwellings during the plan period A significant positive effect is therefore still expected.
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.	/+?	/+?	Effects at Regulation 18 stage: The site is greenfield and is therefore not currently well served by services and facilities. The nearest town centre, Horsham to the south, is not within an easy walking distance of the site. The closest settlement is Horsham. The built up area boundary of this settlement is located approximately 2.0km from the site to the south. The closest education facilities are located to the south of the site in Horsham which are also not within a suitable walking distance of the site. There are also multiple education facilities to the south of the site in Horsham which are also not within walking distance. As such, there is potential for new residents to have a poor level of access to services, particularly during the early stages of development. As part of development, it is proposed that the site would deliver new local shops and village facilities. The site is also expected to deliver one primary school and an early years' facility, however no new secondary school would be delivered. Contribution would be made towards healthcare including land for a new facility if required. The provision of the aforementioned is likely to ensure that residents have access to some services and facilities to support growth in the area. This will depend in part of the phasing of the new development. Overall, a mixed uncertain mixed (minor positive and significant negative) effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: The boundary of the site has not changed and therefore there is no change in the distance of the will likely travel to the new Bohunt site of the railway line to access the school. No new secondary school would be delivered therefore, secondary school aged children would likely travel to the new Bohunt site within suitable walking distance of the site. As such, there is potential for a new healthcare facility on site, it is unlikely to be delivered therefore, secondary school aged children would likely travel to the new Bohunt services, p

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.	0	0	Effects at Regulation 18 stage: The site is on greenfield land and is not within a 40% most socially deprived area. It is not expected to contribute to the vitality and viability of the town centres and village centres in the District. As such, a negligible effect is expected in relation to this SA objective for the potential of the site to promote local regeneration. Effects at Regulation 19 stage: The boundary of the site has not changed and as such the site is still on greenfield land and is not within a 40% most socially deprived area. It is not expected to contribute to the vitality and viability of the town centres and village centres in the District. As such, a negligible effect is expected in relation to this SA objective for the potential of the site to promote local regeneration.
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.	0?	0?	Effects at Regulation 18 stage: The potential of the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: An uncertain negligible effect is still expected given that the detailed design of development is still unknown.
SA 5: To improve public health and wellbeing and reduce health inequalities.	/+?	/+?	Effects at Regulation 18 stage: The nearest health centre is not within walking distance of the site as it is located in Horsham over 4km to the south. The site is also not within walking distance of sports facilities or suitable areas of open space that could be used for recreational purposes. There are multiple PROWs in the area of the site, providing access to the surrounding countryside. As part of development, it is proposed that the site would deliver 60ha of open space, which will include parks and play areas, playing pitches and extensive areas of semi-natural greenspace. These provisions may contribute to increased physical activity amongst residents. Contribution would be made towards healthcare including land for a new facility if required. The northernmost part of the site is located within the noise contour associated with Gatwick Airport. The western edge of the site is adjacent to the A24. Residents at the site could therefore be adversely affected by aircraft or road noise. In addition, there also may possible noise impacts on future residents from the railway line that is present in within the site, although it may be possible to mitigate these impacts. Overall, a mixed (minor positive and significant negative) effect is expected for the site in relation to this SA objective. The effect is uncertain depending on the potential to secure financial contributions or land for a new healthcare facility if required. Effects at Regulation 19 stage: The boundary of the site has not changed, therefore the nearest health centre is not within walking distance of the site given that it is located in Horsham over 4km to the south. The site is also not within walking distance of spents facilities or suitable areas of open space that could be used for recreational purposes. There are multiple PROWs in the area of the site, providing access to the surrounding countryside. As part of development, it is proposed that the site would deliver a new country park, 60ha of open space, which will include playing pitches

SA Objective	SA So	core	Justification
	Reg 18	Reg 19	
			The northernmost part of the site is still located within the noise contour associated with Gatwick Airport. The western edge of the site is adjacent to the A24. Residents at the site could therefore be adversely affected by aircraft or road noise. In addition, there also may be possible noise impacts on future residents from proposed relief road and the railway line that is present within the site, although it may be possible to mitigate these impacts.
			Therefore, a mixed (minor positive and significant negative) effect is expected for the site in relation to this SA objective is still expected. Uncertainty is attached given that contribution to a healthcare facility could help to offset the adverse effect expected.
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species			Effects at Regulation 18 stage: The majority of the site is located within an Impact Risk Zone (IRZ) for a SSSI (Vann Lake and Ockley Woods) that is located 1.8km north- west, and is for industrial/aviation planning applications. Impacts of the development are dependent in part of the specific use which would be delivered as part of any new employment growth. There is a SSSI (Warnham) within 500m to the south-east of the site. The site also contains several areas of Ancient Woodland as well as areas of deciduous woodland priority habitat, which continue along the river corridor from north to south.
and/or sites of biodiversity or geological interest.			A significant negative effect is expected for the site in relation to this SA objective considering the boundaries of the IRZ and the area Ancient Woodland within the site boundaries. There is potential for development to result in the loss and fragmentation of habitats. There is also potential for development to result in increased recreational pressure and increased noise and light disturbance in relation to habitats in the area. The effect is uncertain as it is proposed that the site would achieve a net gain in biodiversity, which will include the provision of 60ha of open space and could help mitigate adverse impacts in relation to the natural environment.
	?	/+?	Effects at Regulation 19 stage: The boundary of the site has not changed and therefore has not affected the proximity of the site to biodiversity designations. The majority of the site is still located within an Impact Risk Zone (IRZ) for a SSSI (Vann Lake and Ockley Woods) that is located 1.8km north-west, and is for industrial/aviation planning applications. Impacts of the development are dependent in part of the specific use which would be delivered as part of any new employment growth. There is a SSSI (Warnham) within 500m to the south-east of the site. The Brockhurst Wood and Gill and Morris' Wood Local Wildlife Site (LWS) lies to the south east of the site, about 250m away. The site still also contains several areas of Ancient Woodland as well as areas of deciduous woodland priority habitat, which continue along the river corridor from north to south. The proposal is now to include the incorporation of a country park as well as re-wilding of agricultural land which is likely to help offset the adverse impacts identified.
			Therefore, a significant negative effect is still expected. The effect is still uncertain as it is proposed that the site would achieve a net gain in biodiversity, which could help mitigate adverse impacts in relation to the natural environment. Given that the proposal includes the delivery of a new country park and the re-wilding of a significant area of land a minor positive effect is expected in combination.
SA 7: To conserve			Effects at Regulation 18 stage: The land within the site has been assessed as part of the Horsham District Landscape Capacity Assessment.
and enhance the character and distinctiveness of the			The vast majority of the site falls within Large Open Fields West and East of the railway line and West of Great Benhams Local Landscape Character Area (LLCA) and has been assessed as having no/low capacity for large scale residential and employment development.
District's landscapes and townscapes, maintaining and strengthening local	?	?	As such, a significant negative effect is expected for the site in relation to this SA objective as it is unlikely that residential development could be accommodated without particularly adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.
			Effects at Regulation 19 stage: The boundary of the site has not changed and therefore still falls within Large Open Fields West and East of the railway line and West of Great Benhams Local Landscape Character Area (LLCA) and has been assessed as having no/low capacity for residential and employment development. Therefore, a

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
distinctiveness and sense of place.			significant negative effect is still expected. The effect is still uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.			Effects at Regulation 18 stage: The site does not contain any designated heritage assets within its boundaries. The site is not adjacent to any designated heritage assets, but there are a number of Grade II Listed Buildings within 500m, the closest of which are located within Kingsfold to the west. In the wider area, there are Scheduled Monuments around 1.5km to the north-west of the site (Medieval moated site, north of Oakdale Farm) and around 1.5km south to the (Moated site 200m west of Graylands Copse). There are also Conservation Areas, which contain high concentrations of Listed Buildings around 2km to the south-west in the settlement of Warnham and around 2.2km east in the settlement of Rusper. An uncertain significant negative effect is expected due to the potential for the development to impact on the respective settings of historic environment assets in proximity to the site. While the site is not directly adjacent to and does not contain any heritage assets it acts to envelop part of the settlement of Kingsfold which contains three Listed
	?	?	Buildings. These heritage assets are considered to be most susceptible to impacts in terms of their setting. The effect is uncertain considering that the design of the new development may present opportunities to mitigate adverse impacts in terms of the significance of the setting of heritage assets in the area.
			Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA459/SA674/SA846. The findings of the assessment work note that there are 17 Listed Buildings within the wider 1km study area set out for the site. The 1km study area for the site also contains four Archaeological Notification Areas (ANAs) (all of which are categorised as amber, sensitive for archaeology) and one archaeological site. The assessment work concluded that development could result in two Listed Buildings (Grade II Listed Cripplegate Farm and Kingsfold Place) being subject to significant change. The assessment work also concluded that four further Grade II Listed Buildings could be subject to potentially significant effects as a result of development. The magnitude of these effects are, however, recorded as low. Given that significant change is expected to result in relation to a number of designated heritage assets overall a significant negative effect is expected for the site in relation to this SA objective.
			The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.
SA 9: To make efficient use of the District's land			Effects at Regulation 18 stage: The site is located on greenfield land and is comprised of grade 3 agricultural land in the west and grade 4 agricultural land in the east. As such, a significant negative effect is expected in relation to this SA objective due to the potential for development to result in the loss of high quality agricultural land. The effect is uncertain as there is no data available to distinguish whether the grade 3 land is grade 3 aor the lower quality grade 3b.
resources through the re-use of previously developed land and conserve its soils.	?	?	Effects at Regulation 19 stage: The boundary of the site has not changed. Further information from the Council's site assessment work indicates that the site is located on greenfield land and is comprised of grade 3b agricultural land in the west with uncertainty attached as to whether the land to the east is grade 3a or grade 3b quality. As such, an uncertain significant negative effect is still expected given the potential development of high value agricultural land.
SA 10: To conserve natural resources, including mineral			Effects at Regulation 18 stage: The entirety of the site is located within a Mineral Safeguarding Area (MSA) for Brick Clay. There is potential for development to result in the sterilisation of mineral resources. As such, a significant negative effect is expected for the site in relation to mineral resources. The effect is uncertain as there may be opportunities to extract mineral resources in the area prior to any development.
resources in the District.	?	?	Effects at Regulation 19 stage. As the boundary of the site has not changed, the entirety of the site is still located within a Mineral Safeguarding Area (MSA) for Brick Clay. Therefore, there is still potential for development to result in the sterilisation of mineral resources. As such, a significant negative effect is still expected for the site in relation to mineral resources. The effect is uncertain as there may be opportunities to extract mineral resources in the area prior to any development.

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.	0	0	Effects at Regulation 18 stage: There is a watercourse (Boldings Brook) that passes through the site. It is assumed that the potential for any water pollution in these watercourses as a result of development will be mitigated by the delivery of SuDS. The site is not located within any Source Protection Zones. The site lies in a portion of the District that is served by Southern Water for its water infrastructure. Discussions between the Council and Southern Water indicate that the site would drain to wastewater treatment works which has Dry Weather Flow (DWF) permit capacity to accommodate growth up to 2035.
			A negligible effect is therefore expected for the site in relation to this SA objective. Effects at Regulation 19 stage: The boundary of the site has not changed, therefore, Bolding Brook watercourse still passes through the site and the site is still not located within any Source Protection Zones. It is assumed that the potential for any water pollution in these watercourses as a result of development will be mitigated by the delivery of SuDS. A negligible effect is therefore still expected.
SA 12: To manage and reduce the risk of flooding.	-	-?	Effects at Regulation 18 stage: A watercourse (Boldings Brook) passes through the central portion of the site from north to south. Land directly adjacent to this watercourse is located in flood zone 2 and 3. However, the majority of the site is located within flood zone 1. The site is greenfield and therefore development will result in an increase in the overall amount of impermeable surfaces in the area, which may increase flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: The boundary of the site has not changed, therefore a watercourse (Boldings Brook) still passes through the central portion of the site from north to south. Land directly adjacent to this watercourse is located in flood zone 2 and 3. However, the majority of the site is located within flood zone 1. The site is greenfield and therefore development will result in an increase in the overall amount of impermeable surfaces in the area, which may increase flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective. The negative effect is uncertain given that the proposal indicates that no development is to occur in high risk flood areas. Furthermore, SuDS are to be adopted through the proposal for the sit wherever possible which is likely to help mitigate any increase flood risk associated with the proliferation of impermeable surfaces.
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	+/-?	+/-?	Effects at Regulation 18 stage: In terms of sustainable travel options, the site is within a suitable walking distance of Warnham Railway Station (1.2km to the south). In addition, site proposals include potential for a new railway station as well as the relocation of Warnham Station, which could increase the potential for residents at the site to travel by rail. The site is not within close proximity to cycle routes, however, there is a bus stop to the immediate west of the site in Kingsfold that could be used by residents. However, commuting patterns (based on 2011 census data) indicate that private car trips are the most used transport mode in the area for trips to work. Development at this location may result in similar travel habits being adopted. The proposals for the site to include a range of services and facilities within the new development will reduce to the need for residents to travel further afield in private cars, potentially reducing congestion in the area. However, the scale of development proposed also has the potential to result in increased numbers of journeys being undertaken in the area, especially given the proximity of the A24 to the site. Furthermore, the route of Sutton and Mole Valley railway line would sever the site meaning that journeys by foot through the site will more difficult given the need to make use of available crossing points. As such, a mixed (minor positive and minor negative) effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			Effects at Regulation 19 stage: The boundary of the site has not changed, therefore the site is still within a suitable walking distance of Warnham Railway Station (1.2km to the south). In addition, site proposals include the potential for a new railway station, which could increase the potential for residents at the site to travel by rail, however there is no evidence that Network Rail supports the proposal. The site is not within close proximity to cycle routes, however, there is a bus stop to the immediate west of the site in Kingsfold that could be used by residents. However, commuting patterns (based on 2011 census data) indicate that private car trips are the most used transport mode in the area for trips to work. Development at this location may result in similar travel habits being adopted.
			The proposals for the site include a range of services and facilities within the new development will reduce to the need for residents to travel further afield in private cars, potentially reducing congestion in the area. However, the scale of development proposed also has the potential to result in increased numbers of journeys being undertaken in the area, especially given the proximity of the A24 to the site. Furthermore, the route of Sutton and Mole Valley railway line would sever the site meaning that journeys by foot through the site will be more difficult given the need to make use of available crossing points. As such, a mixed (minor positive and minor negative) effect is still expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
SA 14: To limit air pollution in the District and ensure lasting improvements in air			Effects at Regulation 18 stage: The site is not directly connected via road to one of the Air Quality Management Areas (AQMAs) in the District or in the surrounding districts. The scale of development proposed has the potential to result in a substantial increase in the number of journeys being made in area and therefore potentially reduced air quality. The proximity of the A24 to the site and the relative isolation of the site from services and facilities means that residents may be encouraged to travel by private vehicle.
quality.			The site is within close proximity to an existing railway station (Warnham to the south) and includes the potential for a new station, which could result in fewer residents travelling using car trips, and therefore reduced adverse impacts on air quality.
			Overall, a mixed (minor positive and minor negative) effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
	+/-?	+/-?	Effects at Regulation 19 stage: The boundary of the site has not changed, therefore, the site is still not directly connected via road to one of the Air Quality Management Areas (AQMAs) in the District or in the surrounding areas. The scale of development proposed has the potential to result in a substantial increase in the number of journeys being made in the area and therefore potentially reduced air quality. The proximity of the A24 to the site and the relative isolation of the site from services and facilities means that residents may be encouraged to travel by private vehicle. However, the proposed Relief Road has the potential to divert traffic from the A24 and possibly improve air quality.
			The site is still within close proximity to an existing railway station (Warnham to the south) and includes the potential for a new station, which could result in fewer residents travelling using car trips, and therefore reduced adverse impacts on air quality. There is no current evidence, however, that Network Rail would support the proposals. In addition, the proposals to deliver services and facilities onsite as part of development has the potential to reduce the overall need to travel, potentially also reducing adverse impacts on air quality.
			Therefore, a mixed (minor positive and minor negative) effect is still expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 15: To minimise the District's contribution to climate			Effects at Regulation 18 stage: The site is within close proximity to a railway station to the south (Warnham) and proposals for development include the potential for a new station. Whilst the site is not within close proximity to cycle routes, it is within close proximity to a bus stop in Kingsfold to the immediate west which could be used by residents as a means of sustainable travel. The site is not expected to provide renewable energy infrastructure.
change and adapt to unavoidable climate change.			The scale of development at the site and the relative isolation of the site from services and facilities has the potential to result in a substantial increase in traveling to and from the site and therefore a potential increase in carbon emissions.
			Overall, a mixed (minor positive and minor negative) effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
	+/-?	++/- ?	Effects at Regulation 19 stage: The boundary of the site has not changed; therefore, the site is still within close proximity to a railway station to the south (Warnham) and proposals for development include the potential for a new station. There is no current evidence, however, that Network Rail would support the proposals. Whilst the site is not within close proximity to cycle routes, it is within close proximity to a bus stop in Kingsfold to the immediate west which could be used by residents as a means of sustainable travel. Additional information has been provided that suggests that a range of measures will be implemented on site, such as, renewable energy generation, carbon reduction, electric vehicle charging points, waste minimisation, water efficiency and more. These measures would help to limit the contribution the development would make in terms of carbon emissions.
			However, the scale of development at the site has the potential to result in a substantial increase in traveling to and from the site and therefore a potential increase in carbon emissions. The relatively close proximity of the A24 means that a proportion of these are likely to be made by private vehicle.
			Overall, a mixed (significant positive and minor negative) effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development and whether those additional measures will be put into place.
SA 16: To facilitate a sustainable and growing economy.			Effects at Regulation 18 stage: It is proposed that the site would deliver a high number of dwellings, which is likely to make a contribution to the local economy due to increased expenditure in the area and an increased workforce. The inclusion of services and facilities as part of development is likely to contribute to the economic potential of the site. As part of development, it is proposed that the site would deliver 75,000m <sup>2</sup> of employment space, which is also likely to make a significant contribution to the local economy.
	++?	0	As such, a significant positive effect is expected for the site in relation to this SA objective. While the site is located where it would be accessible to the primary road network (at the A24), uncertainty is attached to the positive effect identified considering the relative remoteness of the site, which may limit its economic potential.
		++?	Effects at Regulation 19 stage: The boundary has not changed, therefore it is still proposed that the site would deliver a high number of dwellings, which is likely to make a contribution to the local economy due to increased expenditure in the area and an increased workforce. The inclusion of services and facilities as part of development is likely to contribute to the economic potential of the site. As part of development, it is still proposed that the site would deliver 75,000m <sup>2</sup> of employment space, an extension to the Broadlands Business Campus, which is also likely to make a significant contribution to the local economy.
			As such, a significant positive effect is still expected for the site in relation to this SA objective. While the site is located where it would be accessible to the primary road network (at the A24), uncertainty is attached to the positive effect identified considering the relative remoteness of the site, which may limit its economic potential.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.	+/-	+/-	Effects at Regulation 18 stage: The site is within close proximity to a railway station (Warnham to the south) and a bus stop to the immediate west in the settlement of Kingsfold, which could provide potential for people to access the new employment opportunities at the site using sustainable transport modes. The site is located in close proximity to Broadlands Business Campus key employment area which is almost immediately to the south. However, it is not located within walking distance of an existing town centre that could provide access to additional employment opportunities. As such, new residents may benefit from some access to employment opportunities in close proximity to the site in the early stages of development. Overall, an uncertain mixed (minor positive and minor negative) effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: The boundary of the site has not changed: therefore it does not affect the distance from the site to the nearest employment opportunities and

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# Site SA597: Adversane / Land at Steepwood Farm

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 1: To provide affordable, sustainable and decent housing to meet local needs.			Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. This site is expected to provide 2,000 during the plan period, with 3,500 dwellings of varying sizes to be delivered by the year 2043. 35% of dwellings are to be provided as affordable housing. The potential for the provision of gypsy and traveller accommodation on site is also being explored.
	++	++	Overall a significant positive effect is identified for this SA objective as the development of the site will contribute the District's housing requirement and also help to support the delivery of affordable housing.
			Effects at Regulation 19 stage: The boundary of the site has not changed; however, the site is now expected to provide around 2,000 homes during the plan period up to 2038 and 2,850 in the longer term. Of the homes to be delivered, 35% would be affordable. In addition, varied types and sizes could be delivered, including 15 gypsy and traveller pitches.
			Overall a significant positive effect is still identified for this SA objective as the development of the site will contribute the District's housing requirement and also help to support the delivery of affordable housing.
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.	++/- ?		Effects at Regulation 18 stage: The site is not located within close proximity of a town centre, the closest of which is Billingshurst which is located approximately 3.0km to the north. Billingshurst's built up area boundary is approximately 1.5km to the north of the site. Two existing education facilities (a primary school and a college) are located within close proximity to the south west of the site to the north of Pullborough. It is therefore expected that residents would have access to existing educational services depending on capacity of these facilities. The nearest healthcare facility is located within Billingshurst approximately 2.9km from the site. Considering the relatively limited service provision accessible from the site, an uncertain minor negative effect is expected in relation to this SA objective as new residents may not have immediate access to existing services
		++/-	The development is expected to provide financial contributions towards a new primary school and a new through school (schools that combine at least two stages of a child's education) with special educational needs. The provision of these educational facilities within the development will help to ensure that there is some access to education for residents at the site.
		?	The site would include provision of a number of additional services and facilities such as a GP practice as well as a new healthcare and a new high street. The enhanced bus service to be provided will also improve resident's access to existing services at the settlements of Horsham and Billingshurst.
			As such an uncertain mixed (significant positive and minor negative) effect is expected in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such the site is still not located within close proximity of a town centre. A college is located within close proximity to the south west of the site to the north of Pullborough, which a limited number of residents might make regular use of. The appraisal at the Reg 18 stage mistakenly reflected the Focus School - Pulborough Campus in the appraisal, however, this facility is now close. Two primary schools and a 6FE secondary school with special educational needs would be provided at the site. The nearest healthcare facility is located within Billingshurst approximately 2.9km from the site, however, the site would provide a health centre as part of the development.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
			The site would include provision of a number of additional facilities including a leisure facilities, hotel, library and community hall. The enhanced bus service to be provided will also improve resident's access to existing services at the settlements of Horsham and Billingshurst.
			As such an uncertain mixed (significant positive and minor negative) effect is expected in relation to this SA objective.
SA 3: To encourage social inclusion, strengthen community			Effects at Regulation 18 stage: The site is on greenfield land and is not within a socially deprived area. It is not expected to contribute to the vitality and viability of the town centres and village centres in the District. As such, a negligible effect is expected in relation to this SA objective for the potential of the site to promote local regeneration.
cohesion and a respect for diversity.	0	0	Effects at Regulation 19 stage: The boundary of the site has not changed. As such a negligible effect is still expected.
SA 4: To support the creation of safe communities in which levels of crime, anti-	0?	0?	Effects at Regulation 18 stage: The effects of new development on levels of crime and fear of crime will depend on factors such as the incorporation of open space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites but rather they will be determined through the detailed proposals for each site. The site's design and layout have not yet been approved. Therefore, an uncertain negligible effect is expected in relation to this SA objective.
social behaviour and disorder and the fear of crime are reduced.			Effects at Regulation 19 stage: The boundary of the site has not changed. As such a negligible effect is still expected. The effect is uncertain given that the detailed design of the proposal, which could help to limit occurrences of crime, is currently unknown.
SA 5: To improve public health and wellbeing and reduce health inequalities.			Effects at Regulation 18 stage: The closest existing GP surgery to the site is St Marys Surgery in Billingshurst which lies approximately 3.0km north of the site. As such the first residents at the site are unlikely to have immediate access to the new healthcare facilities. Through the provision of a GP practice, new residents are likely to have a good level of access to health care facilities on completion. In addition, the provision of open spaces at this site in the form of parks, playing fields, community gardens and allotments should present opportunities for the encourage of healthier lifestyle choices among residents. There are also a number of existing Public Rights of Way (PRoW) routes that are within close proximity to the site, which may allow for access to the surrounding countryside. There is a railway that passes through the site and therefore residents may be adversely affected by noise. Furthermore, the western boundary of the site is formed by the A29 in places meaning there is potential for some residents to be adversely affected by road noise.
	++/- ?	++/- ?	Overall a mixed (significant positive and minor negative) effect is expected in relation to this SA objective. The effect is uncertain dependent upon the delivery of the new healthcare provisions at the site and the phasing of the development, as it is recognised that the high level of growth proposed may impact upon the capacity of existing healthcare facilities. It is also noted that there may be opportunities to mitigate the impact of noise on the new development.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such the closest existing GP surgery to the site is still St Marys Surgery in Billingshurst which lies approximately 3.0km north of the site. As such the first residents at the site are unlikely to have immediate access to the new healthcare facilities. Through the provision of a new health centre , new residents are likely to have a good level of access to health care facilities. In addition, the provision of open spaces at this site in the form of allotments and accessible natural green space, as well as sports playing fields and different types of equipped play space should present opportunities for the encourage of healthier lifestyle choices among residents. There are also a number of existing Public Rights of Way (PRoW) routes that are within close proximity to the site, which may allow for access to the surrounding countryside. There is a railway that passes through the site and therefore residents may be adversely affected by noise. Furthermore, the western boundary of the site is formed by the A29 in places meaning there is potential for some residents to be adversely affected by road noise.

SA Objective	SA So	core	Justification
	Reg 18	Reg 19	
			Overall a mixed (significant positive and minor negative) effect is still expected in relation to this SA objective. The effect is uncertain dependent upon the delivery of the new healthcare provisions at the site and the phasing of the development, as it is recognised that the high level of growth proposed may impact upon the capacity of existing healthcare facilities. It is also noted that there may be opportunities to mitigate the impact of noise on the new development.
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.		?	Effects at Regulation 18 stage: Three Ancient Woodland designations lie fully within the site boundary. Northwood Farm Fen and Brinsbury College (a Local Wildlife Site) is located approximately 500m to the west and is the closest biodiversity designation outside of the site's boundary. The Mens SAC is located approximately 4.0km to the west of the site and the site lies fully within the Bat Sustenance Zone. Given the close proximity to the international designation, the western half of the site also lies within an Impact Risk Zone (IRZ) for all planning applications. The greenfield land take within the IRZ and in close proximity to the other identified local biodiversity sites may result in increased habitat disturbance as well as potential for fragmentation and loss. There is also potential for development at the site to result in increased recreational pressure and increased noise and light in relation to habitats in the area. The effect is uncertain as the site proposals include a net gain in biodiversity through protection and enhancement of existing Green Infrastructure. As such the design of the development could potentially help mitigate any adverse impact in relation to the natural environment. Overall, an uncertain significant negative effect is expected for the site in relation to this SA objective.
	?		Effects at Regulation 19 stage: The boundary of the site has not changed. As such three Ancient Woodland designations still lie fully within the site boundary. Northwood Farm Fen and Brinsbury College (a Local Wildlife Site) is located approximately 500m to the west and is the closest biodiversity designation outside of the site's boundary. The Mens SAC is located approximately 4.0km to the west of the site and the site lies fully within the Bat Sustenance Zone.
			Given the close proximity to the international designation, the western half of the site also lies within an Impact Risk Zone (IRZ) for all planning applications. The greenfield land take within the IRZ and in close proximity to the other identified local biodiversity sites may result in increased habitat disturbance as well as potential for fragmentation and loss. There is also potential for development at the site to result in increased recreational pressure and increased noise and light in relation to habitats in the area. The effect is uncertain as the site proposals include a net gain in biodiversity of over 15% through protection and enhancement of existing Green Infrastructure. As such the design of the development could potentially help mitigate any adverse impact in relation to the natural environment. Overall, an uncertain significant negative effect is still expected for the site in relation to this SA objective.
SA 7: To conserve and enhance the			Effects at Regulation 18 stage: Land within the site has been assessed in the Horsham District Landscape Capacity Assessment. The site lies almost completely within one Local Landscape Character Area (LLCA), but also overlaps partially with two other LLCAs with varying degrees of landscape capacity.
character and distinctiveness of the District's landscapes			The majority of the site is located in the Brinsbury College and surrounds LLCA that has been identified as having moderate landscape capacity for large scale residential development but low-moderate landscape capacity for large scale employment development.
and townscapes, maintaining and strengthening local distinctiveness and sense of place.	?	?	The north-west of the site, on the opposite side of the railway adjacent to Adversane (the Little Wood, Adversane to Gilmans Farm LLCA) has been identified as having no/low landscape capacity for large scale residential development and large scale employment development. In addition, the south-eastern corner of the site (Land North of Gay Street Lane LLCA) is located in an area that has been identified as also having no/low capacity for large scale residential development development.
			The South Downs National Park is located around 2km south-west of the site, which may increase the potential for development to result in adverse effects on landscape setting.

SA Objective	SA So	core	Justification
	Reg 18	Reg 19	
			As such, a significant negative effect is expected for the site in relation to this SA objective. While the majority of the site has been identified as having moderate landscape capacity for large scale residential development, this area also has low-moderate landscape capacity for large scale employment development. Considering that the site is expected to support a high number of new jobs (including some light industrial uses) it is considered that this element of the new development in particular has the potential to result in adverse impacts in terms of local character and setting. The effect is uncertain as the design of the new development has the potential to provide opportunities to mitigate impacts on the character and quality of the landscape.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such the majority of the site is still identified as having moderate landscape capacity for large scale residential development but low-moderate landscape capacity for large scale employment development.
			The north-west of the site, on the opposite side of the railway adjacent to Adversane (the Little Wood, Adversane to Gilmans Farm LLCA) is still identified as having no/low landscape capacity for large scale residential development and large scale employment development. In addition, the south-eastern corner of the site (Land North of Gay Street Lane LLCA) is located in an area that has still been identified as also having no/low capacity for large scale residential development and large scale as also having no/low capacity for large scale residential development and large scale employment development.
			The South Downs National Park is located around 2km south-west of the site, which may increase the potential for development to result in adverse effects on landscape setting.
			As such, a significant negative effect is still expected for the site in relation to this SA objective. While the majority of the site has been identified as having moderate landscape capacity for large scale residential development, this area also has low-moderate landscape capacity for large scale employment development. Considering that the site is expected to support a high number of new jobs it is considered that this element of the new development in particular has the potential to result in adverse impacts in terms of local character and setting. The effect is uncertain as the design of the new development has the potential to provide opportunities to mitigate impacts on the character and quality of the landscape.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic			Effects at Regulation 18 stage: The site does not contain any designated heritage assets within its boundaries. The north-western part of the site is adjacent to Adversane Conservation Area. The Conservation Area does not currently have a Conservation Area Appraisal or Management Plan, however, it contains nine Grade II Listed Buildings. There are two further designated assets within 500m of the site, which are Grade II Listed Buildings located to the north-east and south. There is potential for development at the site to result in adverse impacts in terms of the setting of these historic environment assets. In the wider area, there are also further designated assets which could experience adverse impacts relating to setting as a result of development at the site. There are several Grade II Listed Buildings within 1.0km to the south in North Heath and on Gay Street as well as to the east within Broadford Bridge.
environment.	?	?	Overall, an uncertain significant negative effect is expected in relation to this SA objective particularly considering the potential for development to adversely impact upon the setting of the Adversane Conservation Area. The effect is uncertain considering that the design of the new development may present opportunities to mitigate adverse impacts in terms of the significance of the setting of heritage assets in the area.
			Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA597. The findings of the assessment work note that there are 24 Listed Buildings and one Conservation Area within the wider 1km study area set out for the site. The 1km study area for the site also contains three Archaeological Notification Areas (ANAs) (all of which are categorised as amber, sensitive for archaeology). One of these ANAs falls within the site boundary. The assessment work concluded that development could result in Adversane Conservation Area and Grade II Listed Griggs Farmhouse being subject to significant change. The assessment work also concluded that nine further Grade II Listed Buildings could be subject to potentially significant effects as a result of development. The magnitude of these effects are, however, recorded as low. Development of the site could also result in effects in relation to Oakleigh non-designated heritage asset, however, both the sensitivity of this asset and magnitude of

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
			the effects recorded are expected to be low and therefore the overall effect is recorded as not significant. Given that significant change is expected to result in relation to Adversane Conservation and a Grade II Listed Building overall a significant negative effect is expected for the site in relation to this SA objective.
			The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.
SA 9: To make efficient use of the			Effects at Regulation 18 stage: The site is entirely greenfield land which is classed as being of Grade 3 agricultural quality. As it is not known if this is grade 3a or 3b agricultural land, an uncertain significant negative effect is identified.
District's land resources through the re-use of previously developed land and conserve its soils.	?	?	Effects at Regulation 19 stage: The boundary of the site has not changed; therefore the site is still entirely greenfield land which is classed as being of Grade 3 agricultural quality. As it is not known if this is grade 3a or 3b agricultural land, an uncertain significant negative effect is still identified.
SA 10: To conserve natural resources, including mineral resources in the District.	?	?	Effects at Regulation 18 stage: The majority of the site lies within a Mineral Safeguarding Area for Brick Clay as defined by the West Sussex Joint Minerals Local Plan (2018). A significant negative effect is therefore identified in relation to this SA objective. This effect is uncertain as it is dependent upon whether extraction could be achieved prior to the development of the site. Effects at Regulation 19 stage: The boundary of the site has not changed. As such the majority of the site still lies within a Mineral Safeguarding Area for Brick Clay as defined by the West Sussex Joint Minerals Local Plan (2018). A significant negative effect is therefore still identified. This effect is uncertain as it is dependent upon whether extraction whether extraction could be achieved prior to the development of the site.
SA 11: To achieve			Effects at Regulation 18 stage: There are no Source Protection Zones (SPZs) within the site boundary.
sustainable water resource management and promote the			The site lies in a portion of the District that is served by Southern Water for its water infrastructure. Discussions between the Council and Southern Water indicate that the site would drain to wastewater treatment works which has Dry Weather Flow (DWF) permit capacity to accommodate growth up to 2035.
quality of the District's waters.	0	0	A negligible effect is therefore expected for the site in relation to this SA objective.
waters.			Effects at Regulation 19 stage: The boundary of the site has not changed. As such there are still no Source Protection Zones (SPZs) within the site boundary. Therefore, a negligible effect is still expected.
SA 12: To manage			Effects at Regulation 18 stage: The site lies outside of flood zone 2 and 3.
and reduce the risk of flooding.		-?	The site is situated entirely on greenfield land so a minor negative effect is expected as the development of this site will increase the amount of impermeable surfaces in the area, which may increase flood risk.
			As such, a minor negative effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The boundary of the site has not changed; therefore the site still lies outside of flood zones 2 and 3. However, as the site is situated entirely on greenfield land a minor negative effect is still expected as the development of this site will increase the amount of impermeable surfaces in the area, which may increase

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			flood risk. The development is to be supported by a Flood Risk Assessment and a drainage strategy which would help to ensure the proliferation of impermeable surfaces would be mitigated in terms of flood risk. Therefore, the negative effect is uncertain.
SA 13: To reduce congestion and the need to travel by private vehicle in the District.			Effects at Regulation 18 stage: The site lies almost equidistant between the towns of Billingshurst and Pulborough. Neither of the town centres at these locations are within reasonable walking distance of the site. There is a railway station in each of these towns; Billingshurst railway station lies approximately 2.2km to the north of the site and Pulborough railway station lies approximate 4.4km to the southwest of the site. However, there are a number of existing bus stops located within close proximity to the site. These can be found on the A29, Stane Street, which forms the sites western boundary. There are no existing cycle routes within close proximity to the site.
			An enhanced and additional shuttle bus is expected to be provided at the site and this is likely to reduce the need to travel by private vehicle. It is also expected to include safeguarded land for a new railway station although there is currently no agreement with Network Rail for this. Furthermore, the site is likely to create a high number of new jobs (approximately 3,500) and would provide new services and facilities, which may further contribute to this trend. However, current patterns (based on 2011 census data) indicate that private car trips are the most used commuting mode in the area, which may be a trend that continues following development considering the relative remoteness of the site to existing town centres.
			The scale of development proposed also has the potential to result in increased traffic on the A29 and B2133 in particular and also in the settlements of Billingshurst, Pulborough, Adversane and Chiltington in the surrounding area.
	/+?	/+?	Considering the lack of immediate access to train services and existing services and facilities from the site and the potential for increased traffic, but that new services and facilities at the site may reduce the need for residents to travel, a mixed (minor positive and significant negative) effect is expected in relation to this SA objective. The effect is uncertain dependent on the delivery of new services and facilities at the site and the phasing of this development. Uncertainty is also present in the overall effect identified due to the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such, the site still lies almost equidistant between the towns of Billingshurst and Pulborough, with neither town centres within reasonable walking distance. There is a railway station in each of these towns; Billingshurst railway station lies approximately 2.2km to the north of the site and Pulborough railway station lies approximate 4.4km to the southwest of the site. The site remains within close proximity to a number of existing bus stops. There are no existing cycle routes within close proximity to the site.
			Bus services are expected to be provided from the site to Billingshurst and Horsham to provide access to the rail network and this is likely to reduce the need to travel by private vehicle. It is also expected to include safeguarded land for a new railway station although there is currently no agreement with the statutory bodies for this. Furthermore, the site is likely to create a high number of new jobs (approximately 2,450) and would provide new services and facilities, which may further contribute to this trend. The scale of development proposed also has the potential to result in increased traffic on the A29 and B2133 in particular and also in the settlements of Billingshurst, Pulborough, Adversane and Chiltington in the surrounding area.
			Considering the lack of immediate access to train services and existing services and facilities from the site and the potential for increased traffic, but that new services and facilities at the site may reduce the need for residents to travel, a mixed (minor positive and significant negative) effect is still expected. The effect is uncertain as it is dependent on the delivery of new services and facilities at the site and the phasing of this development. Uncertainty is also present in the overall effect identified due to the difficulty to predict people's likely travel patterns following development.

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.			Effects at Regulation 18 stage: The site is not within or linked to any AQMA. The site is not located within close proximity of a railway station or town centre but is within close proximity of existing bus stops where the bus service runs on the A29. The existing bus stops may provide new residents with opportunities to travel by public transport which can reduce the need to travel by private vehicle thereby reducing congestion and pollutants. The site is also likely to provide an enhanced and additional shuttle bus which will allow new residents to travel by sustainable modes of transport. In addition, the site is expected to incorporate sustainable energy generation, EV charging points for low/zero emission vehicles, a car club and domestic PV cells. It is also expected to include safeguarded land for a new railway station although there is currently no agreement with Network Rail for this. These provisions may help to reduce emissions that contribute to poor air quality.
			However, scale of development proposed also has the potential to result in increased traffic on the A29 and B2133 and also in the settlements of Billingshurst, Pulborough, Adversane and Chiltington in the surrounding area, which may contribute to decreased air quality in the District. Commuting patterns (based on 2011 census data) indicate that private car trips are the most used commuting mode in the area, which may be a trend that continues following development considering the relative remoteness of the site to existing town centres.
	+/-?	+/-?	Overall a mixed (minor positive and minor negative) effect is expected on this SA objective. The effect is uncertain considering that it partly dependent on the provision of new sustainable transport provisions at the site. Uncertainty is also present in the overall effect identified due to the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such the site is still not within or linked to any AQMA. The site is not located within close proximity of a railway station or town centre but is within close proximity of existing bus stops. The existing bus stops may provide new residents with opportunities to travel by public transport which can reduce the need to travel by private vehicle thereby limiting congestion and pollutants. The site is also still likely to provide an enhanced and additional shuttle bus which will allow new residents to travel by sustainable modes of transport. In addition, the site is expected to incorporate sustainable energy generation and EV charging points at each house. It is also expected to include safeguarded land for a new railway station although there is currently no agreement with the statutory bodies for this. These provisions may help to reduce emissions that contribute to poor air quality.
			However, the scale of development proposed also has the potential to result in increased traffic on the A29 and B2133 and also in the settlements of Billingshurst, Pulborough, Adversane and Chiltington in the surrounding area, which may contribute to decreased air quality in the District.
			Overall a mixed (minor positive and minor negative) effect is still expected on this SA objective. The effect is uncertain considering that it partly dependent on the provision of new sustainable transport provisions at the site. Uncertainty is also present in the overall effect identified due to the difficulty to predict people's likely travel patterns following development.
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.	++/- ?	++/- ?	Effects at Regulation 18 stage: The site is not within close proximity to a railway station or a town centre, but it is within walking distance of bus stops. The site is likely to provide an enhanced and additional shuttle bus which will allow new residents to travel by sustainable modes of transport thereby potentially reducing reliance on journeys made by private vehicles. Furthermore, the site is expected to incorporate sustainable energy generation, EV charging points for low/zero emission vehicles, a car club and domestic PV cells. It is also expected to include safeguarded land for a new railway station although there is currently no agreement with Network Rail for this. As the site would include a high number of services and facilities as well as job opportunities it is expected that some residents will have reduced need to travel from the site a regular basis. These provisions are likely to help limit the contribution new development at the site makes in terms of climate change.
			However, the scale of development proposed also has the potential to result in increased traffic on the A29 and B2133 considering the positive of the site adjacent to these routes. The potential to undertake journeys by private vehicle along these and other routes may contribute to an overall increase of emissions in the District. Furthermore,

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			current commuting patterns (based on 2011 census data) indicate that private car trips are the most used commuting mode in the area, which may be a trend that continues following development due to the remoteness of the site in relation to existing town centres.
			As such, a mixed (significant positive minor negative) effect is expected for the site in relation to this SA objective. The effect is uncertain considering that the phasing for the delivery of the carbon reducing measures at the site is unknown. The uncertainty is also attached related to the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site has not changed. As such the site is still not located within close proximity of a railway station or town centre but is within close proximity of existing bus stops. The existing bus stops may provide new residents with opportunities to travel by public transport which can reduce the need to travel by private vehicle thereby limiting congestion and pollutants. The site is also still likely to provide an enhanced and additional shuttle bus which will allow new residents to travel by sustainable modes of transport. In addition, the site is expected to be net zero by 2025, incorporate sustainable energy generation and EV charging points at each house. It is also expected to include safeguarded land for a new railway station although there is currently no agreement with the statutory bodies for this. These provisions are likely to help make a positive contribution in terms of climate change.
			However, the scale of development proposed also has the potential to result in increased traffic on the A29 and B2133, which may contribute increases in carbon emissions associated with travel by private vehicle along this route.
			As such, a mixed (significant positive minor negative) effect is still expected for the site in relation to this SA objective. The effect is uncertain considering that the phasing for the delivery of the carbon reducing measures at the site is unknown. The uncertainty is also attached related to the difficulty to predict people's likely travel patterns following development.
SA 16: To facilitate a sustainable and growing economy.			Effects at Regulation 18 stage: The site is relatively large and is expected to deliver approximately 3,500 new jobs through the provision of office, light industry, retail, hotel, education and health centres facilities. Furthermore, the increased local provision of housing could help contribute to expenditure in the local economy, expand the local workforce and provide construction jobs.
	++?	++?	As such a significant positive effect is expected in relation to this SA objective. While the site would provide access to the primary road network (at the A29), uncertainty is attached to the positive effect identified considering the relative remoteness of the site, which may limit its economic contribution to the area.
			Effects at Regulation 19 stage: The boundary of the site has not changed; however, the site will now provide around 2,450 jobs through a mix of different buildings and sectors.
			As such a significant positive effect is still expected in relation to this SA objective. While the site would provide access to the primary road network (at the A29), uncertainty is attached to the positive effect identified considering the relative remoteness of the site, which may limit its economic contribution to the area.
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and	+/-	+/-	Effects at Regulation 18 stage: The site is located within close proximity to existing bus stops where the bus service runs along the A29. The site is also likely to provide an enhanced and additional shuttle bus and a car pool club. The aforementioned may provide some potential for people to access employment opportunities at the site using sustainable modes of transport. The site is not located within close proximity of a train station. The site is located within close proximity of a number of key employment area (Gillmans Industrial Estate and Huffwood Trading Estate and Star Road) although it is noted that infrastructure for pedestrian access along the A29 from the site to Billingshurst is limited in places. The site is not located within close proximity of a town centre.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
future needs in the District.			A mixed minor positive and minor negative effect is expected for this SA objective. Effects at Regulation 19 stage: The boundary of the site has not changed. As such the site is still located within close proximity to existing bus stops. The site is also likely to provide an enhanced and additional shuttle bus. There is also potential for a new railway station at the site, although there is no evidence that this type of provision would be supported by the statutory bodies. The aforementioned may provide some potential for people to access employment opportunities at the site using sustainable modes of transport. The site is not located within close proximity of an existing train station. The site is located within relatively close proximity of a number of key employment area (Gillmans Industrial Estate and Huffwood Trading Estate and Star Road) (the closest of which is within 1.5km) although it is noted that infrastructure for pedestrian access along the A29 from the site to Billingshurst is limited in places. The site is not located within close proximity of a town centre. A mixed minor positive and minor negative effect is expected for this SA objective

SA of Horsham District Local Plan (Regulation 19) July 2021

Site SA716: Buck Barn / Land at Newhouse Farm, West Grinstead

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
SA 1: To provide affordable, sustainable and decent housing to meet local needs.			Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. This site is set to provide 2,000 dwellings by the end of the plan period, with a total of 3,500 dwellings to be delivered as the site is fully built out in the long term. The site would also accommodate a 60-80 bed care home. The promoter is also seeking to deliver 35% of dwellings as affordable housing and is exploring the provision of up to 15 gypsy and traveller pitches.
	++	++	Overall a significant positive effect is identified for this SA objective as the development of the site will contribute the District's housing requirement and support the delivery of affordable housing, gypsy and traveller accommodation and homes for the District's ageing population.
			Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. The site is set to provide 2,000 dwellings during the plan period up to 2038 (3,500 dwellings in the longer term) with 35% to be affordable. Housing for older people would also be delivered. In addition, there is potential for the site to deliver 12 Gypsy and Traveller pitches. As such, a significant positive effect is still expected.
SA 2: To maintain and improve access to centres of services and facilities including			Effects at Regulation 18 stage: Southwater is the closest town centre to the site which is located approximately 2.3km to the north of the site. The settlement's built up area boundary is approximately 1.3km to the north west of the site. Given that Southwater is not within close proximity of the site and the nearest education and healthcare facilities are over 2km away, a significant negative effect is also assigned as residents living on the site are unlikely to have good access to existing services until new provisions are made. This negative effect is uncertain as it is linked to the construction phase of the development.
health centres and education.	++/	++/-	The development is set to provide a new neighbourhood centre (including a medical centre) as well as two form of entry primary school provision, a new six form of entry secondary school and an early years nursery. The provision of these new services and facilities within the development will help to ensure that students of all ages, living on the site or in close proximity have a good level of access to these types of provisions as new development is delivered. As such a significant positive effect is also identified for this site. Overall, an uncertain mixed (significant positive/ significant negative) effect is expected for this SA objective.
	?	?	Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. While there has been a change to the boundary, Southwater is still the closest town centre to the site which is located approximately 2.0km to the north of the site. The settlement's built up area boundary is now approximately 900m to the north west of the site meaning some essential services and facilities are likely to be relatively accessible to residents within the settlement. While the built up area boundary of Southwater is reasonably close to the site, the nearest education and healthcare facilities are approximately 2.0km away and therefore a negative effect is still assigned as residents living on the site are unlikely to have good access to certain services until new provisions are made. However, the development is expected to provide two primary schools, a secondary school, nursery school and special educational needs will also be provided. In addition, there is potential for a neighbourhood centre, healthcare facility, a country park and recreational facilities to be provided on site. Overall, an uncertain mixed (significant positive/ minor negative) effect is still expected for this SA objective.
SA 3: To encourage social inclusion, strengthen community	0	0	Effects at Regulation 18 stage: The site is on greenfield land and is not within a socially deprived area. While the site is expected to provide a new neighbourhood centre / community hub, it is not in close proximity to the nearest existing town centre at Southwater and therefore this element of development is unlikely to complement or contribute

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
cohesion and a respect for diversity.			to the vitality and viability of the town centres and village centres in the District. As such, a negligible effect is expected in relation to this SA objective for the potential of the site to promote local regeneration.
			Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. As the site is still not within close proximity to an existing town centre, a negligible effect is still expected.
SA 4: To support the creation of safe communities in which levels of crime, anti-	0?	0?	Effects at Regulation 18 stage: The effects of new development on levels of crime and fear of crime will depend on factors such as the incorporation of open space within development sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of development sites but rather they will be determined through the detailed proposals for each site. The site's design and layout have not yet been approved. Therefore, an uncertain negligible effect is expected in relation to this SA objective.
social behaviour and disorder and the fear of crime are reduced.			Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. As the site's detailed design and layout is still unknown at this stage, an uncertain negligible effect is still expected.
SA 5: To improve public health and wellbeing and reduce health inequalities.			Effects at Regulation 18 stage: The closest existing healthcare facilities to the site are the Village Surgery in the Southwater Health centre located approximately 2.3km to the northwest of the site, the Surgery in St Peters Close, Cowfold which is situated approximately 2.9km east of the site and Oakleigh and Woodlawn Surgeries in Partridge Green approximately 3.4km southeast of the site. As such the new residents to the site are unlikely to have immediate access to the healthcare facilities. The site is not within close proximity of existing areas of open space but well connected to the existing Public Rights of Way network and contains one bridleway and a number of footpaths within its boundary.
			Through the provision of a medical centre on site, new residents will have a good level of access to health care facilities when this provision is completed. In addition, the provision of approximately 20 hectares of public open space at the site is also likely to improve access to recreational facilities for residents which could contribute to health and wellbeing.
	++/-	++/-	It is recognised that part of the western edge of the site abuts the A24, meaning there is potential for noise pollution to adversely affect new residents.
	?	?	Overall a mixed (significant positive and minor negative) effect is expected in relation to this SA objective. The effect is uncertain dependent upon the delivery of the new healthcare provisions at the site and the phasing of the development. The uncertainty is also reflective of potential to mitigate the impacts of noise pollution at the site.
			Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. While the boundary has changed, the closest existing healthcare facilities to the site are still the Village Surgery in the Southwater Health centre located approximately 2.0km to the northwest of the site, the Surgery in St Peters Close, Cowfold which is situated approximately 2.9km east of the site and Oakleigh and Woodlawn Surgeries in Partridge Green approximately 3.4km southeast of the site. However, the site would provide land for a healthcare facility as well as a country park and outdoor and indoor recreational facilities, which could contribute positively to health and wellbeing. It is recognised however that part of the western edge of the site abuts the A24, meaning there is potential for noise pollution to adversely affect new residents. A mixed significant positive and minor negative effect is still expected.

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.	?	/+?	Effects at Regulation 18 stage: The Downs Link, Nutham Wood and Greatsteeds farm Meadow Local Wildlife Site (LNR) lies within the site boundary. Three of the five areas of Ancient Woodland that lie wholly within the site boundary are situated within this LNR. The site lies within an IRZ, however, this has been designated in relation to development for airports, helipads and other aviation proposals. The Arun Valley SPA and SAC is the closest international biodiversity designation to the site and this is located approximately 11.5km to the southwest. The site contains local designations as well as areas of Ancient Woodland and therefore significant negative effects are expected in relation to this SA objective. There is potential for development at the site to result in habitat loss, fragmentation and disturbance. Effects may also include increased recreational pressure and increased noise and light d in relation to habitats in the area. The effect is uncertain as it is proposed that the site would achieve biodiversity net gains and mitigation measures, which include buffers around wooded areas and upgrades to the watercourse with attractive water meadows. These measures could help to mitigate any adverse impact in relation to the natural environment at the site. Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. Three of the five areas of Ancient Woodland that lie wholly within the site boundary are situated within this LWS. It is also noted that a Biodiversity Net Gain of 16% could be achieved on site, however this depending on how measures will be brought forward. The site is expected to be delivered with around 50% of the site as green infrastructure including a linear park and a country park. The site also lies in close proximity to the Knepp Estate Rewilding project to the south and west and there may be potential for new development to disturb or compro
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.	-?	-?	Effects at Regulation 18 stage: The land within the site has been assessed as part of the Horsham District Landscape Capacity Assessment and falls across a number of Local Landscape Character Areas (LLCAs). Land within the Land South of Tuckmans Farm LLCA has been assessed as having moderate-high landscape capacity for large scale residential and moderate scale landscape capacity for large scale employment development. Land within the Land South of New House Farm LLCA has been assessed as having moderate capacity for large scale employment development. Land within the Land South of New House Farm LLCA has been assessed as having moderate capacity for large scale residential development and low-moderate capacity for large scale employment development. Furthermore, land within the Land South of New House Farm LLCA has been assessed as having moderate capacity for large scale residential development. This accounts for much of the land within the site. However, some of the land within the eastern portion of the site falls within the Land west of Downs Link LLCA which has been assessed as having no/low capacity for large scale residential and employment development. As such, a minor negative effect is expected for the site in relation to this SA objective as it is unlikely that residential development could be accommodated without some adverse impacts in terms of setting. The effect is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. The changes to the site boundary weals have an additional area of land with moderate capacity for large scale housing development and low-moderate capacity for large scale employment development as well as land which has not been assessed through the landscape capacity study is now within the site. These areas are to the south an orth west, respectively. The

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			extension of the site to the east also includes some additional land with no/low capacity for large scale residential and employment development. Overall, the majority of the site has been assessed as having moderate or moderate-high capacity for large scale housing development. Therefore, a minor negative effect is still expected for the site as it is unlikely that residential development could be accommodated without some adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic			Effects at Regulation 18 stage: The site does not contain any designated heritage assets within its boundaries, but the boundary of the northern region of the site encircles a Grade II Listed Building (Tuckmans Farmhouse). Further designated assets within 500m of the site include Knepp Castle, a Registered Park and Garden approximately 450m to the south-west; two Grade II Listed Buildings within 250m to the north-east; eight Grade II Listed Buildings within 600m to the south; one Grade II Listed Building 400m to the south-east; and multiple Grade II Listed Buildings approximately 500m to the north-east in Maplehurst. The site is also within 3.0km of Cowfold Conservation Area to the east and Nuthurst Conservation Area to the north-east. As such there is potential for development at the site to result in adverse effects in terms of the respective settings of these historic environment assets.
environment.	?	?	An uncertain significant negative effect is expected in relation to this SA objective due to close proximity to the identified designated heritage assets. The effect is uncertain considering that the design of the new development may present opportunities to mitigate adverse impacts in terms of the significance of the setting of heritage assets in the area.
			Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA716. The findings of the assessment work note that there are 27 Listed Buildings, one Scheduled Monument and one Registered Park and Garden within the wider 1km study area set out for the site. The 1km study area for the site also contains three Archaeological Notification Areas (ANAs) (two of which are categorised as red, very sensitive for archaeology and one of which is categorised as amber, sensitive for archaeology) and two archaeological sites. The assessment work concluded that development could result in four Grade II Listed Buildings (8 Bar Lane, Little Tuckmans, Tuckmans Farmhouse and the Old Cottage) being subject to significant change. The assessment work also concluded that 12 further Grade II Listed Buildings and Grade II Park and Garden Knepp Castle could be subject to potentially significant effects as a result of development. The magnitude of these effects are, however, recorded as low. Given that significant change is expected to result in relation to a number of heritage assets a significant negative effect is expected for the site in relation to this SA objective.
			The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.
SA 9: To make efficient use of the			Effects at Regulation 18 stage: The majority of the site is greenfield land. A large proportion of the site is classed as being of grade 3 agricultural land and the remainder is classed as grade 4. As it is not known if it is grade 3 a or 3b agricultural land, an uncertain significant negative effect is identified.
District's land resources through the re-use of previously developed land and conserve its soils.	?	?	Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. Although the boundary has changed, the majority of the site is still greenfield land and a large proportion of the site is classed as grade 3 agricultural land, the remainder being grade 4 agricultural land. As it is still not known if it is grade 3 aor 3b agricultural land, an uncertain significant negative effect is identified.
SA 10: To conserve natural resources, including mineral	?	?	Effects at Regulation 18 stage: The majority of the site lies within a Mineral Safeguarding Area (MSA) for Brick Clay with two smaller areas to the east are safeguarded for Building Stone as defined by the West Sussex Joint Minerals Local Plan (2018). A significant negative effect is therefore identified in relation to this SA objective. This effect is uncertain as it is dependent upon whether extraction could be achieved prior to the development of the site.

SA Objective	SA Score		Justification			
	Reg 18	Reg 19				
resources in the District.			Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. Although the boundary has changed, the majority of the site still lies within a Mineral Safeguarding Area (MSA) for Brick Clay with two smaller areas to the east are safeguarded for Building Stone as defined by the West Sussex Joint Minerals Local Plan (2018). A significant negative effect is still identified in relation to this SA objective. This effect is uncertain as it is dependent upon whether extraction could be achieved prior to the development of the site.			
SA 11: To achieve sustainable water resource management			Effects at Regulation 18 stage: There are two tributaries of the River Adur within the site boundaries. It is assumed that the potential for any water pollution in these watercourses as a result of development will be mitigated by the delivery of SuDS. The site is not located in a Source Protection Zone. The site lies in a portion of the District that is served by Southern Water for its water infrastructure. Discussions between			
and promote the quality of the District's waters.	0	0	the Council and Southern Water indicate that the site would drain to wastewater treatment works which has Dry Weather Flow (DWF) permit capacity to accommodate growth up to 2035.			
			A negligible effect is therefore expected for the site in relation to this SA objective.			
			Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. Although the boundary has changed, two tributaries of the River Adur still pass through the site and the site is not located within a Source Protection Zone. Therefore, a negligible effect is still expected.			
SA 12: To manage and reduce the risk of			Effects at Regulation 18 stage: Two tributaries of the River Adur confluence within the site boundary. These bodies of water and land directly adjacent are within flood zones 2 and 3. However, the majority of the site is located within flood zone 1.			
flooding.			In addition, the site is situated entirely on greenfield land so a minor negative effect is expected as the development of this site will increase the amount of impermeable surfaces in the area, which may increase flood risk. A minor negative effect is therefore identified.			
		-?	Overall, a minor negative effect is expected for the site in relation to this SA objective.			
		-	-			Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. Although the boundary of the site has changed, two tributaries of the River Adur still confluence within the site boundary. These bodies of water and land directly adjacent are within flood zones 2 and 3. However, the majority of the site is located within flood zone 1. As the site is still situated entirely on greenfield land a minor negative effect is expected as the development of this site will increase the amount of impermeable surfaces in the area, which may increase flood risk. A minor negative effect is therefore still identified. The site is expected to incorporate an appropriate sustainable drainage (SuDs) strategy which is likely to help address any increase flood risk and therefore the effect is uncertain.
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	/+?	/+?	Effects at Regulation 18 stage: In terms of access to sustainable travel options, the site is not in close proximity to a railway station (the closest station is at Christ's Hospital approximately 5.3km to the north west). The National Cycle Route 223 directly aligns with the site's east boundary and there are a number of bus stops along Cowfold Road and along the Worthing Road that are within 450m of the site. The site is, however, not within close proximity of a town centre.			

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			The site is expected to provide a new flyover (including cycle and pedestrian routes) over the A272 junction as well as improvements to the Downs Link, a park and ride scheme with bus connections to Southwater, Christs Hospital railway station and Horsham and these services may have a positive effect in terms of congestion in the area. Furthermore, the site is likely to create a number of new jobs and would provide new services and facilities, thereby reducing resident's need to travel.
			It is recognised that the scale of development proposed may lead to an overall increase in the number of private car trips being undertaken in the area, particularly considering the current lack of access to existing services and facilities. The site is relatively remote and commuting patterns (based on 2011 census data) indicate that private car trips are used most by people in the area to commute to work. The delivery of new growth at this location has the potential to result in similar travel habits being adopted by new residents.
			An overall mixed (minor positive and significant negative) effect is expected in relation to this SA objective. The effect is uncertain dependent on the delivery of new services and facilities at the site and the phasing of this development. Uncertainty attached to the overall effect identified is also considerate of the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. Although the site boundary has changed, the site is still not in close proximity to a railway station (the closest station is at Christ's Hospital approximately 4.9km to the north west). The National Cycle Route 223 directly aligns with the site's east boundary and there are a number of bus stops along Cowfold Road and along the Worthing Road that are within 450m of the site. The site is, however, not within close proximity of a town centre. The site is expected to provide internal walking and cycling route as well as, bus services to major employment centres and improving traffic flow on the A24 through the conversion of Buck Barn junction into a 'hamburger' style roundabout.
			In addition, the development is expected to provide services and facilities on site. Overall a mixed (minor positive and significant negative) effect is still expected in relation to this SA objective. The effect is uncertain dependent on the delivery of new services and facilities at the site and the phasing of this development. Further uncertainty is attached to the overall effect identified given the difficulty to predict people's likely travel patterns following development
SA 14: To limit air pollution in the District			Effects at Regulation 18 stage: The site is not within an AQMA, however it is linked via the A272 to the Cowfold AQMA which is located approximately 2.6km to the east if the site. As this could increase levels of air pollution in these areas as a result of increased vehicle traffic, a significant negative effect is identified.
and ensure lasting improvements in air quality.	/+?	/+?	The site is also located within close proximity to existing bus stops where the bus service runs on the A272 and A29, which is likely to provide new residents with opportunities to travel by public transport. As such the location of the site may reduce the need to travel by private vehicle thereby reducing congestion and the potential for an increase in air pollutants. It is expected that the site would provide a park and ride scheme with bus connections to Southwater, Christs Hospital railway station and Horsham. It is also recognised that enhancement of the Downs Link could help to further promote modal shift in the area. However, the site is relatively remote and commuting patterns (based on 2011 census data) indicate that private car trips are used most by people in the area to commute to work. The delivery of new growth at this location combined with upgrading of the strategic road network at the A272 has the potential to result in similar travel habits being adopted by new residents.
			Overall a mixed (minor positive and significant negative) effect is expected on this SA objective. The effect is uncertain considering that it is partly dependent on the provision of new sustainable transport provisions at the site. Uncertainty attached to the overall effect is also considerate of the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. Although the site boundary has

SA Objective	SA So	core	Justification	
	Reg 18	Reg 19		
			changed, the site is still linked via the A272 to the Cowfold AQMA which is located approximately 2.6km to the east if the site. As this could increase levels of air pollution in these areas as a result of increased vehicle traffic, a significant negative effect is identified. The site is also located within close proximity to existing bus stops where the bus service runs on the A272 and A29, which is likely to provide new residents with opportunities to travel by public transport. In addition, the site is expected to provide internal walking and cycling route as well as, bus services to major employment centres. As such, the location of the site may reduce the need to travel by private vehicle thereby reducing congestion and the potential for an increase in air pollutants.	
			Overall a mixed (minor positive and significant negative) effect is still expected on this SA objective. The effect is uncertain considering that it is partly dependent on the provision of new sustainable transport provisions at the site. Uncertainty attached to the overall effect is also considerate of the difficulty to predict people's likely travel patterns following development	
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.			Effects at Regulation 18 stage: The site is likely to provide a new park and ride scheme with bus connections to Southwater, Christs Hospital railway station and Horsham which will allow new residents to travel by sustainable modes of transport and not rely on private vehicles. It is also recognised that enhancement of the Downs Link could help to further promote modal shift in the area. The site is adjacent to a number of bus stops along the A24 and A272, however, it is not within close proximity of an existing railway station or a range of services and facilities. It is therefore expected that the potential to make use of sustainable travel links may be variable during the early stages of development.	
change.	/+?		The development the site is to provide buildings built to a high standard following fabric-first approach, battery storage system / energy centre, and aspirations for zero- carbon and energy positive technology. As the site would include a high number of services and facilities as well as job opportunities it is expected that residents may not need to travel from the site on a regular basis, dependent upon the phasing of new development. These provisions can reduce emissions that contribute to clime change.	
		++/	However, the scale of development proposed may lead to an overall increase in the overall number of journeys being made in the area. Furthermore, while the upgrading of the A272 associated with the development of the site may help to limit congestion in the area, it may also contribute to establishment of car dominant environment. The site is relatively remote and commuting patterns (based on 2011 census data) indicate that private car trips are used most by people in the area to commute to work, which suggests a car dominant environment may persist following development.	
		/+?	?	A mixed minor positive effect and significant negative effect is therefore expected in relation to this SA objective. The positive effect is uncertain given that impacts will be dependent upon the incorporation of new provisions at the site. Uncertainty attached to the overall is also considerate of the difficulty to predict people's likely travel patterns following development.
				Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. Although the site boundary has changed, the site is likely to provide internal walking and cycling opportunities and an improved bus service to major employment centres, which will allow new residents to travel by sustainable modes of transport and reduce reliance on private vehicles.
			The development aims to provide zero carbon homes, following a taking a 'fabric-first approach' and incorporating sustainable features such as grey water recycling, solar panels and communal boiler systems and combined heating systems. In addition, EV charging points are to be provided at every dwelling. Furthermore, the proposal is expected to incorporate a photovoltaic battery storage park to ensure efficiency of renewable energy. A mixed significant positive effect and significant negative effect is therefore expected in relation to this SA objective. The positive effect is uncertain given that impacts will be dependent upon the incorporation of new provisions at the site. Uncertainty attached to the overall effect is also considerate of the difficulty to predict people's likely travel patterns following development.	

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
SA 16: To facilitate a sustainable and growing economy.		-? ++?	Effects at Regulation 18 stage: The site is relatively large in size and is expected to deliver new jobs through the provision of a care home, primary and secondary schools. The proposed neighbourhood centre / community hub will provide approximately 2.75ha predominantly flexible space with a retail offer of 3,000sqm, and would include new employment floorspace and could provide additional job opportunities in the area. The site would also deliver a high number of new homes which is likely to make a significant contribution to the local economy due to increased expenditure in the area, an increased workforce and the potential for new construction jobs. As such a significant positive effect is expected in relation to this SA objective. While the site is located to provide access to the primary road network (at the A24 and A272), the positive identified is uncertain considering the relative remoteness of the site, which may limit its economic potential.
	++?		Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land. Although the site boundary has changed, it is still expected to deliver new jobs through the provision of a care home, primary and secondary schools. Proposals are also expected to include 30,000sqm of B2/B8 and former B1 uses (of which 21,200sqm is B2/B8) (totalling around 6.5ha). The site would also deliver a high number of new homes which is likely to make a significant contribution to the local economy due to increased expenditure in the area, an increased workforce and the potential for new construction jobs. As such a significant positive effect is still expected in relation to this SA objective. While the site is located to provide access to the primary road network (at the A24 and A272), the positive identified is uncertain considering the relative remoteness of the site, which may limit its economic potential.
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.	/+	+/-	Effects at Regulation 18 stage: The site is not within close proximity of a railway station. It is, however, is located within 450m to existing bus stops where the bus services run on the A272 and A24. The site is also expected to provide a park and ride scheme with bus connections to Southwater, Christs Hospital railway station and Horsham. As such current and future bus provisions at the site are likely to provide residents with opportunities to access the new employment opportunities by sustainable transport. The site is lies approximately 1.9km south of the key employment area Southwater Business Park, 3.2km south of the key employment area in Oakhurst, Southwater and 3.5km north of key employment area Huffwood Trading Estate in Partridge Green. Furthermore, it is not located within close proximity of a town centre. Overall, a mixed (minor positive and significant negative) effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: The boundary of the site is now extended to border the A24 in the north western corner, with an area to the south by Cowfold Road now also included within the site boundary. The eastern boundary of the site has also been extended to include some additional greenfield land which means that the site is now within 1.5km of the key employment area Southwater Business Park. It is noted that infrastructure for pedestrian access along the A24 from the site to Southwater is limited in places. The site boundary change has not greatly affected the distance from the site to a railway station. It is, however, still located within 450m to existing bus stops where the bus services run on the A272 and A24. The site is expected to provide improved bus services which could allow access to major employment areas. As such, current and future bus provisions at the site are likely to provide residents with opportunities to access the new employment opportunities by sustainable transport. The site also does not lie within close proximity to an employment area or

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## Site SA744 (includes SA225) / SA668: West of Billingshurst

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 1: To provide affordable, sustainable and decent housing to meet local needs.			Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. The site is expected to deliver 1,000 dwelling over the plan period. Up to 1,790 dwellings are expected to be delivered as the site is built out beyond the plan period. The land at Newbridge Park is expected to include 35% affordable dwellings as well as assisted living units. The dwelling types to be provided at this portion of the site would include a range of sizes with an emphasis on first time buyers and young families.
	++?	++	A significant positive effect is expected for the site in relation to this SA objective considering its substantial contribution to the local housing need, including affordable housing. The effect is uncertain, however, considering that the number of affordable houses and dwelling types across the southern part of the site (Brookhurst Green and Land at Bridgewaters Farm) is unknown at this stage.
			Effects at Regulation 19 stage: There is no change to site boundary and the development would provide up to 1,000 dwellings. The site would provide around 35% affordable units as well as some elderly specific accommodation. There is potential to provide Gypsy and Traveller accommodation at the site. No uncertainty has been identified in relation to the provision of affordable homes. A significant positive effect is therefore expected.
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.	++/- ?		Effects at Regulation 18 stage: The site is greenfield but is located at the western edge of Billingshurst and as such adjoins its built up area boundary. Billingshurst town centre is within walking distance (less than 720m) of the site to the east. Billingshurst also contains a number of education facilities (including a secondary school and primary school) and healthcare facilities which are also within close proximity to the site. As such, it is likely that new residents will have a good level of access to existing services. It is noted that the high level of residential development to be provided could result impacts in terms of existing services becoming overwhelmed, however, this will be dependent in part on existing capacity issues which are unknown. Furthermore, the path of the A29 currently acts as a potential barrier from the site to the existing urban edge at Billingshurst.
		++/-	As part of the development, it is proposed that the site would provide a range of services and facilities including a new community hub and local centre. In terms of education this includes two primary schools and a nursery. The provision of the aforementioned is likely to ensure that there are sufficient services and facilities to support growth in the area and therefore a significant positive effect is expected.
		?	Overall, a mixed (significant positive and minor negative) effect is expected in relation to this SA objective. Uncertainty is attached to the effect considering that the close proximity of this large site to Billingshurst could potentially result in existing facilities becoming overcapacity. The minor negative effect is reflective of the potential for the A29 bypass to sever the site from Billingshurst, reducing access to services.
			Effects at Regulation 19 stage: There is no change to site boundary and therefore there is no change in terms of the distance from the site to nearby service and facilities and town centres locations. There is still some potential for the existing path of the A29 to act as a barrier from the site to the existing urban edge at Billingshurst. The proposal for the site is now expected to include land for a new primary school and if required for health care, or a financial contribution to existing healthcare facilities. A new community hub is also proposed as part of development. Overall, a mixed (significant positive and minor negative) effect is still expected. Uncertainty is attached to the effect considering the potential for issues of overcapacity resulting at existing services and facilities. There is still potential for the A29 to sever the site from Billingshurst.
SA 3: To encourage social inclusion, strengthen community	+/-?	+/-?	Effects at Regulation 18 stage: The site is on greenfield land and is not within a socially deprived area. The provision of new services and facilities (including new retail, community uses and a local centre) could help to complement existing uses at Billingshurst town centre considering its close proximity to the east. The path of the A29 currently acts as a potential barrier from the site to the existing urban edge at Billingshurst. This physical barrier may act to prevent a sense of cohesion developing between

SA Score		Justification
Reg 18	Reg 19	
		the new development and the existing settlement. As such, an overall mixed (minor positive and minor negative) effect is expected in relation to this SA objective. The effect is uncertain as the impact of delivering new services and facilities will be dependent in part on their phasing which is unknown at this stage. Effects at Regulation 19 stage: There is no change to the site boundary with the presence of the A29 still potentially acting as a barrier to limit social cohesion in the area. The delivery of the new community hub could complement existing service provision within Billingshurst itself. A mixed minor positive and minor negative effect is therefore still expected. The effect is still uncertain given that the exact phasing of new services and facilities is still uncertain.
0?	0?	Effects at Regulation 18 stage: The potential for development at the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: An uncertain negligible effect is still expected given that the detailed design of development is still unknown.
++/- ?	++/- ?	Effects at Regulation 18 stage: The nearest healthcare facilities are located within Billingshurst to the east which is within reasonable walking distance of the site. One of these facilities, however, is located more than 1.0km from the site. The site is also within walking distance of a number of existing outdoor sports facilities, public open spaces and playgrounds within Billingshurst that could be used for recreational purposes. There are also multiple PROWs in the area of the site, which provide access to the surrounding countryside to the west. There is potential for these existing assets to contribute positively to resident's health in the new development by increasing uptake of physical activity. In addition to existing opportunities for physical activity, as part of development it is proposed that the site would maintain space for a new leisure facility and healthcare centre if financial contributions do not meet the planning requirements. New open space and pedestrian and cycle links would also be provided on site as well as a country park. However, the proximity of the site to the A29 bypass may result in residents at the site being adversely impacted by noise. As such, an overall significant positive and minor effect is expected to be in relation to this SA objective. Considering the high number of homes to be provided at the site the effect is uncertain given that there is potential for existing healthcare facilities to become overcapacity. Uncertainty attached to the effect recorded acknowledges the unknown nature of the phasing of the provision of the new leisure facility and healthcare facility and healthcare facilities and outdoor sports facilities and outdoor sports facilities and outdoor sports for noise pollution to impact amenity at the new development.
	Reg 18 0?	Reg 18         Reg 19           0?         0?           0?         0?           +++/-         +++/-

SA Objective	SA Sc	ore	Justification
	Reg 18	Reg 19	
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.	/+?	/+?	Effects at Regulation 18 stage: The site is located within close proximity of a number of areas of Ancient Woodland to the north, south and west. The Upper Arun SSSI and Wey and Arun Canal, River Arun and adjacent meadows Local Wildlife Site also lies in close proximity to the site to the west. It also lies within the bat sustenance zone. A significant negative effect is expected in relation to this SA objective due to the site being located within an IRZ (Impact Risk Zone) for national designations for all planning applications. The greenfield land take within an IRZ may result in increased habitat disturbance as well as potential for fragmentation and loss. There is also potential for development at the site to result in increased recreational pressure and increased noise and light in relation to habitats in the area. The effect is uncertain as the site proposals include a net gain in biodiversity through habitat creation. This is to include the reinstatement of woodland and wetlands at the site. The development is also expected to support the strengthening of the Green Infrastructure network in the area. These measures could help to mitigate adverse effects on the natural environment. Considering that the site would include a significant proportion of the overall development as land for a new country park the significant negative effect. Effects at Regulation 19 stage: There is no change to the site boundary and therefore development is likely to have similar implications in relation the identified Local Wildlife Site, SSSI and areas of Ancient Woodland, as well as the bat sustenance zone. The development of the site would include woodland, wetlands and we wetland provision as well as seeking to achieve biodiversity net gain. A significant negative effect is still expected given the potential for impacts relating to the SSSI, Local Wildlife Site and bat sustenance zone. The effect is combined with a minor positive given that provisions at the site would include woodland, wetlands and a new country park. The
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.	?	?	Effects at Regulation 18 stage: Land to the west of Billingshurst has been assessed in the Horsham District Landscape Capacity Assessment. The site contains land that is located within two Local Landscape Character Areas (LLCAs). The land within the site has been identified as having low-moderate landscape capacity for large scale residential development. Much of the site has no/low landscape capacity for large scale employment development with land at the northern area of the site having low-moderate landscape capacity for large scale employment development development. As such, a significant negative effect is expected for the site in relation to this SA objective as there are parts of the site where it is unlikely that residential or employment development could be accommodated without impacts in terms of setting. The effect is uncertain as the impacts of new development on the character and quality of the landscape will depend in part of detailed development design. Effects at Regulation 19 stage: There is no change to the site boundary and therefore development at the site is still expected to result in substantial impacts on existing character. Furthermore, the presence of the A29 would act to limit the relationship between development at the site and the existing urban edge. Therefore, a significant negative effect is expected. The effect is uncertain as the design of new development may present opportunities to mitigate impacts. The landscape-led approach to development may help to secure benefits in this regard.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the	?	?	Effects at Regulation 18 stage: The western portion of the site contains two Grade II Listed Buildings and there are a further three Grade II Listed Buildings in close proximity to the western boundary. Billingshurst Conservation Area is located around 500m from the western portion of the site. The Conservation Area contains a high concentration of Listed Buildings. The Billingshurst Conservation Area Appraisal and Management Plan (2018) identifies the views at the north and north west as key to the northern part of the Conservation Area and therefore there is potential for development of the northern portion of the site to impact upon these. The Appraisal and Management Plan states that development should be avoided if it would adversely impact the setting of the Conservation Area or important views.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
District's historic environment.			As such, an uncertain significant negative effect is expected in relation to this SA objective due to the proximity of designated assets to the site and the potential for adverse impacts on the respective settings of these assets and particularly that of the Billingshurst Conservation Area. The effect is uncertain considering that the design of the new development may present opportunities to mitigate adverse impacts in terms of the significance of the setting of heritage assets in the area.
			Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA744 (including SA225) / SA668. The findings of the assessment work note that there are 49 Listed Buildings and one Conservation Area within the wider 1km study area set out for the site. The 1km study area for the site also contains six Archaeological Notification Areas (ANAs) (one of which is categorised as red, very sensitive for archaeology and five of which are categorised as amber, sensitive for archaeology) and five archaeological sites. One of these archaeological sites also falls partially within the site boundary. The assessment work concluded that development could result in six Grade II Listed Buildings (Lime Burners Arms, Diggles, Newbridge Cottage, Newbridge Farmhouse, Hole Cottage and New Bridge) being subject to significant change. The assessment work also concluded that two further Grade II Listed Buildings (Rowner and Gatefield Cottage) could be subject to potentially significant effects as a result of development. The magnitude of these effects are, however, recorded as low. Given that significant change is expected to result in relation to a number of heritage assets a significant negative effect is expected for the site in relation to this SA objective.
			The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.
SA 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils.	?	?	Effects at Regulation 18 stage: The site is wholly greenfield land. The majority of the site is also comprised of grade 3 agricultural land. A significant negative effect is expected for the site in relation to this SA objective due to the high proportion of grade 3 and above agricultural land. The effect is uncertain as it is unknown whether this land is grade 3a or grade 3b agricultural land. Effects at Regulation 19 stage: There is no change to the site boundary and therefore the site is still comprised of wholly greenfield land which is grade 3 agricultural quality. A significant negative effect is still expected. The effect remains uncertain given that it is unknown whether this grade 3a or grade 3b agricultural soils are present.
SA 10: To conserve natural resources, including mineral resources in the District.	?	?	Effects at Regulation 18 stage: The majority of the site is located within a Mineral Safeguarding Area (MSA) for Brick Clay and therefore a significant negative effect is expected due to the potential for development to result in the sterilisation of finite mineral resources. The effect is uncertain as there may be opportunities to extract mineral resources prior to development. Effects at Regulation 19 stage: There is no change to the site boundary and therefore the site is still located within a MSA for Brick Clay. A significant negative effect is still expected. The effect remains uncertain as there may be opportunities to extract mineral resources prior to development.
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.	0	-?	Effects at Regulation 18 stage: Part of the River Arun passes through the site. It is assumed that the potential for any water pollution in this watercourse as a result of development will be mitigated by the delivery of SuDS. The site is not located in a Source Protection Zone. The site lies in a portion of the District that is served by Southern Water for its water infrastructure. Discussions between the Council and Southern Water indicate that the site would drain to a wastewater treatment works which current does not have Dry Weather Flow (DWF) permit capacity to accommodate growth up to 2035. However, it is noted that large sites which do not have permitting can apply for revised DWF permits as necessary. A negligible effect is therefore expected for the site in relation to this SA objective.

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SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			Effects at Regulation 19 stage: There is no change to the site boundary and no further impacts are expected in relation to development within Source Protection Zones or wastewater infrastructure. However, Natural England has identified that development of the site should be assessed in terms of potential effects and achieve mitigation in relation to the Upper Arun SSSI. Potential adverse effects are identified in relation to surface and wastewater. The Water Cycle Study also identifies potential capacity issues at WwTW infrastructure towards Billingshurst <sup>271</sup> .
			A minor negative effect is expected in relation to this SA objective. The effect is uncertain given that new infrastructure supported through development of the site would help to mitigate the effect. Overall a minor negative effect is expected.
SA 12: To manage and reduce the risk of flooding.			Effects at Regulation 18 stage: There are two watercourses which run through or in close proximity to land with the site. These are the River Arun which passes the north western corner of this land and Brookhurst Brook/Par Brook which passes through the southern portion of the land. Land directly adjacent to these watercourses is within flood zone 2, with smaller areas of flood zone 3 also present. However, the majority of the land is within flood zone 1.
	-	-?	Due to the majority of the site being greenfield, development is likely to increase the overall amount of impermeable surfaces in the area, which may increase flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: There is no change to the site boundary. Therefore, small parts of the site towards the River Arun and Brookhurst Brook/Par Brook fall within flood zone 2 or 3. The area adjoining the River Arun is not identified for development. The site remains mostly greenfield. A minor negative effect is still expected. The site is expected to incorporate SuDs which is likely to help address any increased flood risk and therefore the effect is uncertain.
SA 13: To reduce congestion and the need to travel by			Effects at Regulation 18 stage: In terms of access to sustainable travel options, the site is located within close proximity of Billingshurst railway station as well as a number of existing bus stops on Slane Street and West Street within Billingshurst itself. Billingshurst town centre is also within close proximity of the site, which may further reduce the need to travel by private vehicle from the site. The site is currently separated from the settlement by the A29.
private vehicle in the District.	++/- ?	++/- ?	However, commuting patterns based on 2011 census data indicate that, despite the site being within 1km of a railway station, few people commute to work from the area using the train and the majority of people in the existing area commute to work using private car trips. As part of development, the development of the site presents opportunities to strengthen the existing bus services in the area. Additionally, the site's proposal to include a range of services and facilities within the new development will also reduce the need for residents to travel further afield by private car. It is, however, noted that the land at the site is be crossed the A272 which lacks safe, attractive pedestrian and cycle links from north to south. This may limit the potential for residents to make use active modes of travel as new development is provided. An overall mixed (significant positive and minor negative) effect is expected in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: There is no change to the site boundary. Therefore, the distance from the site to nearby existing sustainable transport links and centres remains the same. However, the A29 would still act to separate the site from Billingshurst. The site would include some new services and facilities which could limit the need to travel. While the development is to be designed to provide pedestrian and cycle access, no substantial improvements to public transport are proposed. Work would also be required to understand the upgrades necessary to address the issue of access at the A272. In all, a mixed significant positive and minor negative effect is expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.

<sup>271</sup> JBA Consulting on behalf of Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Reigate and Banstead District Council (2020) Gatwick Sub-Region Water Cycle Study

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
SA 14: To limit air pollution in the District and ensure lasting improvements in air			Effects at Regulation 18 stage: The scale of residential and employment development means that there is potential for traffic impacts upon the A29 and A272. Close proximity of services and facilities to the site as well as existing sustainable transport links (including Billingshurst railway station and bus stops within Billingshurst itself) may help to encourage journeys to be undertaken by more alternative modes of transport. The close proximity of Billingshurst town centre is also likely to contribute to a limited need for new residents to travel by private vehicle on a regular basis.
quality.	++/- 2	++/- ?	However, commuting patterns based on 2011 census data indicate that, despite the site being within 1km of a railway station, few people commute to work from the area using the train and the majority of people in the existing area commute to work using private car trips. The development of the site presents opportunities to strengthen the existing bus services in the area. It would also provide services and facilities onsite, which have the potential to reduce congestion on local roads and reduce the overall need to travel, potentially resulting in limited impact sin terms of local air quality. It is noted that land at the site is crossed by the A272 which lacks safe, attractive pedestrian and cycle links from north to south. As such there is potential for residents the existing issue of severance to impact upon the uptake of active modes of travel as new development is provided.
			Overall, a mixed (significant positive and minor negative) effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: There is no change to the site boundary. Therefore, the distance from the site to nearby existing sustainable transport links and centres remains the same. The development of the site would still have to overcome issues of accessibility associated within the A29 and A272 if it was to achieve modal shift on a large scale which could help to improve local air quality. New residents at this location could also adopt similar commuting patterns to those currently prevalent in the area. Overall, a mixed significant positive and minor negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.
SA 15: To minimise the District's			Effects at Regulation 18 stage: The site is within close proximity of Billingshurst railway station as well as a number of bus stops within the town itself. It would not provide immediate access to a cycle routes. The town centre of Billingshurst, at which a number of services and facilities are accessible, is also in close proximity to the site.
contribution to climate change and adapt to unavoidable climate			However, commuting patterns based on 2011 census data indicate that, despite the site being within 1km of a railway station, few people commute to work from the area using the train and the majority of people in the existing area commute to work using private car trips.
change.	+/-?	+/-?	The development of the site would also present opportunities to improve the local bus service at Billingshurst. The land at the site is divided by the A272 with existing provisions across this route currently not in place. This could be detrimental in terms of reducing the potential for carbon emissions as a result of the travel habits of new residents. The site would not include low carbon or sustainable energy generation infrastructure as part of development but would include Electric Vehicle charging points.
		., .	Overall, a mixed (minor positive and minor negative) effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: There is no change to the site boundary. Therefore, the distance from the site to nearby existing sustainable transport links and centres remains the same. The achievement of modal shift on a large scale would mean that accessibility issues associated with the A29 and A272 would still have to be successfully addressed. There is no commitment to renewable or low carbon energy schemes as part of the proposal, other than opportunities for electric vehicle charging. Overall, a mixed minor positive and minor negative effect is still expected. Given the difficulty in predicting people's likely commuting patterns following development the effect remains uncertain.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 16: To facilitate a sustainable and growing economy.	++	++	Effects at Regulation 18 stage: The site is relatively large in size and it is expected to deliver a high number of dwellings over the plan period. This provision is likely to make a significant contribution to the local economy due to increased expenditure in the area, an increased workforce and the potential for new construction jobs. The close proximity of Billingshurst town centre is likely to mean new residents are likely to travel to this location thereby helping ensure the viability of existing businesses at this location. The inclusion of a range of services and facilities as part of development, including new leisure facilities and community centres, are likely to increase the economic contribution of the site. In addition, the site would include new employment space (approximately 4,600m <sup>2</sup> ), which is likely to help attract businesses to the area.
			As such, the site is expected to result in a significant positive effect in relation to this SA objective.
			Effects at Regulation 19 stage: There is no change to the site boundary. Therefore, the site would still deliver a high number of homes and provide benefits in terms of increased expenditure and an increased workforce. The northern part of the site has permission for a petrol filling station and some additional commercial units (approximately 4,600m <sup>2</sup> of B class use employment space). A significant positive effect is therefore still expected.
SA 17: To deliver, maintain and enhance access to diverse			The site is located within close proximity of Billingshurst railway station and a number of existing bus stops within Billingshurst itself which is likely to present opportunities for people to access the new employment land by sustainable travel options. The site is expected to present opportunities to strengthen bus services in the area which may further improve sustainable access to these employment opportunities.
employment opportunities, to meet both current and future needs in the District.	+/-?	+/-?	In terms of access to existing employment opportunities, the site is located within close proximity of key employment areas at Billingshurst including Daux Road Industrial Estate, Eagle Industrial Estate and Huffwood. The site is located within close proximity of Billingshurst town centre, but not Horsham town centre. As such it is expected that the site would provide new residents with nearby access to some existing employment opportunities. However, current commuting patterns show that many existing residents commute out of Billingshurst to other destinations to access jobs, suggesting that new growth at this location may not provide new residents with immediate access to an offer of higher quality jobs.
			Overall, a minor positive effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: There is no change to the site boundary. Therefore, the distance from the site to the nearest employment opportunities and sustainable transport links is unaffected. There is still potential for existing commuting patterns to be strengthened as development occurs at the site. An uncertain mixed minor positive and minor negative effect is still expected.

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## Site SA754: Horsham Golf & Fitness Club

SA Objective	SA Score	
SA 1: To provide affordable, sustainable and decent housing to meet local needs.	++	Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion that is affordable. It is proposed that the site has the potential to deliver 500-550 dwellings as part of a mixed use scheme. A significant positive effect is expected for this site in relation to this SA objective considering its substantial contribution to the local housing need.
SA 2: To maintain and improve access to centres of services and facilities including health centres and education.	+/-?	The site is on greenfield land and therefore there are no existing services and facilities within the site. The site would form an extension to the built up area of Southwater but is separated from this area by the A24. The town centre of Southwater is located around 1.5km to the south and the town centre of Horsham is located around 1.2km to the north, and therefore neither are within reasonable walking distance. The nearest education facility is located within around 1km to the south within Southwater. The nearest healthcare facilities are located around 1.2km to the southwater. Healthcare and educational facilities are also located around 1.3km to the north within Horsham. As such, there is potential for new residents to have relatively poor access to services and facilities during the early stages of development. Therefore, a minor negative effect is expected.
		As part of development, it is proposed that the site would include the delivery some facilities for residents. In terms of education, this may potentially include the delivery of a primary school onsite. As such, an uncertain minor positive effect is expected in combination with the minor negative effect identified.
SA 3: To encourage social inclusion, strengthen community cohesion and a respect for diversity.	0	The site is on greenfield land and is not within a socially deprived area. It is not expected to contribute to the vitality and viability of the town centres and village centres in the District. As such, a negligible effect is expected in relation to this SA objective for the potential of the site to promote local regeneration.
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.	0	The potential of the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.
SA 5: To improve public health and wellbeing and reduce health inequalities.	/+?	The nearest health centres within Southwater and Horsham to the north are not within walking distance of the site. However, the north of the site does contain an outdoor sports facility (golf club clubhouse) and there are further outdoor sports facilities adjacent to the north of the site. The site also contains a PRoW, which could provide access to the surrounding countryside. There is potential for these existing assets to contribute positively to resident's health in the new development by increasing uptake of physical activity.
		As part of development, the site proposals include the delivery of a large range of sports facilities, including two nine hole golf courses, a hockey pitch, an athletics track, a gym and a pedestrian/cycle bridge over the A24. The site proposals do not include the delivery of new healthcare facilities. However, the delivery of the site will result in some reduction in recreational facilities also through the partial loss of some of the existing golf course land. The proximity of the site to the A24 may result in

SA Objective	SA Score	
		residents at the site being adversely impacted by noise. As such, an overall mixed minor positive and significant negative effect is expected to be in relation to this SA objective. The uncertainty attached to the overall effect is reflective of potential to mitigate the impacts of noise pollution at the site
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.	-?	The site is located within two Impact Risk Zones for national designations. However, the IRZs do not include residential development as a potential risk. There are two areas of Ancient Woodland within 400m of the west of the site and there are three areas of Ancient Woodland within 400m of the east of the site. There are also multiple areas of deciduous woodland priority habitat within and around the site. The site is not in close proximity to any local, national or international biodiversity designations beyond this. A minor negative effect is expected in relation to this SA objective considering the proximity of Ancient Woodland to the site. The greenfield land take may result in increased habitat disturbance as well as potential for fragmentation and loss. There is also potential for development at the site to result in increased recreational pressure and increased noise and light disturbance in relation to habitats in the area. The overall effect is uncertain at this stage as appropriate mitigation may avoid adverse effects and could even result in beneficial effects.
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.	?	Land to the north of Southwater has been assessed in the Horsham District Landscape Capacity Assessment. The land that comprises the site has been identified as having no-low landscape capacity for medium or large scale housing development. As such, a significant negative effect is expected for the site in relation to this SA objective as it is unlikely that residential development could be accommodated without particularly adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the land scape.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.	?	Beyond the presence of an Archaeological Notification Area, the site is relatively unconstrained by designated heritage assets that are within its boundaries. There are 25 listed buildings within 1km of the site, 10 of which are within 500m. There is also a Scheduled Monument around 830m to the north east (Moated site and fish ponds). Horsham Conservation Area is just over 1km away to the north. The Council's heritage assessment work for site SA754 concluded that development of the area could result in significant effects in relation to Grade II listed Garden Balustrade and Piers West of Denne Park House, Grade II listed Denne Park House, Grade II listed Gate Cottage. An uncertain significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain considering that the design of the new development may present opportunities to mitigate impacts in terms of the significant of the setting of heritage assets in the area.
SA 9: To make efficient use of the District's land resources through the re-use of previously developed land and conserve its soils.		The site is located on greenfield land and is comprised largely of grade 4 agricultural land, with some grade 3 agricultural land in the south of the site. As such, the site is expected to result in a minor negative effect in relation to this SA objective.

SA Objective	SA Score	
SA 10: To conserve natural resources, including mineral resources in the District.	?	The entirety of the site lies within a Mineral Safeguarding Area (MSA) for building stone, and the majority of the site also lies within an MSA for Brick Clay. Therefore, a significant negative effect is expected in relation to this SA objective due to the potential for development to result in the sterilisation of finite mineral resources in the District. The effect is uncertain as there may be opportunities to extract mineral resources prior to development.
SA 11: To achieve sustainable water resource management and promote the quality of the District's waters.	0	The site is not located within a Source Protection Zone. The site lies in an area of the District that is served by Southern Water for its water infrastructure. Discussions between the Council and Southern Water indicate that the site would drain to wastewater treatment works which has Dry Weather Flow (DWF) permit capacity to accommodate growth up to 2035. A negligible effect is therefore expected for the site in relation to this SA objective.
SA 12: To manage and reduce the risk of flooding.	-?	There is no land in the site that is located within flood zone 2 or flood zone 3. Due to the site being greenfield, development will increase the overall amount of impermeable surfaces in the area, which may result in increased flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective. The site is expected to incorporate SuDs which is likely to help address any increased flood risk and therefore the effect is uncertain.
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	++/-?	In terms of access to sustainable travel options, Christ's Hospital Railway Station is around 1.6km to the west. The site is also adjacent to a bus stop on Millwood Road. As such, there is potential for future residents of the site to undertake journeys by more sustainable modes and limit some potential further congestion that would result as the development is occupied. The site is adjacent to Southwater to the south and Horsham is within 1km to the north, which can both be accessed using public transport. Horsham town is the main settlement in the plan area and this settlement provides access to the largest number of jobs in the District. The site is also within close proximity of an existing key employment area within Southwater. However, the scale of development proposed is also likely to result in increased traffic into Southwater to the south and Horsham to the north along key routes such as the B2237 and A24. Commuting patterns from Southwater (based on 2011 census data) indicate that most trips are by car to Horsham and to Crawley, with a lower but the scale of development by load better to the south and provide the time terms of the scale to the south and to crawley, with a lower but
		still significant number travelling to Horsham by bus. Providing more development at this location may result similar travel habits being adopted. Overall, a mixed significant positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.	++/-?	The site is not directly connected via road to one of the Air Quality Management Areas (AQMAs) in the District or in the surrounding Districts. The site is not directly connected via road to one of the Air Quality Management Areas (AQMAs) in the District or in the surrounding Districts. The site is located within close proximity to Southerwater town centre which may encourage residents to undertake journeys by sustainable transport to this location. However, commuting patterns from Southwater (based on 2011 census data) indicate that most trips are by car to Horsham and to Crawley, with a lower still significant number travelling to Horsham by bus. Providing more development at this location may result similar travel habits being adopted.
		The site is within close proximity to Christ's Hospital Railway Station to west and the site is adjacent to a bus stop to the west. Access to these sustainable travel options has the potential to decrease private car trips, which may result in reduced adverse impacts on air quality.

SA Objective	SA Score	
		An overall mixed (significant positive and minor negative) effect are expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable climate change.	+/-?	Christ's Hospital Railway Station is located around 1.6km to the west and there is a bus stop adjacent to the west of the site. There is potential for residents to use these sustainable modes of transport, which may result in reduced carbon emissions from the new development. However, commuting patterns from Southwater (based on 2011 census data) indicate that most trips are by car to Horsham and to Crawley, with a lower still significant number travelling to Horsham by bus. Providing more development at this location may result similar travel habits being adopted. No supporting information has been submitted to the Council regarding any specific proposals to promote energy efficiency at the site.
		As such, a mixed minor positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
SA 16: To facilitate a sustainable and		It is proposed that the site would deliver a high number of dwellings which is likely to make a contribution to the local economy due to increased expenditure and an increased workforce.
growing economy.	+	While the site would not include a substantial delivery of new employment floorspace, it will deliver a range of leisure facilities as part of development, which may offer some employment opportunities.
		Therefore, a minor positive effect is expected for the site in relation to this SA objective.
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and	+/-?	The site is within walking distance of Southwater Business Park and Oakhurst Business Park which are defined as key employment area. The site is located to the north of Southwater, but it is not within walking distance of Southwater Town Centre of Horsham Town Centre to the north. The site is also located within close proximity of Christ's Hospital Railway Station to the west as well as a bus stop adjacent to the west of the site. As such, there is potential for future residents at the site to have access to employment opportunities using sustainable modes of transport. However, current commuting patterns show that many existing residents commute out of Southwater to other destinations to access jobs, suggesting that new growth at this location may not provide new residents with immediate access to an offer of higher quality jobs.
future needs in the District.		Therefore, an uncertain mixed minor positive and minor negative effect is expected.

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## Site SA085/SA520/SA524/SA539/SA790: Ashington cluster

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
SA 1: To provide affordable, sustainable and decent housing to			Effects at Regulation 18 stage: Impacts relating to ensuring that the housing stock in Horsham meets the needs of local people will be mainly determined by the amount and type of housing that is developed and the proportion this that is affordable. It is expected that the site would deliver around 400 dwellings over the plan period. Of this level of housing, 35% is to be provided as affordable housing. The site has the potential to deliver 700 dwellings beyond the plan period.
meet local needs.	+	+	While the site has capacity for a substantial contribution to the overall housing needs of the District, the number of new homes which could be provided over the plan period is considerably less than the other large site options being considered. A minor positive effect is expected for the site in relation to this SA objective due to the contribution to the area's identified housing need.
			Effects at Regulation 19 stage: The number of homes expected to be delivered at the site is 400. The site would provide around 35% affordable units. No uncertainty has been identified in relation to the provision of affordable homes. A minor positive effect is therefore still expected.
SA 2: To maintain and improve access to centres of services and facilities including health			Effect at Regulation 18 stage: The site is greenfield and therefore there are no existing services and facilities within its boundaries. However, the site is within walking distance of the centre of Ashington (a Medium Village in the Development Hierarchy). It furthermore adjoins the built up area boundary of this settlement. Ashington provides access to a moderate level of services and facilities that could serve residents of the site. This includes a primary school within walking distance of the site. As such, residents during the early stages of development are likely to have some access to existing services and facilities.
centres and education.			Development at the site is expected to support the provision of a primary school, a community facility with a café and village sports and amenity parkland. As such, service provision for residents in the area is likely to improve following the built out of the site.
	+/-?	+/-?	Overall, a mixed minor positive and minor negative effect is expected for the site in relation to this SA objective. The uncertain minor negative effect is recorded considering the relatively high level of housing to be provided at Ashington which is not within the first two tiers of the Development Hierarchy and therefore has a more modest service offer than the larger settlements. The delivery of this level of development could result in existing services and facilities within Ashington becoming overburdened.
			Effects at Regulation 19 stage: The site is still within walking distance of the centre of Ashington. Ashington provides access to a primary school but no secondary school or healthcare centre (the settlement was previously appraised as containing a healthcare centre, however, the facility in question is actually a chiropractor). The development is to provide land for a new primary school and a multi-functional community space. This may incorporate uses including a café, GP outreach service, community hall and sports facilities. Any need for a secondary school provision is to be addressed through Community Infrastructure Levy and expansion of existing education facilities. Overall a mixed minor positive and minor negative effect is still expected. Uncertainty is attached to the effect considering the potential for issues of overcapacity resulting at existing services and facilities.
SA 3: To encourage social inclusion,			Effects at Regulation 18 stage: The site is greenfield and is not located within a 40% most deprived area. As such, there is limited potential for the site to result in local regeneration.
strengthen community cohesion and a respect for diversity.	+?	+?	The site is located directly adjacent to the settlement of Ashington and will deliver community facilities and amenity space. As such, there is potential for the development to contribute to the vitality of the existing village centre.
			Overall, a minor positive effect is expected for the site in relation to this SA objective. The effect is uncertain as the impact of delivering new services and facilities will be dependent in part on their phasing which has not been confirmed at this stage.

SA Objective	SA Score		Justification
	Reg 18	Reg 19	
			Effects at Regulation 19 stage: There is no change to the site in relation to the inclusion of land which falls within more socially deprived areas. No change has resulted in terms of the accessibility from the site to existing neighbourhood centres. The site is still expected to provide some new services and facilities, including multi-functional community space. A minor positive effect is therefore still expected. The effect is still uncertain given that the exact phasing of new services and facilities is still uncertain.
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.	0?	0?	Effects at Regulation 18 stage: The potential for the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective. Effects at Regulation 19 stage: An uncertain negligible effect is still expected given that the detailed design of development is still unknown.
SA 5: To improve public health and wellbeing and reduce health inequalities.	+/-	+/-?	Effects at Regulation 18 stage: There are no health centres within walking distance of the site, however, it lies within walking distance of three outdoor sport facilities. The site was previously appraised as being within walking distance of a health centre, however, this facility has now been identified as a chiropractor. There are multiple PROWs in the area that provide access to the surrounding countryside. There is potential for the existing recreational assets to result in an uptake of physical activity amongst residents. As part of development, it is proposed that the site will deliver village sports and amenity parkland (2.8ha open space) as well as an integrated and accessible green spine for cyclists and pedestrians to be linked to the existing village. Overall, an uncertain mixed minor positive and minor negative effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The site is still within close proximity to areas of open space and PROWs. It does not provide nearby access to an existing health centre. The development is expected to incorporate green space, including allotments, sports pitches, play areas and multi-functional green space. Links for cycles and pedestrians would also be delivered. The site could also provide a GP outreach service as part of the multi-functional community space which may be incorporated. The site is, however, not expected to provide a dedicated GP service. At present, residents in Ashington are required to travel to Storrington, Pulborough or Steyning medical practice and new residents would have a similar level of access to healthcare facilities. A mixed minor positive and minor negative effect is therefore expected. The effect is uncertain considering that access to GP services at the site would be partially dependent upon the phasing of the delivery of the GP outreach service.
SA 6: To conserve, enhance, restore and connect wildlife, habitats, species and/or		?	Effects at Regulation 18 stage: The site is located within an Impact Risk Zone associated with national designations in the region. However, the IRZ is for industrial/aviation planning applications and does not include residential development applications as a potential risk. The whole of the site is located within the Bat Sustenance Zone. The site is also located within 600m of Warminghurst Road Cutting Local Geological Site and within 500m of America & Gratwicke's Wood Local Wildlife Site which is also an area of ancient woodland. It is recognised that the site is separated from this latter feature by the path of the A24.
sites of biodiversity or geological interest.	?		A minor negative effect is expected for the site in relation to this SA objective due to it being located within the Bat Sustenance Zone and within close proximity of the other identified biodiversity and geodiversity designations. There is also potential for development at the site to result in increased recreational pressure and increased noise and light disturbance in relation to habitats in the area. The effects are uncertain as there may be potential for mitigation in relation to minimising habitat loss or disturbance given that the site proposes to include a walkable green network and biodiversity net gains. This will include the installation of bat and bird boxes, retention/replacement of felled trees, green wall, SuDS/ponds and biodiversity management plan.

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			Effects at Regulation 19 stage: The site is still within an IRZ but this is for industrial/aviation planning applications. It also still lies within the bat sustenance zone and is within 500m of America & Gratwicke's Wood Local Wildlife Site which is also an area of ancient woodland. The boundary amendment has resulted in the site being within 680m of Warminghurst Road Cutting Local Geological Site. The proposal for the site is to be set out to achieve biodiversity net gain. A significant negative effect is still expected given the potential for impacts relating to the Local Geological Site, Local Wildlife Site and Ancient Woodland as well as the bat sustenance zone. Effects relating to these areas include the potential for noise, light and air pollution as well as increased recreational pressures. The effect is uncertain given that the site promoters are seeking to promote the achievement of biodiversity net gain which may help to offset the effects identified.
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.	?	?	Effects at Regulation 18 stage: Land within the site has been assessed as having low-moderate landscape capacity for medium-scale housing development. As such, a significant negative effect is expected for the site in relation to this SA objective as it is unlikely that the development proposed could be accommodated without particularly adverse impacts in terms of setting. The effect is uncertain as the design of new development may present opportunities to mitigate impacts relating to character and quality of the landscape. Additionally, further uncertainty is present as the Landscape Capacity Assessment only considers the effects of small-scale housing development in this area. Effects at Regulation 19 stage: There is no change to its landscape capacity identified for the majority of the site which has low-moderate landscape capacity for medium-scale housing development. Therefore, a significant negative effect is expected. The effect is uncertain as the design of new development of new development may present opportunities to mitigate impacts to development which is to secure the retention of existing trees, enhancement of site boundaries and historic field boundaries, may help to secure benefits in this regard.
SA 8: To conserve and/or enhance the qualities, fabric, setting and accessibility of the District's historic environment.	?	?	Effects at Regulation 18 stage: There are no designated heritage assets within the site boundaries. The site is adjacent to six Grade II Listed Buildings. Additionally, there are Scheduled Monuments 500m to the north (Moated site) and 700m to the south (Roman building). There is potential for development to cause disruption to the setting of these historic environment assets. As such, a significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain considering that the design of the new development may present opportunities to mitigate adverse impacts on the setting of heritage assets in the area. Effects at Regulation 19 stage: The Council has now undertaken heritage assessment work for site SA085/SA520/SA524/SA539/SA790. The findings of the assessment work note that there are 24 Listed Buildings and two Scheduled Monuments within the wider 1km study area set out for the site. The 1km study area for the site also contains seven Archaeological Notification Areas (ANAs) (three of which are categorised as red, very sensitive for archaeology and four of which are categorised as mber, sensitive for archaeology) and five archaeological sites. The assessment work concluded that development could result in Grade II Listed Building West Wolves Farmhouse being subject to significant change. The assessment work also concluded that four further Grade II Listed Buildings (The Oast House, Oast House Barn, Oast Cottage and Laurel Cottage/Orchard Cottage) could be subject to potentially significant effects as a result of development. The magnitude of these effects are, however, recorded as low. Given that significant change is expected to result in relation to a number of heritage assets a significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain at this stage as it is dependent on the exact scale, layout and design of the new development
SA 9: To make efficient use of the District's land resources through the re-use of previously	?	?	Effects at Regulation 18 stage: The site is greenfield and the majority is comprised of grade 3 agricultural land. However, there is an area of grade 4 agricultural land in the west of the site.

SA Objective	SA So	ore	Justification					
	Reg 18	Reg 19						
developed land and conserve its soils.			A significant negative effect is expected for the site in relation to this SA objective. The effect is uncertain as it is unknown whether these soils are grade 3a or the lower quality grade 3b.					
			Effects at Regulation 19 stage: The site is still entirely greenfield with the majority and comprised of grade 3 agricultural land. A significant negative effect is therefore still expected. The effect is uncertain as it is unknown whether these soils are grade 3a or the lower quality grade 3b.					
SA 10: To conserve natural resources, including mineral resources in the District.	?	?	Effects at Regulation 18 stage: The whole of the site is located within a Mineral Safeguarding Area (MSA) for Brick Clay and therefore a significant negative effect is expected in relation to this SA objective due to the potential for development to result in the sterilisation of finite mineral resources. The effect is uncertain as there may be opportunities to extract mineral resources prior to development.					
			Effects at Regulation 19 stage: The entirety of the site still falls within a MSA for Brick Clay. A significant negative effect is still expected. The effect remains uncertain as there may be opportunities to extract mineral resources prior to development.					
SA 11: To achieve sustainable water			Effects at Regulation 18 stage: Part of the Lancing Brook passes through the site. It is assumed that the potential for any water pollution in this watercourse as a result of development will be mitigated by the delivery of SuDS.					
resource management and promote the quality of the District's waters.	0	0	The site is not located in a Source Protection Zone. The site lies in a portion of the District that is served by Southern Water for its water infrastructure. Discussions between the Council and Southern Water indicate that the site would drain to a wastewater treatment works which current does not have Dry Weather Flow (DWF) permit capacity to accommodate growth up to 2035. However, it is noted that large sites which do not have permitting can apply for revised DWF permits as necessary.					
			A negligible effect is therefore expected for the site in relation to this SA objective.					
			Effects at Regulation 19 stage: None of the site falls within a Source Protection Zone. However, Southern Water have stated that should 600 dwellings be proposed for the site in the suture there would be a need for reinforcement of the wastewater network. The proposal being considered for the site is currently below that threshold and therefore the effect remains negligible.					
SA 12: To manage and reduce the risk of			Effects at Regulation 18 stage: The site does not contain any land that is located within flood zone 2 or 3. There is watercourse (Lancing Brook) that passes through the north of the site.					
flooding.	-	-?	As the site is greenfield, development will increase the overall amount of impermeable surfaces in the area, which may result in increased flood risk. As such, a minor negative effect is expected for the site in relation to this SA objective.					
			Effects at Regulation 19 stage: The site still remains does not contain any land that is located within flood zone 2 or 3. Given that it is still a greenfield site, development would increase the area of impermeable surfaces in the District. A minor negative is still expected. The effect is uncertain given that the proposal is to include the incorporation of SuDs.					
SA 13: To reduce congestion and the need to travel by private vehicle in the District.	+/-?	+/-?	Effects at Regulation 18 stage: In terms of access to sustainable travel options, the site is over 1.8km from any railway stations. The site is not in close proximity to any cycle routes but there are a number of bus stops (including those on London Road) within walking distance of the site. Additionally, the village centre of Ashington is within walking distance of the site and the close proximity of this centre may reduce the need for residents to travel to access services and facilities.					

SA Objective	SA Se	core	Justification
	Reg 18	Reg 19	
			However, there is potential for the scale of development proposed to lead to increased traffic along the A24 which is adjacent to the eastern side of Ashington. Furthermore, commuting patterns for the area (based on 2011 census data) indicate that private car trips are the most used mode of transport to travel to work. Providing development at this location may result in similar travel habits being adopted.
			Overall, a mixed minor positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The site remains within walking distance of Ashington village centre as well as existing bus stops. It is not within close proximity of a railway station or any cycle routes. The proposal still has the potential to result in increased traffic along the A24 as well as resulting in new residents adopting similar commuting patterns to those already in existence. A mixed minor positive and minor negative effect is still expected. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
SA 14: To limit air pollution in the District and ensure lasting improvements in air quality.			Effects at Regulation 18 stage: The site is in close proximity to the A24 which connects to the A283 to the south-west. As such, there may be some potential for development to result in increased traffic through the Storrington AQMA to the south-west. This will be dependent upon the travel habits of new residents at the site although it is recognised that as a settlement further up the settlement hierarchy than Ashington, many residents may need to travel to Storrington to access certain services and facilities. The site is within walking distance of the village centre of Ashington, which offers some services and facilities. However, it is likely that development will result in increased private car trips along the A24 when residents need to travel further afield, which will have adverse impacts on air quality. Commuting patterns (based on 2011 census data) suggest that private car trips may dominate following development.
	/+?	/+?	The site is not in close proximity to any railway stations. There are a number of bus stops in close proximity to the site and the proposals include the delivery of pedestrian and cycle links to the existing village which may reduce the need for residents to travel using private car trips, and therefore potentially limit any adverse impacts relating to air quality.
			Overall, a mixed minor positive and significant negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: It is expected that development of the site could contribute to some level of increased air pollution within the Storrington AQMA, however, this will be influenced by the travel habits of new residents. The site remains within the same distance of nearby bus stops and the village centre and is still not within walking distance of a railway station. Residents at the site are likely to have to travel form Ashington to meet some of their day to day needs and the proximity of the A24 could see a high number of these made by private vehicle. A mixed minor positive and significant negative effect is still expected. The effect is uncertain given the difficulty to predict people's likely travel patterns following development.
SA 15: To minimise the District's contribution to climate change and adapt to unavoidable	+/-?	+/-?	Effects at Regulation 18 stage: The site is not in close proximity to any railway stations. There are no cycle routes in close proximity to the site but there are a number of bus stops within walking distance. The village centre of Ashington is within walking distance and offers some services and facilities that resident could access without private car trips, possibly reducing per capita carbon emissions. However, commuting patterns (based on 2011 census data) indicate that private car travel is the most popular mode of transport in the area and therefore it is likely private car trips would increase following development, resulting in increased carbon emissions.
climate change.			As part of development, the site proposes to incorporate electric vehicle charging points, energy efficiency measures and on site low and zero carbon technologies where possible. Additionally, the site proposes to incorporate a walkable and bikeable green network, connecting new residents to the existing village and surrounding area. These features of development may help in minimising the District's contribution to climate change.

SA Objective	SA So	ore	Justification
	Reg 18	Reg 19	
			Overall, a mixed minor positive and minor negative effect is expected for the site in relation to this SA objective. Uncertainty is attached to the overall effect identified considering the difficulty to predict people's likely travel patterns following development.
			Effects at Regulation 19 stage: The site remains within the same distance of nearby bus stops and the village centre and is still not within walking distance of a railway station. The design for the site proposal is to maximise solar gain for natural heating with a commitment to employment sustainable construction techniques. Energy saving measures are also to be incorporated at the new dwellings and electric charging points would be supported. The proposal is, however, not expected to contribute infrastructure to support a transition to low carbon energy provision. A mixed minor positive and minor negative effect is still expected. The effect is uncertain given the difficulty to predict people's likely travel patterns following development.
SA 16: To facilitate a sustainable and growing			Effects at Regulation 18 stage: It is proposed that the site would deliver a relatively high number of dwellings which is likely to make a contribution to the local economy due to increased expenditure in the area and an increased workforce.
economy.			As part of development, the site proposes to deliver a community centre with flexible business space which may offer some potential to benefit the local economy.
	+?	+?	Therefore, an uncertain minor positive effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The number of homes to be provided at the site has not been varied greatly meaning it would make a similar contribution to the local economy in terms of increased expenditure and increased workforce. The proposal for the site is also to include flexible employment space, community uses and a cafe which could also benefit the local economy. An uncertain minor positive effect is still expected.
SA 17: To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in the District.			Effects at Regulation 18 stage: The site is within 1.5km of Wiston Business Park key employment area, although pedestrian access to this site is not provided along the A24. The village centre of Ashington is within walking distance of the site but there is likely to be limited employment available here for new residents considering that the settlement falls outside of the first two of the Development Hierarchy. The site is not within walking distance of a railway station but it is in close proximity of a number of bus stops which may allow residents to access employment opportunities further afield using sustainable modes of transport.
	+/-	+/-	The site does not offer a significant level of employment floorspace as part of development. The delivery of an amount of flexible business in close proximity to the strategic road network of the District may allow for some inward economic investment and job creation. The provision of a new community facility and café may offer limited employment opportunities to future residents.
			Overall, an mixed minor positive and minor negative effect is expected for the site in relation to this SA objective.
			Effects at Regulation 19 stage: The site remains the same distance from the nearest key employment area as well as sustainable transport links in the area and Ashington Village Centre. The proposal for the site includes flexible employment space, community uses and a cafe which could offer some limited local employment opportunities. An mixed minor positive and minor negative effect is still expected.

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## Appendix E

SA matrices for the small site options

SA of Horsham District Local Plan (Regulation 19) July 2021

## Ashington

SA Objective	SA085 (residential)	SA122/SA131/SA548/ SA735 (residential use)	SA520 (residential)	SA539 (residential)	SA866 (residential use)	Justification
SA objective 1: Housing	++	++	++	++	++	All the sites have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	+/-?	+?	+/-?	+/-?	+?	All the sites are located within 720m of the built-up area of the Medium Village of Ashington and therefore a minor positive effect is expected in relation to this aspect of the SA objective. None of the sites are located within 1km of a secondary school. Sites SA085, SA520 and SA539 are not located within 450m of a primary school. However, sites SA122/SA131/SA548/SA735 and SA866 are located within 450m of a primary school. As such, an uncertain minor positive effect is expected for sites SA122/SA131/SA548/SA735 and SA866 are located within 450m of a primary school. As such, an uncertain minor positive effect is expected for sites SA122/SA131/SA548/SA735 and SA866 and a minor negative effect is expected for sites SA085, SA520 and SA539 in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown. Overall, an uncertain minor positive effect is expected for sites SA122/SA131/SA548/SA735 and SA866 and a mixed minor positive and uncertain minor negative effect is expected for sites SA085, SA520 and SA866 and a mixed minor positive and uncertain minor negative effect is expected for sites SA085, SA520 and SA866 and a mixed minor positive and uncertain minor negative effect is expected for sites SA085, SA520 and SA866 and a mixed minor positive and uncertain minor negative effect is expected for sites SA085, SA520 and SA866 and a mixed minor positive and uncertain minor negative effect is expected for sites SA085, SA520 and SA539.
SA objective 3: Inclusive communities	0	0	0	0	0	The sites are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where they are most likely to be prevalent. As such, a negligible effect is expected for these sites in relation to this SA objective.
SA objective 4: Crime	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the sites in relation to this SA objective.
SA objective 5: Health	+	+	+	+	+	All of the sites are located within 720m of an area of open space or sports facility but not a healthcare facility. Therefore, a minor positive effect is expected in relation to this SA objective.

SA Objective	SA085 (residential)	SA122/SA131/SA548/ SA735 (residential use)	SA520 (residential)	SA539 (residential)	SA866 (residential use)	Justification
SA objective 6: Biodiversity and geodiversity	-?	-?	-?	-?	-?	All of the sites are located within an SSSI IRZ, but it does not identify residential planning applications as a risk. However, the SA122 part of site SA122/SA131/SA548/SA735 is located within 400m of Ancient Woodland. All of the sites are located within the bat sustenance zone. Therefore, a minor negative effect is expected in relation to this SA objective. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	?	?	?	Area SA131 which forms only a small part of site SA122/SA131/SA548/SA735 and site SA866 are located in an area identified as having low-moderate capacity for medium scale housing development. It is also noted that area SA131 is partly located within the built-up area of Ashington. However, the majority of site SA122/SA131/SA548/SA735 is located within an area identified as having no/low capacity for medium scale housing development. Sites SA085, SA520 and SA539 are located in an area identified as having low-moderate capacity for medium scale housing development. Therefore, a significant negative effect is expected in relation to this SA objective for all of the sites.
						In all cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which Is not yet known.
SA objective 8: Historic environment	-?	?	?	-?	0?	The Council's heritage assessment work for site SA122/SA131/SA548/SA735 concluded that the development of area SA122 would result in significant effects in relation to Grade II Listed Building Church Farmhouse, Church Lane and Grade II* Listed Building Parish Church of St Peter and St Paul. The development of area SA735 was assessed as being likely to result in significant effects in relation to Grade II Listed Building Church Lane. The other portions of the site were assessed as either having negligible effects or only potential significant effects in relation to nearby heritage assets. Overall a significant negative effect is expected in relation to this SA objective for site SA122/SA131/SA548/SA735.
						The Council's heritage assessment work for site SA085 concluded that the development of the area could have potentially significant effects in relation to Grade II listed Laurel Cottage/Orchard Cottage Rectory Lane. As such, a minor negative effect is expected for site SA085 in relation to this SA objective.

SA Objective	SA085 (residential)	SA122/SA131/SA548/ SA735 (residential use)	SA520 (residential)	SA539 (residential)	SA866 (residential use)	Justification
						The Council's heritage assessment work for site SA520 concluded that the development of the area would have significant effects on the Grade II listed Oast House Barn, Billingshurst Road and Oast Cottage, Billingshurst Road. The assessment also concluded that development could have potentially significant effects on Grade II listed The Oast House, Billingshurst Road and west Wolves Farmhouse, Billingshurst Road. As such, a significant negative effect is expected for site SA520 in relation to this SA objective.
						The Council's heritage assessment work for site SA concluded that the development of the area could have potentially significant effects in relation to the Grade II listed Laurel Cottage/Orchard Cottage Rectory Lane. As such, a minor negative effect is expected for site SA539 in relation to this SA objective.
						The Council's heritage assessment work for site SA866 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with the development site. While the heritage assets considered with regards to the site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. The site does not contain any Archaeological Notification Areas or Archaeological Sites.
SA objective 9: Efficient land use	?		?	?	-	Sites SA122/SA131/SA548/SA735 and SA866 are located on greenfield land which is classed as mostly Grade 4 agricultural quality. The areas SA131 and SA548 which form part of the site SA122/SA131/SA548/SA735, contain large amounts of Grade 3 agricultural land. Sites SA085, SA520 and SA539 are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if the land within the boundaries of these sites is Grade 3a or 3b land.
						A minor negative effect is expected in relation to this SA objective for sites SA122/SA131/SA548/SA735, SA866. An uncertain significant negative effect is expected for sites SA085, SA520 and SA539 in relation to this SA objective.
SA objective 10: Mineral resources	?	?	?	?	?	All of the sites are located within a Mineral Safeguarding Area (MSA) and therefore there is potential for development to result in the sterilisation of or loss of access to mineral resources. As such, a significant negative effect is expected for the sites. The effect is

SA Objective	SA085 (residential)	SA122/SA131/SA548/ SA735 (residential use)	SA520 (residential)	SA539 (residential)	SA866 (residential use)	Justification
						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.
SA objective 11: Water resources	0	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	-	-	-	-	All of the sites are located entirely within flood zone 1. However, they are all on greenfield land. Therefore, a minor negative effect is expected.
SA objective 13: Transport	+	+	+	+	+	All of the sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	0	0	0	None of the sites is located within or directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	+	+	+	+	All of the sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected for the sites in relation to this SA objective.
SA objective 16: Economic growth	0	0	0	0	0	All of the sites are being considered for residential use only. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities	+	+	+	+	+	All of the sites are being considered for residential use only. These sites are located within 1.8km of a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective. Site SA735 will deliver residential and employment uses as part of development. It is located within 1.8km of a Key Employment Area but is not within 720m of Horsham town. As such residents at the site will have some level of access to a range of job opportunities in the surrounding area. The site is also is located within 450m of a bus stop and this is likely to provide residents at

SA Objective	SA085 (residential)	SA122/SA131/SA548/ SA735 (residential use)	SA520 (residential)	SA539 (residential)	SA866 (residential use)	Justification
						other locations a level of access to the new employment use provided at the site. Therefore, a minor positive effect is expected in relation to this SA objective.

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## Barns Green

SA Objective	SA006 (residential use)	SA344 (residential use)	SA510 (residential use)	SA613 (residential use)	Justification
SA objective 1: Housing	++	++	++	++	All the sites have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities					All the sites are located within 720m of the built-up area of the Medium Village of Barns Green and therefore a minor positive effect is expected.
	+?	+?	+?	+?	None of the sites are located within 1km of a secondary school. However, they are located within 450m of a primary school. As such, an uncertain minor positive effect is expected for the sites in relation to this aspect of the SA objective. The effect is uncertain as the capacity of schools to accept new pupils is currently unknown. Overall, an uncertain minor positive effect is expected for the sites in relation to this SA objective.
SA objective 3: Inclusive communities	0	0	0	+	Sites SA006, SA344 and SA510 are all located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or reduce social deprivation. As such, a negligible effect is expected for these sites in relation to this SA objective. Site SA613 is not located within an IMD 40% most deprived area but it is located on brownfield land and therefore development may contribute towards regeneration in the District. As such, a minor positive effect is expected for the site in relation to this SA objective.
SA objective 4: Crime	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the sites in relation to this SA objective.
SA objective 5: Health	+	+	+	/+	All the sites are located within 720m of an area of open space or sports facility but are not within 720m of a healthcare facility. Therefore, a minor positive effect is expected.

SA Objective	SA006 (residential use)	SA344 (residential use)	SA510 (residential use)	SA613 (residential use)	Justification
					The development of site SA613 may result in the loss of an area of open space or sports facility at Sumners Pond Fishery and Campsite. Therefore, a significant negative effect is expected in combination with the minor positive effect for this site in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	-?	-?	-?	-?	All the sites are located within a SSSI IRZ but it does not identify residential planning applications as a potential risk. All the sites are located within 400m of an area of ancient woodland and they are also all located within the bat sustenance zone. As such, a minor negative effect is expected for all sites. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	?	-?	The areas in which sites SA006, SA344 and SA510 are located has been identified as having low-moderate landscape capacity for small scale housing development and therefore a significant negative effect is expected. The area in which site SA613 is located has been identified as having moderate landscape capacity for small scale housing development and therefore a minor negative effect is expected. In all cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment					The Council's heritage assessment work for site SA006 concluded that the development of the site would result in significant effects in relation to Grade II Listed Buildings Bennetts, Little Slaughterford Farmhouse, Barns Green Village Store, The Queens Head Public House and Blacksmiths Cottage. Overall a significant negative effect is expected in relation to this SA objective for site SA006.
	?	-?	?	?	The Council's heritage assessment work for site SA344 concluded that the development of the site has the potential to result in harm to the settings of Grade II Listed Buildings Old Home and Sandhills. The assessment, however, concluded that these effects are not expected to be substantial. Overall a minor negative effect is expected in relation to this SA objective for site SA006.
					The Council's heritage assessment work for site SA510 concluded that the development of the site would result in significant effects in relation to Grade II Listed Buildings Bennetts, Barns Green Village Stores, The Queens Head Public House and Blacksmiths Cottage. Overall a significant negative effect is expected in relation to this SA objective for site SA510.

SA Objective	SA006 (residential use)	SA344 (residential use)	SA510 (residential use)	SA613 (residential use)	Justification
					The Council's heritage assessment work for site SA613 concluded that the development of the site would result in significant effects in relation to Grade II Listed Building Little Slaughterford Farmhouse. Overall a significant negative effect is expected in relation to this SA objective for site SA613. In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development.
SA objective 9: Efficient land use	-	?	?	÷	Site SA006 is located on greenfield land which is classed as Grade 4 agricultural quality. Therefore, a minor negative effect is expected in relation to this SA objective. Sites SA344 and SA510 are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if it is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective. Site SA613 is located on brownfield land and therefore a minor positive effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	?	?	?	All the sites are located within a Mineral Safeguarding Area (MSA) and therefore development may result in the sterilisation of mineral resources. As such, a significant negative effect is expected in relation to this SA objective. 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.
SA objective 11: Water resources	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	-	-	0	Sites SA006, SA344 and SA510 are located entirely within flood zone 1. However, they are located on greenfield land. Therefore, a minor negative effect is expected. Site SA613 is located entirely within flood zone 1 and is on brownfield land. Therefore, a negligible effect is expected.
SA objective 13: Transport	+	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.

SA Objective	SA006 (residential use)	SA344 (residential use)	SA510 (residential use)	SA613 (residential use)	Justification
SA objective 14: Air quality	0	0	0	0	None of the sites are not located within or are directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	0	0	0	All sites are considered to deliver residential uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected for these sites in relation to this SA objective.
SA objective 17: Access to employment opportunities					All of the sites are considered to deliver residential uses as part of development. The sites are located more than 2.7km from a Key Employment Area and are not within 720m of Horsham town. Therefore, a significant negative effect is expected in relation to this SA objective.

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## Billingshurst

SA Objective	SA565 (residential use)	SA656 (residential use)	SA698 (residential use)	SA819 (employment use)	SA560 (residential use)	SA607 (residential use)	SA678 (residential use)	SA770 (residential use)	SA573 (employment use)	GA016 (gypsy and traveller use)	Justification
SA objective 1: Housing	++	÷	++	0	++	++	++	++	0	++	Sites SA565, SA560, SA607, SA678, SA698 and SA770 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected. However, site SA656 has the capacity for 10 dwellings or fewer and therefore a minor positive effect is expected in relation to this SA objective. Sites SA819 is and SA573 are being considered for employment use only. Therefore, a negligible effect is expected in relation to this SA objective. Site GA016 is considered for gypsy and traveller use and would help to meet the need for that specific use in the District. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	++/-?	++?	++/-?	++	++?	++/-?	++?	++/-?	++	-?	Sites SA565, SA573, SA656, SA698, SA819, SA560, SA607, SA678 and SA770 are within 720m of the built-up area of Billingshurst (a Small Town/Larger Village) and therefore a significant positive effect is expected. Site GA016 is not located within 720m of the built-up area of Billingshurst and therefore a minor negative effect is expected. Sites SA656, SA560 and SA678 are not within 450m of a primary school but they are located within 1km of a secondary school. As such, an uncertain minor positive effect is expected for these sites in relation to this aspect of the SA objective. Sites SA565, SA607, SA698, SA770 and GA016 are not located within 1km of a secondary school or within 450m of a primary school and therefore an uncertain minor negative effect is expected for these sites

SA Objective	SA565 (residential use)	SA656 (residential use)	SA698 (residential use)	SA819 (employment use)	SA560 (residential use)	SA607 (residential use)	SA678 (residential use)	SA770 (residential use)	SA573 (employment use)	GA016 (gypsy and traveller use)	Justification
											in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown. Overall, an uncertain significant positive effect is expected for sites , SA560, SA656 and SA678 and a mixed significant positive and uncertain minor negative effect is expected for sites SA565, SA607, SA698 and SA770 in relation to this SA objective. An uncertain minor negative effect only is expected for site GA016. As impacts relating to employment sites are not considerate of the proximity to education facilities a significant positive effect alone is expected for site SA819 and SA573.
SA objective 3: Inclusive communities	0	0	0	÷	0	0	0	0	0	0	Sites SA565, SA560, SA573 SA607, SA656, SA678, SA698 SA770 and GA016 are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where they are most likely to be prevalent. As such, a negligible effect is expected for these sites in relation to this SA objective. Site SA819 is located on brownfield land. Therefore, there is potential for development to result in local regeneration. As such, a minor positive effect is expected for this site in relation to this SA objective.
SA objective 4: Crime	0?	0?	0?	0?	0?	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected in relation to this SA objective.

SA Objective	SA565 (residential use)	SA656 (residential use)	SA698 (residential use)	SA819 (employment use)	SA560 (residential use)	SA607 (residential use)	SA678 (residential use)	SA770 (residential use)	SA573 (employment use)	GA016 (gypsy and traveller use)	Justification
SA objective 5: Health	++	÷	++	+	+	+	+	++	++	+	Sites SA560, SA607, SA656, SA678, SA819 and GA016 are not located within 720m of a healthcare facility but are within 720m of an area of open space or sports facility. Therefore, a minor positive effect is expected in relation to this SA objective. Sites SA565, SA698, SA770 and SA573 are located within 720m of a healthcare facility and an area of open space or sports facility. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 6: Biological and geological diversity	-?	?	-?	?	-?	-?	-?	-?	?	?	Sites SA560, SA565, SA607, SA678, SA698, SA770 and GA016 are located within a SSSI IRZ but it does not identify residential planning applications of the scale expected as a risk. However, all of these sites except SA698 are located within 400m of an area of ancient woodland or a local wildlife site. All of these sites also lie within the bat sustenance zone. Therefore, a minor negative effect is expected in relation to this SA objective. Site SA656 is located within an SSSI IRZ that flags residential planning applications as a potential risk. Site SA573 is located within an SSSI IRZ which flags certain types of industrial development as a potential risk. These sites also lie within the bat sustenance zone. Site SA573 is also located within 400m of an area of ancient woodland. Therefore, a significant negative effect is expected in relation to this SA objective. Site SA819 is located within an SSSI IRZ that lists potential risks which could be associated with employment development. The site is also located within 400m of a local wildlife site and is within the bat sustenance zone.

SA Objective	SA565 (residential use)	SA656 (residential use)	SA698 (residential use)	SA819 (employment use)	SA560 (residential use)	SA607 (residential use)	SA678 (residential use)	SA770 (residential use)	SA573 (employment use)	GA016 (gypsy and traveller use)	Justification
											Therefore, a significant negative effect is expected in relation to this SA objective. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	?	?	?	?	?	?	?	?	The areas in which sites SA560, SA565, SA607, SA678, SA698 and SA770 have been identified as having no/low landscape capacity or low-moderate landscape capacity for medium scale housing development and therefore a significant negative effect is expected in relation to this SA objective. Sites SA819 and SA573 are located in an area identified as having no/low landscape capacity and low-moderate landscape capacity for large scale employment development. Therefore, a significant negative effect is expected in relation to this SA objective. The landscape capacity of the area in which sites SA656 and GA016 are located has not been assessed as part of the landscape capacity assessment work for the District and therefore an uncertain effect is expected in relation to this SA objective. The effects are uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment	?	?	-?	?	-?	-?	-?	-?	-?	0?	The Council's heritage impact work has not included an assessment of sites SA565 and SA819 and therefore an uncertain effect is recorded for these sites in relation to this SA objective.

SA Objective	SA565 (residential use)	SA656 (residential use)	SA698 (residential use)	SA819 (employment use)	SA560 (residential use)	SA607 (residential use)	SA678 (residential use)	SA770 (residential use)	SA573 (employment use)	GA016 (gypsy and traveller use)	Justification
											The Council's heritage assessment work for site SA656 concluded that the development of the site would result in significant effects in relation to Grade II Listed Building Great Gillmans Farmhouse. Overall a significant negative effect is expected in relation to this SA objective for site SA656. The Council's heritage assessment work for sites SA560, SA607, SA678 and SA770 concluded that the development of these sites is unlikely to have effects in relation to any designated heritage assets. However, this work suggested that an assessment of any non-designated heritage assets adjacent to these sites should be undertaken. Furthermore, it is also stated that there is potential for as yet unknown archaeological remains within the sites. Overall a minor negative effect is expected in relation to this SA objective for sites SA560, SA607, SA678 and SA770. The Council's heritage assessment work for sites SA573 and SA698 concluded that the designated heritage assets within the study areas are less sensitive to change from the proposed developments due to their location, topography, views or lack historical/functional association with the development site. While the heritage assets considered with regards to the sites were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. However, there is a Red Archaeological Notification Areas within both of the sites and potential for as yet unknown archaeological remains. Overall a minor negative effect is expected in relation to this SA698.

SA Objective	SA565 (residential use)	SA656 (residential use)	SA698 (residential use)	SA819 (employment use)	SA560 (residential use)	SA607 (residential use)	SA678 (residential use)	SA770 (residential use)	SA573 (employment use)	GA016 (gypsy and traveller use)	Justification
											The Council's heritage assessment work for site GA016 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with the development site. While the heritage assets considered with regards to the site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. The site does not contain any Archaeological Notification Areas or Archaeological Sites. In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development.
SA objective 9: Efficient land use	?	?	?	+	?	?	?	?	?	?	Sites SA565, SA560, SA607, SA656, SA678, SA698, SA770, SA573 and GA016 are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if it is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective. Site SA819 is located on brownfield land. Therefore, a minor positive effect is expected for this site in relation to this SA objective.
SA objective 10: Mineral resources	?	?	?	?	?	?	?	?	?	?	All the sites are located within Mineral Safeguarding Areas (MSAs) and therefore there is potential for development to result in the sterilisation of or loss of access to mineral resources. As such, a significant negative effect is expected for the sites. The effect is uncertain as there may be potential to extract mineral resources prior to development or for development to be

SA Objective	SA565 (residential use)	SA656 (residential use)	SA698 (residential use)	SA819 (employment use)	SA560 (residential use)	SA607 (residential use)	SA678 (residential use)	SA770 (residential use)	SA573 (employment use)	GA016 (gypsy and traveller use)	Justification
											delivered in a manner which allows for access to mineral resources to be preserved.
SA objective 11: Water resources	0	0	0	0	0	0	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected in relation to this SA objective.
SA objective 12: Flooding				0	-	-		-		-	All of the sites are located entirely within flood zone 1. However, the majority of the sites (SA565, SA656, SA698, SA560, SA607, SA678, SA770, SA573 and GA016 and SA656) lie on greenfield land. Therefore, a minor negative effect is expected in relation to this SA objective. Site SA819 lies on brownfield land and therefore, a negligible effect is expected in relation to this SA objective.
SA objective 13: Transport	++	++	++	++	++	++	++	++	++	+	Sites SA565, SA560, SA698, SA573, SA607, SA656, SA678, SA770 and SA819 are within 1.8km of a railway station and therefore a significant positive effect is expected in relation to this SA objective. Site GA016 is not located within 1.8km of a railway station but is within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	0	0	0	0	0	0	0	0	None of the sites are located within or directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.

SA Objective	SA565 (residential use)	SA656 (residential use)	SA698 (residential use)	SA819 (employment use)	SA560 (residential use)	SA607 (residential use)	SA678 (residential use)	SA770 (residential use)	SA573 (employment use)	GA016 (gypsy and traveller use)	Justification
SA objective 15: Climate change	++	++	++	++	++	++	++	++	++	+	Sites SA560, SA565, SA698, SA573, SA607, SA656, SA678, SA770 and SA819 are within 1.8km of a railway station and therefore a significant positive effect is expected in relation to this SA objective. Site GA016 is not located within 1.8km of a railway station but is within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	0	0	++	0	0	0	0	+	0	Sites SA560, SA607, SA565, SA656, SA678, SA698, SA770 and GA016 will deliver residential or gypsy and traveller uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective. Site SA819 is expected to deliver more than 5ha of employment floorspace (approximately 6ha) as part of development. Therefore, a significant positive effect is expected. Site SA573 is expected to deliver less than 5ha of employment floorspace (approximately 2.3ha). Therefore, a minor positive effect is expected in relation to this SA objective
SA objective 17: Access to employment opportunities	+	+	+	++	÷	+	+	+	++	-	Sites SA565, SA560, SA607, SA656, SA678, SA698 and SA770 will deliver residential uses as part of development. They are located within 1.8km of a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective.

SA Objective	SA565 (residential use)	SA656 (residential use)	SA698 (residential use)	SA819 (employment use)	SA560 (residential use)	SA607 (residential use)	SA678 (residential use)	SA770 (residential use)	SA573 (employment use)	GA016 (gypsy and traveller use)	Justification
											Site GA016 will deliver gypsy and traveller use only as part of development. It is located between 1.8km and 2.7km from a Key Employment Area but is not within 720m of Horsham town. Therefore, a minor negative effect is expected in relation to this SA objective Sites SA573 and SA819 are located within 1.8km of a railway station. Therefore, a significant positive effect is expected in relation to this SA objective.

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### Bramber and Upper Beeding

SA Objective	SA483/SA055/SA488 (residential use)	Justification
SA objective 1: Housing	++	The site has capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities		The site is located within 720m of the built-up area of Bramber and Upper Beeding which is classed as a Small Town/Larger Village. As such, a significant positive effect is expected for the sites in relation to this aspect of the SA objective.
	++?	The site is located within 450m of a primary school. As such, an uncertain minor positive effect is expected for the site in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown.
		Overall, an uncertain significant positive effect is expected for the site in relation to this SA objective.
SA objective 3: Inclusive communities	0	The site is located on greenfield land and is not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where they are most likely to be prevalent. As such, a negligible effect is expected for the site.
SA objective 4: Crime	0?	The potential for the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.
SA objective 5: Health	++	The site is located within 720m of a healthcare facility and an area of open space or sports facility. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	?	The site is located within a SSSI IRZ that identifies residential planning applications as a potential risk. Therefore, a significant negative effect is expected. The site is not in close proximity to any local designated biodiversity assets.
		The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.

SA Objective	~	Justification
	SA483/SA055/SA488 (residential use)	
SA objective 7: Landscapes and townscapes	?	The landscape capacity of the area in which the site is located has not been assessed as part of the landscape character assessment work for the District and therefore an uncertain effect is expected in relation to this SA objective. The uncertainty also reflects that effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment	?	The Council's heritage assessment work for site SA483/SA055/SA488 concluded that the development of the site would result in significant effects in relation to Grade II Listed Building Pounds House Cottage. Overall a significant negative effect is expected in relation to this SA objective for site SA483/SA055/SA488. In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development.
SA objective 9: Efficient land use	-	The site is located on greenfield land which is mostly classed as Grade 4 agricultural quality. Therefore, a minor negative effect is expected in relation to this SA objective. It is noted that the area to the south comprises Grade 3 agricultural land.
SA objective 10: Mineral resources	0	The site is located over 250m from any Mineral Safeguarding Areas (MSAs) and therefore a negligible effect is expected.
SA objective 11: Water resources	0	The site is not located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	The site is located mainly within flood zone 1. However, it comprises mostly greenfield land. Therefore, a minor negative effect is expected.
SA objective 13: Transport	-	The site is more than 1.8km from a railway station and more than 450m from a bus stop or cycle route. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	The site is not located within or directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	-	The site is more than 1.8km from a railway station and more than 450m from a bus stop or cycle route. Therefore, a minor negative effect is expected in relation to this SA objective.

SA Objective		Justification
	SA483/SA055/SA488 (residential use)	
SA objective 16: Economic growth	0	The site is being considered for residential use only. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities	-	The site is being considered for residential use only. It is located between 1.8km and 2.7km from a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor negative effect is expected in relation to this SA objective.

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### Broadbridge Heath and Slinfold

SA Objective	SA102 (employment use)	SA386 (residential use)	SA622 (residential including specialised housing for older people)	SA833 (employment use)	GA002 (gypsy and traveller use)	Justification
SA objective 1: Housing	0	++	++	0	++	Sites SA386 has the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective. Site SA622 would support the delivery of housing to meet specific needs in the District and therefore a significant positive effect is expected in relation to this SA objective. Site GA002 is considered for gypsy and traveller use and would meet local need. Therefore, a significant positive effect is expected in relation to this SA objective. Site SA102 will deliver employment use only. As such, a negligible effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	++?	++/-?	**	÷	-?	Sites SA102, SA386 and SA622 are located within 720m of the built-up area of Broadbridge Heath (a Small Town/Larger Village) and therefore a significant positive effect is expected in relation to this SA objective. Site SA833 is located within 720m of the build-up area of Slinfold (a Medium Village) and therefore a minor positive effect is expected in relation to this SA objective. Site GA002 is not located within 720m of the built-up area of Slinfold (a Medium Village) and therefore a minor positive effect is expected in relation to this SA objective. Site GA002 is not located within 720m of the built-up area of Slinfold and therefore a minor negative effect is expected in relation to this SA objective. Sites SA386, SA622 and GA002 are not within 450m of a primary or 1km of a secondary school. Therefore, an uncertain minor negative effect is expected for sites SA386 and GA002 in relation to this part of the SA objective. The effects in relation to education facilities are uncertain as existing capacity to accommodate pupils at facilities in the District is currently

SA Objective	SA102 (employment use)	SA386 (residential use)	SA622 (residential including specialised housing for older people)	SA833 (employment use)	GA002 (gypsy and traveller use)	Justification
						unknown. Given that site SA622 would provide specialised housing for older people the effect is not influenced by the relationship between the site and the nearest education facilities. Therefore, a mixed significant positive and uncertain minor negative effect is expected overall for site SA386 in relation to this SA objective. An overall uncertain minor negative effect is expected for site GA002.
SA objective 3: Inclusive communities	+	+	+	+	+	Site GA002 is located on brownfield land and therefore development may contribute towards regeneration in the District. As such, a minor positive effect is expected for the site in relation to this SA objective. Sites SA102, SA386 and SA833 are located on greenfield land and therefore there is little potential for development to result in regeneration in the District in this respect. However, sites SA102, SA386, SA833 and GA002 are located in an IMD 40% most deprived area and therefore development may contribute to reducing social deprivation in areas which would benefit from it most in the District. Therefore, a minor positive effect is expected for these sites in relation to this SA objective. Site SA622 is not located within an IMD 40% most deprived area but would provide specialist housing to meet the needs of older people in the plan area. Therefore, a minor positive effect is expected is expected in relation to this SA objective.
SA objective 4: Crime	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.

SA Objective	SA102 (employment use)	SA386 (residential use)	SA622 (residential including specialised housing for older people)	SA833 (employment use)	GA002 (gypsy and traveller use)	Justification
SA objective 5: Health	+	+	+	+		Sites SA102, SA386, SA622 and SA833 are within 720m of an area of open space or sports facility but are not within 720m of a healthcare facility. Therefore, a minor positive effect is expected in relation to this SA objective. Site GA002 is not located within 720m of a healthcare facility or an area of open space or sports facility. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	?	-?	-?	-?	-?	Site SA102 is located within an SSSI Impact Risk Zone (IRZ) that flags large infrastructure (where total net floorspace is 1,000m <sup>2</sup> ) as a potential risk. The site is also located within the bat sustenance zone. Therefore, a significant negative effect is expected in relation to this SA objective. Site SA833 is located within an SSSI IRZ, but it does not identify potential risks related to employment development. Site GA002 is located within an SSSI IRZ but it does not identify potential risks related to residential development. However, these sites are located within 400m of areas of ancient woodland. Therefore, a minor negative effect is expected in relation to this SA objective. Sites SA386 and SA622 are located more than 400m from any biodiversity or geodiversity designations. However, the site is located within the bat sustenance zone and therefore a minor negative effect is expected in relation to this SA objective. In all cases, the effect identified is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.

SA Objective	SA102 (employment use)	SA386 (residential use)	SA622 (residential including specialised housing for older people)	SA833 (employment use)	GA002 (gypsy and traveller use)	Justification
SA objective 7: Landscapes and townscapes	?	-?	?	?	?	The area in which site SA102 is located has been identified has having low-moderate landscape capacity for large scale employment development and therefore a significant negative effect is expected. The area in which site SA386 is mostly located has been identified as having moderate landscape capacity for medium scale housing development and therefore a minor negative effect is expected. The area in which site SA622 is located has been identified as having no/low landscape capacity for medium scale housing development and therefore a significant negative effect is expected. Sites SA833 and GA002 do not lie within an area which has been assessed as part of the landscape character assessment work and therefore an uncertain effect is expected in relation to this SA objective The effects related to this SA objective are uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which Is not yet known.
SA objective 8: Historic environment	?	?	-?	0?	0?	The Council's heritage assessment work for site SA102 concluded that the site would result in significant effects in relation to Grade II listed buildings Lower Broadbridge Farmhouse, Mill House and Mill Cottage. Overall a significant negative effect is expected in relation to this SA objective for site SA102. The Council's heritage assessment work for site SA386 concluded that the development of the site would result in significant effects in relation to Grade II Listed Buildings Lower Broadbridge Farmhouse, Mill House and Mill Cottage. Overall a significant effects in relation to Grade II Listed Buildings Lower Broadbridge Farmhouse, Mill House and Mill Cottage. Overall a significant negative effect is expected in relation to this SA objective for site SA386.

SA Objective	SA102 (employment use)	SA386 (residential use)	SA622 (residential including specialised housing for older people)	SA833 (employment use)	GA002 (gypsy and traveller use)	Justification
						The Council's heritage assessment work for sites SA622, SA833 and GA002 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with each development site. While the heritage assets considered with regards to each site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. Of these sites, only site SA622 contains an Archaeological Notification Area or Archaeological Site. Therefore, a negligible effect is recorded in relation to this SA objective for sites SA833 and GA002 and a minor negative effect is recorded for site SA622. In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development.
SA objective 9: Efficient land use		?		?	+	Sites SA102 and SA622 are located on greenfield land which is classed mainly as Grade 4 agricultural quality. Therefore, a minor negative effect is expected in relation to this SA objective. Sites SA386 and SA833 are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if this land is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective. Site GA002 is located on brownfield land and therefore a minor positive effect is expected in relation to this SA objective.

SA Objective	SA102 (employment use)	SA386 (residential use)	SA622 (residential including specialised housing for older people)	SA833 (employment use)	GA002 (gypsy and traveller use)	Justification
SA objective 10: Mineral resources	?	?	?	?	?	All sites are located within a Mineral Safeguarding Area (MSA). There is potential for development to result in the sterilisation of mineral resources. As such, a significant negative effect is expected in relation to this SA objective. The effects are 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.
SA objective 11: Water resources	0	0	0	0	0	Sites SA102, SA386, SA622, SA833 and GA002 are not located within a Source Protection Zone and therefore a negligible effect is expected in relation to this SA objective.
SA objective 12: Flooding	-	-	-	-	0	Sites SA102, SA386, SA622 and SA833 are mainly within flood zone 1, however, they are all on greenfield land. Therefore, a minor negative effect is expected in relation to this SA objective. Site GA002 is located entirely within flood zone 1 and is also on brownfield land. Therefore, a negligible effect is expected.
SA objective 13: Transport	+	+	+	+	+	All sites are located more than 1.8km from a railway station but are all within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	0	0	0	All sites are not located within or directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.

SA Objective	SA102 (employment use)	SA386 (residential use)	SA622 (residential including specialised housing for older people)	SA833 (employment use)	GA002 (gypsy and traveller use)	Justification
SA objective 15: Climate change	+	+	+	+	+	All sites are located more than 1.8km from a railway station but are both within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	+	0	+	++	0	Site SA102 is being considered to deliver less than 5ha of employment floorspace (approximately 3.7ha), while site SA833 is being considered to deliver more than 5ha (approximately 6.3ha). Therefore, a minor positive effect is expected in relation to this SA objective for SA102 and the positive effect expected for SA833 is significant. As site SA622 is being considered for specialist homes for older people it could support some level of job creation in the plan area. A minor positive effect is recorded in relation to this SA objective for site SA622. Sites SA386 and GA002 will only deliver residential or gypsy and traveller uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities	+	+	+	+	+	Sites SA386 and GA002 will only deliver residential or gypsy and traveller uses as part of development. Both sites are located within 1.8km of a Key Employment Area but are not within 720m of Horsham town. A minor positive effect is expected in relation to this SA objective for sites SA386 and GA002. Sites SA102, SA622 and SA833 are not located within 1.8km of a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective for sites SA objective.

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### Christ's Hospital

SA Objective		Justification
	SA129 (residential use)	
SA objective 1: Housing	++	The site has the capacity for more than 10 dwellings and therefore a significant positive effect is expected.
SA objective 2: Access to services and facilities		The site is within 720m of the built-up area of the Main Town of Horsham (though the cross of the A24 may limit pedestrian access from the site to services and facilities within that settlement) and therefore a significant positive effect is expected.
	++?	The site is also within 1km of a secondary school but it is not within 450m of a primary school. As such, an uncertain minor positive effect is expected for this site in relation to this aspect of the SA objective. The effects in relation to education facilities are uncertain as existing capacity to accommodate pupils at facilities in the District is currently unknown. It is also noted that the nearest secondary school at Christs Hospital School is a private facility which may not be used by all residents. Overall, an uncertain significant positive effect is expected in relation to this SA objective.
SA objective 3: Inclusive communities	0	The site is located on greenfield land and is not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or positive impacts relating to social deprivation. As such, a negligible effect is expected in relation to this SA objective.
SA objective 4: Crime	0?	The potential for the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.
SA objective 5: Health	+	The site is within 720m of an area of open space or sports facility but is not within 720m of a healthcare facility. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	-?	The site is adjacent to an area of ancient woodland, which is also a Local Wildlife Site (Sparrow Copse). The site is located within a SSSI IRZ but it does not identify residential planning applications as a potential risk. The site is also located within the Bat sustenance zone. As such, a minor negative effect is expected. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.

SA Objective	SA129 (residential use)	Justification
	SA1; use)	
SA objective 7: Landscapes and townscapes	?	The area in which the site is located has been identified as having low-moderate landscape capacity for medium scale housing delivery and therefore a significant negative effect is expected. The effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which Is not yet known.
SA objective 8: Historic environment	0?	The Council's heritage assessment work for site SA129 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with the development site. While the heritage assets considered with regards to the site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. The site does not contain any Archaeological Notification Areas or Archaeological Sites. The effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development.
SA objective 9: Efficient land use	-	The site is located on greenfield land which is classed as Grade 4 agricultural quality. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	The whole of the site is located within a Mineral Safeguarding Area (MSA). There is potential for development to result in the sterilisation of mineral resources. As such, a significant negative effect is expected. 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.
SA objective 11: Water resources	0	The site is not located within a Source Protection Zone and therefore a negligible effect is expected in relation to this SA objective.
SA objective 12: Flooding	-	The site is located entirely in flood zone 1, however, it is on greenfield land. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 13: Transport	++	The site is within 1.8km of a railway station (Christ's Hospital railway station) and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	The site is not located within or directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	++	The site is within 1.8km of a railway station and therefore a significant positive effect is expected in relation to this SA objective.

SA Objective		Justification
	SA129 (residential use)	
SA objective 16: Economic growth	0	The site will deliver residential uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities	++	The site will deliver residential uses as part of development. The site is located within 1.8km of a Key Employment Area and is within 720m of Horsham town. Therefore, a significant positive effect is expected in relation to this SA objective.

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### Cowfold

SA Objective						Justification
	SA076/SA083 (residential use)	SA366 (residential use)	SA609 (residential use)	SA610/SA611 (residential use)	GA017 (gypsy and traveller use)	
SA objective 1: Housing	++	++	++	++	++	Sites SA076/SA083, SA366, SA609 and SA610/SA611 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective. Site GA016 is considered for gypsy and traveller use and would help to meet the need for that specific use in the District. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	+?	+?	+?	+?	-?	Sites SA076/SA083, SA366, SA609 and SA610/SA611 are located within 720m of the built-up area of the Medium Village of Cowfold and therefore a minor positive effect is expected. Site GA017 is not located within 720m of the built-up area of Henfield and therefore a minor negative effect is expected in relation to this SA objective. Sites SA076/SA083, SA366, SA609 and SA610/SA611 are located within 450m of a primary school and therefore an uncertain minor positive effect is expected for the sites in relation to this aspect of the SA objective. Site GA017 is not located within 450m of a primary school or within 1km of a secondary school and therefore an uncertain minor negative effect is expected is expected for this site in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown. Overall, an uncertain minor positive effect is expected for sites SA076/SA083, SA366, SA609 and SA610/SA611. An uncertain minor negative effect only is expected for site GA017.
SA objective 3: Inclusive communities	0	0	0	0	0	All the sites are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where it is most likely to be prevalent in the District. As such, a negligible effect is expected for these sites.

SA Objective	SA076/SA083 (residential use)	SA366 (residential use)	SA609 (residential use)	SA610/SA611 (residential use)	GA017 (gypsy and traveller use)	Justification
SA objective 4: Crime	0?	0?	0?	0?	0?	The potential for the site to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.
SA objective 5: Health	++	++	++	++		Sites SA076/SA083, SA366, SA609 and SA610/SA611 are located within 720m of an area of open space or sports facility and a healthcare facility. Therefore, a significant positive effect is expected. Site GA017 is not located within 720m of a healthcare facility or an area of open space or sports facility. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	0?	-?	0?	0?	-?	Sites SA076/SA083, SA609 and SA610/SA611 are within an SSSI IRZ but it does not identify residential planning applications as a potential risk. These sites are more than 400m from any internationally, nationally, or locally designated biodiversity or geodiversity sites. Therefore, a negligible effect is expected in relation to this SA objective. Sites SA366 and GA017 are also located within an SSSI IRZ but it does not identify residential planning applications as a potential risk. These sites are located within 400m of an area of ancient woodland and/or local wildlife site. As such, a minor negative effect is expected in relation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	?	-?	?	Sites SA076/SA083 and SA609 are located within an area identified as having low-moderate landscape capacity for small scale housing. Site SA366 is located within an area identified as having low-moderate capacity for medium scale housing. Therefore, a significant negative effect is expected in relation to this SA objective. Site GA017 is located within an area identified as having no/low landscape capacity for small scale housing and therefore a significant negative effect is expected in relation to this SA objective.

SA Objective	SA076/SA083 (residential use)	SA366 (residential use)	SA609 (residential use)	SA610/SA611 (residential use)	GA017 (gypsy and traveller use)	Justification Site SA610/SA611 is located within an area identified as having moderate landscape capacity for small scale housing.
						Therefore, a minor negative effect is expected in relation to this SA objective. In all cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment						The Council's heritage assessment work for site SA076/SA083 concluded that the development of the site has the potential to impact upon the significance of the Cowfold Conservation Area as well as Grade II Listed Buildings Brookhill Cottage, Brookhill House and Barrington House. The assessment, however, concluded that while these heritage assets have high sensitivity to change, the magnitude of the effects are expected to be low and the effects relating to the significance of the assets are not likely to be significant. Overall a minor negative effect is expected in relation to this SA objective for site SA076/SA083.
	-?	?	?	?	0?	The Council's heritage assessment work for site SA366 concluded that the development of the site would result in significant effects in relation to Cowfold Conservation Area. There is also potential for effects in relation to Grade II Listed Building Allfreys, although the magnitude of the effects are expected to be low and overall, impacts relating to the significance of the asset are expected to be less substantial. Overall a significant negative effect is expected in relation to this SA objective for site SA366.
						The Council's heritage assessment work for site SA609 concluded that the development of the site would result in significant effects in relation to Cowfold Conservation Area. Overall a significant negative effect is expected in relation to this SA objective for site SA609.
						The Council's heritage assessment work for site SA610/622 concluded that the development of the site would result in significant effects in relation to Cowfold Conservation Area as well as Grade II Listed Building Potters Cottage. There is also potential for effects in relation to Grade I Listed Building Parish Church of St Peter, although the magnitude of the effects are expected to be low and overall, impacts relating to the significance of the asset are expected to be less substantial. Overall a significant negative effect is expected in relation to this SA objective for site SA610/SA611.

SA Objective	SA076/SA083 (residential use)	SA366 (residential use)	SA609 (residential use)	SA610/SA611 (residential use)	GA017 (gypsy and traveller use)	Justification
						The Council's heritage assessment work for site GA017 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with the development site. While the heritage assets considered with regards to the site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. The site does not contain any Archaeological Notification Areas or Archaeological Sites. In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development.
SA objective 9: Efficient land use	?	?	?	?	?	All the sites are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if this land is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	?	?	?	?	All the sites are located within a Mineral Safeguarding Area (MSA) and therefore there is potential for development to result in the sterilisation of or loss of access to mineral resources. As such, a significant negative effect is expected in relation to this SA objective. 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.
SA objective 11: Water resources	0	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	-	-	-	-	All the sites are located entirely or mainly within flood zone 1. However, they are all on greenfield land. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 13: Transport	+	+	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.

SA Objective	SA076/SA083 (residential use)	SA366 (residential use)	SA609 (residential use)	SA610/SA611 (residential use)	GA017 (gypsy and traveller use)	Justification
SA objective 14: Air quality						All the sites are located within or directly connected via a road to the Horsham Cowfold AQMA. Therefore, a significant negative effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	+	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	0	0	0	0	All the sites will deliver residential or gypsy and traveller uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities	+	+	+	+		All the sites will deliver residential or gypsy and traveller uses as part of development. Sites SA076/SA083, SA366, SA609 and SA610/SA611 are located within 1.8km of a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective.
						Site GA017 is located more than 2.7km from a Key Employment Area and is not within 720m of Horsham town. Therefore, a significant negative effect is expected in relation to this SA objective.

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### Henfield

SA Objective	SA005 (residential use)	SA011 (residential use)	SA065 (residential use)	SA317 (residential use)	SA504 (residential use)	SA686 (residential use)	GA011 (gypsy and traveller use)	Justification
SA objective 1: Housing	++	++	++	++	++	++	++	Sites SA005, SA011, SA065, SA317, SA504 and SA686 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective. Site GA011 is considered for gypsy and traveller use and would help meet the need for this type of use in the District. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	++/-?	++/-?	++/-?	++/-?	++/-?	++	-?	<ul> <li>Sites SA005, SA011, SA065, SA317, SA504 and SA686 are located within 720m of the built-up area of Henfield (a Small Town/Larger Village) and therefore a significant positive effect is expected in relation to this aspect of the SA objective. Site GA011 is not located within 720m of the built-up area of Henfield and therefore a minor negative effect is expected in relation to this aspect of the SA objective.</li> <li>However, only site SA686 is within 450m of a primary school. Furthermore, none of the sites are within 1km of a secondary school. Therefore, an uncertain minor negative effect is expected for sites SA006, SA011, SA065, SA317, SA504 and GA011 in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown.</li> <li>Overall, a mixed significant positive and uncertain minor negative effect is expected for sites SA006, SA011, SA065, SA317 and SA504 and a significant positive effect alone is expected for site SA686. An uncertain minor negative effect only is expected for site GA011.</li> </ul>
SA objective 3: Inclusive communities	0	0	0	0	0	0	+	Sites SA005, SA011, SA065, SA317, SA504 and SA686 are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where they are most likely to be prevalent. As such, a negligible effect is expected for these sites.

SA Objective	SA005 (residential use)	SA011 (residential use)	SA065 (residential use)	SA317 (residential use)	SA504 (residential use)	SA686 (residential use)	GA011 (gypsy and traveller use)	Justification
								Site GA011 is not located within an IMD 40% most deprived area but is located on brownfield land and therefore development may contribute towards regeneration in the District. As such, a minor positive effect is expected for the site in relation to this SA objective.
SA objective 4: Crime	0?	0?	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the sites in relation to this SA objective.
SA objective 5: Health	++	++	++	+	+	++	-	Sites SA005, SA011, SA065 and SA686 are located within 720m of a healthcare facility and an area of open space or sports facility. Therefore, a significant positive effect is expected in relation to this SA objective. Sites SA317 and SA504 are located within 720m of an area of open space or sports facility but are not within 720m of a healthcare facility. Therefore, a minor positive effect is expected for these sites in relation to this SA objective. Site GA011 is not located within 720m of a healthcare facility or an area of open space or sports facility. Therefore, a minor positive effect is expected for these sites in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	0?	-?	0?	?	-?	-?	-?	Sites SA005 and SA065 are not located within an SSSI IRZ which identifies residential development as a potential risk, and are more than 400m from an internationally, nationally, or locally designated biodiversity or geodiversity site. Therefore, a negligible effect is expected for this site in relation to this SA objective. Sites SA011, SA504, SA686 and GA016 are also located within an SSSI IRZ that does not identify residential planning applications as a risk. However, these sites are located within 400m of a Local Wildlife Site or an area of ancient woodland. Therefore, a minor negative effect is expected in relation to this SA objective.

SA Objective	SA005 (residential use)	SA011 (residential use)	SA065 (residential use)	SA317 (residential use)	SA504 (residential use)	SA686 (residential use)	GA011 (gypsy and traveller use)	Justification
								Site SA317 is located within an SSSI IRZ that identifies residential planning applications as a potential risk. Therefore, a significant negative effect is expected. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	0?	?	?	?	?	Sites SA005, SA317 and SA686 are located within an area identified as having low-moderate landscape capacity for medium scale housing. Therefore, a significant negative effect is expected in relation to this SA objective. Although sites SA011 and SA504 are located partly within the built-up area of Henfield, they contain land which is located within an area identified as having no/low landscape capacity for medium scale housing. Therefore, a significant negative effect is also expected for these sites in relation to this SA objective. Site GA011 does not lie within an area which has been assessed as part of the landscape character assessment work and therefore an uncertain effect is expected in relation to this SA objective. Site SA065 is located entirely within the built-up area of Henfield. Therefore, a negligible effect is expected. In all cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment	-?	?	0?	?	?	0?	0?	The Council's heritage assessment work for site SA005 concluded that the development of the site is unlikely to have effects in relation to any designated heritage assets. This work suggested that an assessment of any non-designated heritage assets adjacent to the site should be undertaken. Furthermore, it is also stated that there is potential for as yet unknown archaeological remains within the site. Overall a minor negative effect is expected in relation to this SA objective for site SA005.

SA Objective	SA005 (residential use)	SA011 (residential use)	SA065 (residential use)	SA317 (residential use)	SA504 (residential use)	SA686 (residential use)	GA011 (gypsy and traveller use)	Justification
								The Council's heritage assessment work for site SA011 concluded that the development of the site would result in significant effects in relation to Grade II Listed Building Backsettown. Overall a significant negative effect is expected in relation to this SA objective for site SA011. The Council's heritage assessment work for site SA317 concluded that the development of the site would result in significant effects in relation to Grade II Listed Building Camilla Cottage (Dears Farmhouse). Overall a significant negative effect is expected in relation to this SA objective for site SA317. The Council's heritage assessment work for site SA504 concluded that the development of the site would result in significant negative effect is expected in relation to this SA objective for site SA317. The Council's heritage assessment work for site SA504 concluded that the development of the site would result in significant effects in relation to Grade II Listed Building Stipenhoke. Overall a significant negative effect is expected in relation to this SA objective for site SA504. The Council's heritage assessment work for sites SA065, SA686 and GA011 concluded that the designated heritage assessment work for sites SA065, SA686 and GA011 concluded that the designated heritage assess within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with each development site. While the heritage assets considered with regards to sites SA065, SA686 and GA011 were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. The sites do not contain any Archaeological Notification Areas or Archaeological Sites. In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development.
SA objective 9: Efficient land use		?	?		?	?	+	Sites SA005 and SA317 are located on greenfield land which is classed as Grade 2 agricultural quality. Therefore, a significant negative effect is expected in relation to this SA objective. Sites SA011, SA065, SA504 and SA686 are located on greenfield land which is classes as Grade 3 agricultural quality, although it is noted that portions of land within site SA686 are of Grade 2 and Grade 4

SA Objective	SA005 (residential use)	SA011 (residential use)	SA065 (residential use)	SA317 (residential use)	SA504 (residential use)	SA686 (residential use)	GA011 (gypsy and traveller use)	Justification
								quality. However, it is not known if the Grade 3 land within these sites is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective.
								Site GA011 is located on brownfield land and therefore a minor positive effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	?	?	?	?	?	?	The whole of sites SA005, SA011, SA065, SA504, SA686 and GA011 are located within a Mineral Safeguarding Area (MSA) and approximately half of site SA317 is located within an MSA. There is potential for development to result in the sterilisation of or loss of access to mineral resources. As such, a significant negative effect is expected for these sites. 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.
SA objective 11: Water resources	0	0	0	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	-	-	-	-	-	0	Sites SA005, SA011, SA065, SA317, SA504 and SA686 are located entirely within flood zone 1. However, they are all on greenfield land. Therefore, a minor negative effect is expected. Site GA011 is also located entirely within flood zone 1 and is on brownfield land. Therefore, a negligible effect is expected.
SA objective 13: Transport	+	+	+	+	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop and/or cycle route. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	0	0	0	0	0	None of the sites are located within or are directly connected via a road to an AQMA. The Cowfold AQMA is located along the A281 but more than 5.0km to the north of site SA686. Therefore, a negligible effect is expected in relation to this SA objective.

SA Objective	SA005 (residential use)	SA011 (residential use)	SA065 (residential use)	SA317 (residential use)	SA504 (residential use)	SA686 (residential use)	GA011 (gypsy and traveller use)	Justification
SA objective 15: Climate change	+	+	+	+	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop and/or cycle route. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	0	0	0	0	0	0	All the sites are being considered for residential or gypsy and traveller use only. The specific location of these types of sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities	+	+	-	-	+	-	-	All the sites are being considered for residential or gypsy and traveller use only. Sites SA005, SA011 and SA504 are located within 1.8km of a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective. Sites SA065, SA317, SA686 and GA011 are located between 1.8km and 2.7km from a Key Employment Area and are not within 720m of Horsham town. Therefore, a minor negative effect is expected in relation to this SA objective.

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### Horsham

SA Objective	SA074 (residential use)	SA191 (employment use)	SA363 (employment use)	SA568b (residential use)	SA568a (employment use)	SA568 (residential use)	SA570 (employment use)	SA325 (employment use)	Justification
SA objective 1: Housing	++	0	0	++	0	++	0	0	The sites being considered for residential use (SA074, SA568 and SA568b) have capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective. Sites SA191, SA325, SA363, SA568a, SA570 are being considered for employment use without any residential use. A negligible effect is therefore expected for these five options in relation to this SA objective.
SA objective 2: Access to services and facilities	++?	-?	-?	++/-?	++	++/-	++	++	All of the sites apart from sites SA191 and SA363 are within 720m of the built-up area of the Main Town of Horsham and therefore a significant positive effect is expected in relation to this SA objective. Site SA074 is also within 450m of a primary school and within 1km of secondary school. Sites SA568 and SA568b are not within close proximity to either a primary school or secondary school. As such, an uncertain minor negative effect is expected in combination with the significant positive effect identified for SA568 and SA568b, which would provide residential use development both. The effects in relation to education facilities for the residential sites are uncertain as existing capacity of education facilities is currently unknown. As sites SA191 and SA363 are not within 720m of the built-up areas of any of the settlements an uncertain minor negative effect is expected in relation to this SA objective.
SA objective 3: Inclusive communities	0	0	0	0	0	0	0	0	All of the sites are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to help address social deprivation. As such, a negligible effect is expected for these sites in relation to this SA objective.

SA Objective	SA074 (residential use)	SA191 (employment use)	SA363 (employment use)	SA568b (residential use)	SA568a (employment use)	SA568 (residential use)	SA570 (employment use)	SA325 (employment use)	Justification
SA objective 4: Crime	0?	0?	0?	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for all sites in relation to this SA objective.
SA objective 5: Health	+	-	-	+	+	+	+	+	Sites SA074, SA325, SA568a, SA568b, SA568 and SA570 are not located within 720m of a healthcare facility but are within 720m of an area of open space or sports facility. Therefore, a minor positive effect is expected in relation to this SA objective. Sites SA191 and SA363 are not located within 720m of a healthcare facility or an area of open space or sports facility. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	?	-?	-?	-?	-?	-?	-?	-?	Site SA074 is located within 400m of ancient woodland and is within a SSSI IRZ that identifies residential planning applications as a potential risk. As such, a significant negative effect is expected in relation to this SA objective. Sites SA191, SA363, SA568a, SA568b, SA568, SA570 and SA325 are located within a SSSI IRZ which does not identify the use for which these options would be allocated as a potential risk. All of these sites however lie within 400m of a locally designated biodiversity or geodiversity site or area of ancient woodland and therefore a minor negative effect is expected in relation to this SA objective. In all cases, the effect identified is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	?	-?	-?	-?	?	?	The area in which sites SA074, SA363 and SA570 are mostly located has been identified as having no/low landscape capacity for medium scale housing development (or employment) and therefore a significant negative effect is expected in relation to this SA objective.

SA Objective	SA074 (residential use)	SA191 (employment use)	SA363 (employment use)	SA568b (residential use)	SA568a (employment use)	SA568 (residential use)	SA570 (employment use)	SA325 (employment use)	Justification
									The area in which site SA325 is located has been identified as having low-moderate landscape capacity for large scale employment development and therefore a significant negative effect is expected in relation to this SA objective.
									The area in which sites SA568a, SA568b and SA568 are located has been identified as having moderate landscape capacity for medium scale housing or employment development and therefore a minor negative effect is expected in relation to this SA objective for these sites.
									Site SA191 does not lie within an area which has been assessed as part of the landscape character assessment work and therefore an uncertain effect is expected in relation to this SA objective.
									In all cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment									The Council's heritage assessment work for site SA074 concluded that the development of the site has the potential to result in harm to the significance of Grade II Listed Building Falcon Lodge. The assessment, however, concluded that the magnitude of the effects are expected to be low and overall the impacts are only potentially significant. Overall a minor negative effect is expected in relation to this SA objective for site SA074.
	-?	0?	0?	0?	0?	0?	0?	?	The Council's heritage assessment work for sites SA191, SA363, SA568a, SA568b, SA568 and SA570 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with each development site. While the heritage assets considered with regards to the site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. None of these sites contain an Archaeological Notification Area or an Archaeological Site. A negligible effect is expected in relation to this SA objective for sites SA570, SA191, SA363, SA568a, SA568b, SA568 and SA570.

SA Objective	SA074 (residential use)	SA191 (employment use)	SA363 (employment use)	SA568b (residential use)	SA568a (employment use)	SA568 (residential use)	SA570 (employment use)	SA325 (employment use)	Justification
									Site SA325 was not assessed through the Council heritage impact assessment work and therefore an uncertain effect is recorded in relation to this SA objective.
									In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development.
SA objective 9: Efficient land use	-	-	-	?	?	?		?	Sites SA325, SA568a, SA568b and SA568 are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if it is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective. Site SA074 is located on greenfield land which is classed as urban land and sites SA191, SA363 and SA570 are located on greenfield land which is classed as Grade 4 agricultural land. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	0	?	?	?	?	?	-?	?	Site SA570 is located within 250m of a Mineral Safeguarding Area (MSA), sites SA325, SA568a, SA568b and SA568 fall within two MSAs and sites SA191 and SA363 fall within one MSA. As such, a minor negative effect is expected for site SA570 and a significant negative effect is expected for sites SA191, SA325, SA363, SA568a and SA568b. The effects are 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. Site SA074 is located over 250m from any MSA and therefore a negligible effect is expected in relation to this SA objective.
SA objective 11: Water resources	0	0	0	0	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	-	-	-	-	-	-	-	Sites SA074, SA191, SA325, SA363, SA568a, SA568b, SA568 and SA570 are located entirely or mainly within flood zone 1. A watercourse (Boldings Brook) passes through the central portion of site SA325 from

SA Objective	SA074 (residential use)	SA191 (employment use)	SA363 (employment use)	SA568b (residential use)	SA568a (employment use)	SA568 (residential use)	SA570 (employment use)	SA325 (employment use)	Justification
									north to south. Land directly adjacent to this watercourse is located in flood zone 2 and 3. However, the majority of the site is still located within flood zone 1.
									All these sites lie on greenfield land. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 13: Transport	++	++	++	++	++	++	++	++	All the sites are within 1.8km of a railway station (Horsham or Warnham railway station) and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	0				0	0	Sites SA568a, SA568b and SA568 have the potential to lead to increased levels of vehicular traffic within the Hazelwick AQMA in Crawley, via the A264. Therefore, a significant negative effect is expected in relation to this SA objective. Sites SA074, SA191, SA325, SA363, and SA570 are not located within and do not connect via an existing road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	++	++	++	++	++	++	++	++	All the sites are within 1.8km of a railway station and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	+	+	0	+	0	+	++	Sites SA074, SA568 and SA568b will deliver residential use only. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective. Sites SA191, SA568a and SA570 are expected to deliver new employment floorspace as part of development. As these sites are expected to deliver less than 5ha of employment land a minor positive effect is expected in relation to this SA objective. Site SA325 is expected to have capacity to deliver more

SA Objective	SA074 (residential use)	SA191 (employment use)	SA363 (employment use)	SA568b (residential use)	SA568a (employment use)	SA568 (residential use)	SA570 (employment use)	SA325 (employment use)	Justification
									<ul><li>than 5ha of employment land. Therefore, a significant positive effect is expected in relation to this SA objective.</li><li>Site SA363 is also expected to deliver less than 5ha of employment floorspace. The Graylands Estate is in employment use and the allocation would potentially provide opportunity to expand the site. Therefore, a minor positive effect is expected in relation to this SA objective.</li></ul>
SA objective 17: Access to employment opportunities	++	++	++	++	++	++	++	++	Sites SA074, SA568 and SA568b will deliver residential uses as part of development. They are located within 1.8km of Key Employment Areas and within 720m of Horsham town. Therefore, a significant positive effect is expected in relation to this SA objective. The remaining sites will deliver employment uses as their development. These sites are located within 1.8km of a train station. Therefore, a significant positive effect is expected in relation to this SA objective.

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### Lower Beeding

SA Objective	SA567 (residential use)	SA575 (residential use)	SA584 (residential use)	SA657 (residential use)	SA729 (residential use)	Justification
SA objective 1: Housing	++	++	+	++	++	Sites SA567, SA575, SA657 and SA729 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective. However, site SA584 has the capacity for fewer than 10 dwellings and therefore a minor positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	+?	+?	+?	+?	+?	All the sites are located within 720m of the built-up area of the Smaller Village of Lower Beeding and therefore an uncertain negligible effect is expected in relation to this aspect of the SA objective. None of the sites are located within 1km of secondary school. However, they are all located within 450m of primary school and therefore a minor positive effect is expected for the site in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown. Overall, an uncertain minor positive effect is expected for the sites in relation to this SA objective.
SA objective 3: Inclusive communities	0	0	0	0	0	Sites SA567, SA575, SA584 are all entirely (or mostly for SA657 and SA729) located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or address social deprivation in areas of the District which are most affected by this issue. As such, a negligible effect is expected for these sites in relation to this SA objective.
SA objective 4: Crime	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the sites in relation to this SA objective.
SA objective 5: Health	+	+	+	+	+	All the sites are located within 720m of an area of open space or sports facility but are not within 720m of a healthcare facility. Therefore, a minor positive effect is expected.

SA Objective	SA567 (residential use)	SA575 (residential use)	SA584 (residential use)	SA657 (residential use)	SA729 (residential use)	Justification
SA objective 6: Biodiversity and geodiversity	-?	-?	-?	-?	-?	All the sites are located within an SSSI IRZ, but it does not identify residential planning applications as a risk. However, the sites are located within 400m of an area of ancient woodland. Therefore, a minor negative effect is expected. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	?	?	?	The areas in which the majority of all sites considered are located have been identified as having low-moderate landscape capacity for small scale housing development. It is recognized that a small part of site SA575 is located within the built-up area of Lower Beeding. Therefore, a significant negative effect is expected for all sites in relation to this SA objective. In all cases, the effects are uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which Is not yet known.
SA objective 8: Historic environment	-?	-?	?	0?	0?	The Council's heritage assessment work for site SA567 concluded that the development of the site has the potential to result in harm to the significance of Grade II Listed Buildings Parish Church of the Holy Trinity and Lower Beeding War Memorial. The assessment, however, concluded that the magnitude of the effects are expected to be low and overall the impacts are only potentially significant. Overall a minor negative effect is expected in relation to this SA objective for site SA567. The Council's heritage assessment work for site SA575 concluded that the development of the site has the potential to result in harm to the significance of Grade II Listed Buildings Parish Church of the Holy Trinity, Lower Beeding War Memorial and The Plough Inn. The assessment, however, concluded that the magnitude of the effects are expected to be low and overall the impacts are only potentially significant. Overall a minor negative effect is expected in relation to this SA objective for site SA575. The Council's heritage assessment work for site SA584 concluded that the development of the site would result in significant effects in relation to Grade II Listed Building Parish Church of the Holy Trinity. Effects of a low magnitude were identified in relation to the Grade II Listed Buildings Lower Beeding War Memorial and The Plough Inn, meaning overall only potentially significant to the heritage assess. Overall a significant negative effect is expected in relation to this SA objective for site SA584.

SA Objective	SA567 (residential use)	SA575 (residential use)	SA584 (residential use)	SA657 (residential use)	SA729 (residential use)	Justification
						The Council's heritage assessment work for sites SA657 and SA729 concluded that the development of the site is unlikely to have effects in relation to any designated heritage assets. The assessment does not identify the potential archaeological remains within the sites, including Archaeological Notification Areas or Archaeological Sites. Overall a negligible effect is expected in relation to this SA objective for sites SA657 and SA729. In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development
SA objective 9: Efficient land use	?	?	?	?	?	Sites SA567, SA575, SA584, SA657 and SA729 are all located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if this land is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	0	0	0	0	0	All of the sites are located over 250m from a Mineral Safeguarding Areas (MSA). As such, a negligible effect is expected.
SA objective 11: Water resources	0	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	-	-	-	-	Sites SA567, SA575, SA584, SA657 and SA729 are located entirely within flood zone 1. However, they are all on greenfield land. Therefore, a minor negative effect is expected.
SA objective 13: Transport	+	+	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	0	0	0	None of the sites are located within or are directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	+	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.

SA Objective	SA567 (residential use)	SA575 (residential use)	SA584 (residential use)	SA657 (residential use)	SA729 (residential use)	Justification
SA objective 16: Economic growth	0	0	0	0	0	All the sites will deliver residential uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities						All the sites will deliver residential uses as part of development. They are all located more than 2.7km from a Key Employment Area and are not within 720m of Horsham town. Therefore, a significant negative effect is expected in relation to this SA objective.

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### Partridge Green

SA Objective	SA063 (employment uses)	SA274 (residential use)	SA320 (residential use)	SA433 (residential use)	SA634 (residential use)	Justification
SA objective 1: Housing	0	++	++	++	++	Sites SA274, SA320, SA433 and SA634 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective. Site SA063 is being considered for employment use only and as such a negligible effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	÷	+?	+/-?	+?	+/-?	All the sites are located within 720m of the built-up area of Partridge Green (a Medium Village) and therefore a minor positive effect is expected. Sites SA274 and SA433 are located within 450m of a primary school and therefore an uncertain minor positive effect is expected for the sites in relation to this aspect of the SA objective. Sites SA320 and SA634 are not located within 450m of a primary school or within 1km of a secondary school and therefore an uncertain minor negative effect is expected for the sites in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown. Overall, a minor positive effect is expected for sites SA063, SA274 and SA433 in relation to this SA objective. The minor positive effects expected for sites SA274 and SA433 are uncertain given that they are considerate of the proximity and accessible of education facilities for new residents. A mixed minor positive and uncertain minor negative effect is expected for sites SA320 and SA634 in relation to this SA objective.
SA objective 3: Inclusive communities	0	0	0	0	0	All the sites are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where they are most likely to be prevalent. As such, a negligible effect is expected for these sites.

SA Objective	SA063 (employment uses)	SA274 (residential use)	SA320 (residential use)	SA433 (residential use)	SA634 (residential use)	Justification
SA objective 4: Crime	0?	0?	0?	0?	0?	The potential for these sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected in relation to this SA objective.
SA objective 5: Health	++	++	++	++	++	All the sites are located within 720m of an area of open space or sports facility and a healthcare facility. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	?	0?	?	?	?	Site SA274 is not located within an SSSI IRZ, and is more than 400m from an internationally, nationally, or locally designated biodiversity or geodiversity site. Therefore, a negligible effect is expected. Sites SA320, SA433 and SA634 are located within an SSSI IRZ that identifies residential planning applications as a potential risk. Therefore, a significant negative effect is expected in relation to this SA objective. Site SA063 is located within an SSSI IRZ that flags large non-residential developments outside existing settlements as a potential risk. The site is also within 400m of an area of ancient woodland. Therefore, a significant negative effect is expected in relation to this SA objective. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	-?	?	-?	-?	Sites SA274, SA433 and SA634 are located within an area identified as having moderate landscape capacity for small scale housing. Site SA063 is located within an area identified as having moderate-high landscape capacity for small scale housing. Therefore, a minor negative effect is expected in relation to this SA objective. Site SA320 is located within an area identified as having no/low landscape capacity for medium scale housing. Therefore, a significant negative effect is expected in relation to this SA objective. The landscape capacity of the area in which site SA063 is located has not been assessed for employment development and therefore an uncertain effect is expected in relation to this SA objective.

SA Objective	SA063 (employment uses)	SA274 (residential use)	SA320 (residential use)	SA433 (residential use)	SA634 (residential use)	Justification
						In all cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment						The Council's heritage assessment work for sites SA063 and SA320 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with each development site. While the heritage assets considered with regards to the site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. Neither site contains an Archaeological Notification Area or an Archaeological Site.
	0?	?	0?	?	?	effects in relation to Grade II Listed Buildings Beauchamps, Barn to north of Beauchamps and Blanches. Overall a significant negative effect is expected in relation to this SA objective for site SA274.
				·		The Council's heritage assessment work for site SA433 concluded that the development of the site would result in significant effects in relation to Grade II Listed Building Old Priors. Overall a significant negative effect is expected in relation to this SA objective for site SA433.
						The Council's heritage assessment work for site SA634 concluded that the development of the site could adversely affect the setting of Grade II Listed Building Keepers Mead on Greentree Lane. Overall a significant negative effect is expected in relation to this SA objective for site SA634.
						In all cases, the effect is uncertain at this stage as it is dependent on the exact scale, design and layout of the new development.
SA objective 9: Efficient land use	?	?	?	?	?	All the sites are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if it is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective.

SA Objective	SA063 (employment uses)	SA274 (residential use)	SA320 (residential use)	SA433 (residential use)	SA634 (residential use)	Justification
SA objective 10: Mineral resources	?	?	?	?	?	All the sites are located within Mineral Safeguarding Areas (MSAs) and therefore there is potential for development to result in the sterilisation of or loss of access to mineral resources. As such, a significant negative effect is expected for the sites. 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.
SA objective 11: Water resources	0	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	-	-	-	-	All of the sites are located entirely within flood zone 1. However, they are all on greenfield land. Therefore, a minor negative effect is expected.
SA objective 13: Transport	+	+	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop and/or cycle route. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	0	0	0	None of the sites are located within or are directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	+	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop and/or cycle route. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	+	0	0	0	0	Sites SA274, SA320, SA433 and SA634 are being considered for residential use only. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
		Ŭ				Site SA063 is expected to deliver less than 5ha of employment floorspace (approximately 3.9ha). It is recognised that the development of the site would help to provide an improved quality of employment floorspace in the District. Therefore, a minor positive effect is expected.

SA Objective	SA063 (employment uses)	SA274 (residential use)	SA320 (residential use)	SA433 (residential use)	SA634 (residential use)	Justification
SA objective 17: Access to employment opportunities	+	+	+	+	+	Sites SA274, SA320, SA433 and SA634 are being considered for residential use only. They are all located within 1.8km of a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective. Site SA063 is being considered for employment use only and is not located within 1.8km of a railway station but is within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.

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### Pulborough and Codmore Hill

SA Objective	SA112 (residential use)	SA385 (employment use)	SA445 (residential use)	SA556 (residential use)	SA588 (residential use)	SA830 (employment use)	GA007 (gypsy and traveller use)	GA015 (gypsy and traveller use)	Justification
SA objective 1: Housing									The sites SA112, SA445, SA556 and SA588 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective. Site SA588 has capacity for less than 10 dwellings and therefore a minor positive effect is expected in relation to this SA objective.
	++	0	++	++	++	0	++	++	Sites SA385 and SA830 will deliver employment use only and therefore a negligible effect is expected.
									The sites (GA007 and GA015) that have been considered for gypsy and traveller use will all help to meet the need for this use in the District and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities									Sites SA112, SA385, SA556, SA588, SA830 and GA007 are located within 720m of the built-up area of Pulborough and Codmore Hill (a Small Town/Larger Village) and therefore a significant positive effect is expected. Site GA015 is not located within 720m of the built-up area of Pulborough and Codmore Hill and therefore a minor negative effect is expected.
	++/-?	++	++?	++?	++?	++	++/-?	-?	Sites SA445, SA556 and SA588 are not located within 1km of a secondary school but they are located within 450m of a primary school. As such, an uncertain minor positive effect is expected for the sites in relation to this aspect of the SA objective. Sites SA112, GA007 and GA015 are not located within 1km of a secondary school or within 450m of a primary school and therefore an uncertain minor negative effect is expected in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown.
									Overall, an uncertain significant positive effect is expected for sites SA445, SA556 and SA588 and a mixed significant positive and uncertain minor negative effect is expected for sites SA112

SA Objective	SA112 (residential use)	SA385 (employment use)	SA445 (residential use)	SA556 (residential use)	SA588 (residential use)	SA830 (employment use)	GA007 (gypsy and traveller use)	GA015 (gypsy and traveller use)	Justification
									and GA007 in relation to this SA objective. An overall uncertain minor negative effect is expected for site GA015. As impacts relating to employment sites are not considerate of the proximity to education facilities a significant positive effect alone is expected for sites SA385 and SA830.
SA objective 3: Inclusive communities	0	0	0	0	0	0	+	+	Sites SA112, SA385, SA445, SA556, SA588 and SA830 are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where it is most likely to be prevalent. As such, a negligible effect is expected for these sites. Sites GA007 and GA015 are not located within an IMD 40% most deprived area but are located on brownfield land and therefore development may contribute towards regeneration in the District. As such, a minor positive effect is expected for the site in relation to this SA objective.
SA objective 4: Crime	0?	0?	0?	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected in relation to this SA objective.
SA objective 5: Health	+	+	++	++	+	+	+	-	Site GA015 is not located within 720m of a healthcare facility or an area of open space or sports facility. Therefore, a minor negative effect is expected in relation to this SA objective. Sites SA112, SA385, SA588, SA830 and GA007 are located within 720m of an area of open space or sports facility but are not within 720m of a healthcare facility. Therefore, a minor positive effect is expected in relation to this SA objective. Sites SA445 and SA556 are located within 720m of a healthcare facility and an area of open space or sports facility. Therefore, a significant positive effect is expected in relation to this SA objective.

SA Objective	SA112 (residential use)	SA385 (employment use)	SA445 (residential use)	SA556 (residential use)	SA588 (residential use)	SA830 (employment use)	GA007 (gypsy and traveller use)	GA015 (gypsy and traveller use)	Justification
SA objective 6: Biodiversity and geodiversity	?	?	?	?	?	?	-?	0?	Sites SA112, SA445, SA556 and SA588 are located within an SSSI IRZ that identifies residential planning applications as a potential risk. Therefore, a significant negative effect is expected. Site SA385 and SA830 is located within an SSSI IRZ that identifies potential risks which could be associated with employment development. These sites are also located within 400m of an area of ancient woodland and is within the Bat sustenance zone. Therefore, a significant negative effect is expected. Site GA007 is located within an SSSI IRZ, but it does not identify residential planning applications as a risk. However, it is located within 400m of an area of ancient woodland and/or a local wildlife site. Therefore, a minor negative effect is expected in relation to this SA objective. Site GA015 is located within a SSSI IRZ but it does not identify risks related to residential development. It is also more than 400m from any internationally, nationally, or locally designated biodiversity or geodiversity sites. Therefore, a negligible effect is expected in relation to this SA objective. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	?	?	?	?	?	?	The majority of the area in which sites SA112, SA556 and GA007 are located have been identified as having no/low landscape capacity for small and medium scale housing development and therefore a significant negative effect is expected in relation to this SA objective. It is recognized that a small part of site SA112 is within the built-up area of Pulborough and Codmore Hill. Site SA445 is located partly within the built-up area of Pulborough and Codmore Hill, however the majority of the land within the site is located in an area identified as having low-moderate

SA Objective	SA112 (residential use)	SA385 (employment use)	SA445 (residential use)	SA556 (residential use)	SA588 (residential use)	SA830 (employment use)	GA007 (gypsy and traveller use)	GA015 (gypsy and traveller use)	Justification
									landscape capacity for medium scale housing development and therefore a significant negative effect is expected in relation to this SA objective.
									Sites SA588 and GA015 are located in an area identified as having low-moderate landscape capacity for small scale housing development and therefore a significant negative effect is expected in relation to this SA objective.
									The majority of the area in which sites SA385 and SA830 are located have been identified as having low-moderate landscape capacity for large scale employment development and therefore a significant negative effect is expected in relation to this SA objective.
									In all cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which Is not yet known.
SA objective 8: Historic environment									The Council's heritage assessment work for site SA112 concluded that the development of the site has the potential to impact upon the significance of the Grade II Listed Buildings Stane Street Hollow and Codmore House. The assessment, however, concluded that while these heritage assets have high sensitivity to change, the magnitude of the effects are expected to be low and the effects relating to the significance of the assets are not likely to be significant. Overall a minor negative effect is expected in relation to this SA objective for site SA112.
	-?	-?	?	-?	?	?	-?	0?	The Council's heritage assessment work for site SA445 concluded that the development of the site would result in significant effects in relation to Grade II Listed Building New Place Manor and the archway and garden wall at New Place Manor to south east of the house. Overall a significant negative effect is expected in relation to this SA objective for site SA445.
									The Council's heritage assessment work for sites SA385 and GA007 concluded that the development of these sites has the potential to result in harm to the significance of Grade II listed Forge Cottage, The Old Forge. The assessment, however, concluded that the magnitude of the

SA Objective	SA112 (residential use)	SA385 (employment use)	SA445 (residential use)	SA556 (residential use)	SA588 (residential use)	SA830 (employment use)	GA007 (gypsy and traveller use)	GA015 (gypsy and traveller use)	Justification
									effects are expected to be low and overall the impacts are only potentially significant. Overall a minor negative effect is expected in relation to this SA objective for site SA385 and GA007. The Council's heritage assessment work for site SA556 and GA015 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with each development site. While the heritage assets considered with regards to each site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. However, there is an Amber Archaeological Notification Area within the boundaries of site SA556 and potential for as yet unknown archaeological remains. Overall a minor negative effect is expected in relation to this SA objective for site SA556 and a negligible effect for site GA015. The Council's heritage impact work has not included an assessment of sites SA588 and SA830 and therefore an uncertain effect is recorded for these sites in relation to this SA objective. In all cases, the effect is uncertain at this stage as it is dependent on the exact scale, design and layout of the new development.
SA objective 9: Efficient land use	-	?	?	?	?	?	+	+	Site SA112 is located on greenfield land which is classed as Grade 4 agricultural quality. Therefore, a minor negative effect is expected in relation to this SA objective. Sites SA445, SA556, SA588, SA385 and SA830 are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if it is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective.

SA Objective	SA112 (residential use)	SA385 (employment use)	SA445 (residential use)	SA556 (residential use)	SA588 (residential use)	SA830 (employment use)	GA007 (gypsy and traveller use)	GA015 (gypsy and traveller use)	Justification
									Sites GA007 and GA015 are located on brownfield land and therefore a minor positive effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	?	?	?	?	?	?	?	All the sites are located within Mineral Safeguarding Areas (MSA) and therefore development may result in the sterilisation of or loss of access to mineral resources. As such, a significant negative effect is expected for the sites in relation to this SA objective. 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.
SA objective 11: Water resources	0	0	0	0	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected in relation to this SA objective.
SA objective 12: Flooding	-	-	-	-	-	-	0	0	Sites SA112, SA385, SA445, SA556, SA588 and SA830 are located entirely within flood zone 1. However, they all lie on greenfield land and therefore a minor negative effect is expected in relation to this SA objective. Sites G1007 and GA015 are located entirely within flood zone 1 and are also on brownfield land. Therefore, a negligible effect is expected
SA objective 13: Transport	++	+	++	++	++	+	+	+	Sites SA112, SA445, SA556 and SA588 are within 1.8km of a railway station (Pulborough railway station). Therefore, a significant positive effect is expected in relation to this SA objective. Sites SA385, SA830, GA007 and GA015 are not located within 1.8km of a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.

SA Objective	SA112 (residential use)	SA385 (employment use)	SA445 (residential use)	SA556 (residential use)	SA588 (residential use)	SA830 (employment use)	GA007 (gypsy and traveller use)	GA015 (gypsy and traveller use)	Justification
SA objective 14: Air quality	0	0	0	0	0	0	0	0	None of the sites are located within or directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	++	+	++	++	++	+	+	+	Sites SA112, SA445, SA556 and SA588 are within 1.8km of a railway station (Pulborough railway station). Therefore, a significant positive effect is expected in relation to this SA objective. Sites SA385, SA830, GA007 and GA015 are not located within 1.8km of a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	+	0	0	0	+	0	0	Sites SA112, SA445, SA556, SA588, GA007 and GA015 are being considered for residential or gypsy and traveller use. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective. Sites SA385 and SA830 are expected to deliver less than 5ha of employment floorspace (approximately 2.7ha and 2.0ha respectively) as part of development. Therefore, a minor positive effect is expected.
SA objective 17: Access to employment opportunities	+	+	+/	+	+	+			Sites SA112, SA445, SA556 and SA588 will deliver residential uses as part of development. They are all located within 1.8km from a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective. Site SA445 is currently in employment use and its development for residential use could result in loss of employment opportunities in the plan area. Therefore, the minor positive effect is recorded in combination with a significant negative effect.

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SA Objective	SA112 (residential use)	SA385 (employment use)	SA445 (residential use)	SA556 (residential use)	SA588 (residential use)	SA830 (employment use)	GA007 (gypsy and traveller use)	GA015 (gypsy and traveller use)	Justification
									Site GA007 is located between 1.8km and 2.7km from a Key Employment Area but is not within 720m of Horsham town. Therefore, a minor negative effect is expected in relation to this SA objective.
									Site GA015 is located more than 2.7km from a Key Employment Area and is not within 720m of Horsham town. Therefore, a significant negative effect is expected in relation to this SA objective.
									Sites SA385 and SA830 which are being considered for employment uses are not located within 1.8km of a railway station but is within 450m of a bus stop. Therefore, a minor positive effect is expected.

### Rudgwick and Bucks Green

SA Objective	SA442 (residential use)	SA574 (residential use)	SA683 (residential use)	SA794 (residential use)	GA009 (gypsy and traveller use)	Justification
SA objective 1: Housing	++	++	+	+	++	Sites SA442 and SA574 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective. Sites SA683 and SA794 have the capacity for less than 10 dwellings and therefore a minor positive effect is expected in relation to this SA objective.

SA Objective	SA442 (residential use)	SA574 (residential use)	SA683 (residential use)	SA794 (residential use)	GA009 (gypsy and traveller use)	Justification
						Site GA009 is considered for gypsy and traveller use and would help meet the identified need for this type of use in the District. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	+/-?	+?	+/-?	+?	-?	Sites SA442, SA574, SA683 and SA794 are located within 720m of the built-up area of the Medium Village of Rudgwick and Bucks Green and therefore a minor positive effect is expected in relation to this aspect of the SA objective. Site GA009 is not located within 720m of the built-up area of Rudgwick and Bucks Green and therefore a minor negative effect is expected in relation to this aspect of the SA objective. Sites SA574 and SA794 are not located within 1km of a secondary school but they are located within 450m of a primary school. As such, an uncertain minor positive effect is expected for the site in relation to this aspect of the SA objective. Sites SA442, SA683 and GA009 are not located within 1km of a secondary school or within 450m of a primary school and therefore an uncertain minor negative effect is expected for the site in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown. Overall an uncertain minor positive effect is expected for sites SA574 and SA794 and a mixed minor positive and uncertain
SA objective 3: Inclusive communities	0	0	0	0	+	minor negative effect is expected for sites SA442 and SA683. An uncertain minor negative effect is expected for site GA009. Sites SA442, SA574, SA683 and SA794 are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where they are likely to be most prevalent. As such, a negligible effect is expected for these sites. Site GA009 is not located within an IMD 40% most deprived area but is located on brownfield land and therefore development may contribute towards regeneration in the District. As such, a minor positive effect is expected for the site in relation to this SA objective.

SA Objective	SA442 (residential use)	SA574 (residential use)	SA683 (residential use)	SA794 (residential use)	GA009 (gypsy and traveller use)	Justification
SA objective 4: Crime	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the sites in relation to this SA objective.
SA objective 5: Health	++	++	++	++	-	Sites SA442, SA574 SA683 and SA794 are located within 720m of a healthcare facility and an area of open space or sports facility. Therefore, a significant positive effect is expected in relation to this SA objective. Site GA009 is not located within 720m of a healthcare facility or an area of open space or sports facility. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	-?	-?	-?	-?	-?	All sites are located within an SSSI IRZ, but it does not identify residential planning applications as a risk. However, sites SA442, SA574, SA683 and SA794 are located within 400m of an area of ancient woodland or a local wildlife site. Site GA009 is located more than 400m from any internationally, nationally, or locally designated biodiversity or geodiversity sites. However, all sites also lie within the bat sustenance zone. Therefore, a minor negative effect is expected in relation to this SA objective. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	?	?	?	Although site SA442 is located partly within the built-up area of Rudgwick and Bucks Green, the majority of the site lies within an area which has been identified as having low-moderate landscape capacity for small scale housing development and therefore a significant negative effect is expected. The area in which sites SA683 and SA794 are located has also been identified as having low-moderate landscape capacity for small scale housing development and therefore a significant negative effect is expected. Site GA009 does not lie within an area which has been assessed as part of the landscape character assessment work and therefore an uncertain effect is expected in relation to this SA objective.

SA Objective	SA442 (residential use)	SA574 (residential use)	SA683 (residential use)	SA794 (residential use)	GA009 (gypsy and traveller use)	Justification
						The area in which site SA574 is located has been identified as having no/low landscape capacity for medium scale housing development and therefore a significant negative effect is expected. In both cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which Is not yet known.
SA objective 8: Historic environment	-?	0?	-?	-?	0?	The Council's heritage assessment work for site SA442 concluded that the development of the site has the potential to impact upon the setting of the Grade II Listed Buildings Two Wells, Horseshoe Cottage, Ebenezer Cottage, Autumn Cottage and Willow Cottage. The assessment, however, concluded that the potential for any harm would not be substantial. Overall a minor negative effect is expected in relation to this SA objective for site SA442. The Council's heritage assessment work for sites SA574 and GA009 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with the development site. While the heritage assets considered with regards to each site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment work for site SA683 concluded that the development of the site has the potential to impact upon the setting of the Grade I Listed Building Holy Trinity Church. The assessment, however, concluded that the potential for any harm would not be substantial. Overall a minor negative effect is expected in relation to this SA 6838. The Council's heritage assessment work for site SA794 concluded that the development of the site has the potential to impact upon the setting of the Grade I Listed Building Holy Trinity Church. The assessment, however, concluded that the potential for any harm would not be substantial. Overall a minor negative effect is expected in relation to this SA 693. The Council's heritage assessment work for site SA794 concluded that the development of the site has the potential to result in harm to the significance of Grade II Listed Building Goblins Pool Hotel (The Old Cottage/ Snoxall). The assessment, however, concluded that the magnitude of the effects are expected to be low and overall the impacts are only potentially significant. Overall a minor negative effect

SA Objective	SA442 (residential use)	SA574 (residential use)	SA683 (residential use)	SA794 (residential use)	GA009 (gypsy and traveller use)	Justification
SA objective 9: Efficient land use						Site SA442 is located on greenfield land which is mostly classed as Grade 4 agricultural quality. Therefore, a minor negative effect is expected in relation to this SA objective.
	-	?	?	?	+	Sites SA574, SA683 and SA794 are located on greenfield land which is mostly classed as Grade 3 agricultural quality. However, it is not known if it is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective.
						Site GA009 is located on brownfield land and therefore a minor positive effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	?	?	?	?	All sites are located within Mineral Safeguarding Areas (MSAs) and therefore there is potential for development to result in the sterilisation of mineral resources. As such, a significant negative effect is expected for the sites in relation to this SA objective. 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.
SA objective 11: Water resources	0	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	-	-	-	0	All sites are located entirely within flood zone 1. However, sites SA442, SA574, SA683 and SA794 are on greenfield land. Therefore, a minor negative effect is expected in relation to this SA objective. Site GA009 is located on brownfield land and therefore a minor positive effect is expected in relation to this SA objective.
SA objective 13: Transport						Sites SA442, SA574, SA683 and SA794 are more than 1.8km from a railway station but are within 450m of a bus stop or cycle route. Therefore, a minor positive effect is expected in relation to this SA objective.
	+	+	+	+	-	Site GA009 is more than 1.8km from a railway station and more than 450m from a bus stop or cycle route. Therefore, a minor negative effect is expected in relation to this SA objective

SA Objective	SA442 (residential use)	SA574 (residential use)	SA683 (residential use)	SA794 (residential use)	GA009 (gypsy and traveller use)	Justification
SA objective 14: Air quality	0	0	0	0	0	No sites are located within or are directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	+	+	+	-	Sites SA442, SA574, SA683 and SA794 are more than 1.8km from a railway station but are within 450m of a bus stop or cycle route. Therefore, a minor positive effect is expected in relation to this SA objective. Site GA009 is more than 1.8km from a railway station and more than 450m from a bus stop or cycle route. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	0	0	0	0	All sites will deliver residential or gypsy and traveller use as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities					-	All sites are being considered for residential use only. Sites SA442, SA574, SA683 and SA794 are located more than 2.7km from a Key Employment Area and are not within 720m of Horsham town. Therefore, a significant negative effect is expected in relation to this SA objective. Site GA009 is located between 1.8km and 2.7km from a Key Employment Area but is not within 720m of Horsham town. Therefore, a minor negative effect is expected in relation to this SA objective.

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Rusper

SA Objective	SA080 (residential use)	SA465 (residential use)	SA737 (residential use)	SA872 (residential use)	GA008 (gypsy and traveller use)	Justification
SA objective 1: Housing	++	+	+	++	++	Sites SA080 and SA872 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected for these sites in relation to this SA objective. Sites SA465 and SA737 have the capacity for less than 10 dwellings and therefore a minor positive effect is expected for these sites in relation to this SA objective. Site GA008 is considered for gypsy and traveller use and would help to meet the need for this type of use in the District. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	+?	+?	+?	+?	-?	<ul> <li>Sites SA080, SA465, SA737 and SA872 are located within 720m of the built-up area of the Smaller Village of Rusper and therefore an uncertain negligible effect is expected in relation to this aspect of the SA objective.</li> <li>Site GA008 is not located within 720m of the built-up area of Rusper and therefore a minor negative effect is expected in relation to this aspect of the SA objective. It should be noted that the site is located towards the built-up area of Crawley but it is not within 720m, so the minor negative effect is still applicable.</li> <li>Sites SA080, SA465, SA737 and SA872 are not located within 1km of a secondary school but are within 450m of a primary school. As such, a minor positive effect is expected for these sites in relation to this aspect of the SA objective. Site GA008 is not located within 1km of a secondary school or within 450m of a primary school and therefore an uncertain minor negative effect is expected for the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown.</li> <li>Overall, an uncertain minor positive effect is expected for sites SA080, SA465, SA737 and SA872. An uncertain minor negative effect is expected for site GA008.</li> </ul>

SA Objective	SA080 (residential use)	SA465 (residential use)	SA737 (residential use)	SA872 (residential use)	GA008 (gypsy and traveller use)	Justification
SA objective 3: Inclusive communities	0	0	0	0	+	Sites SA080, SA465, SA737 and SA872 are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or reduce social deprivation. As such, a negligible effect is expected for these sites. Site GA008 is not located within an IMD 40% most deprived area but is located on brownfield land and therefore development may contribute towards regeneration in the District. As such, a minor positive effect is expected for the site in relation to this SA objective.
SA objective 4: Crime	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the sites in relation to this SA objective.
SA objective 5: Health	+	+	+	+		Sites SA080, SA465, SA737 and SA872 are not located within 720m of a healthcare facility but are within 720m of an area of open space or sports facility. Therefore, a minor positive effect is expected in relation to this SA objective. Site GA008 is not located within 720m of a healthcare facility or an area of open space or sports facility. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	-?	-?	-?	-?	0?	Sites SA080, SA465, SA737 and SA872 are located within an SSSI IRZ, but it does not identify residential planning applications as a risk. However, they are located within 400m of an area of ancient woodland and/or a local wildlife site. Therefore, a minor negative effect is expected in relation to this SA objective. Site GA008 is located within a SSSI IRZ but it does not identify risks related to residential development. It is also more than 400m from any internationally, nationally, or locally designated biodiversity or geodiversity sites. Therefore, a negligible effect is expected in relation to this SA objective is expected in relation to this SA objective. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.

SA Objective	SA080 (residential use)	SA465 (residential use)	SA737 (residential use)	SA872 (residential use)	GA008 (gypsy and traveller use)	Justification
SA objective 7: Landscapes and townscapes	?	?	?	?	?	The majority of the area in which sites SA080, SA465, SA737 and SA872 are located have been identified as having no/low or low-moderate landscape capacity for small scale housing delivery. It is recognised that small parts of site SA737 are located partly within the built-up area of Horsham. Therefore, a significant negative effect is expected. Site GA008 does not lie within an area which has been assessed as part of the landscape character assessment work and
						therefore an uncertain effect is expected in relation to this SA objective. In all cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which Is not yet known.
SA objective 8: Historic environment						The Council's heritage assessment work for site SA080 concluded that the development of the site would result in significant effects in relation to Grade I Listed Building Parish Church of St Mary Magdalene and Grade II Listed Buildings Rusper War Memorial and Ghyll Manor Cottage. Significant effects were also recorded through this work in relation to Rusper Conservation Area. Effects were also recorded in relation to Grade II Listed Building the Plough Inn, however, the magnitude of the effects were noted to be low meaning the overall impacts were recorded only as potentially significant. Overall a significant negative effect is expected in relation to this SA objective for site SA080.
	?	?	-?	?	0?	The Council's heritage assessment work for sites SA465 and SA872 concluded that the development of these sites would result in significant effects in relation to Rusper Conservation Area. Overall a significant negative effect is expected in relation to this SA objective for both site SA465 and SA872.
						The Council's heritage assessment work for sites SA737 concluded that the development of the site is unlikely to have effects in relation to any designated heritage assets. This work, however, suggested that as Pucks Croft within the site boundaries appears on the early edition O.S. maps of the late nineteenth century, non-designated assets may be present within those boundaries. Overall a minor negative effect is expected in relation to this SA objective for site SA737.
						The Council's heritage assessment work for site GA008 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack

SA Objective	SA080 (residential use)	SA465 (residential use)	SA737 (residential use)	SA872 (residential use)	GA008 (gypsy and traveller use)	Justification
						historical/functional association with the development site. While the heritage assets considered with regards to the site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. There are no Archeological Notification Areas or Archaeological Sites within the site. In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development
SA objective 9: Efficient land use	-	-	-	-	+	Sites SA080, SA465, SA737 and SA872 are located on greenfield land which is classed as Grade 4 agricultural quality. Therefore, a minor negative effect is expected in relation to this SA objective. Site GA008 is located on brownfield land and therefore a minor positive effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	?	?	?	?	All sites are located within Mineral Safeguarding Areas (MSAs) and therefore development may result in loss of access to or the sterilisation of mineral resources. As such, a significant negative effect is expected for these sites. 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.
SA objective 11: Water resources	0	0	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	-	-	-	0	All sites are located entirely within flood zone 1. However, sites SA080, SA465, SA737 and SA872 all lie on greenfield land. Therefore, a minor negative effect is expected. Site GA008 is located entirely within flood zone 1 and is also on brownfield land. Therefore, a negligible effect is expected.
SA objective 13: Transport	+	+	+	+	+	All sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.

SA Objective	SA080 (residential use)	SA465 (residential use)	SA737 (residential use)	SA872 (residential use)	GA008 (gypsy and traveller use)	Justification
SA objective 14: Air quality	0	0	0	0	0	No sites are located within or are directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	+	+	+	+	All sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	0	0	0	0	All sites are being considered for residential or gypsy and traveller use only. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities						All the sites are being considered for residential use only. Sites SA080, SA465, SA737, SA872 and GA008 are located more than 2.7km from a Key Employment Area and are not within 720m of Horsham town. Therefore, a significant negative effect is expected in relation to this SA objective.

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### Small Dole

SA Objective	SA505 (residential use)	SA538 (residential use)	SA689 (residential use)	Justification
SA objective 1: Housing	++	++	++	The sites haves the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	-?	-?	-?	The sites are located within 720m of the built-up area of the Smaller Village of Small Dole and therefore an uncertain negligible effect is expected in relation to this aspect of the SA objective. The sites are not located within 450m of a secondary school or within 1km of a secondary school and therefore an uncertain minor negative effect is expected in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown. Overall, an uncertain minor negative effect is expected.
SA objective 3: Inclusive communities	0	0	0	The sites are mainly located on greenfield land and is not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where they are most likely to be prevalent. As such, a negligible effect is expected for this site.
SA objective 4: Crime	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.
SA objective 5: Health	+	+	+	The sites are located within 720m of an area of open space or sports facility but are not within 720m of a healthcare facility. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	-?	-?	?	All sites are located within 400m of an area of ancient woodland, a local nature reserve and a local wildlife site. Therefore, a minor negative effect is expected. Site SA656 is also partially located within an SSSI IRZ that flags residential planning applications as a potential risk. Therefore, a significant negative effect is expected in relation to this SA objective.

SA Objective	SA505 (residential use)	SA538 (residential use)	SA689 (residential use)	Justification
				The effects are uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	-?	-?	-?	Sites SA505, SA538 and SA689 are located mainly within an area identified as having moderate landscape capacity for small and medium scale housing. Therefore, a minor negative effect is expected against this SA objective. Sites SA505 and SA538 are noted as being partly within the built-up area of Small Dole.
				The effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment				The Council's heritage assessment work for sites SA505 concluded that the development of the site is unlikely to have effects in relation to any designated heritage assets. There are also no recorded Archaeological Sites or Archaeological Notification Areas within or adjacent to the site. Overall a negligible effect is expected in relation to this SA objective for site S505.
	0?	-?	0?	The Council's heritage assessment work for site SA538 concluded that the development of the site has the potential to result in harm to the significance of Grade II Listed Building New Hall and the garden walls and bee boles at New Hall to the north of the house. The assessment, however, concluded that the magnitude of the effects are expected to be low and overall the impacts are only potentially significant. Overall a minor negative effect is expected in relation to this SA objective for site SA538.
				The Council's heritage assessment work for site SA689 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with the development site. While the heritage assets considered with regards to the site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. The site does not contain an Archaeological Site or Archaeological Notification Area.
				In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development
SA objective 9: Efficient land use	?		?	Site SA538 is located on greenfield land which is classed as Grade 2 agricultural quality. Therefore, a significant negative effect is expected in relation to this SA objective for site SA538. Sites SA505 and SA689 are also mainly located on greenfield land but this is classed as Grade 3

SA Objective	SA505 (residential use)	SA538 (residential use)	SA689 (residential use)	Justification
				agricultural quality. It is, however, unknown if this land is Grade 3a or Grade 3b agricultural quality. Therefore, the significant negative effect is expected in relation to this SA objective for sites SA505 and SA689 is uncertain.
SA objective 10: Mineral resources	?	?	?	All sites are located within a Mineral Safeguarding Area (MSA) and therefore there is potential for development to result in the sterilisation of or loss of access to mineral resources. As such, a significant negative effect is expected. 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.
SA objective 11: Water resources	0	0	0	No sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	+	-	-	All sites are located entirely within flood zone 1, however, they are also located on greenfield land. Therefore, a minor negative effect is expected.
SA objective 13: Transport	+	+	+	All sites are more than 1.8km from a railway station but are within 450m of a bus stop and cycle route. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	0	The sites are not located within or directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	+	+	All sites are more than 1.8km from a railway station but are within 450m of a bus stop and cycle route. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	0	0	All sites are being considered for residential use only. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities	+	+	+	All sites are being considered for residential use. They are located within 1.8km of a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective.

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### Southwater

SA Objective	SA324 (residential use)	SA644/SA645 (employment use)	SA703 (employment use)	SA701 (residential use)	SA725 (residential use)	SA743 (residential use	Justification
SA objective 1: Housing	++	0	0	++	++	++	Sites SA644/645 and SA703 will deliver employment uses. As such, a negligible effect is expected for these sites in relation to this SA objective. Sites SA324, SA701, SA725 and SA743 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	++	-?	++	++/-?	++/-?	++/-?	Sites SA324, SA703, SA701, SA725 and SA743 are within 720m of the built-up area of Southwater (a Small Town/Larger Village) and therefore a significant positive effect is expected in relation to this aspect of the SA objective. Sites SA701, SA725 and SA743 are not located in close proximity to a primary school or secondary school and therefore the significant positive effect is expected in combination with an uncertain minor negative effect. Site SA644/SA645 is not located within 720m of the built-up area of a settlement. As such, an uncertain minor negative effect is expected in relation to this SA objective.
SA objective 3: Inclusive communities	0	0	0	0	0	0	All sites are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to reduce social deprivation. As such, a negligible effect is expected in relation to this SA objective.
SA objective 4: Crime	0?	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected in relation to this SA objective.
SA objective 5: Health	+	-	+	+	+	+	Site SA644/SA645 is not located within 720m of a healthcare facility or an area of open space or sports facility. Therefore, a minor negative effect is expected in relation to this SA objective.

SA Objective	SA324 (residential use)	SA644/SA645 (employment use)	SA703 (employment use)	SA701 (residential use)	SA725 (residential use)	SA743 (residential use	Justification
							Sites SA324, SA701, SA703, SA725 and SA743 are not located within 720m of a healthcare facility but are within 720m of an area of open space or sports facility. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	-?	-?	-?	-?	-?	-?	Sites SA644/SA645 and SA703 are located within an SSSI IRZ, but it does not identify potential risks related to employment development. Sites SA324, SA701, SA725 and SA743 are located within an SSSI IRZ, but it does not identify risks related to residential development. However, all sites are either located within 400m of areas of ancient woodland or local wildlife sites. Furthermore, all or large portions of sites SA701, SA725 and SA743 lie within the bat sustenance zone associated with the Mens SAC. Therefore, a minor negative effect is expected in relation to this SA objective. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	-?	?	?	?	?	?	The landscape capacity of the area in which site SA644/SA645 is located has not been assessed as part of the landscape capacity assessment work for the District and therefore an uncertain effect is expected in relation to this SA objective. The area in which sites SA701, SA725 and SA743 are located has been identified as having low-moderate landscape capacity for medium scale housing development and therefore a significant negative effect is expected in relation to this SA objective. Site SA324 is located in an area identified as having moderate-high landscape capacity for medium scale housing development and therefore. Site SA703 is located in an area identified as having low-moderate landscape capacity for large scale employment development. Therefore, a significant negative effect is expected in relation to this SA objective.

SA Objective	SA324 (residential use)	SA644/SA645 (employment use)	SA703 (employment use)	SA701 (residential use)	SA725 (residential use)	SA743 (residential use	Justification
							The effects in relation to this SA objective are uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment							The Council's heritage assessment work for site SA324 concluded that the development of the site is unlikely to have effects in relation to any designated heritage assets. This work, however, identifies two Archaeological Notification Areas within the site that are sensitive for Archaeology. Therefore, there is potential for development to have adverse impacts on these areas. Overall, a minor negative effect is expected in relation to this SA objective for site SA324. The Council's heritage assessment work for site SA644/655 concluded that the development of the site has the potential to result in harm to the significance of Grade II Listed Pondtail Farmhouse and Knepp Castle Registered Park and Garden. The assessment, however, concluded that the magnitude of the effects are expected to be low and overall the impacts are only potentially significant. Overall a minor negative effect is expected in relation to this SA objective for site SA objective for site SA644/655.
	-?	-?	0?	-?	-?	-?	The Council's heritage assessment work for site SA701 concluded that the development of the site is unlikely to have effects in relation to any designated heritage assets. This work, however, suggested that the proximity of the site to Kingsfold, a non-designated heritage asset could result in impacts on its setting. The site is also recorded as being in proximity to WSCC Historic Environment Record, MWS11886, Kingsfold Cottage Farm Historic Farmstead. Overall a minor negative effect is expected in relation to this SA objective for site SA701. The Council's heritage assessment work for sites SA324 and SA703 concluded that the designated heritage assets within the study areas are less sensitive to change from the proposed developments due to their location, topography, views or lack historical/functional association with the development sites. While the heritage assets considered with regards to the sites were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. This work, however, identifies two Amber Archaeological Notification Areas within site SA324. Therefore, there is potential for development to have adverse impacts on these areas. Overall, a minor negative effect is

SA Objective	SA324 (residential use)	SA644/SA645 (employment use)	SA703 (employment use)	SA701 (residential use)	SA725 (residential use)	SA743 (residential use	Justification
							expected in relation to this SA objective for site SA324. Site SA703 does not contain an Archaeological Notification Area or an Archaeological Site so a negligible effect is expected.
							The Council's heritage assessment work for site SA725 concluded that the development of the site is unlikely to have effects in relation to any designated heritage assets. This work, however, identified that the site includes an identified site of a historic outfarm, WSCC Historic Environment Record MWS12819. Overall a minor negative effect is expected in relation to this SA objective for site SA725.
							The Council's heritage assessment work for site SA743 concluded that the development of the site is unlikely to have effects in relation to any designated heritage assets. This work, however, identified that the site contains Woodfords a non-designated heritage asset. Overall a minor negative effect is expected in relation to this SA objective for site SA743.
							In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development.
SA objective 9: Efficient land use		?	?	?	?	?	All sites are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if this land is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	?	?	?	?	?	All sites being considered are located within a Mineral Safeguarding Area (MSA) and therefore development may result in the sterilisation of mineral resources. As such, a significant negative effect is expected. 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.
SA objective 11: Water resources	0	0	0	0	0	0	No sites are located within a Source Protection Zone and therefore a negligible effect is expected.

SA Objective	SA324 (residential use)	SA644/SA645 (employment use)	SA703 (employment use)	SA701 (residential use)	SA725 (residential use)	SA743 (residential use	Justification
SA objective 12: Flooding	-	-	-	-	-	-	All sites are located entirely in flood zone 1, however, they are on greenfield land. Therefore, a minor negative effect is expected.
SA objective 13: Transport	++	+	++	+	+	+	Sites SA644/SA645, SA701, SA725 and SA743 are not located within 1.8km of a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective. Sites SA324 and SA703 are located within 1.8km of a railway station (Christ's Hospital railway station) and as such, a significant positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0		0	0	0	0	Sites SA324, SA701, SA703, SA725 and SA743 are not located within an AQMA and are not directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective. Site SA644/SA645 is directly connected via the A272 to the Cowfold AQMA. Therefore, a significant negative effect is expected in relation to this SA objective.
SA objective 15: Climate change	++	+	++	+	+	+	Sites SA644/SA645, SA701, SA725 and SA743 are not located within 1.8km of a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective. Sites SA324 and SA703 are located within 1.8km of a railway station (Christ's Hospital railway station) and as such, a significant positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	++	+	0	0	0	Site SA644/SA645 is expected to deliver more than 5ha of employment floorspace (approximately 6.0ha) as part of development. Therefore, a significant positive effect is expected in relation to this SA objective. Site SA703 is expected to deliver less than 5ha of employment floorspace (approximately 1ha) as part of development. Therefore, a minor positive effect is expected in relation to this SA objective.

SA Objective	SA324 (residential use)	SA644/SA645 (employment use)	SA703 (employment use)	SA701 (residential use)	SA725 (residential use)	SA743 (residential use	Justification
							Sites SA324, SA701, SA725 and SA743 will deliver residential uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective
SA objective 17: Access to employment opportunities	÷	+	++	+	+	+	Sites SA644/SA645 and SA703 are being considered for employment use and therefore their appraisal reflects the potential for employees to access job opportunities at these locations. Site SA644/SA645 is not located within 1.8km of a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective. Site SA703 is located within 1.8km of a railway station. Therefore, a significant positive effect is expected in relation to this SA objective. Sites SA324, SA701, SA725 and SA743 are being considered for residential use only. These sites are located within 1.8km of a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective

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### Steyning

SA Objective		Justification
	SA742 (residential use)	
SA objective 1: Housing	++	The site has the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities		The site is located within 720m of the built-up area of Bramber and Upper Beeding and Steyning which are classed as a Small Town/Larger Village. As such, a significant positive effect is expected for the sites in relation to this aspect of the SA objective.
	++	Site SA742 is located within 1km of a secondary school but not within close proximity of primary school. As such, an uncertain minor positive effect is expected for the site in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown.
		Overall, an uncertain significant positive effect is expected for the site in relation to this SA objective.
SA objective 3: Inclusive communities	0	The site is located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where they are most likely to be prevalent. As such, a negligible effect is expected for the site.
SA objective 4: Crime	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the site in relation to this SA objective.
SA objective 5: Health	++	The site is located within 720m of a healthcare facility and an area of open space or sports facility. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	?	The site is located within a SSSI IRZ that identifies residential planning applications as a potential risk. Therefore, a significant negative effect is expected. It is not located within 400m of any locally designated biodiversity assets.
		The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	-?	Site SA742 is located within an area identified as having moderate landscape capacity for medium scale housing. Therefore, a minor negative effect is expected in relation to this SA objective.

SA Objective	_	Justification
	SA742 (residential use)	
		The effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment	?	The Council's heritage assessment work for site SA742 concluded that the development of the site could result in significant effects in relation to Grade II Listed Building Kings Barn Old Cottage. Effects relating to Steyning Conservation Area were also identified through this work, although the magnitude of the effects were recorded as low and the overall impact is only potentially significant. Overall a significant negative effect is expected in relation to this SA objective for site SA742.
SA objective 9: Efficient land use	?	Site SA742 are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if this land is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	0	The site is located over 250m from any Mineral Safeguarding Areas (MSAs) and therefore a negligible effect is expected.
SA objective 11: Water resources	0	The site is not located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	The site is located mainly within flood zone 1. However, it is located on greenfield land. Therefore, a minor negative effect is expected.
SA objective 13: Transport	+	Site SA742 is more than 1.8km from a railway station but is within 450m of a bus stop and cycle route. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	The site is not located within or are directly connected via a road to an AQMA. It is recognised that Storrington AQMA is located along the A283, however, this area is more than 9.5km to the west of the site. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	Site SA742 is more than 1.8km from a railway station but is within 450m of a bus stop and cycle route. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	The site is being considered for residential use only. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.

SA Objective		Justification
	sidential	
	(res	
	SA742 use)	
SA objective 17: Access to employment opportunities		The site is being considered for residential use only. Site SA742 is located more than 2.7km from a Key Employment Area and is not within 720m of Horsham town. Therefore, a significant negative effect is expected in relation to this SA objective.

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#### Storrington

SA Objective	SA361/SA732 (residential use)	SA639 (residential use)	SA384 (residential use)	Justification
SA objective 1: Housing	++	++	++	All the sites have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective
SA objective 2: Access to services and facilities	++?	++?	++?	All the sites are located within 720m of the built-up area of Storrington (a Small Town/Larger Village) and therefore a significant positive effect is expected. Sites SA639 and SA384 are located within 450m of a primary school and site SA361/SA732 is also located within 1km of a secondary school. As such, an uncertain minor positive effect is expected for the sites in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown. It should be note that area SA361 of site SA361/SA732 is not located within 450m of a primary school or within 1km of a secondary school. Overall, an uncertain significant positive effect is expected for sites SA361/SA732, SA384 and SA639.
SA objective 3: Inclusive communities	0	0	0	All sites are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where they are most likely to be prevalent. As such, a negligible effect is expected for these sites.
SA objective 4: Crime	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the sites in relation to this SA objective.
SA objective 5: Health	++	++	++	Sites SA361/SA732, SA639, and SA384 are located within 720m of a healthcare facility and an area of open space or sports facility. Therefore, a significant positive effect is expected in relation to this SA objective. It should be noted that area SA361 which forms part of site SA361/SA732 is located within 720m of an area of open space or sports facility but is not within 720m of a healthcare facility.
SA objective 6: Biodiversity and geodiversity	?	?	?	All the sites are located within a SSSI IRZ that identifies residential planning applications as a potential risk. Therefore, a significant negative effect is expected in relation to this SA objective.

SA Objective	SA361/SA732 (residential use)	SA639 (residential use)	SA384 (residential use)	Justification
				The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	?	Although site SA361/SA732 is partly located within the built-up area of Storrington, the majority of this site lies within an area that has been identified as having no/low landscape capacity for medium scale housing development and therefore a significant negative effect is expected. Site SA639 also lies within an area that has been identified as having no/low landscape capacity for medium scale housing development and therefore a significant negative effect is expected. The area in which site SA384 is located has been identified as having low-moderate landscape capacity for medium scale housing development and therefore a significant negative effect is expected in relation to this SA objective. In all cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which Is not yet known.
SA objective 8: Historic environment	?	-?	-?	The Council's heritage assessment work for site SA361/SA732 concluded that the development of the site would result in significant effects in relation to Grade II* Listed Building West Wantley Farmhouse and Grade II Listed Building East Wantley. Overall a significant negative effect is expected in relation to this SA objective for site SA361/SA732. The Council's heritage assessment work for site SA639 concluded that the development of the site is unlikely to have effects in relation to any designated heritage assessment work, however, suggested that the proximity of the site to historic house of Fryern (demolished) and its partially surviving gardens could result in impacts on its setting. The site has also been the subject of a desk based archaeological assessment, record number EWS1678. Overall a minor negative effect is expected in relation to this SA objective for site SA384 concluded that the development of the site has the potential to result in harm to the significance of Grade II Listed Building Penfold. The assessment, however, concluded that the magnitude of the effects are expected to be low and overall the impacts are only potentially significant. Overall a minor negative effect is expected in relation to this SA objective for site SA384. In all cases, the effect is uncertain at this stage as it is dependent upon the exact scale, layout and design of the new development.

SA Objective	SA361/SA732 (residential use)	SA639 (residential use)	SA384 (residential use)	Justification
SA objective 9: Efficient land use	?	?	-	Sites SA361/SA732 and SA639 are located on greenfield land which is mostly classed as Grade 3 agricultural quality. However, it is not known if this land is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective. It should be noted that area SA732 which forms part of site SA361/SA732 contains a large area of Grade 4 agricultural land. Site SA384 is located on greenfield land which is classed as Grade 4 agricultural quality. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	?	?	All the sites are located within mineral safeguarding areas and therefore there is potential for development to result in the sterilisation of or loss of access to mineral resources. As such, a significant negative effect is expected for these sites in relation to this SA objective. 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.
SA objective 11: Water resources	0	0	0	None of the sites are located within a Source Protection Zone and therefore a negligible effect is expected.
SA objective 12: Flooding	-	-	-	All the sites are located entirely or mainly within flood zone 1. However, they are all on greenfield land. Therefore, a minor negative effect is expected.
SA objective 13: Transport	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 14: Air quality				All the sites are directly connected via a road to the Horsham AQMA No1 which covers parts of West Street, High Street, and School Hill and Manleys Hill in Storrington. Therefore, a significant negative effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	+	+	All the sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.

SA Objective	SA361/SA732 (residential use)	SA639 (residential use)	SA384 (residential use)	Justification
SA objective 16: Economic growth	0	0	0	All the sites will deliver residential uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities	+	+	+	All the sites are being considered for residential use only. All sites are located within 1.8km from a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective.

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#### Thakeham

SA Objective	SA039 (residential use)	SA513 (residential use)	SA873 (residential use)	GA010 (gypsy and traveller use)	GA014 (gypsy and traveller use)	Justification
SA objective 1: Housing	++	++	++	++	++	Sites SA039, SA513 and SA873 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective. Sites GA010 and GA014 are considered for gypsy and traveller use and would help meet the identified need for this type of use in the District. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	+/-?	+/-?	+/-?	+?	-?	<ul> <li>Sites SA039, SA513, SA873 and GA010 are within 720m of Thakeham or West Chiltington Village and Common (both of which are Medium Villages) built-up areas and therefore a minor positive effect is expected in relation to this aspect of the SA objective. Site GA014 is not located within 720m of the built-up area of Thakeham or West Chiltington Village and Common and therefore a minor negative effect is expected in relation to this SA objective.</li> <li>Site GA010 is not located within 1km of a secondary school but is located within 450m of a primary school. As such, an uncertain minor positive effect is expected for the site in relation to this aspect of the SA objective. Sites SA039, SA513, SA873 and GA014 are not within 1km of a secondary school or within 450m of a primary school and therefore an uncertain minor negative effect is expected for the sites in relation to this aspect of the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown.</li> <li>Overall, an uncertain minor positive effect is expected for site GA010 and a mixed minor positive and uncertain minor negative effect is expected for site SA039, SA513 and SA873. An uncertain minor negative effect is expected for site GA014.</li> </ul>
SA objective 3: Inclusive communities	0	0	0	+	0	Sites SA039, SA513, SA873 and GA014 are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where it is most likely to be prevalent. As such, a negligible effect is expected for these sites.

SA Objective	SA039 (residential use)	SA513 (residential use)	SA873 (residential use)	GA010 (gypsy and traveller use)	GA014 (gypsy and traveller use)	Justification
						Site GA010 is not located within an IMD 40% most deprived area but is located on brownfield land and therefore development may contribute towards regeneration in the District. As such, a minor positive effect is expected for the site in relation to this SA objective.
SA objective 4: Crime	0?	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the sites in relation to this SA objective.
SA objective 5: Health	+	+	+	+	-	Sites SA039, SA513, SA873 and GA010 are located within 720m of an area of open space or sports facility but are not within 720m of a healthcare facility. Therefore, a minor positive effect is expected in relation to this SA objective. Site GA014 is not located within 720m of a healthcare facility or an area of open space or sports facility. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	-?	-?	-?	-?	-?	Sites SA039, SA513, SA873, GA010 and GA014 are located within an SSSI IRZ, but it does not identify residential planning applications as a risk. However, all sites are located within 400m of an area of ancient woodland and/or a local wildlife or geological site and they are located within the bat sustenance zone. Therefore, a minor negative effect is expected in relation to this SA objective. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	?	?	?	The area in which sites SA513 and GA010 are located has been identified as having no/low landscape capacity for small and medium scale housing development and therefore a significant negative effect is expected in relation to this SA objective. The effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which Is not yet known.

SA Objective	SA039 (residential use)	SA513 (residential use)	SA873 (residential use)	GA010 (gypsy and traveller use)	GA014 (gypsy and traveller use)	Justification
						The landscape capacity of the area in which sites SA039, SA873 and GA014 are located has not been assessed and therefore an uncertain effect is expected in relation to this SA objective.
SA objective 8: Historic environment	0?	0?	0?	0?	0?	The Council's heritage assessment work for sites SA039, SA513 and SA873 concluded either that there are no heritage implications for the development of the sites in question or that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with the development site. While the heritage assets considered in relation to sites SA039 and SA873 were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. The sites do not contain any Archaeological Sites or Archaeological Notification Areas. The Council's heritage assessment work for sites GA010 and GA014 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with each development site. While the heritage assets considered in the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with each development site. While the heritage assets considered with regards to sites GA010 and GA014 were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. There are no Archaeological Notification Areas or Archaeological Sites within the sites. All effects are uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.
SA objective 9: Efficient land use				+	?	Sites SA039, SA513 and SA873 are located mainly on greenfield land which is classed as Grade 2 agricultural quality. Therefore, a significant negative effect is expected in relation to this SA objective. Site GA014 is located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if it is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective. Site GA010 is located on brownfield land and therefore a minor positive effect is expected in relation to this SA objective.

SA Objective	SA039 (residential use)	SA513 (residential use)	SA873 (residential use)	GA010 (gypsy and traveller use)	GA014 (gypsy and traveller use)	Justification
SA objective 10: Mineral resources	-?	?	-?	?	?	The whole of sites SA513, GA010 and GA014 are located within a Mineral Safeguarding Area (MSA) and therefore there is potential for development to result in the sterilisation of or loss of access to mineral resources. As such, significant negative effect is expected for the site in relation to this SA objective. Sites SA039 and SA873 are located within 250m of an MSA and therefore a minor negative effect is expected in relation to this SA objective. 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.
SA objective 11: Water resources	-	-	-	-	0	Sites SA039, SA513, SA873 and GA010 are located within a Source Protection Zone and therefore a minor negative effect is expected in relation to this SA objective. Site GA014 is not located within a Source Protection Zone (SPZ) and therefore a negligible effect is expected in relation to this SA objective.
SA objective 12: Flooding	-	-	-	0	-	All sites are located entirely within flood zone 1. However, sites SA039, SA513, SA873 and GA014 are on greenfield land. Therefore, a minor negative effect is expected in relation to this SA objective. Site GA010 is located entirely within flood zone 1 and is also on brownfield land. Therefore, a negligible effect is expected.
SA objective 13: Transport	+	+	+	+	+	All sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	0	0	0	None of the sites are located within or are directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	+	+	+	+	All sites are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective.

SA Objective	SA039 (residential use)	SA513 (residential use)	SA873 (residential use)	GA010 (gypsy and traveller use)	GA014 (gypsy and traveller use)	Justification
SA objective 16: Economic growth	0	0	0	0	0	All sites will deliver residential or gypsy and traveller uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities						All sites are being considered for residential or gypsy and traveller uses only. Sites SA039, SA513 and SA873 are located within 1.8km from a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective.
	+	+	+			Site GA010 is located between 1.8km and 2.7km from a Key Employment Area but is not within 720m of Horsham town. Therefore, a minor negative effect is expected in relation to this SA objective. Site GA014 is located more than 2.7km from a Key Employment Area and is not within 720m of Horsham town. Therefore, a significant negative effect is expected in relation to this SA objective.

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#### Warnham

SA Objective	SA070 (residential use)	SA071 (residential use)	Justification
SA objective 1: Housing	++	++	Both sites have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	+?	+?	Both sites are within 720m of the built up area of the Medium Village of Warnham. The sites are not within 1km of a secondary school but they are within 450m of a primary school. As such, a minor positive effect is also expected for the sites in relation to this aspect of the SA objective. The effects in relation to education facilities are uncertain as existing capacity of education facilities is currently unknown.
SA objective 3: Inclusive communities	0	0	Both sites are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or reduce social deprivation. As such, a negligible effect is expected for both sites in relation to this SA objective.
SA objective 4: Crime	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the sites in relation to this SA objective.
SA objective 5: Health	+	+	Both sites are within 720m of an area of open space or sports facility but are not within 720m of a healthcare facility. Therefore, a minor positive effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	-?	0?	Both sites are located within SSSI IRZs but residential planning applications have not been identified as a potential risk for these areas. Site SA070 is located within 400m of an area of Ancient woodland and therefore a minor negative effect is expected. Site SA071 is located over 400m from any natural environment designations. As such, a negligible effect is expected for this site. In both cases, the effect identified is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	?	?	Although a small area of site SA070 is located within the built-up area of Warham, the majority of the site and the entirety of site SA071 are located in an area identified as having no/low landscape capacity for small scale housing development. Therefore a significant negative effect is expected in relation to this SA objective.

SA Objective			Justification
	SA070 (residential use)	SA071 (residential use)	
			The effects are uncertain at this stage as the effects of development on the character and quality of the landscape will depend in part on design, which is not yet known.
SA objective 8: Historic environment	?	0?	The Council's heritage assessment work for site SA071 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack historical/functional association with the development site. While the heritage assets considered were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. The site does not contain an Archaeological Site or an Archaeological Notification Area. The Council's heritage impact work has not included an assessment of site SA070 therefore an uncertain effect is recorded for these sites in relation to this SA objective. All effects are uncertain at this stage as it is dependent on the exact scale, layout and design of the new development.
SA objective 9: Efficient land use	?	?	Both sites are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known whether this land is Grade 3a or 3b land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	?	Both sites are located within a Mineral Safeguarding Area (MSA). There is potential for development to result in the sterilisation of mineral resources. As such, a significant negative effect is expected in relation to this SA objective. The effects are 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.
SA objective 11: Water resources	0	0	Neither of the sites are located within a Source Protection Zone and therefore a negligible effect is expected in relation to this SA objective.
SA objective 12: Flooding	-	-	Both sites are located entirely within flood zone 1. However, both sites are on greenfield land. Therefore, a minor negative effect is expected in relation to this SA objective.

SA Objective	SA070 (residential use)	SA071 (residential use)	Justification
SA objective 13: Transport	++	++	Both sites are within 1.8km of a railway station (Warnham railway station) and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	Neither of the sites are located within or are directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	++	++	Both sites are within 1.8km of a railway station and therefore a significant positive effect is expected in relation to this SA objective.
SA objective 16: Economic growth	0	0	Both sites will deliver only residential uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities	+	+	Both sites will deliver residential uses as part of development. They are located within 1.8km of a Key Employment Area but are not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective.

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### West Chiltington Village and Common

SA Objective	SA066 (residential use)	SA429 (residential use)	SA500 (residential use)	GA004 (gypsy and traveller use)	Justification
SA objective 1: Housing	++	++	+	++	Sites SA066 and SA429 have the capacity for more than 10 dwellings and therefore a significant positive effect is expected in relation to this SA objective. Site SA500 has the capacity for less than 10 dwellings and therefore a minor positive effect is expected in relation to this SA objective. Site GA004 is considered for gypsy and traveller use and would help meet the identified need for this use in the District. Therefore, a significant positive effect is expected in relation to this SA objective.
SA objective 2: Access to services and facilities	+?	+/-?	+?	+/-?	All sites are located within 720m of the built-up area of the Medium Village of West Chiltington Village and Common. As such, a minor positive effect is expected in relation to this aspect of the SA objective. Sites SA066 and SA500 are not located within 1km of a secondary school but it is located within 450m of a primary school and therefore an uncertain minor positive effect is expected for the site in relation to this aspect of the SA objective. Sites SA429 and GA004 are not located within 1km of a secondary school or within 450m of a primary school and therefore an uncertain minor negative effect is expected for the SA objective. The effect is uncertain as the capacity for schools to accept new pupils is currently unknown. Overall, an uncertain minor positive effect is expected for sites SA066 and SA500 and a mixed minor positive and uncertain minor negative effect is expected for sites SA429 and GA004.
SA objective 3: Inclusive communities	0	0	0	0	All sites are located on greenfield land and are not within an IMD 40% most deprived area. Therefore, there is little potential for development to result in local regeneration or to address issues of social deprivation where it is most likely to be prevalent. As such, a negligible effect is expected for these sites.

SA Objective	SA066 (residential use)	SA429 (residential use)	SA500 (residential use)	GA004 (gypsy and traveller use)	Justification
SA objective 4: Crime	0?	0?	0?	0?	The potential for the sites to minimise the incidences of and fear of crime is likely to be contingent upon detailed development design, a consideration which is not known at this stage. As such, an uncertain negligible effect is expected for the sites in relation to this SA objective.
SA objective 5: Health	+	-	+	-	Sites SA066 and SA500 are located within 720m of an area of open space or sports facility but is not within 720m of a healthcare facility. Therefore, a minor positive effect is expected in relation to this SA objective. Sites SA429 and GA004 are not located within 720m of a healthcare facility or an area of open space or sports facility. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 6: Biodiversity and geodiversity	0?	0?	0?	0?	Sites SA066, SA429 and GA004 are located within a SSSI IRZ, however this IRZ only identifies risks for more sizeable residential developments. These sites are also more than 400m from any internationally, nationally, or locally designated biodiversity or geodiversity sites. Therefore, a negligible effect is expected in relation to this SA objective. Site SA500 is located within a SSSI IRZ but it does not identify risks related to residential development. It is also more than 400m from any internationally, nationally, or locally designated biodiversity or geodiversity sites. Therefore, a negligible effect is expected in relation to this SA objective. Site SA500 is located within a SSSI IRZ but it does not identify risks related to residential development. It is also more than 400m from any internationally, nationally, or locally designated biodiversity or geodiversity sites. Therefore, a negligible effect is expected in relation to this SA objective. The effect is uncertain as appropriate mitigation may avoid adverse effects and has the potential to result in enhancements.
SA objective 7: Landscapes and townscapes	-?	?	-?	?	The area in which sites SA066 and SA500 are located has been identified as having moderate-high landscape capacity for small scale housing delivery and therefore a minor negative effect is expected. The area in which sites SA429 and GA004 are located has been identified as having no/low landscape capacity for medium scale housing development and therefore a significant negative effect is expected. In all cases, the effect is uncertain as the effects of development on the character and quality of the landscape will depend in part on design, which Is not yet known.

SA Objective	SA066 (residential use)	SA429 (residential use)	SA500 (residential use)	GA004 (gypsy and traveller use)	Justification
SA objective 8: Historic environment					The Council's heritage assessment work for site SA066 concluded that the development of the site would result in significant effects in relation to Grade II Listed Building Newhouse Farmhouse (Tumblestones). Potentially significant effects were also recorded in relation to West Chiltington Conservation Area for the site, however, the likely magnitude of the effects were noted to be low. Overall a significant negative effect is expected in relation to this SA objective for site SA066.
					The Council's heritage assessment work for site SA429 concluded that the development of the site has the potential to result in harm to the significance of Grade II Listed Building Old Haglands. The assessment, however, concluded that the magnitude of the effects are expected to be low and overall the impacts are only potentially significant. Overall a minor negative effect is expected in relation to this SA objective for site SA429.
	?	-?	-?	0?	The Council's heritage assessment work for site SA500 concluded that the development of the site has the potential to result in harm to the significance of Grade II Listed Buildings Naldretts Farmhouse and Barn at Naldretts Farm to north east of the farmhouse. The assessment, however, concluded that the magnitude of the effects are expected to be low and overall the impacts are only potentially significant. Overall a minor negative effect is expected in relation to this SA objective for site SA500.
					The Council's heritage assessment work for site GA004 concluded that the designated heritage assets within the study area are less sensitive to change from the proposed development due to their location, topography, views or lack of historical/functional association with the development site. While the heritage assets considered with regards to the site were judged to have a high sensitivity to change, the magnitude of the change expected and subsequently the overall significance of assessment in relation to each asset was judged to be negligible. The site does not contain any Archaeological Sites or Archaeological Notification Areas.
SA objective 9: Efficient land use	?	?	?	?	All effects are uncertain at this stage as it is dependent on the exact scale, layout and design of the new development. All sites are located on greenfield land which is classed as Grade 3 agricultural quality. However, it is not known if it is Grade 3a or 3b
	?	?	?		land. Therefore, an uncertain significant negative effect is expected in relation to this SA objective.
SA objective 10: Mineral resources	?	-?	?	?	The whole of sites SA066, SA500 and GA004 are located within a Mineral Safeguarding Area (MSA) and therefore development may result in the sterilisation of or loss of access to mineral resources. As such, a significant negative effect is expected for the site. Site

SA Objective	SA066 (residential use)	SA429 (residential use)	SA500 (residential use)	GA004 (gypsy and traveller use)	Justification
					SA429 falls within 250m of an MSA and a very small amount overlaps with it. As such, a minor negative effect is expected for the site. 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.
SA objective 11: Water resources	0	-	-	0	Sites SA066 and GA004 are not located within a Source Protection Zone (SPZ) and therefore a negligible effect is expected in relation to this SA objective. Sites SA429 and SA500 are located within a SPZ and therefore a minor negative effect is expected in relation to this SA objective.
SA objective 12: Flooding	-	-	-	-	All sites are located entirely within flood zone 1. However, they are located on greenfield land. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 13: Transport	+	-	+	+	Sites SA066, SA500 and GA004 are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective. Site SA429 is more than 1.8km from a railway station and more than 450m from a bus stop or cycle route. Therefore, a minor negative effect is expected in relation to this SA objective.
SA objective 14: Air quality	0	0	0	0	No sites are located within or directly connected via a road to an AQMA. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 15: Climate change	+	-	+	+	Sites SA066, SA500 and GA004 are more than 1.8km from a railway station but are within 450m of a bus stop. Therefore, a minor positive effect is expected in relation to this SA objective. Site SA429 is more than 1.8km from a railway station and more than 450m from a bus stop or cycle route. Therefore, a minor negative effect is expected in relation to this SA objective.

SA Objective	SA066 (residential use)	SA429 (residential use)	SA500 (residential use)	GA004 (gypsy and traveller use)	Justification
SA objective 16: Economic growth	0	0	0	0	All sites will deliver residential uses as part of development. The specific location of residential sites within the District will not directly influence sustainable economic growth. Therefore, a negligible effect is expected in relation to this SA objective.
SA objective 17: Access to employment opportunities					All sites are only being considered for residential or gypsy and traveller use. Sites SA066 and GA004 are located more than 2.7km from a Key Employment Area and are not within 720m of Horsham town. Therefore, a significant negative effect is expected in relation to this SA objective.
		+			Site SA500 is located between 1.8km and 2.7km from a Key Employment Area but is not within 720m of Horsham town. Therefore, a minor negative effect is expected in relation to this SA objective. Site SA429 is located within 1.8km of a Key Employment Area but is not within 720m of Horsham town. Therefore, a minor positive effect is expected in relation to this SA objective.

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Table F.1 Audit trail of Council's reasons for selecting or rejecting small site options (residential and employment)

Settlement	Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Neighbour Plan site capacity	Overall number from allocations in the settlement (housing)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
Ashington	SA866	ASN1	Land South of Rectory Lane/Land east of Mousdell Close	75		0	75	New	Υ	The site was submitted after decisions on the Neighbourhood Plan were made, but is considered to meet the allocation criteria for sites and is consistent with the new Local Plan spatial strategy.

Settlement	Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Neighbour Plan site capacity	Overall number from allocations in the settlement (housing)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
	SA122/ 131/ 548/ 735		Southern Cluster	225		225		Y	A	The site is allocated in the made Neighbourhood Plan for Ashington and now forms part of the committed development for the plan period.
Barns Green	SA006	BGR1	Land South of	50		0	105	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the

Settlement	Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Neighbour Plan site capacity	Overall number from allocations in the settlement (housing)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
			Smugglers Lane							LP objectives and spatial strategy.
	SA510	BGR2	Land South of Muntham Drive	25		0		Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA613	BGR3	Land at Slaughterfor d Farm (Sumners Pond)	30		30		Y	Y	The site has been considered by the Itchingfield Neighbourhood Plan (which is at submission stage) and the Council considers the allocation, and evidence supporting it, to be sound.
	SA344		Land rear of Two Mile Ash Road Barns Green	30				Y	A	The northern boundary of this site is designated as Ancient Woodland. The buffer required to maintain the integrity of the ancient woodland is considered to join with the curtilages of 'outpost' and Silwood House. This may impact the ability to provide a suitable access to the site, taking account of a number of Tree Preservation Orders exist along the southern boundary of the site. The

Settlement	Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Neighbour Plan site capacity	Overall number from allocations in the settlement (housing)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
										deliverability of this site is therefore not certain.
Billingshurst	SA560		Land off Marringdean Road	80			0	R	A	Whilst it was considered that these sites meet the criteria for potential allocation, the Council has had regard to the allocation
	SA573		Land at Hilland Farm		5,000			Y	A	of the East of Billingshurst strategic site (650 dwellings)
	SA607		Land at Kingsfold Cottage, Marringdean Road	30				R	A	which will significantly proportionately increase housing in Billingshurst (a large village in the settlement hierarchy, rather than a main town). There is also evidence that the local housing
	SA698		Land at Old Reservoir Farm	40				New	A	sub-market has finite capacity to deliver housing in the area. To allocate these sites would not be in line with the spatial strategy given the strategic site
	SA656		Blackthorne Barn	10				Y	A	allocation, and would open a risk of non-delivery across the sites. Site SA573 is not considered
	SA770		Land North of A272 West of Wooddale Lane	105				R	A	suitable for employment allocation. It lies within the countryside buffer surrounding the recent urban extension to Billingshurst, with the new A272

Settlement	Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Neighbour Plan site capacity	Overall number from allocations in the settlement (housing)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
	SA678		Kingsmead	80				R	A	link road and pylons / power lines reinforcing the sites separation from the urban area. The topography largely disconnects the site from the employment site under construction to the north.
	SA819		Rosier Business Park					Y	R	It is recommended that the core 'employment' section of this site be designated as a new Key Employment Area. It is no longer recommended the site be allocated for additional employment, instead the development of the wider site should be addressed within the strategic site allocation to the east of Billingshurst. The reason is that it is appropriate to plan comprehensively for new employment as part of the strategic site proposals.
Broadbridge Heath / Slinfold	SA102		Land North of Lower Broadbridge Farm		11,000		290	Y	A	Potential deliverability issues due to speculative nature and promoter seeks a wider site and some residential. Given that the District's employment needs do

Settlement	Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Neighbour Plan site capacity	Overall number from allocations in the settlement (housing)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
										not require this site it is not considered it should be progressed at this stage.
	SA386	BRH1	Land at Lower Broadbridge Farm	150		0		Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA622	BRH2	Land at Wellcross	140		0		Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy. The site is allocated for older persons accommodation, for which there is a particular need in the area.
	SA833		Land at Maydwell Avenue		63,000			Y	A	There are potential deliverability issues as it is linked to expansion of business connected to aviation so uncertainties due to COVID-19. Given that the District's employment needs do not require this site it is not

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										considered it should be progressed at this stage.
Christ's Hospital	SA129	CH1	Land at Christ's Hospital, The Warren	20		0	20	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
Cowfold	SA076/ SA083	CW1	Land at Brook Hill/Cowfold Glebe	35		35	105	Y	Y	The site has been considered by the Cowfold Neighbourhood Plan (which is at submission stage) and the Council considers the allocation, and evidence supporting it, to be sound.
	SA609	CW2	Field West of Cowfold, North of A272	35		0		Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA610/ 611	CW3	Fields West of Cowfold, South of A272/Field W of Cowfold, S of A272, W	35		35		Y	Y	The site has been considered by the Cowfold Neighbourhood Plan (which is at submission stage) and the Council considers the allocation, and evidence supporting it, to be sound.

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			of Little Potters							
	SA366		Land East of Cowfold	100				Y	A	Whilst the site (capacity 100) is considered on balance to meet the criteria for potential site allocation, it is also the largest single site considered as one of the reasonable alternatives for Cowfold. The cumulative impact of this site together with other allocations would be considerable with regards pressure on village infrastructure and on the Air Quality Management Area. Its inclusion would significantly proportionately increase housing in Cowfold. There are also concerns regarding landscape impact and settlement form.
Henfield	SA011		Land West of Backsettown Farm	30		30	55	Y	A	The site is allocated in the made Neighbourhood Plan for Henfield and now forms part of the committed development for the plan period.

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	SA065		Land at Wantley Hill	25		25		Y	A	The site is allocated in the made Neighbourhood Plan for Henfield and now forms part of the committed development for the plan period.
	SA317	HNF1	Sandgate Nursery, Henfield	55		0		Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA504		Land South of Bowls Club, off Furners Mead	10		10		Y	A	The site is allocated in the made Neighbourhood Plan for Henfield and now forms part of the committed development for the plan period.
	SA686		Land South & East of Parsonage Farm	205		205		Y	A	The site is allocated in the made Neighbourhood Plan for Henfield and now forms part of the committed development for the plan period.
	SA005		Land North of Furners Lane	100				Y	A	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial

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										strategy. Nevertheless, the location is sensitive to landscape considerations and the site is not considered to be appropriate to allocate. Adverse impacts on local infrastructure capacity, the environment and pressure on social integration has also been considered in relation to the settlement's position as a medium village in the hierarchy.
Horsham	SA074	HOR1	Land at Hornbrook Farm	100		0	400	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA568	HOR2	Land Around Mercer Road, Warnham Station	300		0		Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA568b		Land South of Mercer Road,	300		0		Y	A	The site falls within the boundaries of SA568 which is proposed for allocation.

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			Warnham Station							
	SA191		Broadlands Business Campus		0			Y	R	The site has recently been granted planning permission for 10,000 sqm office floorspace (B1 use) so there is no longer a need to allocate the site.
	SA325		Land at Westons Farm		The total site is around 38ha in size, however, proposals for the site indicate that around half would be landscaping so only around 17ha would be developed. In all there is potential for the delivery of around 52,000sqm of			New	A	This site is not considered suitable for employment allocation. Overall, the site is large in scale, but the form of the site would lead to urbanisation of the landscape beyond the immediate confines of Horsham and the new development under construction at North Horsham, and lead to coalescence with Warnham. Environmental impacts, including flood risk, would also require mitigation. Although new access to the site could potentially be delivered from the A24/A264 roundabout, via a proposed additional lane, further work to understand highways safety and the cumulative impact with new

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					employment floorspace.					development and programmed road upgrades in the area are necessary. Without improvements in local bus services the site is likely to be accessed predominantly by private motor vehicles as it is some distance from Horsham town and the services are hourly from Warnham Station. The impacts of this large site upon the viability of the employment within the 'North of Horsham' strategic site under construction, along with other impacts such as traffic, are likely to be unfavourable if not negative in the present employment market climate.
	SA363	EM2	Land to the West of Graylands Estate, Langhurstwo od Road, Horsham		9,500			Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.

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	SA570		Land South of Hilliers Garden Centre		11,000			Y	A	There are potential deliverability issues due to speculative nature and promoter seeks a wider site and some residential. Given that the District's employment needs do not require this site it is not considered it should be progressed at this stage.
	SA568a		North of Mercer Road, Warnham Station (employmen t)		9,000			Y	A	There are potential deliverability issues due to speculative nature and promoter seeks a wider site and some residential. Given that the District's employment needs do not require this site it is not considered it should be progressed at this stage.
Lower Beeding	SA567	LWB1	Land at Glayde Farm, West of Church Lane	30		30	57	Y	Y	The site has been considered by the Lower Beeding Neighbourhood Plan (which is at submission stage) and the Council considers the allocation, and evidence supporting it, to be sound.
	SA575	LWB2	Land North of	20		20		Y	Y	The site has been considered by the Lower Beeding Neighbourhood Plan (which is at

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			Sandygate Lane							submission stage) and the Council considers the allocation, and evidence supporting it, to be sound.
	SA584	LWB3	Land at Trinity Cottage	7		7		Y	Y	The site has been considered by the Lower Beeding Neighbourhood Plan (which is at submission stage) and the Council considers the allocation, and evidence supporting it, to be sound.
	SA657		Land at Cedar Cottage	20				R	A	The site has not been included in the Lower Beeding Neighbourhood Plan, and was listed in the Reg 18 Site Assessments Report as 'not identified for potential allocation'. Lower Beeding is classed in the settlement hierarchy as a smaller village with limited facilities, and the Neighbourhood Plan is considered to already make an appropriate contribution to housing supply of a scale appropriate to the settlement. Development of the site would

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										significantly alter the settlement form.
	SA729		Land at Sandygate Lower Beeding	10				R	A	The site has not been included in the Lower Beeding Neighbourhood Plan, and was listed in the Reg 18 Site Assessments Report as 'not identified for potential allocation'. Lower Beeding is classed in the settlement hierarchy as a smaller village with limited facilities, and the Neighbourhood Plan is considered to already make an appropriate contribution to housing supply of a scale appropriate to the settlement. Development of the site would lack integration with the existing fabric of the village.
Partridge Green	SA274		Land North of the Rise	55		0	0	Y	A	These sites (total capacity 225) were included in the Regulation 18 consultation. Whilst it was
	SA320		Land West of Church Road	70		0		Y	A	considered that these sites meet the criteria for potential allocation, the Council has had

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			Partridge Green							regard to the allocation of the Buck Barn strategic site (3,500 dwellings over the long term)
	SA433		Land at Dunstans Farm	80		0		Y	A	which will significantly proportionately increase housing in West Grinstead Parish. For this reason the Council does not
	SA634		Land at Dunstans	20				Y	A	consider it appropriate to allocate further sites in this locality.
	SA063	EM1	Land South of Star Road Industrial Estate		9,000			Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
Pulborough	SA112	PLB1	Land at Greendene	60		0	255	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA445	PLB2	Land adj Drovers Lane (New Place Farm)	170		170		Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.

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	SA556	PLB3	Land at Highfields, Codmore Hill	25		25		Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA385	ЕМЗ	Land South of Broomers Hill Park Industrial Estate		7,000			Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA588		Land off Glebelands, Pulborough	0		20		R	A	The site has been rejected as it is considered it would extend the settlement form into pastureland and break the strongly defined settlement boundary, in an area with low to moderate landscape capacity. However, it is included in the emerging Pulborough Neighbourhood Plan as a potential Community Land Trust site for principally affordable housing, and may have some potential as a rural exception site under the emerging Horsham Local Plan Policy 18 - Rural Exception Homes.

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	SA830		Land North of Broomers Hill Park		20,500			New	A	The site is not considered suitable for employment allocation. Its development would create linear urbanising /ribbon development in the countryside. In addition to this, when regard is given to the site promoted and considered suitable for employment allocation to the south of Broomers Hill Industrial Park, there is a lack of evidence to demonstrate there is a need for further employment in this location and / or impact upon the viability of expansion to the south of the Industrial Park.
Rudgwick/ Bucks Green	SA574	RD1	Land North of Guildford Road, Bucks Green	60		0	66	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA794	RD2	The former Pig Farm, Bucks Green	6		0		New	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the

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										LP objectives and spatial strategy.
	SA442		Land to the West of Church Street	15				Y	A	Whilst it is considered that the site meets the criteria for potential allocation, it is considered the less preferable than other sites in Rudgwick/Bucks Green to allocate. The site adjoins an area of ancient woodland to the west. These link to the mature trees which bound the site and may act as wildlife corridors. In addition The site adjoins eight residential properties of which five (Two Wells, Horseshoe Cottage, Ebenezer Cottage, Autumn Cottage and Willow Cottage) are Grade II listed. The setting of these dwellings would need to be considered should development come forward in this location, and together with the proximity of the site to the ancient woodland the developable area is limited and

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										deliverability of this site uncertain at this stage.
	SA683		Land East of Highcroft Drive	6				R	A	Whilst it is considered that the site meets the criteria for potential allocation, it is considered the less preferable than other sites in Rudgwick/Bucks Green to allocate. The site may have some potential for allocation, but would be very limited in number. Further work is required to consider the impact of development on the nearby conservation area and archaeological notification area, which may impact on the level of development which could come forward in this location. Due to this uncertainty the site is not allocated at the current time.
Rusper	SA080	RS1	Rusper Glebe	12		0	38	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.

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	SA465	RS2	Land at East Street	6		0		Y	Υ	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA872	RS3	Land North of East Street, Rusper	20		0		New	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA737		Pucks Croft Cottage and Land South, Rusper	5				Y	A	Whilst it is considered that the site meets the criteria for potential allocation, it is considered the least preferable of possible sites in Rusper to allocate. Rusper is classified as a small settlement with some limited capacity for development. It is considered that the cumulative impact from further allocations would adversely impact on local infrastructure capacity, the environment and pressure on social integration is considered to be unsustainable

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										for a small settlement with limited services and facilities
Small Dole	SA538	SMD1	Land West of Shoreham Road, Small Dole	40		0	40	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA689		Land at Oxcroft Farm	20		20		Y	A	The site is allocated in the made Neighbourhood Plan for Upper Beeding Parish and now forms part of the committed development for the plan period.
	SA505		Highdown Nurseries, off Shoreham Road	10				Y	A	Whilst it is considered that the site meets the criteria for potential allocation, it is considered the least preferable of possible sites in Small Dole to allocate. The ability to deliver this site is not fully certain due to the need to agree 3rd party agreement to access the site. Further assessment also is required regarding the potential for contamination on the former agricultural holdings. In addition, Small Dole is classified as a

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										small settlement with some limited capacity for development. A number of sites have been identified in the village by Henfield and Upper Beeding Parish Council's in their respective neighbourhood plans which are now made. It is considered that the cumulative impact from a further allocation would adversely impact on local infrastructure capacity, the environment and pressure on social integration is considered to be unsustainable for a small settlement with limited services and facilities.
Southwater	SA324		Land at The Copse Worthing Road	15			0	New	A	The sites (each has capacity for 60 homes) are in Shipley Parish but located on the edge of Southwater. They were listed in the Reg 18 Site Assessments
	SA701		Land at Rascals Farm, Shipley	60				R	A	Report as 'not identified for potential allocation'. The Council has had regard to the allocation of the West of Southwater

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	SA725		Land South of Hogs Wood, Shipley	60				R	A	strategic site (1,200 homes over the longer term) which will significantly proportionately increase housing in Southwater (a large village in the settlement
	SA743		Land at Woodfords, Southwater	60				R	A	hierarchy, rather than a main town). Further strategic development is to be allocated at Buck Barn, which is also relatively close to Southwater. To allocate these sites would not be in line with the spatial strategy given the strategic site allocations, but are considered as reasonable alternatives given that Southwater is one of the larger settlements in the District.
	SA703	EM4	Land at Hop Oast Roundabout		7,000			Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
Steyning	SA742	STE1	Land at Glebe Farm, Steyning	240		0	240	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy. Whilst not in the

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										emerging Steyning Neighbourhood Plan, it is considered the only site potentially suited to development at Steyning, which is one of the District's larger settlements with a range of services (classified as a larger village). The indicative number has increased from 50 to 240 dwellings, to reflect the lack of alternatives and the need to make best use of land in a sustainable location. Very careful consideration will need to be taken of the impact on the setting of the South Downs National Park.
Storrington & Sullington	SA361/732	STO1	Land to the north of Melton Drive/Land South of Northlands Lane, Storrington	70		0	145	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy. Storrington has a made Neighbourhood Plan, however the Examiner's report made clear that additional sites would need to be considered through the Horsham LP review.

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	SA384	STO2	Land at Rock Road (larger site)	75		0		R	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy. The site is in Thakeham Parish; Thakeham has a made Neighbourhood Plan, which does not include this site which is located on the edge of the built up area of Storrington. Whilst originally rejected on grounds of being unrelated to the existing settlement form (i.e. Storrington), this has been reconsidered in light of representations and further information from the site promoter.
	SA639		Land off Fryern Road	50				Y	A	Whilst the site is considered on balance to meet the criteria for potential site allocation, it is nevertheless the most environmentally sensitive of the reasonable alternative sites in Storrington.

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Thakeham	SA039	TH1	Land North of High Bar Lane	25		0	65	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy. The site would be additional to allocations in the made Thakeham Neighbourhood Plan.
	SA873	TH2	Land West of Stream House	40		0		New	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy. The site would be additional to allocations in the made Thakeham Neighbourhood Plan.
	SA513		Land to the south of Furze Common Road	25				Y	A	Whilst the site is considered on balance to meet the criteria for potential site allocation, it is nevertheless the least optimal of the alternatives available in respect of settlement form and access.
Upper Beeding	SA483/ 055/ 488		Land East of Pound Lane/Land	70		70	0	Y	А	The site is allocated in the made Neighbourhood Plan for Upper Beeding Parish and now forms

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			at Smugglers Lane/Land at Little Paddocks Pound Lane							part of the committed development for the plan period.
	SA155		Land at Greenfield	0		10		Y	R	Rejected at Reg 19 (no longer a reasonable alternative) as it has emerged that the site is in the South Downs National Park hence is not in the Horsham planning area.
Warnham	SA070		Land north of Bell Road	0		0	20	Y	R	Rejected at Reg 19 (no longer a reasonable alternative) as advice received from the HDC Conservation Officer indicating likely significant harm to numerous listed buildings and to the Warnham Conservation Area.
	SA071	WRN1	Land south of Bell Road	20		0		Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy. The site would be additional to the allocation in the

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										made Warnham Neighbourhood Plan.
West Chiltington	SA066	WCH1	Land at Hatches Estate	15		0	36	Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA429	WCH2	Land West of Smock Alley, S of Little Haglands	15		0		Y	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy.
	SA500	WCH3	Land East of Hatches House	6		0		R	Y	The site is considered to meet the criteria for potential site allocation, and is in line with the LP objectives and spatial strategy. Whilst it was rejected at Reg 18 due to being considered as having capacity for development below the 5 dwelling threshold, the site has been reassessed in greater detail and is now considered to have potential for around 6 dwellings.

Settlement	Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Neighbour Plan site capacity	Overall number from allocations in the settlement (housing)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
Sites not directly at any settlement	SA644		Land North of Buck Barn Services		8,000			Y	Y	The Land at Buck Barn strategic site includes significant employment as part of an emerging masterplan. These additional employment sites are in close proximity to the Buck Barn allocation, but is also separated from it by the A24 dual carriageway and Buck Barn junction. It is therefore no longer considered necessary or appropriate to allocate these sites.
	SA645		Land South of Buck Barn Services		4,000			Y	Y	The Land at Buck Barn strategic site includes significant employment as part of an emerging masterplan. These additional employment sites are in close proximity to the Buck Barn allocation, but is also separated from it by the A24 dual carriageway and Buck Barn junction. It is therefore no longer considered necessary or appropriate to allocate these sites.

SA of Horsham District Local Plan (Regulation 19) July 2021

Table F.2 Audit trail of Council's reasons for selecting or rejecting Gypsy and Traveller site options<sup>272</sup>

Site reference	Site Name	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
GA002	Southview, The Haven, Slinfold	Y	The Council considers it appropriate to allocate this site based on the Gypsy and Traveller Site Assessment <sup>273</sup> .
GA004	Lane Top, Nutbourne Road, Pulborough	Y	The Council considers it appropriate to allocate this site based on the Gypsy and Traveller Site Assessment.
GA007	Hill Farm Lane and Stane Street, Pulborough	Y	The Council considers it appropriate to allocate this site based on the Gypsy and Traveller Site Assessment.
GA008	Northside Farm Rusper Road Ifield	Y	The Council considers it appropriate to allocate this site based on the Gypsy and Traveller Site Assessment.

<sup>&</sup>lt;sup>272</sup> The Council has also considered the potential to allocate Gypsy and Traveller accommodation at strategic site options. This has been captured in the SA Report through the appraisal of the strategic site options (Appendix C and Chapter 5). All strategic sites proposed for allocation in the Regulation 19 Local Plan (SA101, SA118, SA119 and SA716) include the delivery of Gypsy and Traveller accommodation. The Council's site assessment work has assessed them as being capable of delivering a wide range of infrastructure provision, including provision for Gypsy and Travellers on site. Further detail of the Council's reasons for proposing these sites for allocation is included in Table F.3 below.

Site reference	Site Name	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
GA009	Sussex Topiary Naldretts Lane Rudgwick	Y	The Council considers it appropriate to allocate this site based on the Gypsy and Traveller Site Assessment.
GA010	Plot 3 Bramblefield Crays Lane Thakeham	Y	The Council considers it appropriate to allocate this site based on the Gypsy and Traveller Site Assessment.
GA011	Pear Tree Farm Furners Lane Henfield	A	The Council considers it not appropriate to allocate this site based on the Gypsy and Traveller Site Assessment.
GA014	Land East of Coolham Road, Thakeham	A	The Council considers it not appropriate to allocate this site based on the Gypsy and Traveller Site Assessment.
GA015	Land at Junction of Hill Farm Lane and Stane	Y	The Council considers it appropriate to allocate this site based on the Gypsy and Traveller Site Assessment.

Site reference	Site Name	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
	Street, Codmore Hill		
GA016	Land north of Tisserand Farm, Five Oaks	A	The Council considers it not appropriate to allocate this site based on the Gypsy and Traveller Site Assessment.
GA017	The Orchard, Cowfold	A	The Council considers it not appropriate to allocate this site based on the Gypsy and Traveller Site Assessment.

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Table F.3 Audit trail of Council's reasons for selecting or rejecting large site options

Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
Site SA101	HA2	Land west of Ifield (urban extension)	3,250 dwellings (10,000 in longer term beyond plan period)	9,000 sqm B2/B8 and former B1 uses (c.2.0ha)	Y	Y	Taking account of the location of the site close to both Crawley and Horsham, this site is well located in terms of its ability to meet housing demand and meet unmet housing and educational needs for both towns. Homes England is the national agency for strategic housing delivery and there is potential to help secure infrastructure investment required to accelerate housing delivery. The site is therefore considered suitable for allocation. However, any scheme must be carefully designed to deliver high quality development that minimises landscape, biodiversity and other environmental impacts and takes account of its relationship on the edge of Crawley. The development will also need to deliver very high rates of sustainable travel and contribute towards the delivery of a wider Crawley relief road.
SA118	HA4	Land East of Billingshurst (urban extension)	650 dwellings	2,200 sqm B2/B8 and former B1 uses (0.5ha)	Y	Y	This site is considered suitable for allocation, given the clear links and relationship with the existing settlement of Billingshurst and proximity to existing public transport links to larger settlements including Horsham and Crawley. Whilst there are no identified 'showstoppers' for this site, there are however a number of therefore a number of issues that need to be resolved, including certainty as to the level and timing of affordable housing, school and road upgrades. In addition, solutions to address the safety of an unmanned pedestrian railway crossing given the proposed increase in residents in close proximity are also required. As with all strategic allocations, the site will

Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
SA119	НАЗ	West of Southwater (urban extension)	1,200 dwellings	18,000sqm B2/B8 and former B1 uses (c.4.0ha)	Y	Y	Overall it is considered that the proposal is based on a strong vision based on sound place-making principles that would deliver providing education, community facilities, including a restored Great House Farmhouse and employment, and encourage short trips to be made by walking and cycling, rather than by car . It is considered this site is suitable for allocation.
SA291	HA13	West of Kilnwood Vale (urban extension)	350 dwellings		Y	Y	It is considered that this site has potential for allocation for around 350 units in the context of an expansion of the Kilnwood Vale neighbourhood. This would however require mitigation to address any noise and landscape impacts – on both the AONB and the potential for settlement coalscence between Horsham and Crawley. In addition, land should be safeguarded to ensure a future route for the Crawley Western Link Road. Development will also need to contribute to and not detract from the provision of new community facilities in the ongoing Kinwood Vale development.
SA394		Rookwood (urban extension)	725 dwellings	3,000sqm E uses (start-up or flexible desk space facilities) (c.0.4ha)	Y	A	The proposed site is well related to Horsham town and would contribute towards providing housing need in an area of greatest demand in the District. Given the location of the site adjacent to the Warnham nature reserve, it considered that any development should be located to the South of the Walnut Tree Plantation to avoid adverse impacts to biodiversity. Overall, the site is considered to be suitable for development in planning terms for allocation, subject to the delivery of necessary transport and environmental impacts, and

Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
							some provision for local employment. However, given that the strategic planning team has been advised that the site is being re-examined in the context of leisure provision on this site, it is not currently available for development and therefore cannot be allocated in the Local Plan.
SA414		Land North East of Henfield (Mayfield) (new settlement)	2,000 dwellings (7,000 in longer term beyond plan period)	7,000 new jobs	Y	A	The Council's sustainability appraisal has identified that urban extensions are more sustainable that new settlements. Therefore, the decision to allocate any new settlement follows the conclusion that the Council is be unable to meet its housing requirements through the allocation of strategic scale urban extensions. It is acknowledged that this site has a number of positive qualities that would
							help contribute to meeting identified housing and other development needs subject to mitigation of transport, landscape, biodiversity and heritage impacts. Geographically the site is less well connected to the settlements of Horsham, Crawley which is the key area of economic growth and housing demand in North-west Sussex. Although superficially closer to the coast than other proposed new settlements, existing transport connections in this site are poor with rural roads which would require enhancements.
							There is also insufficient evidence provided to the Council justify the allocation of a 3,000 home scheme. The wider scheme also has unresolved landownership issues in terms of being able to fully evidence that the 7,000 can be delivered. Finally the proximity of the site with Mid Sussex District would require engagement with this authority ensure impacts on this District

Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
							are mitigated effectively is also considered to have an impact on housing delivery rates, and the number of homes which could be provided in the plan period to meet the Council's housing targets. The site is therefore not recommended for allocation.
SA459/ 674/ 846		Land East of Kingsfold (urban extension/sa tellite settlement)	dwellings (1,300 in	75,000 sqm	Y	A	The Council's sustainability appraisal has identified that urban extensions are more sustainable that new settlements. Therefore, the decision to allocate any new settlement follows the conclusion that the Council would be unable to meet its housing requirements through the allocation of strategic scale urban extensions.
							This site is not recommended for allocation due to a combination of the adverse environmental impacts, the difficulty in delivering a cohesive community which is not significantly reliant on other settlements, and lack of certainty as to the deliverability and viability of the scheme.
SA597		Adversane / Land at Steepwood Farm (new settlement)	2,000 dwellings (2,850 in longer term beyond plan period)	2,450 jobs	Y	A	The Council's sustainability appraisal has identified that urban extensions are more sustainable that new settlements. Therefore the decision to allocate any new settlement follows the conclusion that the Council would be unable to meet its housing requirements through the allocation of strategic scale urban extensions.

Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
							It is acknowledged that this site has a number of positive qualities that would help contribute to meeting identified housing and other development needs subject to mitigation of transport, landscape, biodiversity and heritage impacts.
							In geographical terms, this site is less well connected to the settlements of Horsham, Crawley which is the key area of economic growth and housing demand in North-west Sussex. The site is also less well connected to the south coast. In comparison to some other proposed new settlements, the site therefore performs less well in terms of how it can meet District and wider sub regional housing requirements.
							The Council's housing delivery study also outlines that the allocation of this site together with Land East of Billingshurst would have an impact on the total amount of housing that could be delivered in the plan period, taking account of the cumulative impact on the housing market in this part of the District. This would have the effect of lowering the level of housing that would be delivered on this site during the plan period. This would therefore impact on the Council's ability to meet the wider government requirements to meet housing needs.
							Taking account of these factors, the site is therefore not recommended for development.
SA716	HA5	Buck Barn / Land at Newhouse	2,100 dwellings (3,500 in	30,000sqm B2/B8 and former B1	Y	Y	The Council's sustainability appraisal has identified that urban extensions are more sustainable that new settlements. Therefore, the decision to allocate any new settlement follows the conclusion that the Council would be unable to

Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
		Farm, West Grinstead	longer term beyond plan	uses (of which			meet its housing requirements through the allocation of strategic scale urban extensions.
		(new settlement)	period)	21,200sqm B2/B8) (c.6.5ha)			This site has a number of positive qualities that would help contribute to meeting identified housing and other development needs subject to mitigation of transport, landscape, biodiversity and heritage impacts
							In geographical terms, this site is located on the A24 which is the main north south route through the District. This provides connections to Horsham and Crawley which is the key area of economic growth and housing demand in North-west Sussex. The A24 also provides a direct road link to Worthing on the south coast. It is therefore considered that the central location of the site within the District provides an opportunity for allow homes to be delivered that meet those for Horsham District and the wider sub-region. These proposals also present an opportunity to bring forward wider transport upgrades to the A24 which have identified as being required without new development.
							housing targets, this site is considered to be the most suitable of the proposed new settlements and is therefore recommended for allocation.
SA744		West of Billingshurst (urban extension)	1,000 dwellings	4,600m2 of B class	Y	A	Whilst this site would help deliver housing to meet the required targets, it is not considered this scheme would deliver a cohesive neighbourhood that is well linked to the existing development in Billingshurst. Development would also have impacts on the landscape, biodiversity and heritage close to the site. To date limited information has been provided to the Council to help demonstrate how the environmental, community and transport impacts can be resolved. The site is not recommended for allocation.

Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
SA754		Horsham Golf & Fitness Club (urban extension)	500-550 dwellings		New	R	The site does have some positive aspects with respect of leisure provision, there are uncertainties that all that is proposed on the site can be delivered (e.g. the athletics track). The proposal will also lead to a reduction of the existing golf course. Whilst there are other sites in the District, further detail would be needed to demonstrate how these needs are no longer required / could be provided.
							The site, whilst close to Southwater is located on the eastern side of the A24, and is therefore physically separated from the existing services and facilities in the village. Whilst linkages could be enhanced as part of the proposals, the scale of the development is not at a level where new infrastructure could be provided on-site to provide a range of services and facilities and therefore deliver a new community with a sense of place. There would inevitably be a need to travel to either Southwater/ Horsham or beyond some of which will be by car.
							The site is also located in the countryside between Horsham and Southwater. Although there are urban influences, the landscape in this area is predominantly very rural in character and development of the site would cause landscape harm by reducing the visual separation between Horsham and Southwater and negatively impact upon the character of each settlement. It is also noted that a number of other land parcels have been promoted for development between Horsham and Southwater, and the allocation of this site could place pressure for further development in the future and further contribute to settlement coalescence.

Site reference	Local Plan reference (where site is allocated)	Site Name	Reg 19 LP assessment Indicative Number (housing)	Reg 19 indicative floorspace sqm (employment)	Assessed as has potential in Reg 18 (Y), Rejected in Reg 18 (R), Newly identified site (New)	Included in Reg19 (Y), Reasonable Alternative (A), Rejected (R)	Reasons for Council's decision making
SA085/ 520/ 524/ 539/ 790		Northern Ashington cluster (urban extension)	450 dwellings	Limited amount of flexible employment space	Y	A	The cluster of sites referred to as the Northern Cluster (total 450) were included in the Reg 18 Local Plan. Subsequently, evidence and representations regarding the overall scale of development at Ashington, and its cumulative impact on infrastructure and village character have been carefully considered. The scale of development given Ashington's settlement hierarchy status of a medium village means that allocation of the cluster would conflict with the spatial strategy. The Northern Cluster is therefore not proposed to be allocated.

**G.1** This appendix presents the findings of an assessment of the likely effects of the Horsham Local Plan on equality issues.

**G.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.

**G.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.

**G.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

**G.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

G.6 As described in the SA Report which has been provided within the full Integrated Impact Assessment (July 2021), the latest version of the Horsham Local Plan (July 2021), sets out 46 overarching policies. It also includes 22 site specific policies which allocate strategic and smaller scale sites for residential led development.

**G.7** The purpose of the Local Plan is to guide development in the District up to 2038. 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**

G.8 The Regulation 19 Horsham Local Plan and Appendix B in the SA Report within the full Integrated Impact Assessment (July 2021) 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-2020 was 145,474<sup>274</sup> compared to the 2011 Census, when 131,301 people lived in the District, across 54,900 households<sup>275</sup>. The population, is split between 74,801 females and 70,673 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%)<sup>276</sup>.

- According to 2019 estimates, there are 84,800 residents aged been 16 and 64<sup>277</sup>. Figures from the 2011 Census for the population that is aged 16 and over show that 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.278
- Horsham has above average percentage of young people compared to the whole of England. It also has above average percentages of people aged 65 and over, and 75 and over when compared to England<sup>279</sup>. The average age in Horsham considerate of mid-2019 estimates is 46.3, which is higher than the average for England as a whole which is 40.0<sup>280</sup>. 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). The population of those aged 85 or above is expected to more than double by 2036 in Horsham<sup>281</sup>.
- 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<sup>282</sup>.
- 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%)283.
- Average life expectancy in Horsham is slightly above the national average, at 82.3 for males and 84.7 for

ONS (2020) Estimates of the population for the UK, England and Wales Scotland and Northern Ireland[Online] Available at:

https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/ populationestimates/datasets/populationestimatesforukenglandandwalesscotlan dandnorthernireland

<sup>&</sup>lt;sup>274</sup> ONS (2021) Estimates of the population for the UK, England and Wales Scotland and Northern Ireland: Mid-2020 using April 2020 local authority district codes [Online] Available at:

https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/ populationestimates/datasets/populationestimatesforukenglandandwalesscotlan dandnorthernireland

<sup>275</sup> UK Census Data (2011) Horsham [Online] Available at:

http://www.ukcensusdata.com/horsham-

e07000227#sthash.1PuT0ZfZ.zziHvNnt.dpbs 276 UK Census Data (2011) Horsham (ONS - 2011 Census (KS209EW) [Online] Available at:

https://www.nomisweb.co.uk/reports/localarea?compare=E07000227 277 Nomis (2019) Labour Market Profile – Horsham [Online] Available at:

https://www.nomisweb.co.uk/reports/Imp/la/1946157343/report.aspx#tabrespop <sup>278</sup> UK Census Data (2011) Horsham (ONS - 2011 Census (KS103EW)) [Online] Available at:

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

<sup>&</sup>lt;sup>279</sup> West Sussex JSNA (2020) Population Estimates and Projections [Online] Available at: https://jsna.westsussex.gov.uk/ccgs/horsham/population/estimatesand-projections/

<sup>&</sup>lt;sup>281</sup> West Sussex JSNA (2020) Population Estimates and Projections [Online] Available at: https://jsna.westsussex.gov.uk/ccgs/horsham/population/estimatesand-projections/

<sup>&</sup>lt;sup>282</sup> NOMIS – Local Area Report (2011) –Horsham [online] Available at:

https://www.nomisweb.co.uk/reports/localarea?compare=E07000227 Public Health England (2019) Local Authority Health Profile 2019 - Horsham [Online] Available at: https://fingertips.phe.org.uk/static-reports/healthprofiles/2019/e07000227.html?area-name=horsham

females<sup>284</sup>. 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 290<sup>th</sup> out of 317 local authority areas where 1 is the most deprived<sup>285</sup>.
- In Horsham in 2019 it was estimated that 6.0% of households (3,538) were classed as being fuel poor. This is lower than the figure for West Sussex at this time which was 7.0%<sup>286</sup>. These figures are reflective of household income, household energy requirements and fuel prices in a given area.

**G.9** There is little baseline information available that is directly relevant to other protected characteristics including gender reassignment, sex or sexual orientation.

## Method

**G.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.

**G.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				

<sup>284</sup> Public Health England (2019) Local Authority Health Profile 2019 -Horsham [Online] Available at: <u>https://fingertips.phe.org.uk/static-reports/health-profiles/2019/e07000227.html?area-name=horsham</u>

<sup>285</sup> 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

**G.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**

**G.13** The detailed findings of the equalities assessment for the policies considered are presented in **Table G.1** below. **Table G.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 policies 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

**G.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 access to these facilities (Policies 2, 3, 4, 12, 13, 18, 27, 28 and HA1) are all expected to result in a positive effect in relation to the protected characteristics of **pregnancy and maternity** and **religion or belief<sup>287</sup>**. 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.

**G.15** The designation of a Green Belt in the District (which was considered as part of the Regulation 18 consultation for the Local Plan) 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.

**G.16** Policies 2 and 3 may allow for some development at the smaller secondary settlements and for the expansion of

<sup>286</sup> Department for Business, Energy and Industrial Strategy (2021) Sub-regional fuel poverty data 2021 (2019 data) [Online] Available at: https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2021

https://www.gov.uk/government/statistics/sub-regional-fuel-poverty-data-2021 <sup>287</sup> The positive effect recorded for Policy 13 only relates to the pregnancy and maternity group given that the policy includes a specific approach for the protection and creation of Class E uses which may include creches, day nurseries and day centre.

settlements, which in some instances could result in residents 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**.

**G.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.

**G.18** Policy 18 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.** 

**G.19** The level of housing to be delivered over the plan period is set out as 1,100 dwelling per annum through Policy 14. Delivering this relatively high level 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. Therefore, the effect of this policy in relation to **age** is likely to be positive. Policies that seek to ensure the provision of affordable homes and a range of housing sizes and types for specific groups of the community (Policies 15, 16, 17, 19 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 positive effect is therefore expected in relation to the protected characteristic of **age**.

**G.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 17), the delivery of retirement homes and specialist care housing (Policy 19), 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**.

**G.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 HA1) require that accommodation for Gypsies and Travellers is considered at such sites. Policy 20 sets out sites allocated to meet the accommodation current and future needs of this group. As such, both Policies 15 and 20 are expected to have a positive effect in relation to the protected characteristic of **race**.

**G.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 24 and 25 require the minimisation of air pollution in the District in order to protect human health. Through Policy 25 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. Policy 33 is supportive of development proposals that are designed to minimise traffic generation, which may contribute to preventing occurrences of poor air quality in the District. These policies are therefore likely to have a positive effect in relation to **age**, **disability** and **pregnancy and maternity**.

**G.23** Through Policies 36 and 41 patterns of development which would allow residents access to services and facilities is supported. This is likely to help limit the reliance on private vehicles to the benefit of air quality as well as a more general support for access to services and facilities which may have particular benefits for pregnant women and certain faith groups. A positive effect is therefore expected in relation to **age, disability, pregnancy and maternity** and **religion or belief** for both policies.

**G.24** 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 42 and therefore this policy is expected to have a positive effect in relation to **age** and **disability**.

**G.25** Policy 44 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

**G.26** The large sites considered for allocation through the Regulation 18 Local Plan 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 were considered to be provided as new settlements (Adversane, Buck Barn and North West of Henfield (Mayfield)) or are at smaller settlements (the Ashington cluster and Kingsfold site) would provide more limited access to existing community facilities.

**G.27** As such, overall, the large site options considered are recorded as having a mixed (positive and negative) effect in relation to these protected characteristics. A mixed overall effect is also expected for the large sites allocated through the Regulation 19 Local Plan. The allocated large sites include urban extensions (East of Billingshurst, West of Crawley at Ifield and West of Southwater) as well as one new settlement (Buck Barn).

**G.28** It is expected that the large sites would deliver development in line with development principles for strategic sites as set out in Policy HA1. 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**.

G.29 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 sites may have an adverse impact in relation to these protected characteristics. A more detailed breakdown of the sites allocated is shown in Table G.2 below.

**G.30** The small sites appraisal also tested all small sites considered for Gypsy and Traveller accommodation. Of these sites, six freestanding Gypsy and Traveller sites have now been allocated through the Regulation 19 Local Plan (Policy 20). All of these sites would have benefits in terms of meeting the accommodation needs for this specific group and therefore a positive effect is recorded in relation to **race** for the small site options tested for Gyspsy and Traveller accommodation as well as those included for allocated.

**G.31** Policies 15, 16 and 17 are expected to help ensure that housing at all sites 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. These policies will also help to ensure that affordable homes are available in the plan area which could help younger people gain a foothold on the housing ladder. As such, the allocation of large and small site options which provide residential use are likely to result in additional benefits in relation to **age** and **disability**.

## **Consultation on the Local Plan**

**G.32** 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.

Table G.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			

Policy 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**.

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.

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 older residents in the District.

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
				Economic De	evelopment				
Policy 6 – New Employment	0	0	0	0	0	0	0	0	0
Policy 7 – Enhancing Existing Employment	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 – Town Centre Hierarchy and Sequential Approach	0	0	0	0	+	0	+	0	0

SA of Horsham District Local Plan (Regulation 19) July 2021

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

Policy 12 supports development that will contribute to the vitality and viability of town centres by setting 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.

Given that Policy 13 supports the creation and retention of Class E uses within town and village centres, where they will be accessible to a large number of residents, a positive effect is expected for this policy in relation to **pregnancy and maternity**. Class E uses may include day nurseries and day centre which may be of particular benefit to this group.

	Housing											
Policy 14 – Housing Provision	+	0	0	0	0	0	0	0	0			
Policy 15 – Meeting Local Housing Needs	+	0	0	0	0	0	0	0	0			
Policy 16 – Affordable Housing	+	0	0	0	0	0	0	0	0			
Policy 17 – Improving Housing Standards in the District	+	+	0	0	0	0	0	0	0			
Policy 18 – Rural Exception Homes	0	0	0	0	+/-	0	+/-	0	0			
Policy 19 – Retirement	+	+	0	0	0	0	0	0	0			

## Appendix G

Equalities impact assessment

SA of Horsham District Local Plan (Regulation 19) July 2021

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Housing and Specialist Care									
Policy 20 – Gypsy and Traveller Accommodation	0	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 14 sets out that 1,100 new homes per year are 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 Chapter 6: Housing of the Local Plan. Requiring this relatively high level of growth over the plan period is likely to help address housing affordability in a more positive manner. This could be of particular benefit to younger people wishing to get on the housing ladder. A positive effect is therefore recorded for this policy in relation to **age**.

Policy 15 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. Ensuring that there is a suitable supply of appropriately sized homes and homes that can support 'downsizing' will be of importance to meet the needs of these groups. Therefore, a positive effect is identified in relation to **age**. Given that Policy 16 would support the delivery of affordable housing which could help younger people (who are more likely to be constrained financially) get on the housing ladder, a positive effect is also recorded for this policy in relation to **age**.

Policies 17, 19 and 23 include provisions that will benefit the residential needs of elderly and disabled people in the District. Policy 17 requires that new development meets housing standards that will ensure that there is delivery of homes that are suitable for wheelchair users; Policy 19 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**.

SA of Horsham District Local Plan (Regulation 19) July 2021

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation	
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Policy 18 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 gropes. 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.

A positive effect is identified for Policy 20 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.

	Conserving and Enhancing the Natural Environment											
Policy 24 – Environmental protection	+	+	0	0	+	0	0	0	0			
Policy 25 – Air Quality	+	+	0	0	+	0	0	0	0			
Policy 26 – The Natural Environment and Landscape Character	0	0	0	0	0	0	0	0	0			
Policy 27 – 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			
Policy 28 – Settlement Coalescence	0	0	0	0	+	0	+	0	0			

## SA of Horsham District Local Plan (Regulation 19) July 2021

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policy 29 – Protected Landscapes	0	0	0	0	0	0	0	0	0
Policy 30 – Green Infrastructure and Biodiversity	0	0	0	0	0	0	0	0	0
Policy 31 – Local Greenspace	0	0	0	0	0	0	0	0	0

Elderly, and younger residents (including young children and infants) can be 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 24 and 25 in relation to **age**, **disability** and **pregnancy and maternity**. Policy 24 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 25. 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. Policy 24 also includes reference to minimising light pollution on neighbouring uses, which may also be of benefit to the resident groups cited above as well as to the wider community.

Policy 27 and Policy 28 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**.

The designation of Green Belt land in the District was considered as part of the Regulation 18 consultation for the Local Plan. The designation of this land 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**.

	Development Quality, Design and Heritage											
Policy 32 – Development Quality	0	0	0	0	0	0	0	0	0			

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Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Policy 33 – Development Principles	+	+	0	0	+	0	0	0	0
Policy 34 – Heritage Assets and Managing Change within the Historic Environment	0	0	0	0	0	0	0	0	0
Policy 35 – Shop Fronts and Advertisements	0	0	0	0	0	0	0	0	0

Elderly, and younger residents (including young children and infants) can be 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. Policy 33 supports development proposals that are designed to minimise traffic generation, which may contribute to preventing occurrences of poor air quality in the District. A positive effect is therefore expected for Policy 33 in relation to **age**, **disability** and **pregnancy and maternity**.

Policies 32 to 35 do not include any direct or indirect references to measures which would have specific benefits for 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 36 – Climate Change	+	+	0	0	+	0	+	0	0			
Policy 37 – Appropriate Energy Use	0	0	0	0	0	0	0	0	0			
Policy 38 – Sustainable	0	0	0	0	0	0	0	0	0			

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Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Design and Construction									
Policy 39 - Flooding	0	0	0	0	0	0	0	0	0

Policy 36 promotes the delivery of development patterns that will reduce the need to travel and maximise opportunities to provide services and facilities within walking distance. This may be of benefit to ensuring good access to spaces used for meetings by pregnant women and/or faith groups. A positive effect is therefore expected for both of the policies in relation to **pregnancy and maternity** and **religion and belief**. This policy is also likely to help limit the emission of pollutants from vehicular sources. Elderly, and younger residents (including young children and infants) 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. A positive effect is therefore also expected for Policy 36 in relation to **age** and **disability**.

Policies 37 to 39 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.

	Infrastructure, Transport and Healthy Communities										
Policy 40 – Infrastructure Provision	0	0	0	0	0	0	0	0	0		
Policy 41 – Sustainable Transport	+	+	0	0	+	+	0	0	0		
Policy 42 - Parking	+	+	0	0	0	0	0	0	0		
Policy 43 – Gatwick Airport Safeguarding	0	0	0	0	0	0	0	0	0		
Policy 44 – Inclusive Communities,	+	+	+	+	+	+	+	+	+		

SA of Horsham District Local Plan (Regulation 19) July 2021

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
Health and Wellbeing									
Policy 45 – Community Facilities, Leisure and Recreation	0	0	0	0	+	0	+	0	0
Policy HA1 – Strategic Site Development Principles	+	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 42 is likely to have a positive effect in relation to **age** and **disability**.

Policy 41 requires that walking routes are designed to be direct and legible which is likely to be sympathetic to the needs of elderly residents in the District. As such, a positive effect is identified for the policy in relation to **age**. Policy 41 also requires that the layout and design of facilities and infrastructure provides opportunities to meet every day needs within walking distance. This may ensure that there is good access to spaces in which meetings for pregnant women and/or faith groups take place. The reduced reliance on private vehicles that this policy is likely to encourage, may help to improve local air quality which would be of particular benefit to older people, young children and infants, pregnant women and people with cardiovascular diseases. As such, in addition to the positive effect expected in relation to age, a positive effect is also identified for the policy in relation to **disability**, **pregnancy and maternity** and **religion or belief**.

Policy 44 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, people with disabilities, 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 45 is expected to have a positive effect in relation to **pregnancy and maternity** and **religion or belief**.

Policy HA1 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 the deliver supporting services and facilities which is to include community buildings which could support meetings for pregnant women and/or faith groups. As such, a positive effect is identified for this policy in relation to **age**, **pregnancy and maternity, race** and **religion or belief**.

Table G.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

Twelve large site options were tested as part of the Regulation 18 Local Plan consultation and the subsequent work for the Regulation 19 consultation. Four sites have now been proposed for allocation through the Regulation 19 Local Plan (see Policies HA2 to HA5).

The delivery a large number of homes at the large sites allocated through the Local Plan is likely to help the affordability of homes in the plan area. This could benefit younger residents in terms of their access to the housing ladder. A positive effect is therefore recorded for the large sites in relation to **age**. 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, West of Kilnwood Vale, Rookwood, East of Billingshurst, West of Billingshurst, West of Southwater and Horsham Golf and Fitness (to the north 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**.

The Regulation 19 Local Plan proposes the allocation of one new settlement site (Buck Barn, Policy HA2) and three new urban extension sites (East of Billingshurst, West of Crawley and West of Southwater, Policies HA3 to HA6). The policies for these allocations require the delivery of new community uses at each location. However, it is still expected that residents at the Buck Barn site would have more limited access to facilities which could benefit pregnancy and maternity and faith groups, particularly in the short term as new services and facilities are incorporated. The West of Kilnwood Vale site is also proposed for allocation but is now to be delivered as a non-strategic allocation. Residents at this site would have access to services and facilities within the existing Kilnwood Vale strategic allocation site, although this site is still being built out meaning some provisions are yet to be delivered.

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.

\* It is expected that development at large sites would be in line with Policy HA1 (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**.

\*\* It is expected that the development of all new homes in the District would be in line with Policy 15 (Meeting Local Housing Needs), Policy 16 (Affordable Housing) and Policy 17 (Improving Housing Standards in the District) which will help to ensure that housing meets the needs of younger and older people as well as the needs of people with disabilities. These policies will also support the delivery of a more affordable housing stock in the plan area which may be of particular benefit for younger people wishing to gain a foothold on the housing ladder. As such, the allocation of these sites may result in additional benefits in relation to **age** and **disability**.

Small sites options**	+	+	0	0	+/-	+	+/-	0	0
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SA of Horsham District Local Plan (Regulation 19) July 2021

Policy	Age	Disability	Gender reassignment	Marriage and civil partnership	Pregnancy and maternity	Race	Religion or belief	Sex	Sexual orientation
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The small sites tested through the SA as part of the Regulation 18 Local Plan consultation and the subsequent work for the Regulation 19 consultation were considered to provide residential, employment or Gypsy and Traveller accommodation. 35 residential-led, four employment and six freestanding Gypsy and Traveller sites have now been allocated through the Regulation 19 Local Plan (see Policies HA6 to HA23, Policy 6 and Policy 20).

It is not expected that the sites considered for employment use would have a direct impact in relation to any of the protected characteristics.

However, where sites are considered for allocation for mixed use which includes new homes or residential use only, proximity to community services and facilities has 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, 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 (sites that are allocated are indicated with the site allocation reference in brackets):

SA005; SA011 (proposed for allocation as site HNF1); SA065 (proposed for allocation as site HF2); SA074 (proposed for allocation as site HOR1); SA112 (proposed for allocation as site PLB1); SA274; SA317 (proposed for allocation as site HF5); SA320; SA361/SA732 (proposed for allocation as site STO1); SA384 (proposed for allocation as site STO2) SA386 (proposed for allocation as site BRH1); SA393; SA433; SA445 (proposed for allocation as site PLB2); SA450; SA483/SA055/SA488 (proposed for allocation as site UB1); SA384; SA636; SA504 (proposed for allocation as site PLB3); SA560; SA565; SA568b, SA568 (proposed for allocation as site HOR2); SA570; SA588; SA622 (proposed for allocation as site BRH2); SA634; SA639; SA656; SA678; SA686 (proposed for allocation as site HF4); SA701; SA725; SA742 (proposed for allocation as site STC1); SA743; SA770.

The remaining small sites considered and allocated for residential-led development 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.

As such a mixed (positive and negative) effect is expected for the small sites considered and as well as those allocated in the Regulation 19 Local Plan in relation to pregnancy and maternity and religion or belief.

The small sites appraisal also tested all those small sites considered for Gypsy and Traveller accommodation. Of these, six freestanding Gypsy and Traveller sites have now been allocated through the Regulation 19 Local Plan (Policy 20). All of these sites would have benefits in terms of meeting the accommodation needs for this specific group and therefore a positive effect is recorded in relation to **race**.

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.

\*\* It is expected that the development of all new homes in the District would be in line with Policy 15 (Meeting Local Housing Needs), Policy 16 (Affordable Housing) and Policy 17 (Improving Housing Standards in the District) which will help to ensure that housing meets the needs of younger and older people as well as the needs of people with disabilities. These policies will also support the delivery of a more affordable housing stock in the plan area which may be of particular benefit for younger people wishing to gain a foothold on the housing ladder. As such, the allocation of these sites may result in additional benefits in relation to **age** and **disability**.